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Good evening. My name is Jenny Greenberg and I serve as the Executive Director of the Neighborhood Gardens Trust (NGT). Thank you for the opportunity to speak today in support of the Proposed Change in Stormwater Rates for Community Gardens, which would establish a special discounted stormwater charge in an amount up to and including 100% for approved community gardens. As you are all well aware, the Philadelphia Water Department (PWD) has recommended proposed changes in the stormwater rates amounting to a 100% discount or exemption from stormwater management service charges for community garden parcels. This 100% discount or exemption is critical to the ongoing support and preservation of community gardens throughout the City of Philadelphia and NGT strongly supports PWD's proposal.

By way of background, NGT acquires and preserves community gardens and shared open spaces to enhance quality of life in Philadelphia's neighborhoods.

There are upwards of 500 community gardens across the city, many of which have transformed vacant, trash-filled lots into beautiful and productive spaces. These gardens serve as community anchors, providing safe, green spaces for residents to come together. They are a source of community identity and pride. Community gardens provide many important benefits, including access to healthy affordable food, positive impacts on physical and mental health, and crime reduction.

And, particularly relevant to the discussion this evening, community gardens are a rich source of pervious soils which manage stormwater onsite.

Recognizing the many benefits of community gardens, NGT and various other stakeholders, together with the support of City Council and Mayor Kenney, worked to sign into law Bill No. 160523 which provides for an exemption from stormwater charges. NGT has joined as a Participant in this special rate proceeding and appears at tonight's hearing to ensure that the full benefit of that Bill are provided to community gardens.

NGT and other community garden owners and their various gardeners would be particularly burdened by anything less than a 100% discount or exemption from stormwater charges.

The Water Department's analysis has already concluded that the 100% discount or exemption would not result in an increase in existing rates and charges.

This is consistent with the fact that PWD has, for the past several years, advised NGT and other community garden landholders to place existing stormwater charges into dispute rather than paying them, in anticipation of a fee exemption. Accordingly, even if these stormwater charges were not a de minimis amount in comparison to the overall PWD budget, these charges should already be reflected in existing rates, since the existing rates contemplate unrecovered or unrecoverable amounts.

Moreover, the existence and continued preservation of community gardens serves as a net benefit to PWD and its efforts to reduce operational, maintenance and repair costs with respect to stormwater runoff and stormwater management. Studies have shown that community gardens decrease the amount of pollutants and runoff



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entering the waterways and relieve the strain on stormwater infrastructure.

The majority of gardeners which NGT serves live in low-and moderate-income neighborhoods and cannot afford to shoulder these fees. Nor can NGT take on these costs. This is a critical threat for the future viability of our organization and community gardens across the city.

In light of the foregoing, I encourage you to support PWD's recommendation for a 100% discount or exemption in stormwater charges. This action is vital to recognizing the many benefits that community gardens bring to our city and to enabling NGT and our partners to continue to support these important growing spaces.

For more information, please contact:

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