

# GROWING FROM THE ROOT



## PUBLIC COMMENTS ON DRAFT PLAN

Thursday, November 3-28, 2022

Pg 12:	Block out names/email addresses showing on comment cards
PG 17	<p>From the perspective of POP and our community partners, there needs to be a separation here between Food Forest/Orchards as cultivated spaces and "public right-of-way, parks, or other natural areas" as less tended spaces open for foraging. These are not the same thing. POP supports 67 community orchard and food forest partner sites in the city that are actively cared for and harvested by community groups, many of which would be unhappy to see their spaces promoted as locations open for foraging (just as most community gardens wouldn't want their annual crops to be designated as open harvest). Although most community orchards wouldn't be overly concerned if a neighbor in need harvested some fruit, there would be conflict and concern with individuals from outside the community coming to 'forage' it.</p> <p><u>Suggested changes in language:</u> Food Forests/Orchards are food producing spaces focused on perennial crops. These cultivated edible landscapes may contain diverse fruits, nuts, and perennial vegetables, herbs, and pollinator plants.</p> <p>Urban foraging spaces include the public right-of-way, parks, and other natural areas. These green spaces, while not intensively tended, are often full of edible and medicinal plants sought by people knowledgeable about foraging.</p> <p><u>If you can't make space for the suggested separation above, maybe combine them in a way</u></p>

	<p><u>that clearly delineates them?</u> Such as:</p> <p>Food Forests/Orchards are cultivated edible landscapes producing fruits, nuts, and other perennial crops. Other city spaces like public right-of-way, parks, and other natural areas may also include edible and medicinal plants sought by people knowledgeable about foraging.</p>
Pg 19:	<p>Confirm with PHS/NGT that the "Keystone Gardens" designation still exists. This seems like something that was reported over a decade ago and it's not clear that it's still active.</p>
Timeline	<p>Some of the markers for events seem misplaced or not chronological. For example on page 44 / 45 it references 1969 Black Panthers beginning their school breakfast program but then jumps back to 1940 referencing Puerto Rico. Similarly on pg 43 it references 1960 urban renewal and then 1920s pig farmers collecting food waste.</p>
PG 51	<p>p51 (or 61 of plan): looks like a typo, should be 'SIDE AND REAR YARD' instead of 'YEAR YARD'?</p>
Pg 56: Recommendation 1.5:	<p>There are hurdles that I don't think the authors have thought of. (1) I don't see any issue with reclassifying farms, gardens, etc, as "community managed open space". However, PCPC categorizes each parcel's land use by the primary use. When orchards, farms, gardens, etc, are on property such as schools or churches, the primary use can't be "open space", managed or otherwise. (2) In the highlighted bar, the recommendation is listed as "Legislative". It's not. Council has no control over how any agency classifies land. That should be changed to "Administrative". (3) And it seems to me that would be a short term, rather than a medium term goal. (4) Keeping an internal land use dataset goes against transparency goals for the agency. Certain things like Section 8 vouchers, or the Garden Data Collaborative dataset, we would use only internally for analysis, that's fine. But maintaining two land use datasets, one married with GDC data, and one without, isn't feasible. Maybe reframe part of the recommendation?</p>
PG 57 point 1.6	<p>This should be the most important outcome of the process. Unless and until development and land restoration and ecosystem restoration are paired through time all efforts will likely fail. The zoning code and the L and I process must be reformed so as to produce more open space - farm land- and ecological reserves as development proceeds. This process will continue into the next century and totally transform the landscape of the City. The Philadelphia Rule should be that if you develop you restore. If there is not space to allow such work then payments will be made into a restoration bank or trust that will fund restoration and acquisition in other parts of the city. Every piece of land in the in the City will be subject to this process. For example the 3000 linear miles of sidewalk will be restored as will medium strips on roads and the same for buffers along utility corridors and the like. For example the proposed new arena for Chinatown would be built underground and on top would be open space- gardens- and woodlands.</p>

