



March 9, 2017

Dr. Seth Murray
Senior Advisory
Office of the Chief Scientist
United States Department of Agriculture

Dear Dr. Murray,

On behalf of the Philadelphia Food Policy Advisory Council, we appreciate the opportunity to offer comment in conjunction with the Visioning of United States, (U.S.) Agricultural Systems for Sustainable Production Stakeholder Listening Session Meeting.

The Philadelphia Food Policy Advisory Council (FPAC) facilitates the development of responsible policies that improve access for all Philadelphia residents to culturally appropriate, nutritionally sound, and affordable food that is grown locally through environmentally sustainable practices. FPAC currently has 33 appointed members representing different sectors of the food system and ex-officio members from City government. Since FPAC's inception in 2011, we have made urban agriculture a priority. Our gardens and farms provide myriad benefits for Philadelphia residents and Philadelphians continue to declare the importance of urban agriculture for our neighborhoods by gardening and farming.

A representative of the Pennsylvania Department of Agriculture recently called Philadelphia a "national model" for urban agriculture. In fact, for generations, the City of Brotherly Love and Sisterly Affection has been home to vibrant gardens and farms. Our city's challenges and successes offer valuable lessons for researchers and other stakeholders in sustainable agriculture.

In September of 2016, the Philadelphia City Council held its first hearing devoted exclusively to urban agriculture. As FPAC shared with City Council members in its testimony, the city is currently home to at least 470 gardens and farms on almost 600 parcels. The majority of these spaces are food producing, distributed citywide, concentrated in historically disinvested neighborhoods, and rooted in the city's African American, Puerto Rican, immigrant, and refugee communities.

Philadelphia's gardens range in size from a single row house lot to the eight-acre Eastwick Community Garden in Southwest Philadelphia. In 2008, a Philadelphia Harvest Report developed by University of Pennsylvania professors Domenic Vitiello and Michael Nairn

estimated that Philadelphia’s gardens produced two million pounds of vegetables and herbs totaling \$4.9 million in worth.¹ Food from gardens is distributed through formal and informal networks, from “delivery at food cupboards through the [Pennsylvania] Horticultural Society’s City Harvest Program to handing out bags of vegetables after church, from inviting children to help plant and harvest to leaving baskets on front porches for neighbors and strangers.”²

Philadelphia also has at least 50 market farms throughout the city, including a robust set of nonprofit educational farming organizations, as well as entrepreneurial endeavors. These provide food through farmers’ markets, onsite farm stands, community supported agriculture and “pick your own” produce days. USDA has helped build Philadelphia’s farmer leadership and skills through Community Food Project and Beginning Farmer and Rancher grants.

Many of Philadelphia’s garden and farm spaces date back to USDA-funded programs of the 1970s and 1980s, having emerged as neighbors transformed abandoned places into vibrant community assets. Hundreds of these spaces are at risk of being lost because of land insecurity. Despite Philadelphia’s surplus of vacant land and its deep agricultural tradition, almost every person testifying before City Council in 2016 spoke about either an impending risk of a garden or farm losing its land or the difficulty of gaining land access at the outset. This simultaneous push pull of possibility and precariousness reflects the overall picture of urban agriculture today in Philadelphia.

Ongoing barriers to land access and preservation require not simply legal or policy solutions or additional financial resources—though all are necessary. To dismantle these barriers, we need commitment across sectors—in particular, at all levels of government—that access to food production is a priority for every neighborhood in our urban centers. That access must be distributed equitably with focus on the most systemically disinvested and food-insecure neighborhoods.

Although obstacles remain, support for urban farming in Philadelphia continues to grow. A new zoning code passed in 2012 recognizes urban agriculture as a land use category, which has made zoning restrictions less cumbersome to farmers, while state legislation has ensured that accessory agricultural structures are exempt from building code requirements. In 2014, the Philadelphia Parks & Recreation Department launched the Farm Philly program, which runs agricultural projects on parkland and coordinates with other organizations to protect urban gardens and farms. In 2017, the newly created Philadelphia Land Bank began acquiring tax delinquent properties for redevelopment, some of which will be devoted to community gardens and

¹ Domenic Vitiello & Michael Nairn, 2008 Harvest Report 48, 52 (Oct. 2009) available at http://www.farmlandinfo.org/sites/default/files/Philadelphia_Harvest_1.pdf.

