

April 25, 2022

New York City Department of Health and Mental Hygiene
Gotham Center, 42-09 28 th St, 14 th Floor, CN30
Long Island City, NY 11101-4132
resolutioncomments@health.nyc.gov

RE: Amendments to Green Cart Rules as required by section 13 of Local Law 18 of 2021

To the New York City Department of Health and Mental Hygiene:

I am writing in support of the proposed amendment to the Green Cart Rules in Local Law 18 of 2021. As a student in the City and Regional Planning program at the Pratt Institute in Brooklyn, I've seen through my involvement in studio projects that food insecurity is an extremely pressing issue in the city. I believe that expanding the boundaries for where green carts can operate, as well as loosening the restrictions on the types of food that they can offer, is an excellent step towards improving access to fresh foods for New Yorkers. However, I believe that this legislation can go even further to better meet its stated goals, by expanding the neighborhoods the program operates in and eliminating the cap on available permits..

As stated in the amendment, the purpose of the Green Cart program was to improve access to healthy, fresh foods in police precincts that are underserved by existing grocery access. Food deserts, or areas where communities have both a low median household income as well as low overall access to fresh foods, are concerningly common in New York City. According to the 2008 "Going to Market: New York City's Neighborhood Grocery Store and Supermarket Shortage" study published by the DOHMH, in collaboration with the New York City Food Policy Coordinator and the NYC Economic Development Corporation, 3 million New Yorkers lived in neighborhoods with a high need for grocery stores and supermarkets. The

Green Cart program was implemented to combat this trend, and has already shown signs of success.

A study of the success of the Green Cart program, published by the DOHMH in 2014, showed the immediate success of the program in increasing food access. Before the program was implemented, neighborhoods where Green Carts were not implemented had a higher percentage of establishments that sold fresh fruit or vegetables (57% in non-Green Cart neighborhoods compared to 50% in Green Cart neighborhoods). Three years after the implementation of the program, this had reversed. In 2011 the percent of establishments selling both fruits and vegetables in neighborhoods with Green Carts increased significantly to 69%, while that number had remained static in non-Green Cart neighborhoods. This increase was seen even when Green Carts themselves were removed from the analysis, indicating that businesses that had previously not carried fresh produce had begun to carry these products after the implementation of the program.

One very likely explanation for this is the increase in competition that green carts bring to these neighborhoods, encouraging bodegas and other existing establishments to expand their offerings to retain some of their business. By expanding the types of products that green carts are able to sell, as is proposed in the amendment, it's very likely that these same ripple effects will occur. This could mean that the availability of water, prepackaged fruits and vegetables, and nuts will start to be offered more widely throughout the neighborhood.

What I'd also like to note about the analysis released by the DOHMH in 2014 is that the availability of fresh produce has been more static in neighborhoods that are not participating in the Green Cart program. While the proposed amendment expands the program to the 63rd and 69th police precincts, given the success of the program in existing neighborhoods, the DOHMH

now has an opportunity to further expand the program to address the availability of healthy foods throughout the city. This process should include an updated analysis of the food access landscape of the city, identifying neighborhoods that may have slipped into a more concerning state in the past 14 years. Ideally, green carts could be allowed throughout the city, allowing the ripple effects of the program to spread to all neighborhoods. Special preference or support could be given to green carts operating in communities of particular need.

In addition, the Department now has a chance to not only increase the products available at green carts, but to increase the overall number of green carts themselves. The rate at which the original 1000 permits for green carts were distributed indicates the interest in participating in this program. These operations, predominantly established and run by members of immigrant communities, are not only beneficial to the populations they serve, but are also meaningful opportunities for entrepreneurial ventures and wealth creation. Removing the cap on the number of available permits could further increase access to healthy foods, lower the city's costs in permit enforcement and management, and expand opportunities for aspiring small business owners.

In summary, I'd like to reiterate my support for the proposed amendment to the Green Cart program, but insist that there is still room to expand and improve this program to better meet the needs of New Yorkers. I look forward to hearing more about the Department's efforts to expand access to healthy foods, while also further considering how their policies and programs can impact these marginalized communities in even more ways.

Regards,

Pratap Jayaram

Master's Student in City and Regional Planning, Pratt Institute