Pg 58-61 (Goal 1.7):	Not a mention of councilmanic prerogative which we know negatively impacts how the Land Bank functions (more discussion of how the Land Bank could be improved is needed)
PG 58-71	Would be great to mention councilmanic prerogative as an obstacle to functioning and transparency of the Land Bank and consider other ways the Land Bank could be improved. Perhaps addressing this isn't politically tenable?
PG 60 1.10 (Land)	While there was representation on the Steering Committee from the Lenni-Lenape Tribe and a land acknowledgement, the role of Native Americans and land theft is not included in Rec. 1:10 (page 60) - or other aspects in this chapter related to telling and preserving history and culture. We know there are references in other chapters (production and people) but would recommend it be included in the Land section as well.
PG 70 / 71 1.21 (Land)	We discussed and reviewed this action step internally and wanted to suggest perhaps removing PHS Landcare from the actual Action / Goal and instead state "Explore how to expand city funded program to recognize". Given that our Landcare program is a city budget line item, advocacy would have to be happening at the city level / city council if we were to consider expansion. It should also be noted that currently Landcare does not have capacity to "protect" land. Second bullet: reword or remove since this is something that would need to come from the city and not PHS. Additionally, PHS only received about \$300 per parcel for Community Landcare group to maintain a parcel. This would not translate to much for a community garden. Furthermore, the city has not been fully supportive of Landcare sites being used for food production purposes since they see Landcare as a temporary solution.
Land?	Maybe I missed it. If so, I apologize. Why haven't we discussed state enabling legislation, like Lancaster County has, to allow Philadelphia to assess agricultural land at a lower tax rate than other land?
PG 78	p88 (or 78 of plan): include medicinal plants along with food, flowers, and fiber? Use 'farmaceuticals (medicinal plants)' if you want to keep the alliteration? There is a very active herbalist community in the city and many more growers are growing medicine than are growing fiber.
PG 90 (Production)	Paragraph referencing PWD offering several opportunities to help growers access water for their gardens. Note the PWD Raincheck program, which is managed by PHS, is only for residential spaces. Unfortunately, gardens cannot apply for rain barrels through raincheck, only renters / home owners. It might also be worth mentioning here, PWD's Stormwater Exemption for gardens and the application process being every 3 years.
PG 92 (Production)	Revised language for PHS paragraph: Pennsylvania Horticultural Society (PHS) offers classes that teach introductory gardening skills as well as urban agriculture and gardening support through its Community Gardens Program. Gardens can apply and access resources, tools and other materials including seedlings grown and distributed through the

	City Harvest Initiative. Re. Growing Home Gardens - I would also reference SEAMAAC here since they currently manage the spaces.
PG 97 (107 of PDF)	"How much space do you need for small animals in the city?" I see goats, bees and fish, but not chickens. Suggest we bring in Philadelphia Backyard Chickens to add to this.
PG 98-99 2.4 (Production)	Just to clarify, PHS's Tree Tenders program currently does not work with orchards but just street trees and improving the tree canopy in Philadelphia through such actions.
PG 102-103 2.7 (Production)	Just wondering if we can also include a push to make eligible Accessory Agricultural Structures eligible for the EZ Permit process.
PG 102-103 2.9 (Production)	I would also incorporate ArtReach in the second action item about partnering with organizations. Though most of their work is with arts and culture organizations, Katie from ArtReach has been talking a lot about accessibility in public gardens, especially community gardens.
Pg. 98: Recommendation 2.16:	Great recommendation but watch out. We'd want this to be very limited if we're talking about riverine-based aquaculture. Salmon farming in coastal waters in North American and western Europe has proven to be an environmental hazard primarily because of the scale at which it's been practiced. It's gotten so bad that British Columbia has banned new ocean-based farms and is trying to figure out how to shut down the remaining farms that are operating. Permitting land-based tank farms would be a good goal, but we should be explicit that we should not support riverine-based large scale aquaculture.
PG 113 3.7 (Prep & Dist)	<p>Page 21 references data that says "roughly half of the city's Census Block Groups have fewer than one in every 10 food stores that sell fresh fruits and vegetables." There are some sections in the Preparation and Distribution Chapter that could be a logical place to include some specific action steps to address this problem. Including recommendation 3.7 (page 113) and 3.9 (page 115).</p> <p>Specifically: Recommendation 3.7 (page 113) could say more about small retailers and corner store initiatives, for example: "Advance non-profit [and other] efforts to facilitate &amp; support partnerships with community gardens &amp; farms and local food distributors, such as food banks, food pantries and food cupboards, [as well as with small food retailers and local restaurants]." Additional bullet-points under this recommendation could be: "Support and expand programs like The Food Trust's Healthy Corner Store Initiative which works with existing small retailers in communities to support their ability to offer produce and is piloting connections to local growers" and "Support The Food Trust in connecting qualified stores to the Pennsylvania Fresh Food Financing Initiative, a program that offers grants and loans to grocery stores, healthy corner stores, farmers markets and other healthy food retailers in LMI and under-resourced communities to increase and support the availability of fresh and healthy foods in these communities."</p>

