A Hungry Industry on Rolling Regulations: A Look at Food Truck Regulations in Cities Across the United States

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A HUNGRY INDUSTRY ON ROLLING REGULATIONS:
A LOOK AT FOOD TRUCK REGULATIONS IN CITIES ACROSS THE UNITED STATES

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ABSTRACT

Although street vending has always been a part of the American food economy, in recent years, modern food trucks have become a dining trend that is sweeping the country. With the booming popularity of food trucks, cities across the country are considering ways to regulate the growing number of vendors selling convenient and creative meals to patrons. The purpose of this article is to provide an overview of regulations and ordinances that govern the operation of mobile food units, commonly known as food trucks, in a variety of American cities. Food trucks are regulated by local government agencies, which take a wide range of approaches. For example, in 34 of the nation’s largest cities, entire areas are off-limits to vendors, often including the most desirable commercial districts. Nineteen cities allow mobile vendors to stay in one spot for only short periods of time, forcing them to spend resources moving rather than selling. Five cities prevent vendors from stopping at all unless flagged by a customer, making it difficult to connect with buyers.

Despite the wide range of regulations, cities throughout the nation have seen food trucks become highly popular and financially successful, offering a large variety of food options to consumers. This article will analyze the different types of regulations, from strict to lenient to in-transition, that govern food trucks in localities across the United States. More specifically, it will look at cities with stringent regulations such as Chicago, Illinois and Dallas, Texas; cities with few regulations such as Indianapolis, Indiana and Philadelphia, Pennsylvania; cities undergoing change such as Washington, D.C. and Jersey City, New Jersey; and cities with food-truck-specific regulations such as Portland, Oregon and Los Angeles, California. Regulations are developing and changing across localities involving many competing interests. Some cities are attempting to balance those interests by regulating food and traffic safety without impeding the creation of a new and popular market in the food industry.
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I.

INTRODUCTION

Although street vending has always been a part of the American food economy, in recent years, modern food trucks have become a dining trend that is sweeping the country. From Los Angeles to St. Paul to Boston, food trucks are making their presence known, reaching consumers looking for convenient and creative meals. Even television shows such as “Eat Street” and “The Great Food Truck Race” have highlighted the thriving businesses.

Food trucks developed from the larger industry of street vending, including hot dog vendors and merchandise sellers. Historically, street vending has been a fixture of urban life, providing economic opportunities for many small businesses, especially immigrants and people with little income. In fact, 95 percent of New York City street vendors are immigrants, each supporting an average of four or five people, domestically and in their homelands. Street vending is a growing industry with over 760,000 street vending businesses operating in the United States in 2007, earning revenues over $40 billion.

A food truck is a mobile, miniature commercial kitchen that must meet the state sanitation requirements of a brick-and-mortar restaurant as well as be in compliance with additional local ordinances. The combination of low start-up costs, the ability to prepare food while mobile, and the utilization of social media have contributed to food truck success. The estimated cost to start a food truck is between $25,000 and $30,000, which is significantly less than the estimated $750,000 needed to launch a restaurant. By taking advantage of the relatively low costs, food trucks are able to sell inexpensive yet creative foods. Furthermore, they have gained momentum through social media, announcing their current locations via
Facebook and Twitter. Thus, the mobile food industry has become hip and innovative, with many upscale options.

Food truck operation is not an endeavor limited to small businesses. Established restaurants have pursued food trucks as a way to market new menu items, to fundraise for organizations, or to bring convenient lunches to consumers. Food trucks offer opportunities for food vendors of all shapes and sizes, but one factor that unites them all are the local regulations. The first step in breaking into the food truck industry is becoming knowledgeable about the applicable regulations.

II.

REGULATIONS GOVERNING THE FOOD TRUCK INDUSTRY

Confusing and outdated regulations in some regions have posed challenges for potential vendors and consumers. For example, in 34 of the nation’s largest cities, entire areas are off-limits to vendors, often including the most desirable commercial districts. Nineteen cities allow mobile vendors to stay in one spot for only short periods of time, forcing them to spend resources moving rather than selling. Five cities prevent vendors from stopping at all unless flagged by a customer, making it difficult to connect with buyers.

