

February 10, 2016

Dear Office of Environmental Justice,

Below are the Berkeley Food Institute's comments regarding the 2016-2020 Environmental Justice Strategic Plan. First, we would like to commend your team on continually seeking out ways to work with underserved and marginalized communities. That being said, we worry that, although USDA's goals were purposely broad, they lack the specificity and urgency necessary to ensure that all agencies prioritize collaborating with environmental justice communities.

Berkeley Food Institute (BFI), a partnership between the UC Berkeley schools of Law, Public Policy, Natural Resources, Public Health, Environmental Design, and Journalism, works to catalyze and support transformative changes in our food system. Key to BFI's mission is making the research of our over 105 affiliated faculty available as a resource to policymakers and the general public. We do not represent the official position of the University of California.

**Goal 1, Objective 1 is to “Fully integrate environmental justice into existing technical and financial assistance.”** The USDA later defines environmental justice on page 26, in part by saying: “To the greatest extent practicable and permitted by law, all populations are provided the opportunity to comment before decisions are rendered on, are allowed to share in the benefits of, are not excluded from, and are not affected in a disproportionately high and adverse manner. Assistance to communities to create prosperity so they are self-sustaining, repopulating, and economically thriving. The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies....”

Given the fact that environmental justice itself involves lofty goals such as eliminating racism and ensuring that all communities are self-sustaining, repopulating, and economically thriving, it seems challenging to “fully integrate environmental justice into existing technical and financial assistance.” Such a broad objective will surely lead to differing interpretations by various agencies. Therefore, we encourage the USDA to make the objective more concrete, or add agency performance measures that address aspects of this objective. One example of such a performance measure is increasing the percentage of beginning, racial and ethnic minority, and women farmers receiving financial assistance from USDA to a given percentage by 2018. We encourage the USDA to build more specific performance measures into the Plan, and apply the principles of environmental justice to evaluate existing agencies and programs. Furthermore, we encourage the USDA to partner with leaders in environmental justice communities to identify areas of improvement for existing technical and financial assistance program strategies and evaluations.

**Goal 2: Increase capacity-building within environmental justice communities.** One of the objectives for this goal was “Prepare guidance on technical and financial

assistance for farmers in environmental justice communities, including practices for sustainable agriculture and conservation.” However, there was no target date or agency performance measure for this objective. Given the urgent need to feed the world’s growing population in a sustainable manner, we urge the USDA to set concrete performance measures and deadlines for this objective.

**Goal 3: Expand public participation in program operations, planning activities, and decision-making processes to benefit environmental justice communities.**

When saying “Integrate environmental justice into USDA agencies’ public participation guidelines,” it is unclear which aspects of the broader definition of environmental justice should be prioritized. While the USDA should encourage agencies to integrate all aspects of environmental justice into public participation guidelines, it should also select a few key aspects of environmental justice that *must* be integrated by 2020.

**Goal 5: Increase the awareness, skills, and abilities of USDA employees regarding environmental justice.**

We believe that the focus of this goal should be on recruiting community leaders in environmental justice communities to work at the USDA, in addition to training existing Responsible Officials to identify and amend programs. When more Responsible Officials represent the community they serve, it will be easier for them to understand the environmental justice issues of the area, as well as how programs, policies, and activities affect their community.

**Goal 6: Review, Update and/or Develop Departmental and Agency Policies and/or Regulations to Address Environmental Justice**

On page 25 of the Plan, the USDA highlights actions that expanded collaboration with Indian Tribal Governments under Executive Order 13175. We encourage similar collaboration with African American, Latino, Asian American, and immigrant communities in rural areas and believe that seeking out such partnerships should be included in this goal.

Thank you for your commitment to increasing outreach and participation by historically underserved communities. Please reach out to us if you have any questions.

Respectfully,

Tara Benesch on behalf of the Berkeley Food Institute  
University of California, Berkeley

[foodinstitute@berkeley.edu](mailto:foodinstitute@berkeley.edu)

food.berkeley.edu