



# South Coast Air Quality Management District

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

## **Review of the Draft EPA School Siting Guidelines**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff welcomes EPA's efforts to provide a comprehensive guidance document for local governments to consider prior to siting a school. As school sites are places where children will congregate for decades or longer, we agree with EPA that careful consideration of all potential environmental hazards and attributes of a site should be considered in a consistent and rigorous manner prior to making a decision to build. This document provides a solid path to achieving that goal. The following comments are provided as suggestions to strengthen the final guidance document.

### **Analysis of Air Quality Impacting School Site**

EPA has provided detailed steps to consider in an air quality analysis of a potential school site that can include computer modeling and/or on-site monitoring. SCAQMD staff requests that some additional discussion be included in the final document regarding the benefits and drawbacks to each approach. For example, interpreting how local sources contribute to onsite monitored concentrations can be difficult in an urban environment with high ambient background pollutant concentrations and potential contributions from onsite sources that may be demolished and no longer present once the school is built.

### **Screening Criteria**

SCAQMD staff notes that one of the recommendations from the Children's Health protection Advisory Committee's (CHPAC) School Siting Task Group was to include two levels of screening analysis. The first level has been kept in the draft guidance and includes a screening perimeter around a potential site that identifies facilities that require further analysis prior to approving the site. The distances in this table generally range from ¼ to 3 miles. The draft school siting guidance did not include the second level of screening recommended by the CHPAC, which included more stringent guidance for sites located in close proximity to large sources of pollution. For example, the second level of screening recommended a 500-foot buffer between all new school sites and freeways.

It is understandable that EPA does not wish to recommend prohibitions of certain land uses based solely on proximity to a source of pollution. However, a second level of siting criteria can provide local governments useful information early in the school site selection process that can potentially save considerable time and money and can ensure that the public is fully informed of the potential hazards of a site. For example, EPA can recommend two actions that could be taken if a potential school site is located within the more proximate screening criteria. First, the local decision making body should be informed at an early stage that the costs and time required to evaluate and potentially mitigate the described hazard may be significant, and for many sites within these zones, mitigation may not reduce the risks to a level below recognized thresholds. Second, if pollutant levels at the site are found to be above recognized thresholds and a decision is made to move forward with the school site, EPA should recommend that the local decision making body make a specific finding prior to approving the site that potential environmental health risks at the school site are significant due to its proximity to the source, however the benefits of the project outweigh the risks. This explicit finding helps ensure that the public is made fully aware of the reasons behind a school siting decision.

#### Web Site Design

Lastly, the publication of this document solely on the EPA website has several potential advantages, including the ability to easily cross-reference related subjects, and providing simple access to more detailed information when necessary. EPA may want to consider providing greater utility to the final website design by linking the different aspects of the text of the environmental review process in a graphical manner to the provided flow charts. For example, by clicking on a box in the flow chart, a user would be taken to the relevant text. There may also be advantages to producing a matching stand-alone print version of the guidelines in that this medium can allow greater ease of indexing, bookmarking, and allows for a thorough table of contents.

SCAQMD staff looks forward to continuing to work with the EPA on school siting issues. Should you have any questions, feel free to contact me at (909) 396-3244.

Sincerely,



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