

**HEARING ON BILL 18-967**

**THE FOOD, ENVIRONMENTAL, AND ECONOMIC  
DEVELOPMENT IN THE DISTRICT OF COLUMBIA  
(FEED DC) ACT OF 2010**

**TESTIMONY BEFORE THE COMMITTEE ON GOVERNMENT OPERATIONS  
AND THE ENVIRONMENT AND ECONOMIC DEVELOPMENT**

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ON BEHALF OF THE **WARD 8 FARMERS' MARKET COOPERATIVE**

Janet Choi and Jennie Howard  
Student Attorneys  
The Community and Economic Development Law Clinic  
The Washington College of Law, American University  
4801 Massachusetts Avenue, N.W.  
Washington, D.C. 20016

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## **I. Introduction**

The Community and Economic Development Law Clinic (“CEDLC”) at the Washington College of Law provides transactional legal services for clients engaged in neighborhood-based community development.<sup>1</sup> As student attorneys in CEDLC, we represent the Ward 8 Farmers’ Market (“W8FM”) under the supervision of Professor Susan Bennett. A component of our representation for W8FM involves legislative advocacy regarding the FEED-DC Act of 2010. We submit this testimony to inform the committee about the invaluable ways in which farmers’ markets, such as W8FM, improve the affordability and accessibility of healthy produce in underserved communities. Furthermore, we offer recommendations on ways the legislation may help farmers’ markets contribute to its goal of improving access to healthy food.

## **II. The Ward 8 Farmers’ Market**

W8FM was formed twelve years ago by concerned community members in response to the inadequacy of healthy food choices in the District of Columbia’s underserved Ward 8.<sup>2</sup> After the closing of the only large-scale supermarket serving the ward, the W8FM cooperative was concerned that Ward 8 residents could only rely on the processed and junk food-laden corner stores as their first source for food supplies. Operating on Saturday mornings, plus Tuesdays for part of the season, the W8FM provides access to organic fruits, vegetables, meats, and whole grain baked goods. Despite the arrival of Giant Food in the ward, W8FM remains a unique source where locally grown produce with premium nutritional value is sold in an environment void of the marketing influences of processed and junk food industries.

W8FM provides an invaluable service to the most underserved population in DC. The residents in Ward 8 have an obesity rate of 42%, the highest in DC.<sup>3</sup> These high obesity statistics correlate with the lowest rate of fruit and vegetable consumption by Ward 8 residents. The ward has the least amount of “category A” food sources, defined as farmers’ markets and large- and small-scale grocery stores that provide fresh produce. Disturbed by these negative statistics, the residents of Ward 8 have expressed concern about their health by voicing their desire for greater access to fresh fruit and vegetables. Ward 8 has the highest percentage of residents, at 91%, who would support legislation mandating restaurants to provide nutritional information on their menus and signs.<sup>4</sup>

## **III. Farmers’ Markets Uniquely Improve Affordability and Accessibility to Healthy Food in Underserved Areas**

The FEED-DC Act of 2010 presents the committee with a valuable opportunity to include and support farmers’ markets in comprehensive legislation to eliminate food deserts. Farmers’ markets provide a unique alternative to brick-and-mortar supermarkets and corner stores for improving the affordability and accessibility of healthy produce in underserved areas. Seasonal farmers’ markets can facilitate the delivery of produce from farm to table in low-income communities by means which conventional supermarkets and corner stores can not. Selling directly to consumers can also translate into lower prices than those in nearby grocery stores.

## **A. Farmers' Markets Provide An Exclusive Forum For Food Assistance Programs**

Farmers' markets in underserved communities, including the W8FM, often accept Supplemental Nutrition Assistance Program ("SNAP") coupons through Electronic Benefit Transfer ("EBT") systems.<sup>5</sup> According to Kevin Concannon, USDA Under Secretary for Food, Nutrition, and Consumer Services, "By welcoming SNAP benefits, farmers markets provide access to fruits and vegetables and other healthy foods which may not otherwise be easily available."<sup>6</sup>

The Special Supplement Nutrition Program for Women, Infants, and Children ("WIC") is a federally funded nutrition program that provides nutrition education, breastfeeding promotion, and supplemental food to pregnant women, new mothers, infants, and children up to age 5.<sup>7</sup> In particular, WIC supports the Farmers' Market Nutrition Program ("FMNP"), known as "Get Fresh" in the District of Columbia, which operates from May 1 to November 30.<sup>8</sup> Under DC's FMNP Program, WIC participants receive five checks worth \$5 each to purchase fresh fruits and vegetables from eligible farmers' markets. The farmers' markets then submit the coupons to a bank or designated state agency for reimbursement. In 2010, over \$314,000 worth of coupons were redeemed at DC farmers' markets.

