

Testimony from NYC Department of Sanitation, NYC Small Business Services, NYC Department of Consumer and Worker Protection & NYC Department of Health and Mental Hygiene

Committee on Consumer and Worker Protection

Oversight Hearing: Street Vending Enforcement and the Issuance of Licenses Pursuant to Local Law 18 of 2021

Council Chambers – City Hall

May 6, 2025

NYC Department of Sanitation (DSNY)

Good morning Chair Menin and members of the Committee on Consumer and Worker Protection. I am Joshua Goodman, Deputy Commissioner, Public Affairs & Customer Experience at the New York City Department of Sanitation.

In April of 2023, Mayor Adams designated DSNY as the agency with primary responsibility for coordinating enforcement of the City's rules around street vending, particularly around cleanliness, street passability, and quality of life. The Mayor designated DSNY for this role because we are uniquely positioned to enforce these kinds of rules – we have a uniformed police force of trained and licensed peace officers, but we also have substantial experience protecting and enforcing access to our streets and sidewalks.

Over the last two years, we have leveraged this experience successfully, and having the Department of Sanitation serve as the lead agency on this complex issue means that this work is done thoughtfully, with a focus on balancing the needs of vendors, brick and mortar businesses, and communities at large. Our enforcement work is rooted in the belief that all New Yorkers, across every neighborhood, in every borough, deserve clean, safe sidewalks.

We take a warnings-first approach, often posting dozens of warning signs throughout an area before taking any enforcement actions, but we also engage in robust enforcement to protect cleanliness and quality of life. This enforcement is civil in nature, and Sanitation Police as a general rule do not make arrests.

In Fiscal Year 2025 so far, the 35 Sanitation Police assigned to street vending enforcement have conducted more than 8,000 inspections, issued approximately 5,000 summonses, and donated or composted about one and a quarter million lbs. of food that was either abandoned or being vended illegally. Generally, about one quarter of summonses issued by DSNY are for unlicensed vending.

The overwhelming passage of Proposition 2 in November 2024 shows that this work is resonating with the public. This measure gives DSNY the ability to enforce street vendor rules in public areas that are not streets. However, at this time we have not yet used this authority and are developing a plan for implementation. In any case, the passage of Proposition 2 is evidence that New Yorkers support ongoing enforcement of these laws – as is the continued volume of requests for enforcement that we receive via 311, from community groups, and, in particular, from members of this Council.

While DSNY does not set the laws or penalties, we are responsible for fair and consistent enforcement, particularly in cases where public safety or sanitation is compromised. We enforce these laws, with a focus on situations where vending has created dirty conditions, safety issues, items being left out overnight, and setups that block curbs, subway entrances, bus stops, sidewalks or store entrances.

Several of the bills on the agenda today deal with issues of licensure, and we yield to our agency partners to speak about them. One bill, Introduction 1164, sponsored by Council Member Ariola, does deal with enforcement, requiring the development of an interagency portal for sharing street vending enforcement information. This bill duplicates the work of the Office of Street Vendor Enforcement, legislating a tech solution to a problem that we have not encountered in a systemic way. DSNY does share data with relevant agencies, and they with us, but as the lead agency on vending enforcement, this is done at a staff level. Given the fiscal and time impact of this bill, and the fact that significant data is already on Open Data, we feel it is unnecessary at this time.

Thank you for the opportunity to testify. Now I would like to pass it over to my colleague from NYC Small Business Services for their testimony.

NYC Small Business Services (SBS)

Good morning, Chair Menin and members of the City Council Committee on Consumer and Worker Protection. My name is Haris Khan, and I serve as Chief of Staff at the Department of Small Business Services ("SBS"). Thank you for the opportunity to testify today.

At SBS, we are committed to supporting entrepreneurship, including startups, micro-enterprises, storefronts, and street vendors. Our no-cost services include business courses, legal consultations, help navigating concessionary opportunities, and more. Our programs are accessible to New Yorkers through SBS's seven neighborhood-based Business Solution Centers, our hotline (888-SBS-4NYC), and our MyCity Business site at www.nyc.gov/business. Our work is grounded in an education-first approach that seeks to equip small businesses with clearer understanding of current regulations and connects them to resources that can help them grow and thrive.

Street vendors play a vital role in New York City's economy as they are, in many ways, the smallest of small businesses. Recognizing this, the administration has included leadership from the Street Vendor Project in the Small Business Advisory Commission, formed under Executive Order 15 in 2022. This ensures that the voices of street vendors are included in conversations about the regulatory landscape facing small businesses. SBS also partners with sister agencies to conduct outreach to vendors when new licensing opportunities arise. Over the past three years, we have mailed over 22,000 pamphlets to street vendors, making them aware of available SBS resources in a host of languages, including Spanish, Haitian Creole, and Wolof. In coordination with DOHMH's supervisory license rollout, we also provided DOHMH over 15,000 pamphlets. Additionally, we translated DOHMH's technical assistance presentation into multiple languages and co-hosted physical and virtual workshops to help vendors better understand the opportunity. Our services are broadly accessible to all, whether a business operates from a storefront or from a cart, and in FY24, over 24,000 New Yorkers benefited from our services. We are proud of that reach and impact.

I would now like to turn to Intro, 408, which would create a Division of Street Vendor Assistance within SBS and require the department to tailor programs specifically for street vendors. While we support the

goal of ensuring vendors take advantage of our services, SBS's existing programs are already inclusive and designed to meet the diverse needs of small businesses. Creating a separate division would divert limited time and resources away from service delivery and into new layers of reporting and program design. Moreover, the bill's reporting requirements, especially tracking vendor participation, can deter engagement from a community that includes many immigrants.

We welcome continued dialogue with the bill sponsors and the City Council to find effective ways to ensure street vendors are supported and look forward to answering any questions.

NYC Department of Consumer and Worker Protection (DCWP)

Good morning, Chair Menin, and members of the Committee on Consumer & Worker Protection. I am Carlos Ortiz, Deputy Commissioner of External Affairs at the Department of Consumer and Worker Protection (DCWP). Thank you for the opportunity to testify today on issues related to street vending.

The Department of Consumer & Worker Protection issues general vendor licenses to those who sell goods or services in a public place, such as the street or sidewalk. There are currently ~1,900 licensed general vendors. The number of licenses issued to non-veteran general vendors is capped at 853 licenses and the waiting list for non-veteran applicants is currently closed. License applications for general vendors are available to veterans or the surviving spouses or domestic partners of a veteran.

Introduction 431 would increase the number of food vendor supervisory licenses and general vendor licenses available each year for five years, and thereafter would remove the cap on food vendor supervisory licenses and general vendor licenses. The Administration supports reducing regulatory barriers on businesses, such as expanding the total number of licenses, to bring more street vendors into regulation and compliance. The Administration is opposed to lifting the cap entirely on street vendor licenses due to concerns about the impact on the quality of life for every day New Yorkers. We look forward to engaging in the legislative process with the Council, and stakeholders here today, to join this conversation on examining license caps and understanding how the City can better support street vendors, our smallest small businesses, while balancing the needs of brick & mortar establishments.

Thank you for the opportunity to testify before the committee on these issues. I would now like to pass it over to my colleague from NYC Department of Health and Mental Hygiene for their testimony.

NYC Department of Health and Mental Hygiene (DOHMH)

Good morning, Chair Menin and members of the Committee on Consumer and Worker Protection. I am Corinne Schiff, Deputy Commissioner for Environmental Health at the New York City Department of Health and Mental Hygiene. On behalf of Acting Commissioner Dr. Michelle Morse, thank you for the opportunity to testify today on the Health Department's enforcement of street food vending and on the legislation before the committee.

The Department's mission is to protect and promote the health of all New Yorkers, including by promoting the safety of food sold from food carts and trucks. We do this by issuing permits to operate a food cart or truck, issuing licenses to the people who vend food, providing mandated training for vendors on food protection, and conducting food safety inspections.