<p>PG 115 3.9 (Prep &amp; Dist)</p>	<p>Recommendation 3.9 (page 115) could be a good place to highlight corner stores and other small food retailers: "Connect farmers and food producers with wholesale opportunities to sell produce or get their products into local businesses such as [restaurants, corner stores, and other small food retailers], helping vendors and farmers access multiple income streams."</p>
<p>pg 119:</p>	<p>"Native American tribes across the continent thrived by foraging prior to the arrival of European colonists." - I would add that they also carefully planted and tended to fruit trees and berry bushes in such a way that they weren't recognized by colonists as a form of agriculture. (inelegant phrasing, but would just like to make the point that it wasn't all foraging-based)</p>
<p>pg 121:</p>	<p>I don't think that the West Philly Fresh Food Hub still exists (if that is supposed to reference the food truck once operated by Greensgrow which has been defunct for several years now)</p>
<p>PG 122</p>	<p>On page 122, we'd like to recommend editing the context around the Philly Food Bucks program so that it accurately reflects the challenges with the program overall - namely funding and sustainability to meet the demand. We also think it could be beneficial to include context that ties in the case study example featured on this page in the context. We respectfully submit this edit for review: "Currently, most farmers markets in the city are run by two organizations: The Food Trust and Farm to City. Those organizations provide centralized expertise and resources, and The Food Trust increases access to fresh produce and supports its affordability with the Food Bucks program that encourages shoppers paying with Supplemental Nutrition Assistance Program (SNAP) dollars to buy more fruits and vegetables from local growers; customers who spend \$5 using their ACCESS card receive an additional \$2 to purchase fresh produce. The Food Trust also distributes promotional Food Bucks during cooking demonstrations and through community partners as well as Food Bucks Rx, produce prescription vouchers that healthcare providers distribute to patients and can be redeemed at farmers markets and stores around the city. Though this program was initially funded through the Philadelphia Department of Public Health, when that investment ended The Food Trust was able to secure a combination of USDA GusNIP funds, private foundation grants, and individual donations to support the program. The demand for Food Bucks and growth in volume of the program has demonstrated the need for diverse funding of this resource. Other states have leveraged city and state funding to draw down larger grant awards from the USDA to support nutrition incentive programs. This issue and program deserves more attention and is critical to supporting the health of Philadelphia residents."</p>
<p>PG 122-123 3.6 (Prep &amp; Dist)</p>	<p>Just a point of clarity that PHS does not operate vans, just pick up trucks. Perhaps investment in a shared cooler trucker is a good option.</p>
<p>PG 122-123 3.7</p>	<p>Ideally, further funding from the city for such programs.</p>

(Prep & Dist)	
pg 123:	Where Philadelphians forage - the Wissahickon is mentioned twice. Also, spraying of chemicals is not mentioned as a potential hazard (the City is well known to use certain toxic sprays to manage weeds and invasive plants, because they are too understaffed to take any other approach)
Consumption? or Prep & Dist?	P.11: The vision includes "offering residents agency over the food they consume," but does not include corner stores or grocery stores as options. Corner stores are a vital part of the food network of the city, especially for young people. Has there been discussion of how to incorporate corner stores and other commercial food retailers into the proposed food system?
PG 131 4.4	Recommendation 4.4 (page 131) makes a comment about investing in existing and new school gardens in the school district, and establishing a process for incorporating the produce harvested into school meals. However, the plan also mentions that the school district's current policy on gardens is that "students [can] eat garden produce as part of a class or after-school activity, but the produce cannot be served as part of school meals (Page 121)." The plan doesn't specifically address the steps that should be taken in order to change the school district's current policy which we see as an integral step to incorporating food harvested from school gardens into school meals. We noticed thorough responses to similar policy barriers in other recommendations throughout the plan and suggest that the recommendation of investing in school gardens should also include adequate recognition of the policy challenges standing in the way. Similarly this reference to policies on page 121: "City policies that restrict the amount that growers can sell if the underlying land is City-owned" could also be named to better inform what barriers need to be overcome to address the problem. If the specifics of the referenced policies are unknown, perhaps it would be helpful to include a recommendation in this chapter to conduct a study to better understand the policies.
PG 132	In recommendation 4.8 bullet point #2 (page 132) we see another opportunity to ensure that the correct problem is addressed when it comes to implementing Philly Food Bucks at Farmers Markets. Although promoting this benefit is important, securing the needed funding to meet the demand is necessary in order to successfully meet the current and any increased demand. Promotion without funding will not be sufficient.
pg 135	Farm to Families link is broken (use <a href="https://scfchildren.org/farm-to-families/">https://scfchildren.org/farm-to-families/</a> instead)
pg 136: 4.11	needs to also include a new approach from PPR for managing non-native/invasive species that doesn't rely on spraying, ESPECIALLY when those sprays could impact plants that people may want to forage (and even more so if the areas are sprayed without notices posted)
PG 146-147 4.12	Last action item referring to POP and PHS Tree Tenders. As mentioned above, Tree Tenders