Despite the wide range of regulations, cities throughout the nation have seen food trucks become highly popular and financially successful, offering a large variety of food options to consumers. The first step in launching a successful food truck is building a knowledge base about local regulations in order to make well-informed business decisions.

This article will analyze the different types of regulations, from strict to lenient to in-transition, that govern food trucks in localities across the United States. More specifically, it will look at sites with stringent regulations such as Chicago, Illinois and Dallas, Texas; sites with few regulations such as Indianapolis, Indiana and Philadelphia, Pennsylvania; sites undergoing
change such as Washington, D.C. and Jersey City, New Jersey; and sites with food-truck-specific regulations such as Portland, Oregon and Los Angeles, California.

A. **SOME CITIES HAVE STRINGENT REGULATIONS THAT WERE ORIGINALLY INTENDED TO REGULATE ICE CREAM TRUCKS.**

In response to the onset of food trucks, some cities have applied their existing regulations that were initially put in place for ice cream trucks. As a result, many of these cities have strict regulations such as rules prohibiting vendors from being in certain places or requiring vendors to constantly move as would be expected for ice cream trucks.¹¹

Until recently, the food truck regulations in Chicago, Illinois were among the most stringent in the country. Chicago food vending regulations were initially intended to regulate ice cream trucks, even requiring that “all ice milk and other frozen dessert mix shall be obtained from sources approved by the Department of Health and shall be frozen not later than nine days past the date of pasteurization.”¹² Until recently, the reliance on old ordinances continued because of concerns about the freshness of food as well as traffic congestion.¹³ However, food trucks were required to meet the same sanitation requirements of all sellers of food, and a mostly pedestrian market makes traffic congestion unlikely.

Unlike most cities, Chicago initially banned mobile food preparation and only allowed the sale of already prepared and packaged foods.¹⁴ As a result, a hot dog vendor could not put Chicago-style toppings on a hot dog at the cart, nor could a taco truck top its tacos with fresh salsa for customers. Instead, all items must be prepackaged, resulting in the disposal of many plastic containers. On July 19, 2012, the Chicago City Council approved an expansion to the city’s mobile food ordinance to allow truck owners to prepare “food to order” on board their trucks.¹⁵ The expanded ordinance further provides food truckers the opportunity to park for free in newly created “food truck stands” in highly congested areas as well as legal metered spaces.
Under the previous ordinance, Chicago mobile vendors were not allowed to sell food for more than two hours on any one block or sell between the hours of 10:00 p.m. and 10:00 a.m.\textsuperscript{16} Although the two hour limit still applies, the new ordinance expands the time of operation and enables food trucks in Chicago to operate from 5:00 a.m. to 2:00 a.m.\textsuperscript{17} In addition, food trucks may not operate within 200 feet of a restaurant and must use mounted GPS devices in each truck so that the City and consumers can monitor their locations.\textsuperscript{18} In a dense city like Chicago, this may amount to a virtual ban from downtown, requiring intimate knowledge of where vendors can lawfully operate.

Thus, opinions are slowly changing. The president of the Illinois Restaurant Association, who once advocated for strict limits on where food trucks could sell, has recently expressed a desire “to come to a solution that is mutually beneficial to all of the business owners involved.”\textsuperscript{19} In Illinois, there is no universal opinion of the restaurant industry; some restaurant owners oppose food trucks while others restaurant owners own and operate food trucks.\textsuperscript{20} As food trucks become increasingly popular and as established restaurants become involved in the new market, regulations are likely to be relaxed.

Dallas, Texas is another city with relatively strict regulations. Street vendors are regulated by chapter 50 of the City Code, which governs Consumer Affairs, as well as chapter 17 of the City Code, which governs Food Establishments. The trucks may vend in the Central Business District after acquiring a specific concession license only valid for up to five sites.\textsuperscript{21} The number of licenses to be issued can be limited at the discretion of the Director of the Restaurant and Bar Inspection Division based on “factors related to the public health, safety, and welfare.”\textsuperscript{22} In the Arts and Warehouse District, food trucks cannot occupy a location for more than two consecutive hours, or more than four hours in any one day.\textsuperscript{23} Upon relocation, the
trucks must move at least 50 feet. Another limitation on location is a rule forbidding trucks from selling within two city blocks or 600 feet of a school from 7:30 a.m. to 4:30 p.m. on school days. Food truck business operation in general is limited to between the hours of 6:00 a.m. and 8:00 p.m.

