

April 18<sup>th</sup>, 2022

New York City Department of Health and Mental Hygiene

Gotham Center, 42-09 28<sup>th</sup> St, 14<sup>th</sup> Floor, CN30

Long Island City, NY 11101-4132

[resolutioncomments@health.nyc.gov](mailto:resolutioncomments@health.nyc.gov)

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

Dear NYC Department of Health and Mental Hygiene,

I am writing to express my approval to the NYC Health and Mental Department's updated amendment, adding additional food regulations and vendor locations for the city's 'Green Cart' program, as a part of section 13 of Local Law 18 of 2021. The Green Cart program was established in 2008 to expand access to fresh produce to underserved police precincts in the city, places that would otherwise have limited access to these healthy foods. Local Law 18 of 2021 expanded the program to allow vendors to offer additional non-fruit items, including bottled water or prepackaged nuts. The proposed rule offers updates to the specified additional foods allowed, as well as new police precincts included in the program.

In the proposed Local Law 18, in section 2, an item which determines green cart food items, was updated to include raw prepacked shelled nuts, as well as including that no other foods are allowed.

Prior to the proposal, other food may have been designated by the department's commissioner. Section 3 provides more detail to the prior section, stating that green carts may offer ONLY the following foods:

unprocessed, unfrozen, uncombined, raw fruit and vegetables; prepackaged cut fruits and vegetables with no added sodium or artificial sweeteners; prepackaged still or carbonated water with no added sodium or artificial sweeteners; and raw, prepackaged, single-ingredient nuts. In addition, all packaged food must be labeled in accordance with the NYS Apartment of Agriculture and Markets regulations. Additional green cart permits can now be used in the 63<sup>rd</sup> police precinct (Flatbush/flatlands/Farragut) and the 69<sup>th</sup> precinct (Canarsie).

I am a 2<sup>nd</sup> semester City and Regional Planning Student, enrolled in the Graduate Center for Planning and the Environment at Pratt Institute in Brooklyn, NY. My focus in this program has been learning more about food inequities, specifically in NYC, from a geospatial analyst perspective. Through this program, I have learned a lot about how impactful geographic information systems can be when studying a planning issue, since it allows additional messages to be portrayed. However, food systems analysis is not as mentioned in these areas of thought, because it is a very complex topic. Nonetheless, I find it the most interesting and important issue to tackle. I believe that the Green Cart Program is a successful city policy aimed to fight food inequities.

Though I support the proposed rule for additional amendment requirements in the green cart program, I recommend the following measures to be taken to ensure that the program is as beneficial as it can possibly be:

The proposal is requesting green cart vendors to have no additional items in their cart, only the ones explicitly stated in the updated amendment. However, to create such a firm order, proper analyses of additional cart items should be in-place. Overall, the non-produce items include regular water, carbonated water, and single-packaged nuts. How were these items chosen? Did they appear after the relaxed ruling of Local Law 18 of 2021 and these were the items that stuck? I urge additional analysis, for there might have been non-produce items that the vendors decided to sell, and it worked well with their community served. I understand standardization of items and additional regulations are the easiest approach, but I fear that there are one to three key items that may be missing from the list.

The proposal also allowed additional police precincts in Brooklyn to gain permits for green carting services. From the perspective of being involved in planning academia, it would be great for the department to release a summary report/analysis describing why those two precincts were chosen in the update. The vague description states “inadequacy to healthy foods”, but what parameters were chosen to decide this? I believe this would be helpful information for all the boroughs, especially for community-based organizations, because if a neighborhood with similar inadequacies is being overlooked, the community can gain a better understanding of the department’s decision-making. In addition, planners can use this information to further understand the realm of food inequity in NYC.

Overall, the proposed amendment additions to the green cart policies provide stricter, but safer regulations on food choices, as well as providing additional services to the southeast side of Brooklyn. I recommend further analysis on the department’s additional food choices, as well as providing an additional report summary on why those specific Brooklyn police precincts were chosen.

I strongly support the Green Cart program update with consideration and implementation of the above-mentioned recommendations. Adopting these recommendations will ensure that the Department of Health and Mental Hygiene, as well as the Green Cart Program, is looking out for the best interests of all residents in New York City.

Sincerely,

Alyssa Bement, CRP Pratt Institute