I want to start by providing a brief update on the Department's implementation of Local Law 18 of 2021, which expanded opportunities for street food vending. Local Law 18 established a new mobile food vending license, called a supervisory license, and a new kind of permit, a supervisory license permit. The mobile food vending license authorizes a person to vend, and a permit authorizes a food cart or truck to be used for vending. A food cart or truck with a supervisory license permit must be operated by a person with a supervisory license.

The Department is charged with issuing 445 applications for a supervisory license each year for ten years as of July 2022. Supervisory license applications are issued to people on waiting lists in accordance with the local law's detailed criteria and prioritization. Vendors on the waiting lists can track their progress on the Department's lookup tool, available on our website. Once a person has a supervisory license, they are entitled to apply for a supervisory license permit for a food cart or truck at any time; there is no deadline or waiting list to apply. The Local Law requires that as of July 1, 2032, all full term food carts and trucks, other than Green Carts, operate under a supervisory license permit.

The Department has issued almost twice as many supervisory license applications as the local law requires, offering not only the 445 supervisory license applications per year for the last three years, but also re-issuing applications that did not turn into supervisory licenses and offering applications that became available for legacy permits no longer in use. As of late April, 823 vendors applied for the supervisory license, and after approving the applications, the Department issued all 823 supervisory licenses. So far, 382 of the 823 licensees have obtained their supervisory license permits. Other vendors are in the permitting process, and—because the local law has no deadline to apply for the supervisory license permit—others may be preparing to apply sometime in the future.

I will turn now to the legislation under consideration today. Introduction 431 would accelerate the transition to supervisory license permits by moving the deadline from 2032 to 2029, increasing the number of supervisory license applications required to be issued each year, and would remove the cap on licenses as of July 2029.

The NYC Health Department has no concerns about issuing more supervisory license applications annually than the local law currently requires and would like to work with the City Council on some of the details to ease implementation. The Administration is opposed to lifting the cap entirely and looks forward to further conversations. If the Council changes the cap on food vending carts and trucks, this will expand the Health Department's current workload to monitor food safety, including the issuance of licenses and permits, provision of mandatory food safety training, and inspections – leading to increased costs for the Department. We have no concerns with Introduction 1251, which would allow the Department to issue additional supervisory license applications if needed to meet licensing targets.

We want to note that New York State and New York City law require food carts and trucks to have a commissary; commissaries provide cleaning, storage, and facilities for food preparation. Any vending expansion must ensure sufficient commissary space to meet food safety requirements.

Thank you for the opportunity to testify. I, along with my colleagues from DSNY, DCWP, and SBS, are happy to take your questions.



**JUMAANE D.
WILLIAMS**

**STATEMENT OF PUBLIC ADVOCATE JUMAANE D. WILLIAMS
TO THE NEW YORK CITY COUNCIL COMMITTEE ON CONSUMER AND
WORKER PROTECTION
MAY 6, 2025**

Good Morning,

My name is Jumaane D. Williams, the Public Advocate for the City of New York. Thank you to Chair Menin and committee members for holding this hearing.

This day has been long fought for. This hearing is essential at a moment when the federal government is actively seeking to criminalize our communities and prosecute our small businesses. New York's street vendors are our smallest businesses, many of which are Minority and Women-Owned Businesses. They are frequently the targets of excessive enforcement by law enforcement and city agencies. Today, we are one important step closer to changing this dangerous dynamic of criminalization.

In 2024, the NYPD and Department of Sanitation issued nearly double the amount of vending-related tickets issued in 2023 and five times higher than the number of tickets issued in 2019.¹² The enforcement costs related to issuing these tickets vastly outweighs the revenue generated by penalties.³ In addition, the Independent Budget Office found that the license proposal made by Intro 431 would boost the city's GDP by \$59 million.⁴ Frankly, this legislation is commonsense and long overdue. As of October 2023, there were almost 11,000 individuals on the waitlist for general vendors licenses and nearly 10,000 individuals waiting to receive a food vendor permit.⁵

As part of the Street Vendor Reform Package, I introduced Intro 408 which would create a division within the department of small business services (SBS) to assist street vendors. This division would provide much needed services and resources for street vendors alongside important educational and training programs on safe vending. These bills are part of a package for a reason—each piece is essential. There is a budget proposal this year that would allocate an additional \$7.7 million dollars to the Department of Sanitation for vendor enforcement. Notably, there is still nothing to support vendor compliance and education. Ending the criminalization of street vendors, many of whom have been vending for years, must include more licenses, more services, and more training—not just more enforcement. I've said this before and will say it again, "you can't rain down enforcement on an unfair system." The goals of Intro 431 and

¹ <https://www.thecity.nyc/2025/04/25/vendor-tickets-enforcement-issued-whitest-neighborhoods/>

² <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

³ Ibid.

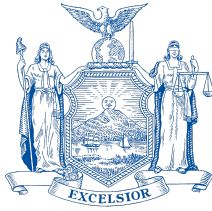
⁴ <https://www.ibo.nyc.gov/content/publications/2024-january-fiscal-impact-of-eliminating-street-vendor-permit-caps>

⁵ Ibid.

Intro 408 are to create a predictable and regulatory system for vendors. A system that is ultimately safer for vendors AND consumers.

In closing, I cannot overstate how crucial these bills are in our current moment. The President and the Mayor are quickly leading our communities and our economy into extreme hardship. We must provide our communities with ways to support themselves and their loved ones. This commonsense legislation being heard today is a major step in a direction that chooses opportunity over criminalization and love over fear for our smallest businesses.

Thank you.



CATALINA CRUZ
Assemblywoman 39th District

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Puerto Rican/Hispanic Task Force

Task Force on Women's Issues

May 7, 2025

Honorable Julie Menin
Chair
Committee on Consumer & Worker Protection
New York City Council
250 Broadway, Suite 1821
New York, New York 10007

Dear Chair Menin:

I would like to thank Chair Menin and the Committee for the opportunity to testify today in support of reforming the regulations for our street vendors. As the New York State Assemblywoman for District 39, encompassing the neighborhoods of Corona, Elmhurst, Jackson Heights, Middle Village, and Rego Park, one of the most diverse districts in the nation and one of the most heavily impacted by COVID-19, I've had the privilege of standing alongside the very people who kept our community fed, connected, and alive: our street vendors. These vendors are more than small business owners; they are neighbors, parents, and immigrants who have faced enormous challenges with resilience and grace. During the Pandemic, when so many lost jobs and access to aid, vendors showed up every day to serve their communities, often without access to the same safety net system other businesses relied on.

New York City is home to an estimated 23,000 street vendors, a workforce overwhelmingly made up of immigrants, people of color, and women. Collectively, these entrepreneurs contribute \$192 million in wages, \$292.7 million in goods and services, and \$71.2 million in taxes to our local economy each year. They are the backbone of many communities and an essential part of our city's cultural and economic life.

My office has worked closely with the vendors at Corona Plaza—listening to their concerns, helping them organize, and connecting them with legal support. We've collaborated with community allies and elected partners like Queens Borough President Donovan Richards, Assemblymembers Jessica González-Rojas and Steven Raga, and organizations such as the Street Vendor Project, Queens Economic Development Corporation, and the Corona Plaza Task Force. Together, we've pushed for solutions that prioritize safety, fairness, and opportunity.

For decades, critics have falsely associated street vending with chaos and disorder, while the real disorder lies in the broken system vendors are forced to navigate. The arbitrary caps on licenses and permits have locked thousands of entrepreneurs out of legitimacy. Roughly 75% of mobile food vendors and 37% of general vendors operate without business licenses, not because they don't want to follow the rules, but because the rules are structurally rigged against them. The City's permit waitlists are tens of thousands of names long, and many have been closed for over a decade.