Dallas food truck operators must maintain good relations with private property owners. To operate on private property, they must have written authorization from the owner for the specific times of operation as well as an agreement to use the toilet facilities or garbage receptacles, which must be within 600 feet of the mobile food vehicle.

While the regulations are stringent, Dallas has seen some recent changes that have relaxed key provisions. For example, in June of 2011, the City Council relaxed itinerary requirements by allowing trucks to submit a single general itinerary with the Department of Code Enforcement rather than submitting one each month with addresses and arrival times within 30 minutes. In December of 2011, the City Code was amended to “allow a retrofitted or converted motorized vehicle to be used as a mobile food preparation vehicle” where before only vehicles originally designed to be food trucks could operate.

Thus, even among those cities with the strictest regulations, food trucks are continuing to operate with success while exercising growing influence over local government decisions.

B. SOME CITIES ARE ONLY LIGHTLY REGULATED WITH FEW REGULATIONS IN PLACE FOR MOBILE FOOD VENDORS.

Because the food truck market has expanded so rapidly, some cities have found themselves without many regulations directly applicable to the operation of food trucks. As a result, they often simply require that mobile vendors meet the city’s basic sanitation requirements.
One example of a city with few food truck regulations is Indianapolis, Indiana. In December of 2010, the Indianapolis Department of Code Enforcement, the body responsible for issuing permits and licenses for vendors who serve customers on the sidewalks of Indianapolis, released a one-page document compiling mobile food truck operating restrictions. According to this document, food trucks must comply with the Food Vending Vehicle ordinance, Section 611-500 of the Revised Code for the Consolidated City of Indianapolis. Among the restrictions on food trucks is a prohibition selling food between the hours of 10:00 p.m. and 6:00 a.m. in the public right of way and from selling between the hours of 7:00 a.m. and 4:00 p.m. on school days within 1000 feet of a grade or junior high school. The vehicle must be legally parked, and all sales must be made from the curbside. Indicative of the initial purpose to govern ice cream vendors, several subsections regulate audible advertising and safety equipment, such as stop signs and flashing lights.

Likely because of the lack of stringent regulations beyond meeting traditional sanitation requirements, Indianapolis has seen significant growth in the number of food trucks. Furthermore, licensed commercial kitchens in Indianapolis provide shared space for trucks to rent hourly and use as a base for their food preparation. The first food truck in Indianapolis began business in June of 2010. By the spring of 2011, there were 21 food trucks operating within the city. Just one year later, there are now 47 food trucks selling a variety of food in Indianapolis. In fact, Indianapolis has been identified as a top growth spot for the food truck business, along with Minneapolis, Philadelphia, Raleigh, and Tampa.

Philadelphia is another location with few regulations specifically meant to regulate food trucks. Mobile food units in Philadelphia are regulated by the Office of Food Protection and Title 9 of the Philadelphia Code, which regulates Businesses, Trades and Professions. Section 9-
203 consists of merely 15 rules prohibiting the activity of street vendors and a few requirements. For example, a food truck shall not “create or become a nuisance, or increase traffic congestion or delay, or constitute a hazard to traffic, life or property, or an obstruction to adequate access to fire, police, or sanitation vehicles.”\textsuperscript{41} The trucks are also prohibited from selling between midnight and 7:00 a.m.\textsuperscript{42} The trucks must pay an annual fee of $2,750 to “reimburse the City for the loss of parking meter revenue and for the additional cost of regulation.”\textsuperscript{43}

In cities such as Indianapolis and Philadelphia, the small number of regulations means food truck operators know what is required of them and can run their business with significant freedom and flexibility.