WIC also supports the Senior Farmers' Market Nutrition Program ("SFMNP"). Through the USDA's Food and Nutrition Service, SFMNP granted the DC over \$159,000 in 2010 to provide low-income seniors with coupons that can be exchanged for eligible foods (fruits, vegetables, honey, and fresh-cut herbs) at farmers' markets.<sup>9</sup> Seniors aged sixty or over are eligible to participate in the SFMNP and receive six checks valued at \$5 each, for a total value of \$30.

Without the existence of farmers' markets in underserved communities, such as the W8FM, beneficiaries would be unable to spend their coupons without the considerable time and cost burdens of traveling to other neighborhoods. The benefits would likely remain unused. W8FM provides an invaluable forum for WIC recipients to spend their benefits, obtain nutritious food for their families, and contribute to the economic development of a local, sustainable food system.

## **B. Farmers' Markets Provide Immediate Access to Quality, Locally Grown, and Nutritious Produce**

Shopping at a farmers' market like the W8FM offers many health benefits that are not available through traditional bricks-and-mortar supermarkets and corner stores.<sup>10</sup> At a farmers' market, the fruits and vegetables have been harvested when truly ripe and brought to market immediately thereafter, thus retaining premium levels of nutrients and antioxidants. In contrast, many supermarket chains sell produce that has been picked prematurely, often chemically treated, and shipped cross-country, thus losing a considerable percentage of nutritional value while appearing fresh. Some produce at supermarket chains is sourced from foreign countries where production facilities are

infrequently inspected by the USDA. Additionally, supermarket produce frequently originates from large producers who use heavy pesticides and petroleum-based fertilizers. By contrast, farmers' market produce is generally organic and pesticide-free, originating from small-scale farms.

### **C. Farmers' Markets Provide Nutritional Education to Their Customers**

Farmers' markets provide low-income communities with a unique venue for nutrition education, cooking demonstrations, and ideas on preparing foods. Without concurrent education, increased access to healthy foods can only provide short-term, limited benefits. However, farmers' markets ensure long-term progress by educating the community in how to lead a healthy lifestyle and keeping the consumers interested in discovering produce and recipes. The W8FM is a model for demonstrating how the unique feature of nutrition education at farmers' markets can improve both access and consumption of healthy foods in underserved communities.

W8FM partners with the Center for Nutrition, Diet, and Health at the University of the District of Columbia ("CNDH")<sup>11</sup> and the Summit Health Institute for Research and Education ("SHIRE")<sup>12</sup> to provide education in nutrition for its low-income customers. "Healthy Eating Day," hosted by W8FM on October 16, 2010, illustrates the possibilities for nutrition education at farmers' markets. At the event, CNDH provided recipes incorporating produce sold at the market and distributed brochures detailing nutritional information, cooking ideas, and recipes for every vegetable sold by the farmers. SHIRE provided a chef who demonstrated a recipe and served the meal to customers. Additionally, SHIRE taught the customers about Body Mass Index, heart rates, and the importance of exercise through an interactive song and dance experience. This education spurred low-income residents to become interested in the benefits of a healthy lifestyle — an incentive not offered at traditional supermarkets and corner stores.

### **D. Farmers' Markets Donate Produce Through Gleaning Programs and Corner Store Initiatives**

Farmers' markets in food deserts improve accessibility to healthy produce for adults and children through gleaning programs and corner store initiatives. Gleaning is the collection of food that would otherwise go unused or unharvested. Farmers' market gleaning programs involve gathering a certain amount of the fresh produce which is not sold at the end of a market day and giving it to local nonprofits such as local food banks and pantries, as well as other organizations that provide nutritious food.<sup>13</sup> The charities that are the recipients of gleaning are referred to as "gleaners." Some markets, like W8FM, buy unsold produce from farmers through a "buy-back" program, and this produce may be available for gleaning. The W8FM, for instance, designates a portion of its buy-back for gleaners.

In food deserts, corner stores are the most convenient, and sometimes only, locations to buy food, but they usually do not carry fresh produce. Some farmers' markets, through

corner store initiatives, increase the availability of healthy food and produce. W8FM designates the remaining portion of its buy-back to support its corner store initiative.