The result? A dangerous but thriving underground market where vendors are forced to rent permits at exploitative prices, or work without one entirely—risking fines that often exceed a week’s earnings. And enforcement has only worsened. Under this administration, the number of tickets issued to vendors has tripled. Agencies that were once civil in nature are now being used for punitive enforcement, particularly against immigrant and Black and brown vendors. This is not public safety. It’s discrimination masquerading as regulation.

We need comprehensive reform. We need a regulatory system that is predictable, enforceable, and fair—one that cuts red tape and replaces criminalization with opportunity. Our city must stop punishing people for trying to feed their families and instead invest in clear, accessible pathways to legitimacy.

This is also a gender equity issue. Nearly half of all street vendors are women, yet only 27% of mobile food permit holders and 14% of general vendor license holders are women. Fixing this system means empowering more women to build wealth and stability for their families.

We also cannot ignore the fiscal upside. According to the Independent Budget Office, expanding access to vendor licenses would result in a net revenue increase of \$59 million for the City. That’s funding that can be reinvested in our communities, all while improving compliance and safety on our streets.

This is about racial justice, immigrant rights, economic opportunity, and the fair use of public space. Street vendors are not the problem—they’re part of the solution. It’s time our policies reflect that truth. The City Council has a chance to move beyond the outdated narratives and toward a future where all small businesses—mobile and brick-and-mortar alike—can thrive together.

Thank you again for the opportunity to testify and for your leadership on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Catalina Cruz', with a stylized flourish at the end.

Catalina Cruz, Esq.
New York State Assemblywoman
District 39



May 6, 2025

Alaina Turnquist, Lead Budget and Policy Analyst, New York City Independent Budget Office on
Oversight - Street Vending Enforcement and the Issuance of Licenses Pursuant to Local Law 18 of 2021
Before the Committee on Consumer and Worker Protection

Good morning, Chair Menin and members of the Committee on Consumer and Worker Protection. My name is Alaina Turnquist and I am a lead budget and policy analyst at the New York City Independent Budget Office (IBO). I am joined by my colleague, lead economist, Eric Mosher. IBO is an independent, nonpartisan City agency that conducts fiscal and policy research for the City. Thank you for the invitation to testify today. I will be speaking about the fiscal impact to the City's budget, were the cap on street vending permits and licenses to be eliminated.

At the request of 14 Council Members, IBO analyzed the fiscal impact on the City's budget that could result from lifting the cap on street vending in New York City. In January of 2024, IBO published a [report](#) outlining potential impacts to the City's tax revenue and agency expenditures and detailing the current regulatory environment for various types of vending in New York City. IBO also published a Spanish-translation of the report.

We found that that lifting the caps on the number of permits and licenses available to street vendors would have an overall positive fiscal impact on the City's budget. Figure 1 shows the revenues and costs that feed into the net fiscal impact to the City.

The actual scale of fiscal impact would depend on the number of vendors that become newly permitted. If 10% of people on the current vendor permit waitlists—around 20,000 people total—were to become permitted vendors, the net revenue gain to the City would be about \$5.9 million annually; if 100% of those on the waitlists became permitted, the net impact would increase to about \$59 million. IBO expects that new sales tax revenue from permitted vendors would be the largest source of new revenue. Figure 2 (below) presents the additional revenue and costs that IBO predicts would come from lifting the cap if 10% of the waitlist became licensed.

Figure 1

**Determining Fiscal Impact of Lifting
Cap on the Number of Vendor Permits**

	Sales Tax Revenue
+	Income Tax Revenue
	+ Fine Revenue
	+ Fee Revenue
-	Administrative Costs
-	<u>Enforcement Costs</u>
	Fiscal Impact to the City

In preparing this testimony, IBO identified an error in our original analysis that caused an underestimate in our forecast of relevant tax revenues. The January 2024 report misstated the \$59 million upper estimate as \$17 million. We have updated the report on the IBO website, and our overall methodology, key findings, and conclusions remain unchanged.

Figure 2 Fiscal Impact from 10 Percent of Current Waitlists Becoming Permitted Vendors			
	Mobile Food Vendor	General Vendor	Total
Number of New Vendors	988	1,099	2,087
Sales Tax Revenue	\$1,700,000	\$1,900,000	\$3,600,000
Income Tax Revenue	\$2,100,000	\$700,000	\$2,800,000
Fines	\$20,000	\$20,000	\$40,000
Fees	\$770,000	\$220,000	\$990,000
Administrative Costs	(\$1,270,000)	(\$200,000)	(\$1,470,000)
Total Fiscal Impact	\$3,300,000	\$2,600,000	\$5,900,000
SOURCE: IBO analysis of DOHMH, DCWP, OATH and Street Vendor Project data			
NOTE: Totals may not sum due to rounding.			
<i>New York City Independent Budget Office</i>			

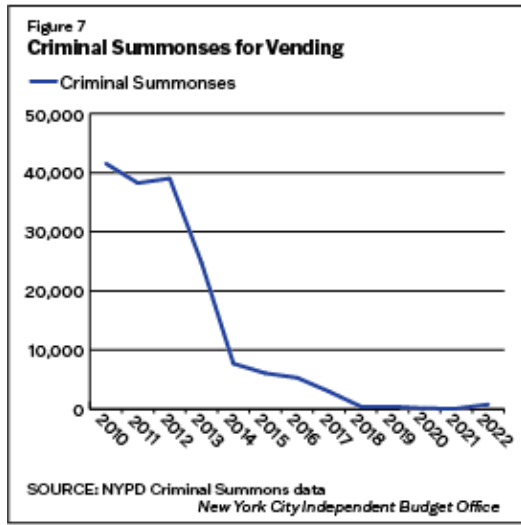
IBO expects the overall macroeconomic impact of eliminating the caps on street vendor permits would be minimal, though the microeconomic impact to some individual vendors who become permitted or licensed would likely be substantial. For example, holding a legal permit or license would prevent some street vendors from receiving costly tickets and having their materials confiscated by law enforcement, assuming they follow other City rules and regulations while vending.

Vendor revenues and profits are modest, for both permitted and unpermitted vending. According to IBO analysis of vendor survey data, the average annual profit for all vendors in the City was roughly \$41,000 in 2019. General Vendors, which sell merchandise, had lower average annual profits compared to Mobile Food Vendors—around \$35,000 compared to \$46,000, respectively. These figures are pre-pandemic, adjusted to 2023 dollars. There has not been a post-pandemic survey of street vendors in New York City which would allow for a more current analysis.

In terms of additional administrative costs, IBO expects additional costs would be borne by the Department on Consumer and Worker Protection as well as the Department of Health and Mental Hygiene. Additional Mobile Food Vending permits would have higher administrative costs than General Vending licenses, primarily due to health department resources to inspect mobile food vending units to ensure food safety.

IBO assumed no additional uniformed agency enforcement costs would necessarily result from removing the permit caps for street vending; any change would be at the City's discretion. Law

enforcement for vending has shifted away from criminal summonses and towards civil enforcement over the past decade (see Figure 7 from the report).¹



Importantly, even without a cap on the number of permits and licenses for street vendors, vendors would need to comply with other street vendor regulations. For example, strict siting rules make many City streets off-limits for vending (even with a permit), and food vendors are required to store their vending units in City-permitted commissary facilities, which have limited capacity. Therefore, while lifting the cap on permits and licenses would likely benefit many vendors and provide a positive fiscal impact to the City overall, it is unlikely to immediately bring all street vendors into the permitted-vending economy.

Finally, vendors must pay any outstanding fines to the City before being eligible to receive a license or permit. IBO’s analysis of the Street Vendor Census indicates that most unpermitted vendors have modest earnings compared to permitted vendors. For unpermitted vendors seeking to legalize, paying outstanding fines may be a barrier and could affect the number of individuals who would convert from the informal to formal market.

