



SFDPH Program on Health, Equity, and Sustainability

Urban Health and Place Team

Environmental Impact Report Public Health Review



Environmental Impact Report Public Health Review: Integrating Health into Environmental Impact Assessment

The practice of environmental impact assessment (EIA) originated to fulfill the mandate of the 1969 National Environmental Policy Act (NEPA), requiring any “major federal action significantly affecting the quality of the human environment” to undergo an evaluation and public disclosure of its environmental effects (NEPA 1969). Subsequently, the California legislature passed, the California Environmental Quality Act (CEQA), which made State and local public agencies responsible for producing an environmental impact report (EIR) on any discretionary action with potentially significant environmental effects. Under CEQA, if the environmental analysis identifies significant environmental impacts, the lead agency must adopt feasible mitigations into the conditions for project approval.

A striking range of public actions, including, for example, highways and other transit projects and programs, natural resource management, and large-scale urban redevelopment projects trigger requirements for EIA. Actions subject to EIA impact important determinants of health and well-being, including the preservation of natural areas, air and water quality, community noise, housing, transportation systems, food resources, public services, and economic well-being.

As explained in [*Integrating Human Health into Environmental Impact Assessment: An Unrealized Opportunity for Environmental Health and Justice*](#), ensuring comprehensive health analysis in the NEPA and CEQA processes not only serves to fulfill legal requirements but also improves decision outcomes, prevents avoidable harm, and increases public acceptance (Bhatia and Wernham 2008). In California, public projects that may cause substantial adverse effects on human beings, either directly or indirectly, must legally prepare an EIR that discusses “health and safety problems caused by the physical changes” (CEQA Guidelines Section 15126.2)



Several countries, such as Canada and Australia, have developed formal guidance on how to integrate health impacts analysis into EIA (EnHealth 2001; Health Canada 1999). In the United States, some practitioners are now successfully using Health Impact Assessment (HIA) methods within the NEPA and CEQA processes to gain

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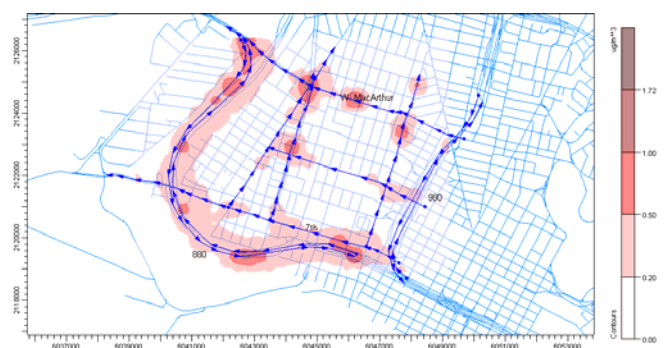
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attention and action on health impacts. The US Centers for Disease Control also provides comments on the scope of environmental analysis conducted by Federal agencies under NEPA. The EIA process has several entry points for integrating health concerns and analysis:

- During the lead agency's screening phase, stakeholders, including the public health community, can identify public health impacts that may trigger a requirement for the conduction of an EIA.
- During the scoping phase for an EIA, stakeholders can also identify potential impacts for analysis along with supporting evidence, data on population vulnerabilities, available methodologies, relevant significance thresholds, and alternatives and mitigations.
- During the analysis phase, stakeholders may consider conducting independent health analysis on the proposal, sharing their analysis with the lead agency. Agencies preparing the draft EIR are required to consider and utilize available relevant evidence.
- During mandatory public review period for the draft EIA, stakeholders can offer critiques on the EIA and suggest the inclusion of public health data, additional analysis, or consideration of alternatives or mitigations.
- If the lead agency does not adequately conduct analyses of health issues, stakeholders can formally challenge the adequacy of an analysis using the appeals process or litigation.

In San Francisco, the Department of Public Health (SFDPH) supports the San Francisco Planning Department in reviewing project analysis of adverse environmental health impacts. SFDPH has developed and implemented new methods for analysis of health impacts from air pollution, environmental noise, and pedestrian safety hazards and has identified feasible mitigation strategies to prevent adverse health impacts. SFDPH has provided health analyses for or comments on a number of environmental impact reports (EIR), including those for the SF General Plan Housing Element, the Eastern Neighborhoods Community Plan, the Visitacion Valley Development Program, and the San Francisco General Hospital Project. Comment letters and environmental documents in which SFDPH has integrated health analysis are listed below.



SFDPH Air Quality Analysis - measuring PM 2.5 concentrations on busy roadways

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Department of Public Health Comments Letters on Environmental Impact Reports

- [Trinity Draft Environmental Impact Report Scope](#) *September 2003* (pdf)
- [Spear & Folsom Draft Environmental Impact Report](#) *September 2003* (pdf)
- [Rincon Hill Area Plan Draft Environmental Impact Report](#) *December 2004* (pdf)
- [Transportation 2030 Plan Comments](#) *January 2005* (pdf)
- [Eastern Neighborhoods Environmental Impact Report Scoping Comments and Data Resources](#) *April 2005* (pdf)
- University of California San Francisco Long Range Growth Plan
- [Hastings Parking Garage Draft Environmental Impact Report](#) *June 2006* (pdf)
- [Caldecott Tunnel Draft Environmental Impact Report](#) *July 2006* (pdf)
- Visitation Valley Redevelopment Program *July 2008*



San Francisco Environmental Impact Reports Including Integrated Public Health Analysis

[Eastern Neighborhoods Community Planning Final EIR](#) (2007)

[San Francisco General Hospital Draft EIR](#) (2008)

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Resources and Links for Integrating Health Analysis with EIA

[California Environmental Quality Act Guidelines and Resources](#)

[National Environmental Policy Act Regulations](#)

[Canadian Handbook on Health Impact Assessment](#)

[Government of Australia Health Impact Assessment Guidelines](#)

[Centers for Disease Control NEPA EIS Review Program](#)



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