January 26, 2012

To: John Carpenter  
Deputy Executive Director  
NSP & Land Policy  
Philadelphia Redevelopment Authority (PRA)  
1234 Market St., 16th Floor  
Philadelphia, PA 19107

Bridget Collins-Greenwald  
Deputy Managing Director  
Municipal Services Building  
1401 JFK Boulevard, Ste 1430  
Philadelphia, PA 19102

Re: Draft Vacant Land Disposition Policy of the Philadelphia Redevelopment Authority

Dear Mr. Carpenter and Ms. Collins-Greenwald,

We are submitting this letter to comment on the Philadelphia Redevelopment Authority's pending vacant land disposition policy for the City of Philadelphia.
Food Organizing Collaborative (FORC) organizes food growers, food workers, and food eaters in the Philadelphia region to reclaim control of our food system. In the past year, FORC has co-sponsored two community meetings with 100 community members where we discussed food-growing policy that would create an inclusive, equitable, sustainable, and just food system. Vacant land policy and the needs of gardeners related to land access were central to these discussions. The community input gained from these discussions guide our comments.

Here is some of what we think is important:

We invite vacant land policy changes that are transparent, fair, and beneficial to long-term community health. Gardeners are stakeholders in this process. We have long been and will continue to be the City’s vacant land stewards and can provide crucial input to effective policies going forward. However, understanding proposed policies and developing meaningful comments take time. While other stakeholders were brought into this process earlier, we have only recently been made aware of PRA’s proposed policies and have only begun to share that information with gardeners.

- In order for gardeners to have adequate time to comment, we need an additional 90 days to learn about and understand the policy change proposal and to comment on it.

- Gardeners invest time and labor in cleaning vacant land. We grow food and we grow community. Gardening on vacant land strengthens and nourishes our families, our neighbors, and our communities. The City should engage with gardeners to determine parcels available for long term gardening use, in a way that works together with long term plans for economic and affordable housing development.
• The public should be provided with a simple process for obtaining the land for gardening, including access to current maps of and data about city-owned vacant land and information about the short and long term plans for that land, if any.

• We value stable growing spaces that provide us with opportunities for self-reliance. We are concerned that the structure of Urban Garden Agreements (UGAs) – as temporary 1 year arrangements between the City and gardeners – will never provide the stability to allow garden projects to grow to their fullest potential – both financially and in their roles as anchor community institutions.

• Gardeners should be able to easily secure leases on vacant land that are at least 3 years long with opportunities for renewal. Urban Garden Agreements meet the needs of few gardeners and should be the exception. These short-term agreements discourage gardeners from investing their time and labor into improving the land, as there is no guarantee of using the land a second year. At the very least these agreements should serve as an opportunity to demonstrate a garden's sustainability and a steppingstone to a longer-term commitment by both the gardener and the City.

• Finally, community gardens do so much in the way of growing food, developing leadership, building community, and reclaiming and greening abandoned spaces, with very little money. Many of us are also working to enhance our organizational capacity, but steps like acquiring nonprofit status or purchasing liability insurance may be prohibitively expensive and inaccessible at this stage. Gardeners should have the opportunity to help the City understand garden stability and sustainability, beyond showing nonprofit status or fiscal sponsorship. Further, gardeners need time to
explore and develop affordable methods of acquiring insurance, such as bulk policies.

We thank you for considering our comments and look forward to being considered stakeholders as the PRA develops food policy on vacant land. An open discussion about vacant-land use will help us accomplish a goal that the PRA and gardeners share: building a safe, healthy, vibrant Philadelphia.

Sincerely,

FORC Board Members

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Community Food and Farm Resource Center at Bartam’s Garden
Urban Nutrition Initiative
The University of Pennsylvania

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a community owned park with community garden space
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East Rittenhouse Community Garden

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cc: Tumar Alexander
Government Affairs Specialist, Deputy Chief of Staff

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