Such programs offer critical channels to fight childhood obesity. Generally, gleaning gives low-income children and families better access to healthy food, and many specific programs, such as DC's Children of Mine, target childhood hunger through after-school programs as part of its mission. In addition, corner stores are frequent destinations of children on the way to and from school. Without the involvement of farmers' markets through corner store initiatives, these children can only buy highly processed and junk foods and do not even have the option to buy healthy food. A 2009 study by *Pediatrics* revealed that urban children in 4th through 6th grades who shopped at corner stores before or after school purchased approximately 356 calories in non-nutritive and energy dense foods a day.<sup>14</sup> For many children, such habits would account for an additional 3,560 calories a week. Considering that a pound of body fat equates to 3,500 calories, these statistics are devastating.

W8FM, for example, collaborates with Children of Mine, an after-school shelter that provides hot meals to underprivileged children, and allows the organization to glean their produce after the Saturday market. Therefore, the children at the shelter are able to receive a hot meal comprised of nutritious fresh produce, instead of pre-packed or frozen foods. In addition, W8FM piloted a Corner Store Initiative with three local corner stores in Ward 8 through a grant from the Capital Area Food Bank.<sup>15</sup> The Board of Directors for W8FM delivers unsold produce to the corner stores after the market, places the produce prominently on the shelves, and requires the corner store to charge appropriately affordable prices. This produce reaches consumers who do not attend the farmers' market, thereby expanding accessibility to fresh produce.

#### **IV. The FEED-DC Act Can Improve Affordability and Accessibility to Healthy Foods By Including Provisions Pertaining to Farmers' Markets**

Farmers' markets have the unique ability to improve affordability and accessibility to healthy foods in low-income neighborhoods. Their merits include acceptance of farmers' market-specific food assistance coupons, high quality produce, nutritional education, and corner store initiatives. Despite their commendable mission and their tenacity, farmers' markets, such as W8FM, face continuous financial and regulatory battles. The FEED-DC Act could effectively relieve concerns that farmers' markets in low-income communities face and stimulate their ability to increase access to healthy foods. The following are some farmers' market-specific suggestions, many of which have already been enacted across the nation, for inclusion in the provisions of the FEED-DC Act.

##### **A. Competitive Grants for Farmers' Markets**

Despite their invaluable function, farmers' markets in low-income communities and food deserts struggle with self-sustainability and often operate through government grants. Therefore, DC, like many states nationwide, should mark these non-traditional food

sources as eligible for any competitive grant funds within the FEED-DC Act. Eligibility for competitive grant funds should be open to any 501(c) organization, as opposed to strictly 501(c)(3) entities, as many farmers' markets are 501(c)(12) organizations. To ensure the focus remains on low-income neighborhoods, the FEED-DC Act could place additional eligibility requirements on the farmers' markets receiving funds.

Pennsylvania's Farmers' Market Development Grant Program<sup>16</sup> proposed providing funding to farmers' market under specific eligibility requirements. Among these requirements are directions to use the funds to (1) subsidize promotional materials and media outreach; (2) hire staff to manage and operate the market; (3) purchase tables, stands, and display materials; or (4) conduct outreach programs to increase participation in foods assistance programs.

Additionally, §262 of the New York Code: "State Aid for Farmers' Markets"<sup>17</sup> stipulates specific criteria for farmers' markets to obtain competitive grants. The commissioner must determine whether the proposed farmers' market project has a positive impact on the economy of the area to be served, whether the local community will participate in the project, the extent to which local farmers would financially benefit, whether the monies would impact a broad geographic constituent, and the extent to which the proposed project would foster economic development in the community.

New York and Pennsylvania enumerated important ways that farmers' markets may use competitive grants. The FEED-DC Act can expand the non-exhaustive list of grant eligible programs to include buy-back initiatives, which guarantee participating farmers a set sale of produce that is then donated or distributed by the farmers' market to local corner stores and hunger-relief charities. Buy-back programs are integral to attract and retain farmers in markets in underserved areas, considering farmers have the choice to participate in farmers' markets in more affluent neighborhoods and face less financial risk.