The City could choose to pursue civil fine forgiveness for vendors on a one-time basis, as have some other cities like Washington, D.C. Overall, IBO estimated that uncollected vending-related fines total over \$780,000.² From 2018 through 2022, roughly 38% of all vending-related civil fines went unpaid. The most common type of civil summons issued to vendors was related to vending in a place where vending was not allowed, followed by a vendor not having the proper license or permit.

It is unclear how much of this uncollected revenue would realistically be collected if it is not forgiven. “Ghost fines”—fines owed by an individual who is not a real identifiable individual—are believed to be common in civil penalty data. Such uncollectable fines may be more common for vending because unpermitted vending is one of the limited options for individuals who face barriers to entering the formal economy. For that reason, and because this cost is optional, the cost of fine forgiveness was not factored into IBO’s overall fiscal impact analysis.

A final caveat has to do with how rates of tax compliance may affect IBO’s fiscal impact estimate. The United States Internal Revenue Service estimated in 2022 that cash-based sole proprietors avoid paying taxes on up to 57% of their cash sales. With no data on the rate of tax noncompliance by street vendors in particular, IBO assumes that street vendor sales and income tax noncompliance will fall at 28.5%, the midpoint between 0% and 57%. Making a different assumption of tax evasion by licensed street vendors would affect the outcome of the fiscal impact estimate.

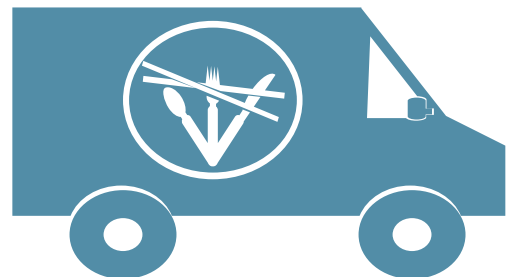
In conclusion, lifting the cap on vending permits and licenses would likely have a positive fiscal impact on the City's budget. The overall scale of impact is highly dependent on the number of vendors who are able to enter the formal permitted market as well as the type of vendors who become licensed or permitted.

Thank you for the opportunity to testify. We are happy to answer questions at today's hearing or in the future about this report.

¹ In the report, IBO defines "enforcement costs" as vendor-related costs borne by uniformed agencies, specifically the Department of Sanitation (DSNY) and New York City Police Department (NYPD).

² This figure includes all fines assessed since 2013.

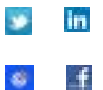
Fiscal Impact Of Eliminating Street Vendor Permit Caps in New York City



New York City
Independent Budget Office
Louisa Chafee, Director

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Executive Summary

Since the 1980s, there has been little change in the total number of street vending permits and licenses in New York City—City-issued documents that allow street vendors to sell food and goods legally. The demand from street vendors for permits outpaces the supply, as evidenced by waitlists of over 20,000 people for two types of street vendor documentation: Mobile Food Vendor (MFV) permits and General Vendor (GV) licenses.

At the request of 14 Council Members, led by Pierina Sanchez and Amanda Farías, IBO estimated that lifting the caps on the number of permits and licenses available to street vendors would have a small positive fiscal impact on the City’s budget. New York City would see new revenues from tax collections, fines, and registration fees, but also increased costs of administering and monitoring the newly permitted vendors. IBO’s findings include:

- The actual scale of fiscal impact would depend on the number of vendors that become newly permitted. If 10 percent of people on the current waitlists were to become permitted vendors, the net revenue gain to the City would be about \$5.9 million; if 100 percent of those on the waitlists became permitted, the net impact would increase to about \$59 million. IBO expects that new sales tax revenue from permitted vendors would be the largest source of new revenue.
- Vendor revenues and profits are modest, for both permitted and unpermitted vending. According to IBO analysis of vendor survey data, the average annual profit for all vendors in the City was roughly \$35,000 in 2019. General Vendors had lower average annual profits compared to Mobile Food Vendors—around \$30,000 compared to \$40,000, respectively.
- The overall macroeconomic impact of eliminating the caps on street vendor permits would be minimal, though the microeconomic impact to some individual vendors who become licensed would likely be substantial. For example, holding a legal permit or license would prevent some street vendors from receiving costly tickets and having their materials confiscated by law enforcement, assuming they follow other city rules and regulations while vending.
- Additional MFV permits would have higher administrative costs than GV licenses, primarily due to health department resources to inspect MFV units to ensure food safety. MFVs, on average, generate higher tax revenue than GVs and their total net fiscal impact per additional permit would be larger. In this report, IBO defines “administrative costs” as vendor-related costs borne by the Department of Health and Mental Hygiene (DOHMH) and Department of Consumer and Worker Protection (DCWP).
- IBO assumed no additional uniformed agency enforcement costs would automatically result from removing the permit caps for street vending; any increase would be at the City’s discretion. Law enforcement for vending has shifted away from criminal summonses and towards civil enforcement over the past decade. In this report, IBO defines “enforcement costs” as vendor-related costs borne by uniformed agencies, specifically the Department of Sanitation (DSNY) and New York City Police Department (NYPD).

Even without a cap on the number of permits and licenses for street vendors, vendors would need to comply with other street vendor regulations. For example, strict siting rules mean that many city streets are off-limits for vending (even with a permit), and food vendors are required to store their vending units in City-permitted commissary facilities, which have limited capacity. Therefore, while lifting the cap on permits and licenses would likely benefit many vendors and provide a positive fiscal impact to the City overall, it is unlikely to immediately bring all street vendors into the formal economy.

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Introduction

Street vending is a longstanding and fiercely debated facet of New York City’s urban landscape. Though the number of street vendors in the City is unknown, some estimates suggest the total number of active vendors in the City may near or exceed 20,000.¹

Caps on the number of individuals allowed to vend legally within the City have seen little change since the early 1980s. Since 1979, General Vendor (GV) licenses—for the sale of non-food merchandise—have been capped at 853 (for non-veterans). In 1983, Mobile Food Vendor (MFV) permits—for the sale of food—were capped at 3,000, with the total number of MFV permits increasing to 5,100 since then. Reform efforts passed in 2021 as part of [Local Law 18](#) were designed to increase the number of legal food vending permits by up to 4,450 over the next 10 years.

The shortage of City-issued permits has contributed to a persistent informal vending economy in the City, as well as the creation of an illegal secondary market for city permits. Though official city licenses and permits only cost a low-level processing fee (typically \$200 or lower), permits and licenses rent at high prices on the illegal secondary market—in some cases, annual rents cost \$17,000 or more, according to IBO analysis.²

For years, vendors have protested the low number of permits, calling on the City to make more permits available to meet vendor demand.³ High-profile enforcement sweeps of prominent vending locations such as Corona Plaza and Sunset Park have driven headlines in recent months.⁴ The influx of migrants from South and Central America, many of whom have turned to vending on streets and subways, has also heightened the visibility of informal vending.⁵

IBO produced this report at the request of 14 City Council members—Pierina Sanchez, Amanda Farías, Diana Ayala, Carmen De La Rosa, Jennifer Gutiérrez, Shekar Krishnan, Julie Won, Carlina Rivera, Chi Ossé, Shahana Hanif, Kristin Richardson Jordan, Althea Stevens, Mercedes Narcisse, and Sandy Nurse—who asked IBO to estimate and analyze the potential impact of lifting the current caps on MFV permits and GV licenses—specifically, how lifting limits would affect city revenues, administrative and enforcement costs, and the overall city economy. IBO begins with a discussion of the history and current policy landscape of vending followed by an estimation of potential city revenues, fees, administrative and enforcement costs, and the overall economic impact that may result from the elimination of street vendor permit caps. This analysis does not address other regulations covering street vending in New York, such as siting guidelines that restrict vendors from operating legally on many city blocks.