C. \textbf{SOME CITIES ARE EXPERIENCING GREAT CHANGE IN THEIR REGULATIONS TO ACCOMMODATE MOBILE FOOD UNITS.}

Cities have responded to what is being called a food truck revolution in a variety of ways, each with different timelines. Local governments have been pressured to issue regulations appropriate to the mobile food business model by consumers advocating for dining options as well as food truck operators promoting their businesses.\textsuperscript{44} However, some traditional restaurants have voiced concerns over increased competition. Thus, a number of cities have spent months or even years proposing changes to regulations.\textsuperscript{45}

One city that has received significant media attention regarding its impending changes to food truck regulations is Washington, D.C. On January 20, 2012, the mayor of Washington, D.C., Vincent Gray, proposed rules to update the 35-year-old regulations governing food trucks, which were intended for ice cream trucks and did not foresee social media playing such a vital role.\textsuperscript{46} The old rules still being applied allow a food truck to stop only when hailed by a customer and to remain open only if there is a constant line of customers.\textsuperscript{47} Under the proposed rules, non-dessert trucks would be able to remain in a location for the duration allowed by the
parking meter or posted parking regulations. However, dessert trucks would still be limited to ten minutes without waiting customers. Food trucks would remain limited to the Vending Development Zones, and would still be required to close at 10:00 p.m. on weekdays and 1:00 a.m. on weekends.

According to the proposed rules, food trucks would continue to be expected to meet all of the food preparation and handling standards as articulated in Title 25 of the District of Columbia Municipal Regulations governing food operations and facilities, including inspections and approval from the Department of Health. In addition, they must comply with the maximum dimensions of vending vehicles: 18 feet 6 inches long, 8 feet wide, and 10 feet 6 inches high. They are also required to have a 5-gallon or larger fresh water tank, a waste water tank, a three-compartment sink, a generator-powered refrigerator to store foods at 41 degrees or below, a generator-powered freezer to store foods at 0 degrees or below, and adequate ventilation.

In spite of wide public support for the proposed rules, they have not yet been implemented because of some opposition. For example, the Restaurant Association of Metropolitan Washington is pushing for legislation that will allow food trucks to operate provided that the trucks pay adequate sales taxes and remain in designated areas of the city.

Regardless of the final outcome, Washington, D.C. promises to see some change in the near future regarding how the over 80 food trucks in the city can operate their businesses. In fact, the mayor has released a goal “to have the final version of new regulations” by the end of 2012. It is likely that the resolutions reached in Washington, D.C. will have implications for other cities around the country engaging in similar discussions about food trucks.

Jersey City’s food truck industry has also been largely defined by discussions of change. The effort to reform the regulations began in August of 2009 when Health Officer Joseph
Castagna became the subject of an investigation after issuing food truck permits, called “itinerant catering licenses,” in numbers that far exceeded the legal cap. More concerns arose in January of 2010 for the welfare of consumers when a truck had its license revoked for sanitary reasons.\(^{58}\) A memorandum to the Municipal Council in May of 2011 reviewed ordinances in other East coast cities and proposed requiring operators to attend a course “on the handling of food products,” to undergo criminal background checks, to submit to a pre-operation inspection, and to provide their own trash and recycling receptacles.\(^{59}\)

In addition to changes meant to protect consumers, changes were needed to protect the business viability of food truck operators. Old regulations prohibited food trucks from selling food or drink within 300 feet of any licensed eating establishment or remain in any location for more than 40 minutes during a four-hour period.\(^{60}\) On November 21, 2011, the Municipal Council amended Chapter 175 governing Itinerant Eating and Drinking Establishments. Rather than being 300 feet away from a restaurant, food trucks must be only 200 feet away; instead of moving after only 40 minutes, food trucks can remain stationary for up to 120 minutes unless they purchase a monthly parking permit.\(^{61}\) Food trucks can operate Monday through Friday from 6:00 a.m. until 9:00 p.m.\(^{62}\)

Although the process is not immediate, the food truck industry has effected change in some cities and will continue to do so in others.

D. **SOME CITIES HAVE WRITTEN CLEAR AND SPECIFIC ORDINANCES REGULATING CONTEMPORARY FOOD TRUCKS.**

Cities with longer histories of food trucks have had time to adjust their ordinances to reflect unique characteristics of the mobile food industry.\(^{63}\) Rather than relying on ice cream truck regulations, they have proposed and adopted regulations treating food trucks as small and portable kitchens and restaurants.
An example of a city with regulations narrowly tailored to food truck operation is Portland, Oregon. The state and the city have been able to respond to the mobile food market and find ways to regulate effectively because modern food trucks first began to spring up in Portland in the late 1980s. According to one journalist, “[u]nlike other cities where obtaining a cart and the necessary permits is cost-prohibitive or full of red tape and black-market pressure, here the city seems to encourage the proliferation of food carts.”