In fact, W8FM believes that the greatest obstacle to attracting and retaining local farmers to farmers' markets in food deserts is the uncertainty of reaching a critical mass of sales to justify the travel and effort, as well as to compensate for the opportunity cost of forsaking an opportunity to participate in a farmers' market in a more affluent neighborhood on that day. Through a grant from the Capital Area Food Bank, W8FM has been able to combat this effect by offering a buy-back program, which buys up to a certain amount of the farmers' produce at the end of the market day. (Currently, W8FM funding for the buy-back program is slated to end after this season.) Buy-back programs also provide a source of produce for gleaning programs and corner store initiatives. After each market, the board of directors distribute the produce to local corner-stores and gleaners. Thus, buy-back programs such as this ensure a steady distribution of farmers' market produce to appropriate sites that address the problem of food deserts. Farmers' markets with buy-back programs like W8FM represent an efficient delivery system for wholesome food in low-income communities by delivering produce through three separate channels: the market itself, the corner stores, and the gleaners.

## **B. SNAP Matching Programs Provide Incentives for the Purchase of More Healthy Foods**

SNAP matching and subsidizing programs offer financial incentives for SNAP recipients to buy larger quantities of healthy food. As these incentives are conditioned on use at participating farmers' markets, SNAP recipients encounter lower barriers to the advantages provided by farmers' markets, such as quality, locally grown produce and nutrition education.

The Food Project and the City of Boston sponsor the "Boston Bounty Bucks" program in an effort to increase the accessibility of locally-sourced farm products in Boston's farmers' markets.<sup>18</sup> The program promises that all purchases made with SNAP benefits are matched up to \$10, so that SNAP recipients may purchase their fresh produce at 50% off, up to \$20. The program, with more than 82,000 participating Boston residents, is easily implemented. SNAP recipients visit any participating farmers' market, select their produce, and take the bill and their EBT to the Market Information Table. The Market Manager then debits the EBT at the reduced price and provides the customer with Boston Bounty Bucks equal to the amount of the purchase, which the customer then hands over to the farmers to pay for their produce.

In New York City, the Department of Health and Mental Hygiene launched its "Health Bucks" program in 2005 to encourage residents to buy fresh fruits and vegetables at farmers' markets.<sup>19</sup> Health Bucks motivate SNAP recipients by providing a subsidy of \$2 that can be redeemed for fruits and vegetables for every \$5 spent with an EBT card at a participating farmers' market. In 2009, the program generated \$220,000 in sales of fresh, locally grown produce, and food stamp sales doubled from 2008 to 2009.

In 2009, three FRESHFARM Markets in the District of Columbia (H Street, White House, and the US Dep't of Health and Human Services) successfully implemented a "Double Dollars" program, supported by the Wholesome Wave Foundation's Double Value Coupon Initiative.<sup>20</sup> The program doubles the value of SNAP benefits, thereby increasing access to healthy food. For example, an identical program in Holyoke, Massachusetts saw sales using food stamps increase by 290 percent.<sup>21</sup>

The success of SNAP matching and subsidy programs in increasing accessibility and affordability of healthy foods in underserved communities is undeniable. However, the "Double Dollars" program supported by Wholesome Wave is limited due to its reliance on charitable donations for operation. The FEED-DC Act could provide funding for a comparable SNAP benefit matching or subsidy program to attain similar success within DC in improving food accessibility and affordability.

## **C. Remote Access and Prescreening for SNAP Registration**

A considerable segment of W8FM customers consists of SNAP recipients. However, W8FM routinely has customers attend the market who unknowingly qualify for SNAP benefits or do not have the knowledge or means to register for the program. Too

frequently, the market advises customers of their eligibility but cannot lower barriers to access to those benefits. Customers must leave the market to register and wait to receive their EBT cards, a process which takes up to several weeks. The FEED-DC Act could implement remote access and pre-screening programs to streamline the use of SNAP benefits at farmers' markets, thereby increasing accessibility to healthy food sources in low-income communities.

The City Heights Farmers' Market in San Diego, California demonstrates the success of remote registration and pre-screening tools.<sup>22</sup> The City Heights Market Manager, in conjunction with the San Diego Hunger Coalition, provides efficient computer pre-screening to determine SNAP eligibility for the market's customers. If the customer qualifies, the market helps the customer fill out and mail in the initial round of paperwork, thus eliminating one of the most time consuming and overwhelming steps of the process. The program also ensures accessibility to healthy produce to residents whose primary language is not English by providing multilingual pre-screening tools in Spanish, and other languages. The operation successfully identifies barriers to access and increases enrollment without requiring costly resources.

