



Oregon

Theodore R. Kulongoski, Governor

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Bicycle & Pedestrian Advisory Committee**
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Environmental Protection Agency
Re: Draft School Siting Guidelines

To Whom It May Concern:

This letter is provided on behalf of the Oregon Bicycle and Pedestrian Advisory Committee (OBPAC). The committee offers the following comments about the transportation and energy impacts of the EPA's proposed School Siting Guidelines.

This committee believes that the proposed guidelines, although not legally binding, are an opportunity for the EPA to envision communities more amenable to pedestrian and bicycle accessibility. The guidelines should reflect the broader context of communities with regard to environmental hazards, the complete factorization of all transportation costs and the cost-effectiveness of adaptive reuse of buildings and school sites. Additionally, the guidelines should more boldly define desirable policy outcomes and innovative approaches to environmental hazard mitigation.

Siting Criteria Considerations for a school must be broadened to the scope of the school's enrollment district.

The proposed Siting Criteria Considerations (SCCs) must be broadened in scope with the intent of creating vibrant community schools:

1. The overview portion of the *Siting Criteria Considerations* states that "in new areas schools can be designed to encourage integration with future developments" without giving specific examples of how this integration might occur. This committee encourages development that can best integrate with and enhance existing infrastructure for walking and bicycling.
2. The street network's effect on school siting, is mentioned only in passing in the *Recommendations for States and Tribes*, and is not designated as a feature or a land use that affects walking and biking. We encourage the EPA to look at street network designs that encourage these modes in future development.
3. While high-traffic roads and highways are a criteria consideration in school siting, their screening perimeter of only ½ mile from a school site is inadequate, especially when considering those walking and biking from larger distances in the school's enrollment district. The screening perimeter should be based on the distances students could conceivably walk or bike to school depending on the

local context. Further, a larger, more regional screening perimeter would provide safety for faculty and staff traveling to work.

4. The length of crossings across high-traffic roads is an additional element of concern that is currently not represented in the proposed SCCs. Number of vehicle travel lanes and average daily traffic counts should be additional metrics included in the SCCs for determining environmental hazards.

All school sitings should account for parent/student transportation cost externalities.

As stated in the *Recommendations for States and Tribes*, the true long-term costs of a site should include “long-term busing costs, improvements to the utilities and street network around the school site, and long-term site mitigation costs.” However, unaccounted for in this policy recommendation is the need to consider the long-term costs of parents and students driving to school:

1. When school sitings far from student neighborhoods do not facilitate easy access by foot or by bicycle, those that drive impose additional burdens on school children by driving, such as numerous hazardous crossings. Active transportation assessments that encourage the completion of extensive pedestrian and bicycling networks with the construction or renovation of schools will further these healthier modes of travel, and allow schools to better integrate into existing communities.
2. Of note are the health implications of idling vehicles, an activity for which there exists a vacuum in environmental regulation.

LEAs must collaborate with metropolitan planning organizations and counties when siting schools.

While the proposed governmental recommendations tend to suggest a larger, clarified role for states in the siting of schools process, we encourage LEA collaboration with metropolitan planning organizations (MPOs) and counties for the following reasons:

1. MPOs and counties plan communities comprised of several municipalities.
2. As urban areas continue to grow, it is imperative that local school siting decisions reflect regional priorities of school enrollment.
3. Each municipality should share equitably the costs and benefits of schools by taking into account their respective transportation concerns while the understanding that smaller, more localized schools more often encourage biking and walking.
4. By taking a regional approach to school sitings, LEAs may have the ability to more accurately forecast potential need for future school sitings and necessary tax revenue.

Adaptive reuse of buildings and school sites is more cost-effective.

By considering juxtaposing land uses, municipalities and local education agencies (LEAs) may decrease student exposure to environmental contaminants by choosing existing buildings and school sites for school siting. This committee contends:

1. Denser school environments promote walking and biking.

2. While current SCCs focus on specific and potentially hazardous land uses in isolation, an additional land use assessment, looking at the density of land uses collectively in determining school sitings, may yield better sites for schools.
3. A collective land use assessment may reveal whether existing zoning codes facilitate the interconnectivity of modes and the potential for partnerships with existing programs such as the U.S. Department of Transportation's Safe Routes to School program.
4. Existing schools, especially those built before the 1960s, tend to illustrate the desired principles cited in the proposed guidelines. These schools already exist as community centers with nearby housing and commercial zoning that encourage walking and biking.
5. Existing school facilities also have existing transportation plans, and, as noted in this process, existing infrastructure nearby that may be tapped for reinvestment and reuse for local community needs.
6. Suggesting architectural firms with a certain level of experience in building rehabilitation, may lead LEAs to better cost estimates that often times make or break the building renovation for existing school sites.

Above all, this committee encourages holistic approaches to school sitings. Of interest to the committee is the current trend of creating large schools with many course offerings. Collaboration with various agencies, in addition to the Department of Education (arguably the most important agency in this venture), in answering this trend will be crucial. By addressing the comments in this letter, the EPA may in turn help support positive educational outcomes for students.

This committee is pleased to offer these comments and suggestions about the proposed School Siting Guidelines. We are here as a resource should the EPA have questions, concerns or require more information about our comments and its school siting guidelines.

Sincerely,

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Oregon Bicycle & Pedestrian Advisory Committee

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