

From: Alex Saloutos <asaloutos@tds.net>

Date: Wednesday, February 11, 2026 at 5:40 PM

To: <PACommission@cityofmadison.com>

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Subject: Public Comments on Legistar File No. 91152, Documenting Policies for Food Production on City-Owned Land, Agenda Item No. 11, February 11, 2026

Board of Park Commissioners:

Please find attached my public comments on Legistar File No. 91152, Documenting Policies for Food Production on City-Owned Land, which is Agenda Item No. 11 on tonight's agenda. I support the resolution's goals and have identified several issues I believe the Board of Park Commissioners should address before recommending approval. I am unable to speak at tonight's meeting, so I would be grateful if you could review the attached memorandum before you vote. Thank you for your consideration. Thank you for your consideration.

Warm regards,

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A handwritten signature in black ink, appearing to be the letter 'A' with a stylized flourish extending from the bottom right.

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M E M O R A N D U M

Date: February 11, 2026

To: Board of Park Commissioners

From: Alex Saloutos

RE: **Public Comments on Legistar File No. 91152, Documenting Policies for Food Production on City-Owned Land, Agenda Item No. 11, February 11, 2026**

This memorandum addresses Legistar File No. [91152](#), which directs the City to document policies that allow food production on city-owned brownfield and greenfield land and to share those policies with the public and potential growers in time for the 2026 growing season.

I support the resolution's goals. Expanding access to city-owned land for food production, especially for residents and communities most in need, aligns with the City's Comprehensive Plan, the Farmland Preservation Task Force recommendations, and decades of community gardening in Madison. My concern is not whether to pursue these goals, but how to do so in a way that is realistic, equitable, and transparent.

The issues I raise here do not appear to have been addressed in earlier reviews by the Board of Public Works, the Water Utility Board, and the Sustainable Madison Committee, which have already recommended approval of this resolution.

SUMMARY

There are five issues that the Board of Park Commissioners should address before recommending that the Common Council approve the resolution. Each is discussed in the Analysis and Discussion section below, and recommended actions appear in the Conclusion.

1. The resolution should specify that the Common Council approves the resulting policies.
2. The timeline is unrealistic and should be adjusted to accommodate the comprehensive policy development process described in the resolution.
3. The resolution and resulting policies should be coordinated with the Strategic Partnership Charter, which is under development by the Long Range Planning Subcommittee.
4. The Food Policy Director position, or a comparable position, identified as essential for this kind of cross-departmental coordination, should be restored.
5. The cost-allocation model in the staff memorandum creates barriers for the historically disenfranchised communities that the resolution is intended to serve.

ANALYSIS AND DISCUSSION

A. Who Approves the Resulting Policies?

The resolution directs the City to "document policies" for food production on City-owned land with "research and support from the Madison Food Policy Council," and to communicate those policies "in clear, direct language." It does not specify who adopts or approves those policies.

Because these policies will govern private use of public land, the Common Council should adopt them following committee review and public input.

B. Why the 2026 Growing Season Timeline Doesn't Work

The resolution requires that policies be “documented so that staff and potential growers are prepared for the 2026 growing season.” Given the work involved, this is not realistic.

The earliest the Common Council can adopt the resolution is February 24, 2026. After that, the Madison Food Policy Council, with staff support, would need to draft policies that would likely undergo committee review and public input. Even on an accelerated schedule, Council adoption of final policies would likely not occur until late spring 2026.

Only then could new growers select and evaluate a site, arrange soil testing if needed, plan for mitigation (such as raised beds or soil caps), complete a title review, obtain insurance, and execute either an amendment to the Rooted WI Master Lease or a separate lease through City Real Estate. These are time-consuming steps, and soil testing, contracting, and insurance often move slowly in spring.

Typical Madison planting dates place indoor seed starting in late April and early May, direct sowing in late May, and transplanting in early June. To be ready, growers need clear policies, a confirmed site, a signed lease, and basic infrastructure in place well before those dates. The Farmland Preservation Task Force therefore recommended issuing RFPs for leasing City-owned land in September or October so farmers can prepare for the following season. It also emphasized the need for a Food Policy Director to coordinate this work across departments; that position remains vacant.