² Id. at 4.

nonprofit and entrepreneurial farms. Additionally, an ordinance that went into effect in 2017 grants qualifying gardens a one hundred percent discount from storm water fees.

While these are positive steps, a lack of agency coordination continues to be cause for concern. Witnesses at the City Council hearing have advised the creation of a central office to coordinate urban agriculture initiatives. Attendees also requested that City Council contribute capital and offer incentives for urban farming.

During the September hearing, advocates representing nonprofits, public agencies, students, grassroots organizations, and individual gardens and farms called on City Council to devise a comprehensive urban agriculture strategy for the city. In preparing to engage in an Urban Agriculture Strategic Plan for our city, FPAC has articulated a set of goals relating to the range of benefits provided by urban agriculture.

- 1) **Increase Access to Healthy Food:** Support new and existing urban agriculture projects to distribute and/or sell fresh, culturally appropriate, and affordable produce to local communities.
- 2) **Improve Public Health:** Promote gardening as a source of outdoor physical activity, stress reduction, cognitive stimulation, sense of pride and accomplishment, and retreat from the urban environment.
- 3) **Develop Urban Agriculture Workforce:** Encourage residents, especially youth, to learn about the provenance of food, agricultural processes, nutrition, and sustainability, and to develop new skills for wage-earning and entrepreneurial opportunities.
- 4) **Support Community Development & Education:** Expand urban agriculture programming that provides opportunities for strengthening community cohesion and intergenerational relationships, maintaining cultural heritage, catalyzing community organizing and broader community improvement, and increasing perceived sense of safety.
- 5) **Improve Environmental Health:** Support urban agriculture projects that increase biodiversity and pollinator habitat, manage storm water, sequester carbon, reduce greenhouse gas emissions from food transportation, filter pollutants out of the air, and combat the urban heat island effect.

The need for land underlies each of these goals because without land access and land security none of these goals can be accomplished.

Equity is also a core value imbued in each of these goals. Our commitment is to ensure that benefits are felt broadly, but are targeted toward our low income communities, communities of color, and immigrant and refugee communities, who have been long been both at the forefront of Philadelphia's food production and face the ongoing systemic barriers of racial and economic inequity that continue to make this work so challenging.

In conjunction with this process we are also engaged in an effort to develop shared metrics to measure the progress our urban agriculture efforts make to achieve the above goals. In doing so, we are embarking on a project—with farmers and gardeners—to define the questions they see as reflecting their missions, values, and on-the-ground efforts.

Community engagement is essential for equitable, effective, and efficient agriculture policy. This is also true for research. At FPAC, we encourage that the USDA support farmer-driven and community-centered research in sustainable agriculture using the following guidelines:

1. Farming and gardening practitioners should participate in all stages of the research.
2. Farming and gardening practitioners should benefit from the research.
3. The research questions themselves should be defined in collaboration with farming and gardening practitioners.
4. Research itself should be scalable, able to benefit smaller, but still impactful, food producing enterprises.
5. Research should be interdisciplinary, recognizing that the benefits of sustainable agriculture themselves lie in its diversity.
6. Measurements of impact should reflect the diversity of benefits provided by sustainable agriculture to a range of social, environmental, and economic systems and should be geared toward promoting positive impact across these systems.

Finally, we offer the following recommendations for research and support that have been defined by stakeholders in our city.

Support for the development of equitable and sustainable urban agricultural efforts:

- We recommend that USDA fund research that places value on the ecological and social services performed by urban farms and sponsor the development of simple tools to allow gardeners and farmers to report such values as a way to establish long term viability in the constant push and pull between different potential land uses.
- We further recommend that USDA sponsor more critical analysis of existing urban agriculture policies, disseminate best practices, and educate municipal officials on farm functions and best support strategies.
- We recommend that USDA consider providing additional funds toward university research that is directed primary at urban agriculture.

Enhanced USDA support for urban agriculture efforts and integration in USDA's own data collection:

Currently, while people seeking agricultural advice in Philadelphia can rely on Penn State Extension and the Pennsylvania Horticultural Society, as well as other locally based resources, USDA's Natural Resources Conservation Service (NRCS), traditional agricultural outreach for crop production, and traditional agricultural services are not readily available in Philadelphia. Though NRCS in Harrisburg and Delaware are active in Philadelphia, they still do not have a "home base" in the city.