In this report, for easier reading, IBO refers to all street vendors who have the necessary street vending paperwork to vend legally as “permitted”; those who do not are referred to as “unpermitted.” IBO includes all vendor-related spending by the Department of Health and Mental Hygiene (DOHMH) and Department of Consumer and Worker Protection (DCWP) under “administrative costs”; IBO includes all vendor-related spending by the Department of Sanitation (DSNY) and New York City Police Department (NYPD) under “enforcement costs.”

Current Street Vending Policy Landscape

Vending in New York City operates under a complicated regulatory framework in which an interlocking matrix of factors—caps on the number of permits or licenses, locations, variations for times, days, and seasons, type of products sold, and veteran or disability status—determine whether and where an individual can vend legally. Multiple city agencies have a hand in overseeing street vending, as shown in Figure 1.

Types of Vendors. Generally, the City recognizes three main types of vendors based on the category of products sold: General Vendors (GV), Mobile Food Vendors (MFV), and First Amendment Vendors. Types

Brief History of Street Vending Permits in New York City

Street vending in New York City has long been a facet of the City's urban landscape, with deep ties to the City's identity as a destination for new arrivals in the United States. Although early forms of mobile vending like pushcarts and dock sellers date back to the earliest days of the City's founding, modern city regulation of vending did not begin until the early 20th century.⁶

Initially, peddlers in the City were required to remain mobile. In the 1930s, Mayor LaGuardia utilized federal stimulus to construct indoor vendor markets, some of which still stand today. Markets were meant to create designated space for vendors and improve conditions primarily in crowded neighborhoods of new arrivals where pushcart markets had risen to prominence.⁷

The current regulatory environment for vendors began in the wake of the City's financial crisis of the 1970s—when “general economic downturn coupled with an influx of new immigrants and counterculture youth led to an increased visibility of vending in the city.”⁸ During this time, general vending became increasingly popular, as the startup costs are typically lower than mobile food vending.

With the increased influence of business interest groups in the wake of the financial crisis, Mayor Koch pushed to limit the number of vendors and the locations available within the City for vending. Following Mayor Beame's initial Midtown vending location restrictions passed in 1977, Koch passed a cap on GV licenses.⁹ The cap—set at 853—is still in place today. The cap on MFV permits followed in 1983 and was set higher at 3,000.¹⁰ In the 1990s, Mayor Giuliani's administration limited the allowed zones of vending within the City, proposing to close off most of the Financial District and large swathes of Midtown Manhattan.¹¹

Though vending regulations have become generally more restrictive over the past century, in multiple instances legal challenges have lifted vending caps for specific subsets of vendors. In 1990, a group of veterans sued the City citing a state law meant to benefit veterans returning from the Civil War by granting them the right to vend without restriction.¹² The legal challenge ultimately won unlimited GV licenses for veterans in the City. Additionally, in 1995, a group of visual artists sued the City, claiming that city restrictions on vending violated free speech protections in the state and federal constitutions. The legal challenge ultimately created unrestricted vending for vendors selling “expressive materials” such as books, music, and artwork in the City, protecting the ability of First Amendment Vendors to operate without licenses or permits.¹³

The cap on food vendor permits has also expanded since the initial caps to include a subset of 100 permits available specifically for veterans or individuals with disabilities and, separately, 1,000 temporary or seasonal permits. With the goal of bringing fresh produce to ‘food deserts,’ the City introduced 1,000 additional produce permits, also known as Green Carts, in 2008, during Mayor Bloomberg's administration.

Another reform came in 2021, when the City Council passed Local Law 18 to expand food vending through creating a supervisory license system, meant to cut down on the practice of illegal permit leasing that has been common among vendors due to the scarcity of legal permits. The law established a system to issue up to 4,450 supervisory license permits by 2032.

of vendors are distinguished by the category of products sold. GVs sell merchandise; MFVs sell prepacked food, prepared food, and produce; and First Amendment Vendors sell “expressive materials” such as art, music, books, magazines, and pamphlets.

Though the number of legal MFVs and GVs is limited through permit/license caps, First Amendment Vendors are constitutionally protected and thus cannot face permit/license caps. First Amendment Vendors must still remit sales tax and adhere to the same location/siting regulations as GVs. IBO’s analysis addressed the fiscal impact of allowing for unlimited permitting of GVs and MFVs. Any vending that is already unlimited—First Amendment and Veteran General Vendors—was excluded from IBO’s analysis.

Licensing and Permit Caps: Mobile Food Vendors. The City’s regulation of Mobile Food Vending is highly complex, with multiple permit types and license types that each have specific requirements. The City is also currently in the process of implementing reforms passed in 2021, which bring new levels of complexity to the food vending license and permit structure. Most permitted food vendors in operation today vend under the older permitting system; the new permitting system will fully phase in by 2032.

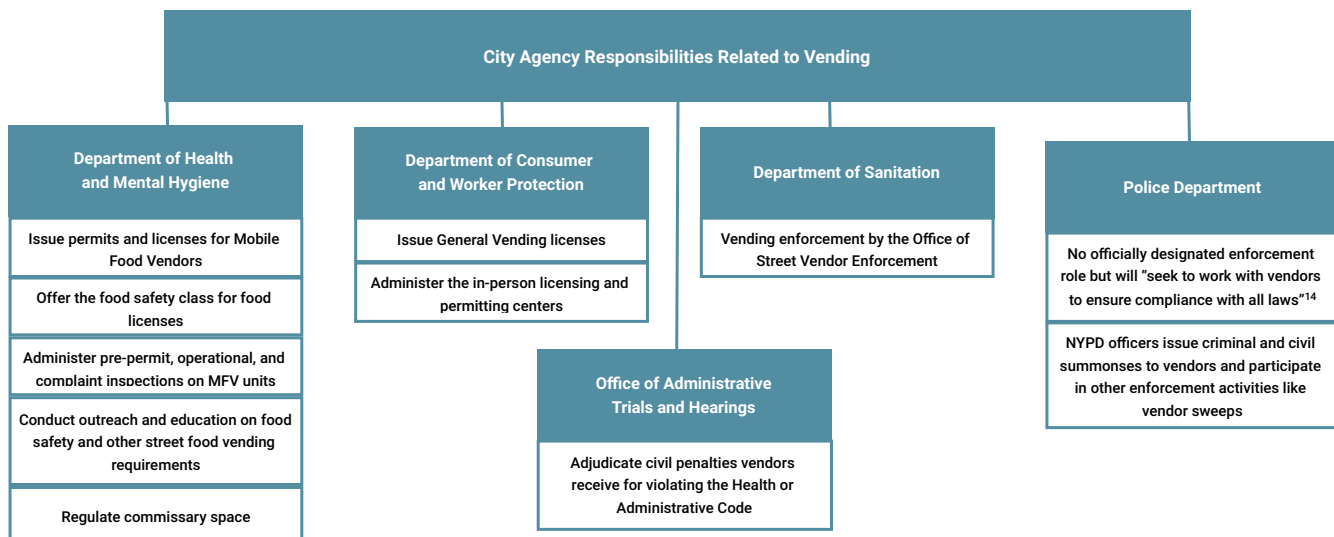
Prior to the enactment of Local Law 18 in 2021, the City issued six different types of MFV Permits: Citywide, Temporary/Seasonal, Borough-Specific, Fresh Fruit and Vegetable (Green Cart), Restricted Area, and Specialized Disabled Veteran Vendor. Most of these permits allow vendors to operate in specified spaces within the City, and some permits are only available to certain categories of vendors—for example, military veterans and persons with disabilities.

Importantly, MFV permits are different from MFV licenses. An MFV permit is required for a vendor to operate a food vending unit legally, whereas a license is required for an individual to handle and sell food legally in the City. Unlike MFV permits, there is no cap on the number of MFV licenses issued by the City. A license-holder may legally work in a food vending unit without holding an MFV permit, as long as the unit has an associated permit-holder. Some MFV license-holders work for other vendors while they wait to receive an MFV permit from the City. As a result, the number of MFV licenses is about three times higher than the number of MFV permits.

