



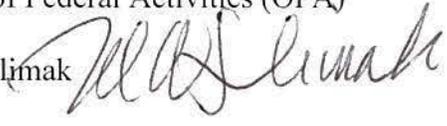
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 10 2015

**MEMORANDUM**

**SUBJECT:** Promoting the Use of Health Impact Assessment to Address Human Health in Reviews Conducted Pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act

**FROM:** Susan E. Bromm   
Director  
Office Enforcement and Compliance Assurance (OECA)  
Office of Federal Activities (OFA)

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Sustainable and Healthy Communities (SHC) Research Program

**TO:** Regional NEPA Directors  
Regional 309 Environmental Review Coordinators

Health Impact Assessment (HIA) is a decision support tool that provides a means of factoring evidence-based health considerations into the decision-making process. HIA has been described as “a systematic process that uses an array of data sources and analytic methods, and considers input from stakeholders to determine the potential effects of a proposed policy, plan, program, or project on the health of a population and the distribution of those effects within the population. HIA provides recommendations on monitoring and managing those effects.”<sup>1</sup> HIA promotes a broad definition of health, beyond the mere absence of disease or infirmity, and provides evidence-based recommendations to address disproportionate health effects, mitigate potential adverse health effects, and bolster potential beneficial health effects of the proposed decision.

The practice of HIA has been seen as a way to not only enhance human health considerations in the NEPA process, but also ensure considerations of environmental justice (EJ) and children’s health (as called for in Executive Orders 12898 and 13045, respectively) due to its ability to:

- Provide the lead agencies and other stakeholders with information on the potential health effects of a proposed action and its alternatives, through the broad consideration of impacts to health and health determinants and deliberative engagement of community members and other stakeholders throughout the HIA process;

<sup>1</sup> National Research Council. (2011). *Improving Health in the United States: The Role of Health Impact Assessment*. Washington, D.C.: The National Academies Press.

- Identify disproportionate human health and/or environmental effects, including high and adverse impacts, of a proposed action and its alternatives on minority and tribal populations, low-income populations, and vulnerable populations, such as children and the elderly, and develop recommendations to address those effects; and
- Develop recommendations to promote the health benefits of a proposed action and its alternatives and/or mitigate against potential negative health impacts before the action is implemented.

OFA and SHC will be working together to consider the use of HIA in the NEPA process as part of EPA's NEPA/Section 309 reviews. More specifically, we are working to:

- Develop screening and scoping tools for use by Regional NEPA/Section 309 reviewers to identify proposals that could benefit from an HIA or HIA elements, based on the proposal's potential for significant impacts on human health.
- Develop web-based training to educate Regional NEPA/Section 309 reviewers on HIA, the HIA process, and the role HIA may play in the NEPA process.
- Partner with a federal agency (or agencies) to conduct a pilot project integrating HIA into an environmental impact statement and/or assessment, using general HIA best practices identified in EPA's systematic review of health impact assessments in the U.S.<sup>2</sup> and lessons learned from the HIA field of practice for integrating HIA into environmental impact assessment.

We welcome your input on these efforts, and we will be forming a workgroup to ensure Regional participation. For questions, please contact Julie Roemele, NEPA Compliance Division, at 202-564-5632 ([roemele.julie@epa.gov](mailto:roemele.julie@epa.gov)) or Florence Fulk, ORD, at 513-569-7379 ([fulk.florence@epa.gov](mailto:fulk.florence@epa.gov)).

cc: Florence Fulk, Office of Research and Development  
Julie Roemele, Office of Federal Activities

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<sup>2</sup> Rhodus, J., F. Fulk, Brad Autrey, S. O'Shea, and A. Roth. (2013). *A Review of Health Impact Assessments in the U.S.: Current State-of-Science, Best Practices, and Areas for Improvement*. EPA/600/R-13/354. Washington, DC: U.S. Environmental Protection Agency.