



Dec. 28, 2012

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

Re: 3rd Proposed Rulemaking Comments Chapter 5 of Title 24

I am writing today as the co-owner-operator of the DC Slices food truck, established in 2010. We started small with one truck and one employee, and through hard work and great support from our customers have grown our business to two trucks and seven employees. Today we are continuing to grow with the hopes of opening a brick-and-mortar location.

I started my vending career selling souvenirs with my father as a roadway vendor 14 years ago and have been part of the Washington, DC vending community since then. During my time as a licensed vendor I have seen many positive changes within the city and the vending community as a whole, but none have been as important to this city as food trucks. Food trucks are the newest and most popular type of vending the district has seen and has helped create and advance a sense of community in this city between vendors, district officials, restaurant owners, and especially the hundreds of customers that visit food trucks daily.

So far, DC food trucks have been able create a sense of community around food and conversation, and do so in an outdoor environment that energizes and reactivates public space. By doing so, we are an exceptionally great use of public space, but oddly enough, the District of Columbia seems to want to stifle this great resurgence of bringing people outside to enjoy all this city has to offer. It also seems the voices of special interest groups and a few close-minded people are trying to set back a forward-thinking movement that improves the overall vibrancy of the city and an industry that provides hundreds of meals and jobs a day.

This city now competes with cities like New York, Austin, Los Angeles, Portland and other great cities where well-known chefs are on food trucks as well as in restaurants, and consumers are making the decision of how, when, where and what types of food items they would like to have available to them and what times of day they want them.

While I am in support of creating new regulations, as you review and make your decision about the proposed new regulations, please:

1. Do not grant the District Department of Transportation the responsibility for enforcing unduly restrictive minimum sidewalk width lengths for mobile vending (both within the Central Business District and beyond). That would place excessive, anti-competitive and wholly unnecessary limitations on the ability of mobile food vendors to serve customers in some of the most attractive vending locations in the District.
2. Make sure any sidewalk width restrictions would not unnecessarily limit the ability of mobile food vendors to serve customers and that if any sidewalk width rule be created, that said width rule be evenly and fairly applied to all brick-and-mortar businesses regarding patio seating as well as Stationary Roadway Vendors.
3. Create a Mobile Vending Parking Permit (MVPP) that allows parking at any metered location in the city for a period of up to 4 hours. The fee for such a permit is \$480, which is the equivalent of paying to access a metered space for up to four hours a day, five days a week per calendar quarter. In addition to allowing mobile vendors to park for up to four hours at any legal parking spot, this permit would also be required to participate in Mobile Roadway Vending Locations.
4. Allow food trucks to be open and operate the same hours as restaurants. There is no reason based in consumer health and safety for a food truck to close before last call of any tavern or bar.
5. Make it possible for vending businesses to hire “helper employees” under one master vending license so that a business does not need to hold multiple vending licenses.
6. Make sure Vending Development Zones are not used to create “Food Truck Free Zones” that limit or eliminate options for consumers.
7. The comments of the Washington, DC Food Trucks Association as well as all comments submitted to DCRA are taken into full consideration.

Thank you in advance for your time.

Sincerely,

Thomas MacDonald

Co-Owner/ Operator DC Slices