- We recommend that NRCS develop a presence in Philadelphia, particularly educational servicing.
- Moreover, we recommend that USDA do a survey of NRCS programs serving urban centers throughout the country.

Overall, urban farms are underrepresented in farm census data, which results in lack of access to USDA programs.

- We recommend that USDA do targeted outreach to urban farms to get them to register with farm services agencies and to receive a Farm ID number, so that farms become eligible for NRCS programs, such as high tunnel programs, and are entered into the database to receive an agricultural census.
- We recommend that USDA consider dropping rural mandates for programs that could benefit urban farmers, for example Rural Development Agency cooperative formation and support programs.
- We further recommend that USDA provide guidance about the rate of production or a production baseline that could result in the provision of additional services to cities such as Philadelphia.
- Include credit for cover crop in crop insurance rules so that growers using cover crops are not penalized by reduced yield calculations for payout because of a perceived reduction in growing time and yield maturity of insured crop.

Enhanced support for the development of safe and healthy soils and growing sites:

Philadelphia possesses some of the state's most leaded soils placed within the highest zones of poverty. Growers on city plots need access to free heavy metal soil testing that is convenient and not cumbersome. Drawing from FPAC's own report on *Soil Safety and Urban Gardening in Philadelphia*,³ we recommend support for the development of:

- A more affordable inductively coupled plasma (ICP) testing panel;
- A comparison of x-ray fluorescence (XRF) and ICP testing methods to determine a testing method that effectively balances affordability and accuracy; and

³ Philadelphia Food Policy Advisory Council, *Soil Safety and Urban Gardening in Philadelphia: Process Report and Recommendations to the City of Philadelphia* (2015) available at <https://phillyfpac.files.wordpress.com/2015/10/soil-safety-process-and-recommendations-report.pdf>.

- Expanded and affordable opportunities to test for polycyclic aromatic hydrocarbons (PAHs) and volatile organic compounds (VOCs), which are not covered by heavy metal testing panels.

We further need to understand the potential impacts of contaminated soils and develop methods to mitigate these impacts. We recommend that USDA support:

- Research into determining the scope of food production in potentially unsafe soils and research into the uptake of various contaminants into plant species.
- Establishment of contaminant concentration thresholds specific to urban agriculture in specified cities. Alternatively, identify appropriate third party contaminant concentration thresholds that are regularly updated for urban gardeners to reference.
- Development of systems for affordable remediation.
- Analysis of soil in existing gardens to determine how long-term gardening improves soil quality.
- Expand the research on toxic trace metals that created the EPA 503 Rules to include field commodity and specialty crops over a span of at least 7-10 years.

Enhanced support for urban agricultural land access and land tenure:

The precarity of farmland is a known problem in the rural context. This precarity is less documented, but no less present, with respect to urban agriculture. We recommend that USDA support:

- Incorporation of urban food production into its agricultural census, providing data by which to assess the current scope of urban agriculture.
- Research into loss of urban farmland, in the context of shifting real estate markets, competing land uses, and historical and current federal and city land policies, including redlining and federal urban renewal efforts.
- Development of mechanisms and supports to permanently support affordable urban food production, modeled on community and agricultural land trusts.
- Development of incentive structures and policy mechanisms to enhance land access and land tenure.

We also incorporate by reference the research gaps identified by the Johns Hopkins Center for Livable Future in their 2016 report *Vacant Lots to Vibrant Plots: A Review of the Benefits and Limitations of Urban Agriculture*, authored by Raychel Santo, Anne Palmer, and Brent Kim, available at http://www.jhsph.edu/research/centers-and-institutes/johns-hopkins-center-for-a-livable-future/pdf/research/clf_reports/urban-ag-literature-review.pdf.

We thank you for your opportunity to offer these written comments. Please feel free to be in touch if we can contribute further assistance or information.

Sincerely,



Amy Laura Cahn
FPAC Co-Chair
acahn@pubintl.org



Nancy Kohn
FPAC Urban Agriculture Subcommittee Co-Chair
nkohn@pennhort.org