Local Law 18 changed the landscape of MFV permits and licenses, creating a new license and permit framework. Under the law, the vendor must first receive a supervisory license, which then entitles them

Figure 1

City Agencies Involved in Street Vending



SOURCES: DCWP, DOHMH, DSNY, NYPD, and OATH data

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to apply for a supervisory license permit. In the new system, a food cart or truck with a supervisory license permit must have a supervisory licensee physically present on the unit during business operation. Under the reform, all individuals with a supervisory license are entitled to apply for a supervisory license permit. DOHMH will issue 445 supervisory license applications annually for 10 years until 2032, eventually increasing the total number of MFV permits by up to 4,450.¹⁵

Unlike the older borough-specific MFV permits, which confine vendors to a specific borough outside Manhattan, supervisory license permits allow individuals to vend in any borough outside Manhattan. DOHMH now only issues Borough-Specific MFV Permits upon renewal.

Licensing and Permit Caps: General Vendors. For GVs, the City issues three subtypes of licenses: White, Yellow, and Blue. These subtypes were created by the State Legislature in the 1990s, in response to the legal challenge which provided unlimited GV licenses for veterans. Blue and Yellow licenses are only available to service-disabled veterans and offer expanded vending locations in the City. The 140 Blue licenses are the most coveted, as Blue license-holders are the only merchandise vendors allowed to operate within Midtown Manhattan. GV White licenses are capped at 853 and are available to any individual regardless of military service status. Figure 2 provides a comparison between GV and MFV regulations.

Other Types of Vending. To vend within city parks, vendors participate in the competitive bidding and proposal process that is managed and regulated by the New York City Department of Parks and Recreation. Vendors within city parks are considered “concessions” and receive permission to vend on park land through entering permitting/licensing agreements with the Parks Department. Such agreements often specify the location where the vendor can be within a park.

Figure 2

Overview of Street Vending Regulations (General and Mobile Food Vending)

	General Vending	Mobile Food Vending
Goods Sold	<ul style="list-style-type: none"> Merchandise 	<ul style="list-style-type: none"> Prepared food, prepackaged food, produce
Legal Permission	<ul style="list-style-type: none"> GV license 	<ul style="list-style-type: none"> MFV permit or supervisory license permit (by cart/unit) MFV license or supervisory license (by individual)
Primary Regulating City Agency	<ul style="list-style-type: none"> Department of Consumer and Worker Protection (DCWP) 	<ul style="list-style-type: none"> Department of Health and Mental Hygiene (DOHMH)
Cap on Number of Vendors	853 GV licenses <u>Unlimited for veterans</u> Total = 853 + veteran licensees ** Subtypes: Blue, White, and Yellow licenses	Citywide permits: 2,800 Borough-Specific: 50 each, excluding Manhattan Disability/Veteran Specialized: 100 Seasonal/Temporary: 1,000 <u>Green Cart: 1,000</u> Total = 5,100 ** Plus 445 new supervisory license applications issued by DOHMH each year (2022-2032) ** Unlimited “Restricted Area Permits” available to vend on private property and no limit on number of specialized disabled veteran vendor permits
Wait List (as of October 2023)	<ul style="list-style-type: none"> 10,992 for non-veteran licenses 	<ul style="list-style-type: none"> 9,878 individuals on at least one waitlist
Total Number Active Legal Vendor Units	1,844 active licenses <ul style="list-style-type: none"> 775 non-veteran 1069 veteran As of October 2023	3,805 active units <ul style="list-style-type: none"> 3,755 active permits 50 supervisory license permits As of December 2023

SOURCES: DCWP and DOHMH data, and September 27, 2023 letter from Mayor Adams to City Comptroller

NOTE: Despite the legal cap of 1,000 Green Cart Permits, as of October 2023 only 220 permits were active within the city.

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Importantly, General and Mobile Food Vendors are prohibited from operating within city parks regardless of whether they possess a license/permit for vending elsewhere within the City. In the case of recent high-profile vendor sweeps in Sunset Park, the siting restrictions—not the permit and license cap—prohibit vending.¹⁶

Finally, to sell food or merchandise at city-authorized street fairs, block parties, or festivals, vendors must receive a Temporary Street Fair Permit (merchandise) or a Temporary Food Service Establishment Permit (food) and register with the authorized event where they plan to vend. Such permits are, in theory, unlimited—though they must be associated directly with a city-authorized event.

Data on Street Vendors

Reliable data on street vending is scarce. Because many street vendors operate outside the formal economy, there is little, if any, official government data on the income or profitability of street vendor businesses. While city agencies do have detailed information on current permit- and license-holders, the city government does not collect data on unpermitted vendors. There is no official headcount of street vendors in New York City, though an oft-cited estimate is about 20,000.¹⁷

The most detailed information on the street vendor landscape in New York City likely comes from Street Vendor Project (SVP), a non-profit organization of street vendors and advocates. In 2021, SVP conducted a survey of over 2,000 street vendors and collected information about their income and business expenses, both before and during the Covid-19 pandemic. The survey also collected demographic information such as age, country of birth, immigration status, as well as data on vendor permit status. Respondents included MFVs, GVs, and First Amendment Vendors; both permitted and non-permitted vendors are represented in the sample.

This data was generated from a survey sample and not a complete census of street vendors. If the estimates of 20,000 vendors citywide are accurate, then this survey covers about 10 percent of street vendors in 2021. The data likely overrepresents individuals who had a prior connection to SVP and may underrepresent vendor groups that are less prominent in SVP's membership—such as food trucks, veterans, and high-earning franchised vendors. Nevertheless, the SVP survey is likely the most comprehensive collection of data from the recent population of street vendors in New York City. IBO utilized the Street Vendor Project dataset. (The use of this dataset in no way implies that IBO supports or opposes SVP's advocacy agenda. For more details on this dataset, see the Appendix, which discusses IBO's methodology in more detail.)

The city agencies that oversee food vending (DOHMH) and general vending (DCWP) maintain waitlists of individuals who may be interested in applying for vending permits when permits become available. DCWP maintains the waitlist for GVs; its length as of October 2023 is 10,992 individuals. This list has been closed and has not accepted new applications since 2016.

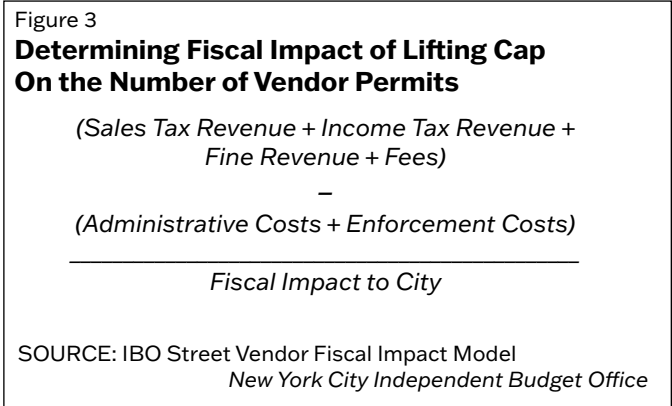
For Mobile Food Vendors, DOHMH has maintained several different waitlists for different food vendor categories. Following Local Law 18 requirements, DOHMH created new supervisory license waitlists. DOHMH compiled the current list by including individuals that met at least one of two criteria: first, individuals who were previously on a DOHMH MFV waitlist, and second, individuals who had continually held food handling licenses since March 2017 but have not had a permit to operate their own vending unit. The current DOHMH list contains 9,878 individuals as of October 2023.

Notably, the DOHMH waitlists for citywide and non-Manhattan supervisory licenses have never been open to the public and the GV waitlist has not been open in seven years.¹⁸ These waitlists may be undercounts of all individuals in the City who are interested in vending—though presumably not all individuals on a waitlist would choose to apply for a permit or meet the qualifications for a permit, if the permit cap were lifted. Nevertheless, these two waitlists offer the clearest detail of the potential scale of additional street vendors in the event of broad liberalization of vending permits.

