

September 4, 2012

Dr. Jonathan Fielding, Director
Los Angeles County Health Department
313 N. Figueroa Street
Los Angeles, CA 90012

RE: Strong Opposition to Possible Relaxation of Food Truck Standards

Dear Dr. Fielding:

On behalf of the Neighborhood Council of Westchester/Playa, I am writing to express our opposition to any relaxation of the Los Angeles County Department of Public Health standards for food trucks that is not also provided to brick-and-mortar restaurants. We believe that the contemplated relaxation in standards, particularly the restroom standards, would endanger public health and have a negative impact on our community.

We are extremely concerned about the quality of food that is served by food truck vendors and how the contemplated relaxation in standards will impact the public health. The most common cause of foodborne illness at both mobile food trucks and restaurants is bare hand contact with food. An estimated 76 million cases of foodborne disease occur each year in the United States, according to the U.S. Centers for Disease Control and Prevention, and inadequate hand washing by individuals who prepare, process and handle food, means bacteria and fecal-oral transfer of foodborne illnesses continues to be a problem.

This is particularly true of food trucks, where employees often have inadequate hand-washing facilities—one of the primary reasons the Department of Public Health instituted the current restroom requirements in the first place.

If brick-and-mortar restaurants throughout the county are required to have restrooms and hand-washing facilities, we believe the same standard should apply to food truck owners. Any leniency of standards for accessing clean water sources for food preparation and employee hygiene will have a negative impact on public health. Simply put, regulations regarding food preparation among food trucks should be science-based and designed to protect the public health, not relaxed simply because the food truck movement is currently popular or the industry is lobbying hard to eliminate the restroom requirement to make it easier for food truck operators to conduct business.

While a mobile operation can be opened on a shoestring for \$20,000 to \$30,000, a full-fledged restaurant can start at ten times that amount and quickly rocket way, way up. While a mobile vendor might have zero to very few additional employees, even a small café requires at least a dozen. With dependent staff and lots of money invested comes responsibility and, often, a keener focus on adhering to the county's regulations. We are concerned that the reduced barrier to entry and the mobile nature of food trucks makes their operators more likely to ignore health standards, either purposely or through ignorance, and that the county should be looking at better ways to enforce existing standards instead of relaxing those standards.

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Furthermore, we encourage the Los Angeles County Department of Public Health to engage with local residents, chambers of commerce, neighborhood councils, and other critical stakeholders, as it explores this issue, which has a real and direct impact on our community and its health. A comprehensive outreach campaign that engages the community should be conducted so that everyone can understand the ramifications of any proposed relaxation in standards before any new regulations are contemplated or implemented.

Food trucks are obviously a hot industry right now and, when properly operated, can be a popular and beneficial addition to the community. However, we believe that public health must be our top priority. If brick-and-mortar restaurants are required to have restroom and hand washing facilities, then this same standard should be appropriately applied to food trucks. Any relaxation of standards for accessing clean water sources for food preparation and employee hygiene will only serve to reduce the hygienic preparation of food and increase foodborne illnesses.

For these reasons and more, we strongly encourage the Los Angeles County Department of Public Health to reconsider any relaxation in health standards for food trucks.

Sincerely,

NEIGHBORHOOD COUNCIL OF WESTCHESTER/PLAYA

Cyndi Hench
President

cc: Mr. Angelo Bellomo, Director Environmental Health
Mr. Terrance Powell, Director of Enforcement

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