Most food truck regulations in Portland aim to promote consumer safety, requiring standards similar to those of traditional restaurants. For example, sick employees cannot work, and sores or cuts must have a watertight cover. Hand washing facilities must have warm running water, soap, paper towels, and a wastebasket. Potentially hazardous foods must be kept cold at 41 degrees or colder or kept hot at 140 degrees or hotter. A commercial dishwasher or three-compartment sink is used to wash, rinse, and sanitize all equipment and utensils. Food trucks must obtain a license after a review from the Environmental Health Department, and all workers must have a food handler’s certificate.

Food carts in Portland fall into four different classes based on the products sold and equipment required: Class I sells intact, packaged foods and potentially non-hazardous drinks; Class II sells unpackaged foods on hot and cold holding areas; Class III sells food items cooked and prepared on the unit without the cooking of raw animal food; and Class IV serves a full menu. Food carts must have a base of operation or be specially certified as a self-contained unit as long as it has all of the equipment and utensils a commissary would provide.

At any given moment, Portland has over 475 food trucks and carts available. The trucks are grouped and located in designated areas, usually surface lots called pods, and the concentrated number of mobile eating options creates the feel of a street festival. The city’s
support for food trucks comes from a study performed by the Portland Bureau of Planning and Sustainability in 2008, which found that the trucks promote social interactions, provide employment opportunities, and “have positive impacts on street vitality and neighborhood life.”

Due to such a long history of food trucks, Los Angeles, California, has regulations tailored specifically to the operation of food trucks and high standards for sanitation. Chapter VIII of the Los Angeles Municipal Code governs the city’s Traffic, including “Catering Trucks.” Trucks are required to obey all posted parking restrictions and to dispense food from the street side only. They must provide a trash receptacle in a conspicuous place clearly marked for patrons. In addition to traffic regulations, the trucks are bound by Chapter 10 of the California Retail Food Code. Under this chapter, a truck that will operate in any one location for over an hour must have permission to use a restroom located within 200 feet of the truck. The truck itself must have a ware-washing sink with three compartments large enough to fit the biggest utensil.

With accurate information about local regulations, entrepreneurs and restaurants can launch a successful mobile food business while contributing to the unique environment and culture that food trucks bring to a city.

III.

Conclusion

Regulations are developing and changing across localities involving many competing interests. Some cities are attempting to balance those interests by regulating food and traffic safety without impeding the creation of a new and popular market in the food industry. It is not likely a market that will go away any time soon. In fact, a 2011 study released by Technomic, a food industry consulting and research firm, found that “91 percent of consumers polled who are
familiar with food trucks say they view the trend as having staying power and not a passing fad.” According to the 2012 Restaurant Industry Forecast, 22 percent of fast-casual and 13 percent of family-dining operators said they would consider adding a food truck component to their business.

Not only do food trucks offer opportunities for entrepreneurs to break into the food industry, but they also offer opportunities for already established restaurants. Opening a food truck is a way for an existing restaurant to increase its name recognition and to reach additional consumers who may sample a unique dish from a restaurant’s food truck and be inspired to later dine at the corresponding sit-down restaurant. Mobile units can open the door to large catering opportunities, community outreach, and untapped markets. According to food truck owner and chef, Rachael Grossman, “[i]n this country, this kind of food is something that’s trapped inside fine dining. It doesn’t have to be.”

3 Norman, supra note 1 at 5.
6 On July 3, 2012, the Taco Bell truck paid a visit to a small town in Alaska and gave away 10,000 free tacos, drawing significant media attention. Tiffany Hsu, Taco Bell Helicopters 10,000 Tacos to Bethel, Alaska, L.A. TIMES (July 2, 2012), http://www.latimes.com/business/money/la-fi-mo-taco-bell-alaska-20120703,0,4812897.story. Fazoli’s has taken its popular breadsticks on the road this summer to 15 cities across the country to raise awareness and funds for childhood hunger charity, Feed the Children. Mark Brandau, New Fazoli’s Food Truck to Tour U.S., NATION’S RESTAURANT NEWS (June 18, 2012), http://nrn.com/article/new-fazolis-food-truck-tour-us. Similarly, Dairy Queen’s “Blizzardmobile” toured 25 cities to raise money for the Children’s Miracle network. Dairy Queen Launches Mobile Truck, QUICK SERVICE RESTAURANT WEB (Apr. 6, 2010),

