



May 14, 2021

Office of Environmental Health Hazard Assessment  
California Environmental Protection Agency  
1001 I Street,  
Sacramento, CA 95814

To Whom It May Concern,

Prevention Institute and the undersigned leaders are pleased to share our comments on the new draft version of the California Communities Environmental Health Screening Tool: CalEnviroScreen 4.0. We appreciate the work of the Office of Environmental Health Hazard Assessment (OEHHA) and its continued efforts to provide a data hub and mapping tool for policymakers and advocates to identify communities most impacted by pollution.

Prevention Institute is a national nonprofit with offices in Oakland, Los Angeles, Houston, and Washington, D.C. Our mission is to build prevention and health equity into key policies and actions at the federal, state, local, and organizational levels to ensure that the places where all people live, work, play and learn foster health, safety, and wellbeing. Since 1997, we have partnered with communities, local government entities, foundations, multiple sectors, and public health agencies to bring cutting-edge research, practice, strategy, and analysis to the pressing health and safety concerns of the day. Our work focuses on addressing the social determinants of health, which includes improving the quality of the built and natural environment to advance health equity.

As OEHHA continues its effort to improve CalEnviroScreen and address the ways in which pollution burden disproportionately impacts marginalized communities, we recommend that OEHHA consider including a component for “Park Need” to sharpen how the tool measures community vulnerability and accounts for the role of parks and other green spaces in mitigating pollution’s effects. Measuring a population’s access to parks and green spaces is a proxy for measuring the quality of the built environment as well as a key indicator linked to critical community health outcomes and resiliency in the face of environmental burden.

Parks and green space play a central role in mitigating exposures to pollutants in a community. They can improve the quality of the environment and promote physical activity, mental wellness, and disease and injury prevention. Parks and green space filter air, remove pollution, buffer noise, cool temperatures,

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filter stormwater, and replenish groundwater.<sup>1</sup> Los Angeles County Department of Public Health's *Park and Public Health in Los Angeles County: A Cities and Communities Approach*, found that cities and unincorporated areas with less park space per capita have higher rates of premature mortality from cardiovascular disease and diabetes, higher prevalence of eating- and activity-related chronic illness among children, and greater economic hardship compared with cities and communities with more park space per capita.<sup>2</sup> The report also indicates that areas with little to no park space typically have a higher pollution burden with negative implications on community health for years to come.

In September 2020, Prevention Institute released its [\*Park Equity, Life Expectancy, and Power Building Advocacy Toolkit\*](#), a comprehensive set of reports and maps that examine the relationship between access to parkland and life expectancy in LA County.<sup>3</sup> The predictive model developed through this [research](#) established a statistically significant association between available park acreage, tree canopy or vegetation, and life expectancy. The model also found that increasing park acreage has the potential to increase life expectancy for residents in areas that have less tree cover or lower vegetation levels than the county median. In LA County, census tracts with less tree cover are typically park poor, disproportionately low income, and generally home to majority people of color.

As these and other studies have shown, access to parks and green spaces is an important determinant of health and well-being. Poor access to parks has adverse health impacts on communities and disproportionately impacts low-income communities and communities of color. Including a Park Need component that measures access to parks and green spaces will help account for the role of the built environment as both a social determinant of health and an indicator of a community's environmental resilience.

#### Statewide Data Sets that Measure Park Access and Vegetation

CalEnviroScreen can rely on existing datasets focused on parks, green space, and vegetation to build a Park Need component. The California Protected Areas Database (CPAD) is a publicly accessible dataset "depicting lands that are owned in fee and protected for open space purposes by over 1,000 public agencies or non-profit organizations."<sup>4</sup> CPAD depicts the wide diversity of parks and open spaces in California, ranging from National Forests and Parks to neighborhood pocket parks. To measure access, CalEnviroScreen could build a metric similar to the California Healthy Places Index's Park Access indicator that measures an area's park access by the percent of a census tract's population that live within a half-mile of a park of at least one-acre in size.<sup>5</sup>

To measure greenness and vegetation, OEHHA could utilize the Normalized Difference Vegetation Index (NDVI) from the National Agriculture Imagery Program (NAIP) which approximates density of vegetation

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<sup>1</sup> Wolch, Jennifer R., Jason Byrne, and Joshua P. Newell. "Urban Green Space, Public Health, and Environmental Justice: The Challenge of Making Cities 'Just Green Enough.'" *Landscape and Urban Planning*, vol. 125, 2014, pp. 234–244., doi:10.1016/j.landurbplan.2014.01.017.

<sup>2</sup> Los Angeles County Department of Public Health. *Parks and Public Health in Los Angeles County A Cities and Communities Report*. May 2016. Accessed April 22, 2021. [http://publichealth.lacounty.gov/chronic/docs/Parks\\_Report\\_2016-rev\\_051816.pdf](http://publichealth.lacounty.gov/chronic/docs/Parks_Report_2016-rev_051816.pdf).

<sup>3</sup> Yañez, Elva, Manal J. Aboeleta, and Jasneet Bains. *Park Equity, Life Expectancy, and Power Building*. Prevention Institute. Advocacy Toolkit for Park Equity, Life Expectancy, and Power Building. <https://preventioninstitute.org/tools/advocacy-toolkit-park-equity-life-expectancy-and-power-building>.

<sup>4</sup> "California's Protected Areas." California Protected Areas Database. 2018. Accessed April 23, 2021. <https://www.calands.org>.

<sup>5</sup> "Park Access." California Healthy Places Index. Accessed April 23, 2021. <https://healthyplacesindex.org/policy-actions/park-access/>.

across the state of California.<sup>6</sup> This index illustrates the quality of vegetation by using a choropleth map which provides a color ramp that goes from brown (less healthy vegetation) to red to green (healthier vegetation or more greenness). The NVDI is a service of the California Department of Fish and Wildlife (CDFW) and is updated biannually.

Incorporating a Park Need data component into CalEnviroScreen 4.0 would contribute to a more accurate picture of environmental burden in California by indicating areas of the state that lack the park and green space infrastructure to withstand and mitigate exposure to pollution. This important enhancement to CalEnviroScreen 4.0 will aid policymakers and advocates in targeting the highest need areas for investments in parks, green space, and open space in relation to other environmental burdens.

In closing, we thank you for the opportunity to provide feedback on the draft CalEnviroScreen 4.0. We stand ready to assist OEHHA in advancing our recommendations about a park need metric. And we look forward to working with OEHHA to ensure that health equity and environmental justice guide the State of California's efforts to create healthy, clean environments for all.

Sincerely,

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<sup>6</sup> "NAIP 2018 NDVI, California." California State Geoportal. March 24, 2020. Accessed April 14, 2021. <https://gis.data.ca.gov/datasets/07bbc452e55445a19d1cc3a643a78838>.