

July 10, 2015

Honorable Members, Los Angeles City Council
Honorable Members, City Planning Commission
Mr. Michael LoGrande, Director, Department of City Planning
200 N. Spring St., Fifth Floor
Los Angeles, CA 90012

RE: CF 11-0112 and CPC

Honorable Councilmembers, Commissioners and Director:

Thank you for the opportunity to submit this comment letter regarding the proposed Clean Up Green Up initiative. We are particularly encouraged by and supportive of the proposed Health Impact Assessment (HIA) requirement, and are writing to provide information and resources to support its continued inclusion in the overall ordinance.

Human Impact Partners is a national non-profit – based in Oakland, CA – working to transform policies and places in ways that improve health, equity, and wellbeing. People need to live healthy lives and it is important for the public sector to take the lead in increasing opportunities for healthy living and considering health and equity in their decision making. We have been a leader in the field of HIA since its inception, and no other organization has our depth of experience and knowledge with HIA. Since our founding in 2006, HIP has accomplished the following (among many other activities):

- Completed over 20 high-quality and well-regarded Health Impact Assessments, on housing, land use, transportation and other built environment topics.
- Provided targeted mentoring and technical assistance to organizations and agencies across the country on over 30 HIAs.
- Conducted over 50 HIA trainings for over 1500 people.
- Provided both formal and informal support for public health practitioners interested in focusing on the social determinants of health, community engagement, and equity.

To date, over 300 HIAs have been completed or are in process around the country – many of these conducted by government agencies including health departments, planning departments, and MPOs. There exists considerable diversity in the practice and in the products of HIA due to the variety of policies, plans, programs, and projects assessed; the diverse settings in which decisions take place; and the evolution of the field. Fundamentally, however, the purpose of HIA is to assess the health impacts of proposed projects and plans – including cumulative health impacts in communities experiencing disproportionate health hazards – and identify ways to mitigate any potential harms identified. In addition, engagement of community members throughout an HIA is a core part of the HIA process.

As written in the proposed Clean Up Green Up ordinance, the HIA requirement is in line with this purpose and is properly targeted to the type of projects that may benefit from HIA-type review. There are a number of available guidance documents for HIA that describe the

procedural steps and outputs of the HIA process, and that can support potential project sponsors who would be required to conduct an HIA. The *Minimum Elements and Practice Standards for Health Impact Assessment* (attached for your review) provide guidance on what is required for a study to be considered an HIA and benchmarks for effective practice. We highlight here several of minimum elements that reflect the intent of the CUGU initiative:

- *Minimum Element 3*: HIA systematically considers the full range of potential impacts of the proposal on health determinants, health status, and health equity.
- *Minimum Element 6*: HIA provides recommendations, as needed, on feasible and effective actions to promote the positive health impacts and mitigate the negative health impacts of the decision, identifying, where appropriate, alternatives or modifications to the proposal.
- *Minimum Element 8*: HIA proposes indicators, actions, and responsible parties, where indicated, for a plan to monitor the implementation of recommendations, as well as health effects and outcomes of the proposal.

Our organization was one of the primary authors of this document, and has significant experience in applying the standards in HIA practice. In addition, the National Academy of Sciences published *Improving Health in the United States: The Role of Health Impact Assessment*, which describes the background of HIA, steps in the process, and offers guidance to officials in the public and private sectors on conducting HIAs.

While we endorse providing a regulatory framework under which HIA would be conducted, most HIAs are done outside of any formal legal or regulatory requirement, and the vast majority has been conducted voluntarily to great success. A recently completed legal review of HIAs concerning the use of HIAs found that, “*Even in the absence of explicit legal authority to conduct HIAs, government agencies and officials increasingly conduct HIAs or consider the results of HIAs conducted by other organizations to inform their decisions. This has been the most common method of HIA practice in the United States.*” Requirements for HIA can be found in Washington for several types of energy and environment proposals and Massachusetts for several types of transportation proposals.

However, numerous laws across the country *facilitate* the conduct of HIAs by authorizing or requiring the functional equivalent of an HIA to inform programmatic, policy, or administrative decisions. Furthermore, HIAs – when applied in domains that require environmental review – often cover material not regularly assessed in an EIR which complements and expands the base of information considered to facilitate sound decision making.

Given this context, the requirement to conduct an HIA as part of the Conditional Use process is appropriate and would contribute to an expansion of the field by normalizing the collection, evaluation and dissemination of public health data and considering public health implications in the land use approval process.

Attached is a full list of HIAs that our organization has conducted. In addition to Human Impact Partners, other technical HIA provider organizations include (but are not limited to): Upstream Public Health, Oregon Public Health Institute, Habitat Health Impact Consulting, Raimi + Associates, EnviroHealth Consulting, Georgia Health Policy Center, and Environmental

Resources Management. We are happy to provide you with a list of consultants should you be interested.

We applaud the Planning Department, City Planning Commission, and City Council in their foresight to consider the role of HIAs in permitting certain types of projects that are known to affect health and wellbeing, and we are happy to answer any questions you may have. Again, thank you for the opportunity to submit this letter of support.

Sincerely,

A handwritten signature in cursive script that reads "Lili Farhang". The signature is written in black ink and is positioned below the word "Sincerely,".

Lili Farhang
Co-Director
Human Impact Partners

Cc: Hagu Solomon-Cary, Department of City Planning