

November 13, 2012

I write to express my disapproval of DC's proposed mobile vending regulations that would unduly and capriciously restrict food trucks from doing business within areas of high demand for their services. In particular, the notion that ten—and only ten—feet of "unobstructed" sidewalk space can safely and effectively accommodate lunchtime crowds in front of food trucks and balance the trucks' customers' needs with those of other pedestrians is almost certainly unjustified; along with DDOT's rather liberal definition of a sidewalk obstruction, the regulations would prevent a thriving sector from serving customers in some of the most high-demand areas in the District. And while I would like to believe that DDOT's ability to designate Mobile Roadway Vending (MRV) locations under the proposed regulations would take into account the needs of all stakeholders and preserve what seems to be a perfectly fine status quo, the decision making process lacks transparency and is susceptible to undue influence from parties not sympathetic to food trucks and their growing customer base, e.g. the brick-and-mortar restaurant industry of downtown DC.

At a time when so many District residents are unemployed or underemployed, a fact that District politicians constantly remind us of, it is unfortunate that the District Government is taking steps to undermine a group of small businesses that is actually creating jobs, to say nothing of generating sales tax revenue for the District. DC should be creating incentives for these small businesses to locate their kitchens in DC, hire employees from the local labor force, and spend their capital in DC instead of in Maryland or Virginia. Food trucks and their supporting industries represent a local economic "cluster" that can be a key driver of local economic development; DC should not squander the opportunity these small businesses represent.

Sincerely,

Aaron Malinoff
Washington, DC