



National Association of County & City Health Officials

*The National Connection for Local Public Health*

February 14, 2016

The Honorable Tom Vilsack  
Secretary  
United States Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Dear Secretary Vilsack:

The National Association of County and City Health Officials (NACCHO) is writing to provide comments on the United States Department of Agriculture's (USDA) Environmental Justice (EJ) Strategic Plan: 2016-2020. NACCHO represents the nation's 2,800 local governmental health departments. These city, county, metropolitan, district, and tribal departments work every day to protect and promote the health and well-being of all people in their communities.

NACCHO appreciates the USDA's work to increase capacity-building, public participation, and opportunities to environmental justice communities as stated in the USDA EJ Strategic Plan: 2016-2020. NACCHO recommends the following in response to the USDA EJ Strategic Plan: 2016-2020.

Goal 1: Ensure USDA programs provide opportunities for environmental justice communities

NACCHO supports the empowerment of environmental justice communities, as defined by USDA, by providing aid to build climate-change resilient communities. NACCHO urges USDA to incorporate other high-impact disasters of increasing risk in addition to drought and flooding. Disease, which has already been demonstrated during the avian influenza outbreak, will have a high impact on farmers across the nation, many of which are part of environmental justice communities. As climate-change increases the risk of diseases formerly not prevalent in the United States, and thus the threat of rapid spread, farmers can lose their crops or livestock, losing their source of income, and ultimately losing their livelihood.

Man-made disasters, which will be exacerbated with climate-change, should also be considered. Many communities experiencing environmental inequities are dangerously near waste sites and other hazardous sites. With the increase in erosion of soil and flooding due to climate change, waste sites may become breached, resulting in the contamination of the air, land and water of environmental justice communities.

*Example 8: USDA's Agricultural Marketing Service (AMS) is implementing the Farmers Market and Local Food Promotion Programs with special emphasis on low-food access/low-income*



*areas (i.e., where low-income communities have limited access to local grocery stores) to support America's underserved communities in their pursuit of improved access to fresh, healthy food.*

Many local health department food safety programs have farmers markets incorporated. NACCHO encourages USDA to work with local health departments to increase the reach, and ultimately the aid, to environmental justice communities' access to fresh, healthy, affordable food.

*Example 10: The Food Safety and Inspection Service (FSIS) provides technical assistance and resources, customer service, and outreach to small and very small plant operations in a variety of languages through print, online, and a telephonic help desk. FSIS also shares safe food handling information with consumers and organizations nationwide in order to prevent foodborne illness. FSIS also informs consumers about risks of various ethnic and cultural food traditions in an effort to reduce the likelihood of food poisoning.*

Many local health departments also partner with industry and the community on food safety issues. USDA could partner with local health departments to further collaborate and incorporate industry and the environmental justice community to improve the understanding of food poisoning risks in order to prevent foodborne illness.

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

*Objective 1: Ensure public access to data and other information necessary for meaningful participation at the local level.*

NACCHO supports USDA's effort in sharing data and other information with members of environmental justice communities. Many of these communities have limited access to internet and outside sources. NACCHO urges USDA to consider several different avenues of dissemination of data and other information to improve access to all communities. USDA should also engage the local health departments who connect with these communities regularly to understand access gaps and needs – an involvement which has the potential to sustain this objective long-term.

Goal 4: Ensure USDA's activities do not have disproportionately high and adverse human health impacts on environmental justice communities and resolve environmental justice issues and complaints.

*Agency Performance Measure: Continue research on diet and nutrition impacts on human health.*

NACCHO supports the research on diet and nutrition in environmental justice communities. The performance measure could be expanded to incorporate access or the lack of access to fresh,

nutritious food, as many environmental justice communities reside within food deserts. An objective should also be added to correlate with this performance measure surrounding diet and nutrition, and the access to these foods. There is a need to incentivize markets to enter rural and Tribal environmental justice communities, as well as implementation of a new market for farmers to grow a variety of nutritious, fresh crops with stipends to keep food local to provide for the community.

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

NACCHO supports the work USDA does to increase awareness, skills, and abilities of all employees regarding environmental justice. An additional objective should be to ensure environmental justice community members are at the table when working groups, forums, and committees are convened. In addition, the most effective way to increase awareness of environmental justice is for USDA employees to visit environmental justice communities themselves to better understand the challenges and needs they face.

NACCHO appreciates the opportunity to comment on the USDA EJ Strategic Plan: 2016-2020. As a local governmental public health partner, we look forward to continuing to work with USDA to realize the goals of the strategic plan. NACCHO's Environmental Health Committee convenes monthly and would welcome the opportunity to engage in dialogue with USDA leadership on the strategic plan. If you have any questions, please contact Jennifer Li, Director of Environmental Health, for further information at 202-507-4242 or [jli@naccho.org](mailto:jli@naccho.org).

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Hasbrouck', with a large, stylized flourish at the end.

LaMar Hasbrouck, MD, MPH  
Executive Director