Taken together, these factors make implementation for the 2026 growing season impractical. A more realistic approach is to set Q4 2026 as the policy-adoption target for the 2027 growing season.

C. Need for Coordination with the Strategic Partnership Charter

The Parks Long Range Planning Subcommittee's Strategic Partnership Charter (Legistar ID No. [91561](#)) is intended to classify existing partnerships on parkland and establish a framework for evaluating future proposals. It is being developed in three phases: classifying current partnerships; researching how other park systems structure similar arrangements; and recommending partnership goals and priorities.

The charter is designed to replace the current case-by-case approach, which is burdensome for staff, creates opportunities for uneven treatment, and makes coherent policy difficult. These concerns apply directly to community gardens and urban agriculture on parkland. Gardens on parkland are partnerships between the City and outside organizations or individuals. Rooted WI's Master Lease for 19 community gardens is a clear example and falls naturally within the charter's scope.

If food-production policies for parkland move forward without reference to the charter, several problems can arise: criteria for using parkland for food production might conflict with or duplicate partnership criteria under the charter; garden partnerships might be treated differently from other, similar partnerships; staff could repeat research; and the current assumption that the controlling agency makes final decisions on garden requests may not align with any future role for the Board of Park Commissioners.

At the same time, food-production policies should not be delayed while the work anticipated under the charter is completed. The resolution should therefore:

- Require that policies affecting parkland be developed in consultation with the Board and, to the extent possible, in alignment with the outcomes of the Strategic Partnership Charter as it is being developed; and
- Commit to reviewing and amending those policies once the charter's framework is adopted, so that community gardens and similar activities are explicitly integrated into the broader partnership structure.

This approach allows food-production policies to advance now while ensuring they can be updated to reflect and incorporate the charter's long-term framework for strategic partnerships on parkland.

D. Cost Allocation and Equity

The resolution's "WHEREAS" clauses emphasize making City-owned farmland available "on a more equitable basis to historically disenfranchised communities," consistent with the Farmland Preservation Task Force findings. The Task Force documented that Black, Hmong, Indigenous, Latinx, and other growers of color face significant barriers to land access, and that the costs of formal brownfields testing and remediation are often out of reach for community groups with small or no budgets. It recommended the USEPA Raised Bed Method as a more equitable and cost-effective approach.

The resolution's first operative clause aligns with this recommendation by directing the City to document policies allowing food production on brownfield land, provided that potentially contaminated soil is physically separated from the growth medium. The Economic Development Division's draft staff memo, however, assigns the costs of soil testing (if needed), title review, contamination mitigation (raised beds or soil caps), and insurance entirely to the requesting organization, with no City cost-sharing or financial support.

This cost structure risks undercutting the equity aims of both the resolution and the Task Force report. Organizations serving historically disenfranchised communities are the least likely to have the financial capacity to cover these up-front expenses. If the City intends to prioritize equity in access to food production on public land, it needs to directly address who pays for site preparation and risk mitigation.

The Board should recommend that the resolution direct that the cost-allocation framework be revised to eliminate financial barriers for the communities the policy is intended to benefit.

CONCLUSION AND RECOMMENDATION

The goals of this resolution are strong and consistent with Madison's history of community gardening and the Farmland Preservation Task Force's recommendations. Expanding access to City land for food production, especially for historically disenfranchised communities, is a worthy public purpose. To meet those goals, the implementation framework needs a few targeted adjustments.

The Board of Park Commissioners should recommend approval of the resolution with five additions:

1. Clarify that the policies will be adopted by the Common Council after committee review and public input, rather than leaving approval authority undefined.

2. Adjust the timeline to target policy adoption by Q4 2026 for the 2027 growing season, allowing for a transparent and inclusive development process.
3. Require coordination between the food-production policies and the Strategic Partnership Charter under development by the Long Range Planning Subcommittee, so that garden partnerships on parkland are managed within the broader partnership framework.
4. Revise the cost-allocation framework in the staff memo to ensure it does not create barriers for the historically disenfranchised communities that the resolution is intended to serve.
5. Recommend that the Common Council fund a Food Policy Director or a comparable position to coordinate implementation across departments.

These changes would make the resolution more realistic, equitable, and transparent, and better aligned with the City's broader efforts, giving it the best chance of achieving the access and transparency its sponsors intend.

Thank you for your consideration.