(Consumption)	currently does not work in fruit / nut trees but perhaps we can explore funding to expand.
pg 156-7:	Sharing Excess is another great organization to highlight in the area of preventing food waste
Food Waste	Chickens are the fastest way to compost kitchen scraps (48 hours instead of 4 months), with valuable fertilizer (chicken manure) to amend nearby garden beds.
Waste	It would be great to see a recommendation around incentivizing creative solutions to recovering and redistributing edible food waste to people who need it. Developing systems for existing programs, publicizing those resources, and providing training (5.12 on page 157) are all excellent and there is a lot of innovation happening in communities across the country related to "food rescue for people" that Philadelphia could also be tapping into. Integrating food waste reduction and recovery measures in schools and institutions is excellent (5.4, p 151). It would be nice to see a specific recommendation here related to how the recovery of edible food could be redistributed - and that schools could be a laboratory for these innovative solutions and the city could support bringing them to scale. - Sam Gibb
pg 165:	Not sure if "8th Street Garden" is supposed to be the 8th & Poplar Farm? (Never hear them refer to it as 8th Street Garden)
pg 166-167:	"Develop guidelines for the design of City-sponsored agricultural programming" also seems to have budgetary implications, not just administrative. Current city-sponsored agricultural programming is extremely limited.
pg 166:	"Collaborate with experts from BIPOC..." this sub-goal leaves out disability community
pg 176:	Penn Park Farm & Orchard are not really separate (and surprise, Penn may be turning that space into a parking lot or building in the years to come)
pg 176:	University of the Sciences merged with St Joe's and no longer exists as a separate institution so far as I know
pg 187 (People)	I would like youth workforce training and urban ag jobs to be considered a priority. I know this is addressed, and there are excellent recommendations - but I would like to see more opportunities for training/workforce/ag education. school district, PYN and other organizations could/should be encouraged to offer year round (not just summer) urban ag/food systems/food waste reduction/food security internship/externship opportunities. School/Community partnerships (Schools and local Rec Centers) and School based jobs for student interns year round (food waste/composting/food growing would help students see that what they are learning is valued and needed by community. Students should be eating locally grown, nutritionally dense, delicious food made by community members/students in kitchens - not eating reheated commodity food. It is hard to grow a generation of healthy humans, who will continue this work, if they don't get these opportunities. I totally get that everything can't be a priority - and that maybe this is outside of the city agency authority.

