

Ms. Lisa P. Jackson
Administrator
United States Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460

February 17, 2011

Dear Administrator Jackson,

On behalf of Healthy Schools Campaign, I am writing in regards to EPA's Proposed School Siting Guidelines Public Review Draft. As a leading advocate for healthy school environments, Healthy Schools Campaign commends the EPA for its efforts in developing the guidelines and for fully engaging stakeholders to assist in the process.

Overall, we are very pleased with these guidelines and believe they provide a foundation which communities can use to make sound school siting decisions. While we applaud the EPA's effort, we would like to raise one concern with regards to these guidelines. We believe the EPA should include distance-based siting criteria to avoid locating schools near contaminated sites and air polluting facilities. Specifically, in the final guidelines, EPA should restore the distance-based siting criteria recommended by the agency's Children's Health Protection Advisory Committee (CHPAC) last March.

EPA's proposed guidance can be improved when it comes to siting criteria that identify land use features that pose environmental and public health risks. EPA should follow the advice of the CHPAC who recommended using two distance-based siting criteria screens: 1) screening perimeters (similar to EPA's proposal) and 2) exclusion/buffer zones that define a desirable distance between proposed school sites and environmental hazards. According to the CHPAC, if a potential site is located within an "exclusion/buffer zone" of an environmental hazard, the site should no longer be pursued. However, if no other site was identified, then the school siting committee could go back to the site in the exclusion/buffer zone and do a more thorough evaluation of the site and assess whether to do a complete cleanup. A total of 19 exclusion/buffer zones based on environmental hazards were selected based on state and local policies. We strongly recommend that EPA restore the distance based environmental hazard siting criteria recommended by CHPAC.

Thank you for considering our comments on this critical environmental health issue and for your commitment to supporting healthy school environments across the nation.

Sincerely,



Rochelle Davis
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