



January 27, 2012

Planning and Land Use Management Committee
Councilmember Ed P. Reyes, Chair
Councilmember Jose Huizar
Councilmember Mitch Englander

Re: **Opposition** to Proposed Farmers' Market Ordinance
Council File No: 10-1832

Honorable Ed Reyes and Councilmembers:

Efforts to promote the availability and access to fresh, healthy and safe (free from contamination and adulteration) produce to the residents of Los Angeles are commendable. A proposed Farmers' Market Ordinance is under consideration that will streamline the permit process and expand the allowable locations of farmers' markets. Of particular concern is the following stipulation: *A proposed ordinance amending section 12.24 of the Los Angeles Municipal Code to allow farmers' markets through the Further Authority of the Zoning Administrator in all residential zones.*

As well intentioned as this measure may be, the Old Granada Hills Residents' Group takes exception with the manner in which this issue has been assessed and evaluated:

- A clear cut case has not been made whether an Ordinance such as this is justified. Has a city-wide needs assessment been performed in all communities (including those that are underserved)? There appear to be ample locations within commercial or other appropriate zones where farmers' markets could locate and conduct their business. These more suitable sites would be of benefit to entire community without impacting residential districts.
- Environmental impacts to the R zoned areas have not been fully studied or determined.
- The enactment of this flawed ordinance would set a dangerous precedent and "open the door" for other commercial enterprises to locate within areas zoned residential.
- By their very nature R zones are not designed to accommodate traffic, noise, parking, and signs that are associated with high volume businesses.
- Stipulations within the proposed ordinance regulating permit application, procedures, requirements, violations, and annual review are weak and inadequate:
 - Operations should be conducted by Certified Farmers' Markets only (other city agencies or non- profits lack the proper qualifications to sponsor legitimate produce markets).
 - There are no specified parking provisions or mitigation measures for increased traffic
 - There are no established guidelines for control of vermin and other types of infestation
 - Frequency of operation is not specified. Would farmers' markets be allowed to operate on a daily or weekly basis?
 - A distance of 300' radius notification is insufficient and must be expanded to at least 500'
 - There are no provisions for early notification to respective neighborhood organizations or councils

Therefore, Old Granada Hills Residents' Group strongly urges you to oppose the proposed Farmers' Market Ordinance. We see no compelling evidence to weaken existing long standing protections in the residential, agricultural, commercial, manufacturing and parking zones. Furthermore, permitting farmer's markets by-right in residential zoned would create incompatible land uses that would be inconsistent with the General Plan due to potential noise, traffic, trash, parking and public safety issues. There are current permitting procedures (CUP process) in place that allow for location of farmers' markets in specified zones requiring a Zoning Administrator Determination and a public hearing. We find no valid justifications to amend or modify current regulations.

Sincerely,

Dave Beauvais, President
Old Granada Hills Residents' Group

Maria Fisk, Board of Directors
Old Granada Hills Residents' Group