7 Norman, supra note 1 at 8.

8 Cities with restricted zones include the following: Albuquerque, NM; Charlotte, NC; Chicago, IL; Cleveland, OH; Denver, CO; El Paso, TX; Fresno, CA; Honolulu, HI; Houston, TX; Jacksonville, FL; Kansas City, MO; Long Beach, CA; Los Angeles, CA; Louisville, KY; Memphis, TN; Milwaukee, WI; Minneapolis, MN; Nashville, TN; New York, NY; Oakland, CA; Oklahoma City, OK; Philadelphia, PA; Phoenix, AZ; Raleigh, NC; Sacramento, CA; San Antonio, TX; San Diego, CA; San Francisco, CA; San Jose, CA; Seattle, WA; Tucson, AZ; Tulsa, OK; Virginia Beach, VA; and Washington, D.C. Id. at 16.

9 Cities with duration restrictions include the following: Atlanta, GA; Baltimore, MD; Charlotte, NC; Chicago, IL; Columbus, OH; Dallas, TX; Fort Worth, TX; Jacksonville, FL; Las Vegas, NV; Long Beach, CA; Memphis, TN; Milwaukee, WI; Omaha, NE; Phoenix, AZ; Portland, OR; Sacramento, CA; San Jose, CA; Tucson, AZ; and Virginia Beach, VA. Id. at 16.

10 Cities with stop-and-wait restrictions include the following: Fresno, CA; Louisville, KY; Memphis, TN; Miami, FL; and Washington, D.C. Id. at 16.

11 Among those cities with stringent food truck regulations are the following: Dallas, TX; Jacksonville, FL; Long Beach, CA; Louisville, KY; Memphis, TN; Oakland, CA; Phoenix, AZ; San Antonio, TX; Virginia Beach, VA. Id. at 16.

12 CHICAGO BOARD OF HEALTH, RULES AND REGULATIONS PERTAINING TO MOBILE FOOD DISPENSERS, available at webapps.cityofchicago.org/healthinspection/docs/BoHFoodRegs.pdf.


18 Id.


20 Sheila O’Grady, Op-Ed, City Needs New Mobile Food Vendor Ordinance, CRAIN’S CHICAGO BUSINESS (Jan. 30, 2012),


Among those cities with few food truck regulations are the following: Arlington, TX; Boston, MA; Colorado Springs, CO; Detroit, MI; Indianapolis, IN; Mesa, AZ; Philadelphia, PA. See Norman, supra note 2 at 16.


Among those cities with movements to revise food truck regulations are the following: Grand Rapids, MI; Jersey City, NJ; Peoria, IL; New Orleans, LA; Sacramento, CA; Salt Lake City, UT; Washington, D.C.
Jersey City has also been looking at different versions of proposed food vending regulations since August of 2009. Jersey City, N.J., Rev. Ordinances § 175-8 to 15 (2011).


59 Id.


53 Id.


56 D.C. Food Truck Ass’n, DCFTA Statement about Mayor’s Decision to Send Vending Regulations Back to Drawing Board (Mar. 16, 2012), http://www.dcfoodtrucks.org/news/.


58 Id.

59 Id.

60 Code of Jersey City, § 175-13 (repealed 2011).

61 Code of Jersey City, § 175-14

62 Code of Jersey City, § 175-9.3(c).

63 Among those cities with specific food truck regulations are the following: Austin, TX; Denver, CO; Los Angeles, CA; Portland, OR; Seattle, WA.


66 Id.

67 Id.

68 Id.


70 Oregon Department of Human Services, supra note 47.


72 Bowen, supra note 66.
74 L.A. MUN. CODE, 80.73(b)(2)(B), (C).
75 L.A. MUN. CODE, 80.73(b)(2)(D).
76 CAL. CODE, 113941.
77 CAL. CODE, 114313.
80 Bowan, supra note 66.