

Exhibit 2: Meaningful Public Involvement Points and Opportunities

Before the Siting Process Begins		
<i>LEA Activity</i>	<i>Description of Activity</i>	<i>Opportunities for Meaningful Public Involvement</i>
<i>Develop Long-range School Facilities Plan (see Section 4.2.1)</i>	A long-range school facilities plan functions as a way for local education agencies (LEAs) to identify important projections of long-term school and community needs such as student enrollment, operational costs and infrastructure to use in making school siting decisions.	<ul style="list-style-type: none"> Review and comment on the long-range facilities plan
<i>Establish School Siting Committee (see Section 3.3)</i>	If not already in place, EPA recommends that LEAs establish a SSC whose responsibilities include making recommendations to the LEA’s governing body on locations for building new schools, leasing space for new schools, and/or renovating or expanding existing schools, and considering environmental, public health and sustainable communities objectives (see Section 3.3).	<ul style="list-style-type: none"> Provide nominations for stakeholder/community representatives on the SSC Request a community meet-and-greet with SSC representatives, once selected
<i>Develop Communications Plan (see Section 3.4)</i>	LEAs should develop a communications plan to ensure meaningful public involvement in school siting. The plan should include dates and methods of delivery of information to the public, and identify ways for the public to participate in school siting decisions. The plan should also ensure sufficient funds are allocated for meaningful public involvement activities in the school siting budget.	<ul style="list-style-type: none"> Voice expectations for informed and meaningful involvement while addressing potential communications barriers and considerations for underrepresented community members, including translation services Provide recommendations for the location of an information repository and information delivery needs, and ensure that the communications plan and public involvement budget will meet these needs

Before the Siting Process Begins		
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<p><i>Provide Opportunities for Training and Technical Assistance (see links to resources at www.epa.gov/schools/siting/resources)</i></p>	<p>A broad representation of stakeholder groups is important for meaningful public involvement. However, it should not be assumed all members of the SSC have the necessary skills and knowledge to fully participate on the SSC. For these reasons, it is critical that all members of the SSC and the community have the opportunity to access technical assistance and/or training resources that provide a basis for common knowledge and understanding of factors that are critical in the school location decision, including public health, transportation options, environmental review, site review issues, site-specific mitigation/remediation strategies and legal considerations.</p>	<ul style="list-style-type: none"> ▪ Ensure that all community members (including the SSC) have the ability to access and utilize available independent technical assistance options and training resources ▪ This may be accomplished by inquiring about grant funding for technical assistance and/or the availability of low-cost or free online training resources ▪ Consider reaching out to local colleges and universities, state, tribal and local governments, or professional organizations for assistance and training on specific scientific or technical topics
<p><i>Determine if a New School Facility is Needed (see Section 4.2.2)</i></p>	<p>LEAs should consider renovation, repair and/or expansion options before deciding to build a new school facility. "Old" and "obsolete" are not synonymous. Many existing schools can be retrofitted with new technologies to expand their useful life, possibly at a lower cost and lower environmental impact than new construction.</p>	<ul style="list-style-type: none"> ▪ Engage in discussions with the LEA and SSC regarding the pros and cons of using an existing school building versus building a new school facility. These discussions may include getting community input on the influence of the existing school on the well-being of the overall community, including disadvantaged/underserved, minority and low-income populations

Environmental Siting Criteria Considerations		
<i>LEA Activity</i>	<i>Description of Activity</i>	<i>Opportunities for Meaningful Public Involvement</i>
<p><i>Evaluate Desirable Environmental Attributes of Candidate Locations and Appropriate Environmental Criteria (see Section 4)</i></p>	<p>The LEA, in concert with the SSC and with meaningful public involvement, should identify the criteria that will be used to evaluate both the present characteristics and the possible future characteristics of all locations being considered for use as a school. In addition, the SSC should weigh those location characteristics that may adversely affect the decision, including exposure to onsite contamination and offsite pollution.</p>	<ul style="list-style-type: none"> ▪ Discuss the characteristics of the community's preferred school site, including location (both proximity to students and other community buildings) and compatibility (space and accessibility) with student and staff activities ▪ Help to identify environmental or public health siting considerations (with a basis for common knowledge and understanding on factors that are critical in the school location decision), including public health, community health environmental review, site review issues and site-specific mitigation/remediation strategies, legal considerations as well as green building techniques that are important to the community ▪ Provide insight into key community characteristics that could influence the siting decision (e.g., demographics, income)