PG 176-177 6.2 (People)	All of this is wonderful and would add that in the first action item, there should be some resources available to ensure these programs and materials are accessible including offering translation services at no cost or reduced cost to organizations or groups.
PG 180-181 6.4 (People)	For all of this, it would be great if the city and / or partners could offer a certificate type program for garden leaders that is recognized by the city (similar to block captains).
PG 189-92	It could be beneficial to include state (Pennsylvania Fresh Food Financing Initiative) and federal Healthy Food Financing Initiative (HFFI) programs in the resources list on pages 189-192. These programs offer grants and loans to grocery stores, healthy corner stores, farmers markets and other healthy food retailers in LMI and under-resourced communities to increase and support the availability of fresh and healthy foods in these communities.
P 196	Was there any discussion or interest from anyone to update the "Vacant Land 215 Toolkit" from 2016
P196	P. 196 - Public Interest Law Center section "is an organization that provides direct Represents growers" - perhaps cut "provides direct" "The center has produced several resource[s] for agriculture"
PG 196-199	There is mention throughout the plan around "Farm to School", educational programming within schools, and working with the school district. It might be helpful to include a section on "collaborating with schools" in Appendix A "Resources for Growers" (page 196-199), for growers interested in collaborating or partnering. Some specific partners that come to mind include: Greener Partners, Common Market and Eat Right Philly (specifically their pre-existing gardening project that was developed by ERP/SNAP-Ed). We also know SDoP is currently working on a list of approved farms for farm field trips - potentially including a specific person with the school district as a contact would be beneficial for growers as well.
PG 197	The link to "Philadelphia Water Department (PWD) produced a guide in 2019 (Guide for Urban Gardens & Farms: Getting Water Access) to support growers in gaining access to water resources (e.g. fire hydrants permits, new water lines)" does not work.
P 198	P. 198 - Soil Safety and Urban Gardening section The document also informs growers of soil health and safety, and [provides?] resources to research
P 214	P. 214 - Farmers want to more ways section - strike "to" from title
P 221	P. 221 - Partnership and investments section We heard [from] respondents that
P 224	P. 224 - what we heard section Respondents described interaction[s with] city agencies
P 226	I heard in the meeting where the plan was revealed that the recommendations around hens/chickens were removed during discussions with the city. I'm curious what the reasoning was, especially given the data point that 90% of survey takers during the 2nd public meeting mentioned Bees and hens as something that was needed.



P 226	P. 226 - meeting participant comment #2 has two quotation marks at the beginning
P 227	P. 227 - meeting participant comment #2 has two quotation marks at the beginning
P 230	P. 230 - last paragraph in About this Station section In response to input from this public meeting, the diagram presented in this meeting [has] been edited
P 230	P. 230 - activities section Two periods at the end of the last sentence
P 231	P. 231 - community-led efforts section 59% of participants get land security, whether [that] means - than?
Misc	Suggestion to post plan on <a href="http://SoilGeneration.org">SoilGeneration.org</a> website too
Misc	Suggestion to add a contact person or email to plan
Misc	Lots of instances of something that looks like it should be a link, but isn't, and some but not all links are italicized.
Misc	Footnotes could also be live links (maybe this is the plan for the final version? would be very helpful for navigating the document).
Misc	<p>The real economic impact on individuals and families.</p> <p>The plan repeatedly implies this helps individuals and families economically, but offers NO NUMBERS to back it up. Any person with experience in gardening knows a person growing on one of these small plots cannot sustain themselves on what they grow - not even close. This is fact. The economic impact is more oblique - and important - but it's not from the growing: it's from the community cultivation, individual skill building, long term planning, etc. This plan is very misleading and makes it seem like urban gardening will alleviate food deficiency and improve individual economic hardship - it will not. People will still have to shop - and providing access to affordable commercial grocery is more of an immediate concern.</p> <p>I'm in full support of this endeavor, but be transparent and honest about economic impact. For example, page 122 you cite the school growing program contributing to Saul Cafeteria, but nowhere in the sidebar or in the cited article are HARD NUMBERS AND DATA provided. It's just feel-good anecdotal fluff: kids gardening and providing food is an emotional picture to paint. What percentage of the food needed by Sauls is provided by urban gardening? How much does Sauls still spend on commercial growing? How much does Saul save from receiving this? How many meals are actually produced? Even the article hints at the real impact - these kids stay in school and go to college. THATS the real economic impact - not the food grown or Saul serving it up.</p> <p>The importance of this program is undeniable, but stop pandering to people's ignorance of the real economic impact. The time spent by an individual growing and the amount they</p>

	<p>consume, in the long run, will not help them economically. It will benefit them in other ways, which MAY translate into other skills, perspectives, opportunities, networking, etc that provide economic security. Growing is fun, community building, and educational. But I will never grow enough on a small plot to benefit myself economically. If anything - it's a loss. The time spent doing it could make me more working at McDonalds. You're setting people up for economic disappointment.</p> <p>The real need is access to grocery stores, government regulation on pricing and profit, etc. The need for this program is more social and educational, and any economic impact is really marginal - which is why you don't provide hard numbers of economic gain by individuals and families.</p>
Misc	<p>Will there be formal and planned convenings for the people and groups in the "Philadelphia urban ag committee" to continue discussing implementation and opportunities to hold the city accountable?</p>