The FEED-DC Act could direct the Office of the Deputy Mayor to assign Department of Human Services, or the appropriate agency, to formulate a program for remote pre-screening for SNAP eligibility, perhaps with the technical assistance of the Office of the Chief Technology Officer ("OCTO"). In addition, the Department of Human Services, or the appropriate agency, can distribute a one-time \$5 coupon through participating farmers' markets for people to come to the market and apply for SNAP. The coupon would only be valid for purchases of produce at participating farmers' markets. This encourages SNAP-eligible people to obtain food assistance in the long run, and in the short run, enable them to explore and buy healthy food at the farmers' market.

DC could also take a progressive step through the FEED-DC Act by expanding upon the City Heights Farmers' market model. By facilitating access technologies, an expanded program would bring eligible customers into food benefit programs from remote locations such as farmers' markets or community healthy events. Immediate registration into SNAP would allow customers to use their benefits at the market that day, without having to return several weeks later.

#### **D. Streamlined Procedures and Regulations for Farmers**

The farmers at the W8FM, and throughout DC, face financial and time-consuming burdens due to the various logistical challenges and challenging regulatory policies affecting farmers. Consequently, farmers must often increase the price of their produce to compensate for their financial hardships. The FEED-DC Act could eliminate or alleviate many of these burdens, thereby allowing the farmers to reduce the cost of their produce and attracting the participation of new farmers.

First, farmers must register with various DC Government entities to operate at a market. They must register with the Department of Health for WIC registration, and with the

Department of Consumer and Regulatory Affairs for weights and measuring device registration. Many farmers own farms in Pennsylvania and must make several expensive trips into DC to complete the necessary registrations. The FEED-DC Act could eliminate the complicated process by streamlining the registration within one centralized agency.

Second, food benefit programs including SNAP and WIC require mandatory training for farmers. The training is effective, but the logistics of the meetings are burdensome. Notably, the DC Department of Health offered only one training day for the WIC program, which took place on March 10th, 2010 in Greenbelt, Maryland.<sup>23</sup> The FEED-DC Act could ensure a selection of dates for food benefits training and ensure that all programs are folded into one training program. In addition, the DC Department of Health could work out an agreement with Maryland to accept training across District and state lines.<sup>24</sup>

Finally, the General Business License required by the DCRA does not offer prorated fees for farmers despite the seasonal nature of farmers' markets. Although the W8FM operates from May to November, the farmers must pay an annual fee. Therefore, farmers must raise their prices to cover their bottom line. The FEED-DC act could require the DCRA to prorate business license fees to cover the farmers' seven months of operation. At a total cost of \$324.50 (\$110 fee, \$77 application, and \$27.50 activity fee), a prorated fee could save each farmer approximately \$135 each year, which would be directly passed along to low-income communities through lower priced produce.

## **V. Conclusion**

Farmers' markets are a unique source of fruits and vegetables for low-income urban residents. Communities located in DC's food deserts benefit from farmers' markets, which provide a venue for using federal nutrition program benefits, obtaining premium quality produce, communicating nutrition education, donating to corner stores, and fostering healthy lifestyles. The FEED-DC Act presents the committee with an opportunity to bring farmers' markets into its legislative efforts to enhance the accessibility and affordability of healthy foods in low-income populations and to implement a truly comprehensive approach to eliminating food deserts.

Thank you for your leadership in initiating this vital legislation and the opportunity to submit written testimony concerning Bill 18-967.

## **VI. Contact Information**

If you have questions concerning any information contained within this testimony, please contact us at your earliest convenience.

Respectfully submitted,

Jennie Howard and Janet Choi  
Student Attorneys  
The Community and Economic Development Law Clinic  
The Washington College of Law, American University  
4801 Massachusetts Avenue, NW  
Suite 417  
Washington, DC 20016-8184

T: 202-274-4147 Ext. 53217

Email: Jennie Howard - [Jh8208a@american.edu](mailto:Jh8208a@american.edu)  
Janet Choi - [jc5916a@american.edu](mailto:jc5916a@american.edu)

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<sup>1</sup> The Community and Economic Development Law Clinic, The Washington College of Law, American University, <http://www.wcl.american.edu/clinical/community.cfm>.

<sup>2</sup> The Ward 8 Farmers' Market, <http://sites.google.com/site/ward8farmersmarket/>.

<sup>3</sup> "Obesity in the District of Columbia", Government of the District of Columbia, Department of Health, Center for Policy, Planning and Evaluation, January 2010, <http://newsroom.dc.gov/file.aspx/release/19808/FINAL%20Obesity%202009%20Report.pdf>

<sup>4</sup> Id.