Fiscal Impact of Lifting the Cap on the Number of Street Vending Permits for New York City

Revenue and Expense Considerations. For the City, the fiscal impact of removing the cap on street vendor permits consists of the sum of new revenue and registration fees received by the City because of permitting additional vendors, less the costs incurred by the City to license, permit, and inspect the additional permitted vendors (see Figure 3). The actual fiscal impact depends on the number of vendors that successfully become permitted following the removal of the permit cap.

Unfortunately, there is no precise indication of the demand for new permits that would follow the elimination of permit caps. On one hand, there is clear demand for additional permits—both from anecdotal accounts of street vendors reported in the media and from the fact that some food vendors are willing to pay tens of thousands of dollars a year to lease valid permits from existing permit-holders via the informal market. On the other hand, it is impossible to say in advance how many currently unpermitted vendors would apply for permits as opposed to continuing to vend without a permit, even if the cap were eliminated. There are costs associated with applying for a vending permit, and some vendors may choose to remain unpermitted even if it were administratively possible to join the formal market.



Creating an Incremental Fiscal Impact as a Baseline. First, IBO estimated the net increase in revenue for the City if 10 percent of both vendor waitlists applied for and were awarded new permits. For reference, 10 percent of the MFV waitlist is equal to 988 food vendors, and 10 percent of the GV waitlist is equal to 1,099 vendors. At this baseline, authorizing 10 percent of the Mobile Food Vendor waitlist to vend would yield \$2.6 million in new revenue for the City, while 10 percent of the General Vendors would yield \$3.3 million, for a combined total of \$5.9 million in net new revenues. Referring to the 10 percent estimates in Figure 4, readers can develop scenarios that they think are realistic based on what scale of new vendor permits they believe would result from eliminating the current caps. For example, if a reader believes that eliminating the permit cap would lead to 50 percent of the current waitlists becoming permitted, the reader can multiply IBO’s 10 percent estimates by five to arrive at a new estimate.

IBO’s analysis found that, overall, the fiscal impact of new GV licenses and new MFV permits would be positive, yet small compared to the City’s total \$110.5 billion budget. IBO also found that the fiscal

Figure 4

Fiscal Impact from 10 Percent of Current Waitlists Becoming Permitted Vendors

	Mobile Food Vendor	General Vendor	Total
Number of New Vendors	988	1,099	2,087
Sales Tax Revenue	\$1,700,000	\$1,900,000	\$3,600,000
Income Tax Revenue	2,100,000	700,000	2,800,000
Fines	20,000	20,000	40,000
Fees	770,000	220,000	990,000
Administrative Costs	(1,270,000)	(200,000)	(1,470,000)
Total Fiscal Impact	\$3,300,000	\$2,600,000	\$5,900,000

SOURCES: IBO analysis of DOHMH, DCWP, OATH and Street Vendor Project data
NOTE: Totals may not sum due to rounding.

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impacts of the two permit types would not be equal. Since MFV vendors require food safety training and additional inspections, it costs more for the City to administer MFV permits than GV licenses. As a result, a marginal GV license would have a greater net fiscal impact than a new MFV permit. The following sections on revenues and expenses include further discussion of estimated revenues and costs associated with eliminating street vendor permit caps.

Two Example Scenarios for Permit Demand. To illustrate two possible outcomes of eliminating the cap on street vendor permits, IBO developed two scenarios. These scenarios draw from IBO's fiscal impact baseline above, which estimates the fiscal impact of 10 percent of the current vendor waitlists becoming permitted. In the lower-demand scenario, new MFV permits and GV licenses equaled 40 percent of the permit waitlists. In the higher-demand scenario, new permits and licenses equaled 80 percent of the current waitlists. Figure 5 shows the net fiscal impact the City would experience under each scenario, according to IBO's estimates.

These scenarios are two of many possible outcomes. Different readers will have different assumptions for what they believe is an appropriate estimate of how many street vendors would become permitted if there were no permit caps. It is worth noting that, even under an assumption of strong uptake of permits by street vendors, the net fiscal impact to the City would be small relative to the City's overall budget; although the overall fiscal impact does not necessarily capture the financial impact that lifting the cap may have for individual vendors.

Street Vending Revenues

New tax revenue would be the largest source of new revenue from increasing the number of permitted street vendors. On average, new MFV permits would lead to more new income tax revenue than sales tax revenue, while new GV licenses would generate more sales tax than income tax. This discrepancy reflects the fact that GVs tend to earn lower income than MFVs, and therefore many GVs earn too little income to necessarily owe income tax. Meanwhile, most vendors sell items on which sales tax must be collected, tracked, and remitted to the City and State. Newly permitted vendors would also lead to increased revenue from fines. (For example, this may include fines for not following food handling protocols or vending in prohibited locations). Finally, new vendor permits would generate additional fees from the permitting process.

Figure 5

Two Potential Scenarios for New Vendor Permits If Cap Were Eliminated

	Lower-Demand Scenario 40 percent of Waitlists Become Newly Permitted		Higher-Demand Scenario 80 percent of Waitlists Become Newly Permitted	
	Mobile Food Vendor	General Vendor	Mobile Food Vendor	General Vendor
Number of New Permits	3,951	4,397	7,902	8,794
Sales Tax	\$6,600,000	\$7,600,000	\$13,200,000	\$15,400,000
Income Tax	8,300,000	2,700,000	16,700,000	5,300,000
OATH Fines	100,000	100,000	200,000	200,000
Fees	3,100,000	900,000	6,200,000	1,800,000
Admin Costs	(5,100,000)	(800,000)	(10,200,000)	(1,600,000)
Fiscal Impact	\$13,000,000	\$10,500,000	\$26,100,000	\$21,100,000
Total Fiscal Impact	\$23,500,000		\$47,200,000	
Total Number of Permitted Vendors	14,341		22,689	

SOURCES: IBO analysis of DOHMH, DCWP, OATH, and Street Vendor Project data.

NOTE: Totals may not sum due to rounding.

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Sales Tax. Using vendors' reported annual profits and business expenses from the SVP survey data, IBO found that an increase in street vendor permits equivalent to 10 percent of the current waitlists would generate \$3.6 million in new sales tax revenue. In this estimate, IBO excluded MFVs that primarily sell produce, as fresh fruit and vegetables are not subject to sales tax. IBO's sales tax estimates factor in a level of non-compliance, based on estimates from the Internal Revenue Service on cash-based sole-proprietorship businesses. For more details, see methodology discussion in the appendix.

Income Tax. To calculate the effect of new vendor permits on income tax revenue, IBO used reported profits in the SVP survey. IBO considered "profits" in the survey as a stand-in for "income," because most street vendors are sole proprietors. An increase in street vendor permits equivalent to 10 percent of the current waitlists would create about \$2.8 million in new income tax revenue for the City. Most of this new revenue—\$2.1 million—would come from food vendor permit-holders, for two reasons. First, MFV operations earn higher average annual profits than GV (\$40,000 compared with \$30,000). Second, IBO assumed that each MFV permit has a multiplier effect on the number of street vendor food workers in a way that we cannot observe for GVs. MFV licenses are required for all street vendors who work with food, both permit-holders and other street-based food workers. For example, an owner of a permitted cart must have a license, as well as all employees. Based on the ratio of current MFV licenses to MFV permits—about 3:1—IBO assumed that each MFV permit would generate additional employment beyond the individual permit-holder. As a result, IBO estimated higher income tax from increased MFV permits than from increased GV licenses. IBO's income tax estimates also factor in a level of non-compliance.

Fine Revenue. The City collects civil fines from vendors after the Office of Administrative Trials and Hearings (OATH) adjudicates civil summonses.¹⁹ Recorded fines can vary from \$25 to \$1,000 depending on the severity of the violation. Using OATH data, IBO estimated that each additional permitted vendor would result in roughly \$22 in civil fine revenue, with MFVs paying on average \$24 per vendor and GVs paying \$17. For every 10 percent of vendors on the waitlists added, IBO predicted roughly \$40,000 in new revenue from fines.