Environmental Review Process		
LEA Activity	Description of Activity	Opportunities for Meaningful Public Involvement
<p><i>Project Scoping/Initial Screening of Candidate Site Locations</i> (see Section 5.5)</p>	<p>This portion of the environmental review process begins when the LEA decides to proceed with a school facility project (ideally identified in a long-range school facility plan). This decision includes such considerations as the project size (number of students to be served), scope (type of school to be built) and target date for completion. At this point, the SSC should be tasked with identifying candidate sites for the school project and should plan to give the public an opportunity to comment on the preferred site that is selected.</p>	<ul style="list-style-type: none"> ▪ Review/comment on the screening criteria proposed by the LEA, as well as the top three sites proposed for preliminary environmental review ▪ Recommend additional sites for consideration that the community deems as candidates for preliminary environmental review ▪ Offer community knowledge regarding historic land use on candidate sites (e.g., the site was used for agricultural or industrial purposes in the past)
<p><i>Preliminary Environmental Review</i> (see Section 5.6)</p>	<p>The LEA should engage environmental professionals or professional firms to conduct the necessary environmental reviews for the project.</p> <p>The LEA should solicit public comment on the preliminary environmental assessment and proposed next steps based on review findings. A public comment period is recommended and may be required by the tribal or state regulatory agency, particularly if the preliminary review indicates that no further environmental review is necessary and no other methods of securing public comment are likely.</p>	<ul style="list-style-type: none"> ▪ Review/comment on each preliminary environmental review report as they become available and request LEA response to comments received ▪ Identify community needs for technical assistance to explain the technical/scientific information in the reports ▪ Request tours of candidate sites for community members/representatives, if possible ▪ Notify the LEA of the community's perspectives on the preferred site(s) and request a response to community recommendations ▪ Request changes to the public involvement plan (e.g., to extend the public comment period), if necessary

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<p><i>Comprehensive Environmental Review/Site Selection (see Section 5.7)</i></p>	<p>The purpose of the comprehensive environmental review is to gather and analyze data on environmental and public health hazards and impacts identified in the preliminary environmental review, and evaluate the risks posed to children’s health, public health, and the environment based on the contamination or impacts found. The comprehensive environmental review also includes developing preliminary plans and cost estimates for mitigating or reducing risks.</p> <p>The environmental professional should prepare draft reports of onsite contamination, investigation results, offsite hazards and project environmental impacts. The LEA should release those drafts for public comment. The environmental professional should then prepare final drafts that take into account public comments. The final drafts should be subject to review and approval by the SSC and LEA.</p>	<ul style="list-style-type: none"> ▪ Review and comment on the draft versions of the comprehensive environmental review report ▪ Request a response to public comments from the LEA and review the resulting final draft of the comprehensive environmental review report ▪ Request and attend any scheduled public meetings to discuss project impacts ▪ If the final comprehensive environmental review report includes proposals for mitigation measures (e.g., additional sidewalks, enhanced filtration in the heating, ventilating and air conditioning system, institutional controls), review preliminary cost estimates and schedules of implementation for any remediation of onsite contamination and provide input on implications of the suitability of that site for a school

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<p><i>Develop Site-specific Mitigation/ Remediation (Cleanup) Measures (see Section 5.8)</i></p>	<p>If the LEA decides to proceed with a site where contamination will be cleaned up, a remedial action workplan should be developed and submitted to the state or tribal regulatory agency for approval, typically with the help of an environmental professional.</p> <p>The remedial action workplan should identify and recommend methods for cleaning up the site to contaminant levels that meet the applicable safety standards and should clearly describe the responsibilities and long-term environmental stewardship obligations of the LEA (or other responsible parties) for inspection, maintenance and reporting associated with any engineering or institutional control implemented as part of the cleanup. The remedial action workplan should also include a preliminary long-term stewardship plan (LTSP).</p>	<ul style="list-style-type: none"> ▪ Participate in the public hearing on the draft remedial action workplan, which the LEA should conduct in the neighborhood or jurisdiction where the candidate site is located, at a time and location convenient for community residents, with interpretation services provided as needed ▪ Review and comment on the draft remedial action workplan during the public comment period and request a response to comments from the LEA ▪ Community input is important on remedial action workplan issues such as: <ul style="list-style-type: none"> ▪ Sufficiency of remedial response ▪ Timeline for remedial work ▪ Cost estimates for remedial work ▪ Effects of remedial actions on the community and daily life (traffic, noise, etc.)

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<p><i>Implement Remedial/Mitigation Measures (see Section 5.8)</i></p>	<p>Prior to the onset of any school construction on the candidate site, EPA recommends that the remediation of the site, as defined in the remedial action workplan, be completed. If engineering or institutional controls are required as part of remediation, construction of those controls may begin following approval by the state or tribal environmental regulatory agency.</p>	<ul style="list-style-type: none"> ▪ Review and comment on documentation regarding the implementation of the plan and all final sampling results ▪ Any modifications to the remedial action workplan should also go through the appropriate public review processes ▪ Review and comment on the revised LTSP, which should detail specific engineering and institutional controls, if applicable (see Section 8.14) ▪ Suggest adding a public accountability/oversight plan to the LTSP to ensure long-term public and institutional memory of the LTSP through activities designed to promote awareness by students, staff and the community, including signage at the site and reporting measures
<p><i>Long-term Maintenance and Monitoring (see Section 5.10)</i></p>	<p>LEAs should incorporate key components of the long-term stewardship plan into other facilities and operational plans and training materials for principals, facilities staff, groundskeepers and contractors. This plan describes in detail the specific manner in which institutional and engineering controls will be employed in the future, and by whom.</p>	<ul style="list-style-type: none"> ▪ Consider forming a public oversight committee to ensure that periodic reviews are conducted on the effectiveness of remedial measures and any engineering and institutional controls that are used at the site ▪ Provide the LEA and tribe or state with a list of community contacts to be notified if a problem arises. Ensure there is a contact person for the community to go to with concerns related to facility maintenance or monitoring