



November 15, 2022

City of Buffalo
Zoning Board of Appeals
65 Niagara Square
Buffalo, NY 14202

Re: Proposed Lombard Street Container Garden

Dear City of Buffalo Zoning Board of Appeals:

The Food Policy Council of Buffalo and Erie County (FPC) has reviewed the above-referenced document referred to us by the City of Buffalo Office of Strategic Planning. We recognize the ongoing work involved in implementing the City's Comprehensive Plan and Unified Development Ordinance and offer the following comments:

- The FPC's 2020 *Local Food Action Plan* (the Plan) encourages, "policies and programs that help ensure equitable access to healthy, affordable food through increased food availability and accessibility" and recommends obtaining food from nearby farmers to bridge this gap. The City should work with the applicant to explore the feasibility of establishing a neighborhood distribution network to share excess produce with community members. Local partners may include the Broadway Market, Jericho Road, FeedMore WNY, Buffalo Freedom Gardens, Grassroots Gardens WNY, and/or the myriad faith- and community-based organizations that serve the area.
- The Plan defines Community Gardens as "community-based collaborative projects focused on small-scale agriculture." Stewardship of these spaces is typically shared by participants as is the bounty of fruits and vegetables. These spaces can increase affordable and healthy food access, act as community green space, reactivate vacant lots, and contribute to skill-building and a sense of community. The FPC has concerns over the use of the term "community garden" in the Project's context, which does not align with the commonly accepted use of the term and is in conflict with ongoing statewide efforts to create a legal definition of "community garden." The developer may wish to revisit use of "community garden" or may wish to amend the project to include designated space for actual community gardening on site.
- The Plan supports, "efforts to develop a diverse, equitable, and sustainable food economy". The use of shipping containers as building materials has local precedent in Buffalo and has become relatively commonplace throughout the country. Furthermore, the use of containers in food production is becoming a more accepted practice, due to their efficiency and relative ease of use. The FPC supports the use of innovative methods to produce more food locally.

Members of the Council would be happy to coordinate with your efforts. We welcome you to review any parts of our *Local Food Action Plan* or our work to implement it. An electronic version of the Plan can be found at erie.gov/foodactionplan.

Thank you for your thoughtful consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Antonina Simeti". The signature is fluid and cursive, with a large initial "A" and "S".

Antonina Simeti
Chair, Food Policy Council of Buffalo & Erie County

AS: seg

Our mission is to advocate for an equitable and sustainable food system for the people of Buffalo and Erie County.

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