



July 23, 2010

Helder Gil, Legislative Affairs Specialist
Department of Consumer and Regulatory Affairs
1100 4th Street SW, Room 5164
Washington, D.C. 20024

Re: Proposed Regulations to Amend Chapter 5 of Title 24 of the District of Columbia Municipal Regulations (Vendors)

D.C. Hunger Solutions appreciates this opportunity to submit comments regarding the proposed regulations to amend the vending regulations set forth in Chapter 5 of Title 24 of the District of Columbia Municipal Regulations. *See* D.C. Register Vol. 57, No. 26 (June 25, 2010). D.C. Hunger Solutions seeks to create a hunger-free community and thereby improve the nutrition, health, economic security, and well-being of low-income District residents.

We support the proposed vending regulations' creation of a Class C Vending Business License for public markets, which exempts farmers' markets (and similar markets) from many of the myriad regulations that govern design, placement, and other aspects of traditional vending trucks, carts, and stands. And we concur with the comments submitted by the D.C. Farmers' Market Collaborative.

D.C. Hunger Solutions is pleased that the District recognizes the importance of access for all residents to healthy food.

- We applaud the move by DCRA, within the proposed regulations (Section 528.2), to expand access to healthy food, by giving priority for Roadway Vending Locations to Mobile Vendors selling only fruits and vegetables. We understand from conversations with Samuel Williams of DCRA that the intent of Section 528.2 is to pave the way for a healthy vending program in the District.
- We also understand from Sam Williams that the Vending Development Zones described in the proposed vending regulations will create opportunities for healthy vending and other innovative businesses. We support this proposal and encourage the District to prioritize fresh produce within Vending Development Zones, and to use new vending concepts to expand access to fresh produce in underserved communities and job opportunities for District residents.
- The District also took an important step in helping create new potential sites for the sale of produce when, with passage of the Healthy Schools Act of 2010, it amended the District of Columbia Municipal Regulations to facilitate access to healthy foods at public recreation facilities. *See* Healthy Schools Act of 2010, Section 304: "... The provisions of this section shall not preclude the use of public recreation facilities by programs to provide community access to healthy foods, such as farmers' markets."

To ensure the success of the healthy food vending, it is essential to create a set of clear, easy-to-follow guidelines for potential vendors and public market managers who seek to sell fresh produce and other nutritious foods. The District also must identify sites that can support the successful sale of produce, in particular, for communities that lack access to sufficient nutritious food and in many cases, are suffering from high rates of obesity.

We look forward to working with DCRA and other agencies (e.g., the Department of Health and the Department of Transportation) to help make healthy vending a success, particularly in areas underserved by fresh produce.

Thank you for the opportunity to submit comments. Please contact D.C. Hunger Solutions at 202- 986-2200 (ext. 3041) if you have any questions or would like to discuss anything.

Sincerely,

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Director

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