



April 19, 2012

School Environmental Health Program Guideline Comments (MC 1107T)
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: State School Environmental Health Guidelines

To whom it may concern:

The Safe Routes to School National Partnership appreciates the opportunity to provide public comment on the draft State School Environmental Health Guidelines from the U.S. Environmental Protection Agency (EPA). The Safe Routes to School National Partnership (National Partnership) is a network of more than 500 nonprofit organizations, government agencies, schools, and professionals working together to advance the Safe Routes to School movement in the United States. Our focus is on making it safer for more children to walk and bicycle to and from school and in daily life as this benefits public health.

After reviewing the draft guidelines, we understand that the focus of the guidelines is on indoor air quality (per the FAQ response on p. 105). However, there are several areas in which the guidelines start to address outdoor air quality, such as through no-idling or school bus diesel retrofits (for example, on p 17-18, and on p. 70). Because of this, we believe the guidelines would be strengthened through a more cohesive and consistent approach to policy recommendations about air quality directly surrounding schools.

In addition, the EPA has already developed strong [Voluntary School Siting Guidelines](#) that look at a wide range of environmental impacts resulting from the selection of a school site. While these guidelines are referenced in a few places in this draft, there are a few other places in which school siting considerations would be beneficial.

Specifically, we recommend that:

1. In *The Importance of Environmental Health in K-12 Schools* section on p. 6-7 add at least a sentence clarifying that while the focus of the guidelines are on indoor air quality, that the air quality on the grounds surrounding the school also impact children—specifically during outdoor play time and during arrival and dismissal. Clarify that these impacts are due to factors such as the level of traffic congestion, proximity of high-volume roads, and the types of vehicles around the school.
2. In the *Developing a Successful State or Tribal K-12 School Environmental Health Program* section on p. 21, lines 558-559, amend the bullet to read as follows (new text in italics): Encourage smart materials selection and [careful selection of a school site](#) that avoids environmental hazards and maximizes the health, livability and sustainability of the campus and neighborhoods when building new, or renovating existing, school facilities.
3. In the *Common Environmental Health Issues in K-12 Schools, Manage Chemicals and Environmental Contaminants* section, add a new paragraph focused on outdoor air quality

P.O. Box 663 / Fairfax, CA 94978 / saferoutespartnership.org

Ongoing support provided by Bikes Belong. The Safe Routes to School National Partnership is hosted by the Bikes Belong Foundation, a 501(c)(3) nonprofit organization.

to incorporate anti-idling policies, school bus diesel retrofits, and Safe Routes to School programs to reduce traffic congestion around schools. This will ensure that this section is consistent with the Model Guidelines in Appendix A, which incorporate outdoor air quality issues into managing chemicals and environmental contaminants.

4. In the *Model Guidelines, Component 3: Manage Chemicals and Environmental Contaminants* section, we recommend that the EPA make the following changes to explicitly mention Safe Routes to School initiatives as a part of addressing outdoor air pollution:
 - a. P. 70, line 2089: Add the following new bullet: “Conduct a Safe Routes to School assessment to determine what changes could be made to maximize student walking and bicycling to school and to minimize traffic congestion and air pollution around schools resulting from high levels of parent drop-offs.
 - b. P. 72, line 2182: Add the following new bullet: “Implement a Safe Routes to School program to address safety concerns and to encourage more parents to allow their children to walk and bicycle to and from school, reducing traffic congestion around the school.
 - c. P. 73, line 2206: Add the following new bullet: “Partner with the local government to apply for federal Safe Routes to School funding to improve infrastructure around the school that facilitates walking and bicycling to school, reducing traffic congestion around the school.”
 - d. For any of these, you could add a resource to link to either <http://safety.fhwa.dot.gov/saferoutes/> or <http://www.saferoutespartnership.org> for more information on Safe Routes to School.

5. In the *Model Guidelines, New Construction and Renovation Projects* section, we recommend moving the reference to school siting that is on p. 84, lines 2694-2700 up towards the beginning of this section. It would more logically flow to group items regarding the selection of the site before you address items regarding the actual construction of the school building.

* * * * *

Thank you again for the opportunity to comment on the EPA’s draft school environmental health guidelines. We believe our comments will help further integrate a comprehensive approach to school environmental health—including the impact of outdoor air quality and traffic—into the guidelines. Please contact us if you have questions about our ideas or would like to discuss them further.

Sincerely,



Deb Hubsmith, Director
Safe Routes to School National Partnership
(415) 454-7430, deb@saferoutespartnership.org