

BUSINESS IMPROVEMENT AREA

March 27, 2014

City Clerk
Toronto City Council Members
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Toronto City Councillors:

RE: LS27.1- New Opportunities for Toronto's Street Food Vendors

On March 14, 2014, we submitted our support letter to the Licencing and Standards Committee commending the efforts of Municipal Licensing and Standards staff for a well-researched and thorough report, which offered recommendations, which are not only fair and reasonable, but gave consideration to all parties involved. The report addressed the need to have a balanced approach to mobile food operations and existing licensed restaurants.

Our BIA fully supports:

- the continued moratorium in Wards 27, 28 & 20 on boulevard vending;
- the restriction, whereby truck food vendors cannot be located within a 50 metre RADIUS of operating licensed food establishment, which is on par with other cities such as Chicago;
- that the Executive Director will notify businesses within 25 metres of the outermost perimeter of the Mobile Vending Zone, the Board of Management of the local BIA and the local Councillor, indicating they have fourteen (14) days to object in writing;
- Only 2 vending trucks can operate, in any given block, at one time.

Under the new bylaw, food truck operators will be provided with upwards of 350 new locations to operate, which includes many areas of Toronto, which previously did not allow any type of mobile food vending, for a relatively low annual fee of \$5,066, when compared to rent and commercial property tax on a permanent establishment. One food truck deputant advised the Committee that there were only 25 food trucks operating in the city and with this in mind, 350 new locations should provide the food trucks with numerous opportunities to located, especially in areas that are currently underserved by food operators.

The City Staff report presented a balanced approach to mobile vending which is fair for all. The staff took many important factors into account, to include their understanding of bylaw enforcement and the current and ongoing challenges, which enforcement staff faces on a daily basis.

At the March 18th meeting, it was very disappointing to hear certain Councillors disregard the efforts and research provided by City Staff and essentially indicate that they would fully support mobile vending, without any restrictions. Filling up on-street parking spaces, with end to end food trucks was suggested as a welcome form of enterprise. Two deputants introduced themselves and their new mobile fashion business, to the Committee, as they have set up a mobile store. This concept could discourage many entrepreneurs from occupying permanent space and opting for mobile business only.

RECEIVED
CITY CLERK'S OFFICE
SECRETARIAT 1207
2014 MAR 28 PM 1:28



Competition was mentioned on numerous occasions, which is a part of doing business, but it must be fair competition. **Depending on size and location, a 'bricks and mortar' business would be lucky if they only paid \$5,066 to cover 2 months of commercial property taxes alone!**

If the City elects to ignore the Staff report recommendations and give 'carte blanche' to mobile vending, then the City should expect to see:

- unlimited numbers of truck vendors of all types;
- more noise from generators;
- more fumes from exhaust fans and pipes;
- the possibility of food trucks from large corporations such as McDonald's, Tim Horton's etc.
- completely blocked storefronts of all types of merchants - fashion, galleries, salons etc. (10 metre trucks could easily cover 2 to 3 storefronts) ;
- fewer on-street parking spaces available for customers resulting in less revenue to the City;
- less sidewalk space for pedestrians to accommodate food truck patron queues;
- more vacant commercial spaces, which will have a significant economic impact, to include job losses and will ultimately impact the City's bottom line, when fewer tax dollars are collected.

It is important to consider the existing 'bricks & mortar' food operators to include their start-up costs, their investment in a community and ongoing carrying costs! Our BIA alone is home to over 165 members, who operate food establishments, ranging from fast food to fine dining. Many of these are independent, family/owner operated businesses, which solely rely on one location, where they pay rent, taxes, operating costs, license fees, employer taxes etc. They are small business operators, who provide employment and work with tight margins. They are often tied into their locations for a determined period of time and they do not have the option of moving.

We encourage Toronto City Council to give full regard and support to the efforts, research and recommendations that Municipal Licensing and Standards staff have presented in their original report and ask that you do not support the amendments made by the Licensing and Standards Committee.

Thank you.

Yours truly,



Dr. David Homer
Traffic Committee Chair