<sup>5</sup> USDA Food and Nutrition Service, "Supplemental Nutrition Assistance Program", <http://www.fns.usda.gov/snap/ebt/fm.htm>

<sup>6</sup> Michelle Greenhalgh, Food Safety News, "USDA Releases Farmers Market Guide to SNAP", Jun. 28, 2010, available at <http://www.foodsafetynews.com/2010/06/usda-releases-farmers-market-guide-to-snap/>

<sup>7</sup> USDA Food and Nutrition Service, "Women, Infants, and Children", <http://www.fns.usda.gov/wic/>

<sup>8</sup> District of Columbia, Department of Health, Farmers' Market Nutrition Program, [http://dchealth.dc.gov/DOH/cwp/view,a,1371,q,582102,dohNav\\_GID,1787,dohNav,%7C33120%7C33139%7C.asp](http://dchealth.dc.gov/DOH/cwp/view,a,1371,q,582102,dohNav_GID,1787,dohNav,%7C33120%7C33139%7C.asp)

<sup>9</sup> District of Columbia, Department of Health, Senior Farmers' Market Nutrition Program, [http://dchealth.dc.gov/doh/cwp/view,a,1373,q,582739,dohNav\\_GID,1801,dohNav,%7C33183%7C33186%7C,.asp](http://dchealth.dc.gov/doh/cwp/view,a,1373,q,582739,dohNav_GID,1801,dohNav,%7C33183%7C33186%7C,.asp)

<sup>10</sup> Marianne Gary Wolf et. al, "A Profile of Farmers' Market Consumers and the Perceived Advantage of Produce Sold at Farmers' Markets," AgEcon, Research in Agricultural and Applied Economics, University of Minnesota, <http://ageconsearch.umn.edu/bitstream/26768/1/36010192.pdf>

<sup>11</sup> The Center for Nutrition, Diet, and Health, The University of the District of Columbia, <http://www.udc.edu/ces/cndh/about.htm>

<sup>12</sup> The Summit Health Institute for Research and Education, <http://www.shireinc.org>.

<sup>13</sup> Max Finberg, Director of the USDA Center for Faith-Based and Neighborhood Partnerships, "Share the Harvest: Your farmers Market Can Help End Hunger," <http://farmersmarketcoalition.org/share-the-harvest/>

<sup>14</sup> Kelley Borradaile et. al, "Snacking in Children: The Role of Urban Corner Stores," Pediatrics Vol. 124, No. 5, Nov. 2009, available at <http://pediatrics.aappublications.org/cgi/content/full/124/5/1293?maxtoshow=&hits=10&RESULTFORMAT=&fulltext=karpyn&searchid=1&FIRSTINDEX=0&sortspec=relevance&resourcetype=HWCIT>

<sup>15</sup> Latoya Peterson, "Better Farmers Market", The American Prospect, May 24, 2010, available at [http://www.prospect.org/cs/articles?article=better\\_farmers\\_markets](http://www.prospect.org/cs/articles?article=better_farmers_markets)

<sup>16</sup> House Bill # 2472 (2006).

<sup>17</sup> New York Code § 262 (2006).

<sup>18</sup> The Food Project, "Boston Bounty Bucks", <http://thefoodproject.org/bountybucks>

<sup>19</sup> Jennifer 8. Lee, "Sales Using Food Stamps Double at Greenmarkets," <http://cityroom.blogs.nytimes.com/2009/11/23/food-stamp-sales-double-at-citys-greenmarkets/>; NYC Department of Health & Mental Hygiene, "Farmers' Markets Initiatives: Promoting Fresh Fruits and Vegetables in Underserved Communities 2010 Report," <http://www.nyc.gov/html/doh/downloads/pdf/cdp/cdp-farmers-market-report.pdf>

<sup>20</sup> Wholesome Wave, "Double Value Coupon Program", <http://wholesomewave.org/what-we-do/double-value-coupon-program/>

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<sup>21</sup> Nora Lewis, "DC Farmers' Markets to Double The Value of Food Stamps," Bread For The City, July 2., 2009 available at <http://breadforthecity.blogspot.com/2009/07/dc-farmers-markets-to-double-value-of.html>

<sup>22</sup> City Heights Farmers' Market, [www.cityheightsfarmersmarket.com](http://www.cityheightsfarmersmarket.com)

<sup>23</sup> "WIC at Farmers Markets: Will DC Miss an Opportunity?" DC Food For All, Feb. 26th, 2010.

<sup>24</sup> <http://dcfoodforall.com/2010/03/letter-from-freshfarm-to-dc-make-wic-work/>