February 16, 2023

Rishi P. Reddi, Director of Environmental Justice
Executive Office of Energy and Environmental Affairs
100 Cambridge Street
Suite 900
Boston, MA 02114

Dear Director Reddi:

The Equity Policy Network of the Massachusetts Food System Collaborative has reviewed the draft Environmental Justice Strategy for the Department of Agricultural Resources (MDAR). The document addresses many aspects of how the Department operates – from how it reaches out to the communities it serves, to how it operates internally, to hiring practices, to how it runs programs and offers grants and comprehensive support services, to how it measures success. We applaud the intent and much of the content of this draft, and offer these items for your consideration for inclusion.

- It would be a powerful symbol and core element of stake-building with the BIPOC farming community if MDAR would include equity language in its mission statement. We propose the following: "The Massachusetts Department of Agricultural Resources' (MDAR) mission is to help keep the Massachusetts' food supply safe and secure, to work to keep Massachusetts agriculture economically and environmentally sound, **and to promote an equitable food system for all**."
- Department leaders should commit to meeting at least twice a year with BIPOC farming leaders and stakeholders for conversations about progress on the implementation of this plan, and other programs, policies, or initiatives that MDAR plans to take to imbue equity in the Department.
- Until MDAR staff is more diverse, the internal workgroup proposed on page 60 will not reflect the diversity of the communities the Department serves. We urge the Department to include representatives from the BIPOC farming community on this workgroup.
- On page 61 the document proposes a "Commitment to work with BIPOC farmers for land access and to facilitate their successful transition from urban to larger scale farms, through mentorship programs and local farming organization partnerships." This statement suggests that all BIPOC farmers are urban, which they are not, and that all urban farmers wish to transition to larger scale farms, which is not the case. The commitments to BIPOC farmer land access and small-to-large scale farming transition assistance should be coupled with a policy that focuses on working with and meeting socially disadvantaged/BIPOC farmers where they are. This means empowering and educating urban and BIPOC farmers, wherever they may be, on how to be sustainable and viable in their current communities, if their intent is to remain there.
- We would like to see intentionality in regards to diversifying the regions in which MDAR grants and comprehensive support services are allocated. In addition to metrics on BIPOC farmer land ownership, metrics should be tracked that look at where grants and support services from MDAR are being dispersed across the state. This data will help MDAR identify regions where it needs to focus additional outreach and engagement.
- There are opportunities for collaboration between Brownfields revitalization efforts and the need for more accessible farmland. The Brownfields programs and MDAR should work together to prioritize revitalizing land into growing space in EJ communities.

We appreciate MDAR's commitment to equity and the priorities around EJ set forth in this draft. I and the Equity Policy Network are excited to see the final version of this draft, and to support its implementation. I do hope MDAR leadership will consider some of the proposals mentioned in this letter as they represent crucial, implementable, low- and no-cost strategies that would strengthen the work of the Department and all of the farmers MDAR serves.

If there are any questions or you would like further conversation regarding any of the suggestions listed above, don't hesitate to reach out.

All the best,

Norris Guscott
Equity Policy Network Manager