Additionally, there are criminal summonses issued to vendors, which are discussed in the enforcement section of this report. IBO estimated that adding more permitted vendors would be likely to affect civil summonses and does not expect substantial additional criminal summons revenue from additional permitted vending.

Uncollected Fine Revenue and Fine Forgiveness. Currently, vendors must pay any outstanding fines to the City before being eligible to receive a license or permit. IBO's analysis of the profits reported in the Street Vendor Census indicates that most unpermitted vendors have modest earnings compared to permitted vendors. For unpermitted vendors seeking to legalize, having outstanding fines owed to the City may be a barrier and could affect the number of individuals who would convert from the informal to formal market.

The City could choose to pursue civil fine forgiveness for vendors on a one-time basis. IBO estimated that uncollected vending-related fines total over \$780,000, which includes all fines assessed since 2013. From 2018 through 2022, roughly 38 percent of all vending-related civil fines went unpaid. The most common type of civil summons issued to vendors was related to vending in a place where vending was not allowed followed by a vendor not having the proper license or permit. Importantly, it is unclear how much of this uncollected revenue would realistically be collected if it is not forgiven. For that reason, and because this cost is optional, the cost of fine forgiveness was not factored into IBO's overall fiscal impact analysis.

Also, "ghost fines"—fines owed by an individual who is not a real identifiable individual—are believed to be common in civil penalty data. Such uncollectable fines may be more common for vending because unpermitted vending is one of the limited options for individuals who face barriers to entering the formal economy.

Additionally, unpaid fines resulting from civil summonses eventually transfer from OATH to the Department of Finance (DOF), which can collect interest and additional fines on unpaid sums. This would suggest a higher total of uncollected fines—though by the time revenue from unpaid vendor fines reaches DOF for collections, IBO assumes this revenue is likely not revenue the City would realistically ever receive.

Administrative Fees. In the process of awarding new permits to food and merchandise vendors, city agencies would collect fees. Fees should be set at rates high enough to cover the costs of administering the licenses, but not so high that they can be considered as a new revenue source. Nevertheless, fees from newly permitted vendors would represent additional new money coming into the City that would at least partially account for the costs of administering the additional licenses.

Under the current fee structure, MFV fees depend on three factors: first, whether a vendor holds a permit and a license or just a license; second, what kind of food the vendor wants to sell; and third, whether the license is a supervisory license. MFV permit-holders pay between \$15 for a seasonal permit to sell pre-packaged food and \$200 for a full-term permit fee if food is prepared on-site. The food vendor license has a \$50 fee for a first-time license and a \$60 fee upon renewal. Each license-holder must take a mandatory food protection course—which costs \$53—once before receiving a license for the first time. For the supervisory license, the new license category established by Local Law 18, the fee is \$0 on issuance and \$438 every two years thereafter. The supervisory license permit has the same fee structure as full-term permits prior to Local Law 18 (which cost up to \$200 for a two-year term).²⁰

GV licenses expire on September 30 of every odd year, so they are eligible for a maximum of two years. Permit fees range from \$50 to \$200, depending on the length of time until the next expiration date.

IBO's analysis found that, for each 10 percent of the combined waitlists that become permitted vendors, the City would receive about \$1 million in additional licensing and permitting fees. This calculation assumed a continuation of the supervisory license fee structure established by Local Law 18.

Street Vending Expenses

DOHMH and DCWP—tasked with administering mobile food vending and general vending, respectively—would both require additional resources if the number of vendor permits were to increase. The administrative costs of additional MFVs are notably higher than adding GVs. Unlike administrative costs, which are directly tied to the number of permitted vendors in the City's legal vending system, enforcement costs are determined by the law enforcement agencies that oversee street vendors. These agencies likely make enforcement decisions based on the number of overall vendors in the City, regardless of permitted or unpermitted vending status. IBO assumed that increasing the number of permitted vendors would not necessarily lead to higher enforcement costs from DSNY and NYPD.

Administrative Costs. IBO estimated that the City would incur more costs per MFV added—\$1,286 per vending unit—than that for each GV added—\$179 per vending unit. For every 10 percent of the waitlist that received a new permit or license, the City would incur \$1.5 million in new administrative costs.

The difference in the cost of food and merchandise vending administration is largely due to the health code administration costs the City incurs for Mobile Food Vendors but does not incur for GVs. IBO estimated that DOHMH's permitting and licensing regimen is more costly to administer overall because it requires the permitting and licensing of Mobile Food Vendors, as well as the enforcement of the health code through inspections.

Enforcement Agencies. The City's approach to vending regulation enforcement has undergone several shifts in the past decade, including decriminalization and the reassignment of vending enforcement responsibilities

Figure 6

Costs to Administer Mobile Food Vendors and General Vendors

DOHMH Cost per Mobile Food Vending Unit	DCWP Cost per General Vendor
Permit: \$989 per permit <ul style="list-style-type: none"> \$716 inspection cost per unit + \$273 permit issuing costs per unit Inspection cost factors in cost of potential repeat visit License: \$297 <ul style="list-style-type: none"> \$96 per license Uses license multiplier assuming 3 licenses per new permit 	License: \$179 issuance cost
Total = \$1,286 per vending unit added	Total = \$179 per license added
SOURCES: DCWP and DOHMH Agency Permitting and Licensing Fee Schedules <i>New York City Independent Budget Office</i>	

to several agencies. Prior to recent changes, NYPD was the primary city agency officially responsible for enforcing vending regulations, through the issuance of both criminal and civil tickets. NYPD is a uniformed agency with arrest and enforcement powers. The City's 2021 reforms created the Office of Street Vendor Enforcement (OSVE), which was then assigned to DCWP, a civilian agency. In April 2023, Mayor Adams transferred OSVE into DSNY.²¹ The transfer represented a return to using uniformed officers within the City to enforce vending regulations.

While additional permitting and licensing staff are inherent costs to increased permitted vending, the City's approach to enforcement is a discretionary policy decision. To this point, enforcement of vendors over the past decade has shifted significantly away from criminal ticketing and towards civil enforcement of vending regulations. The number of criminal summonses issued to vendors has gone from roughly 42,000 in 2010 to

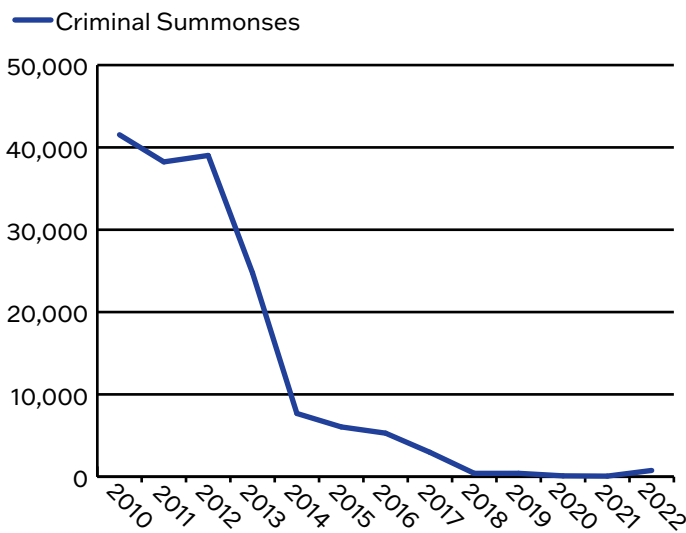
less than 800 in 2022, as shown in Figure 7. This is consistent with a citywide trend of shifting low-level offenses from criminal to civil summons, most notably through the City's 2016 Criminal Justice Reform Act. There is no indication that the vending practices and number of vendors in the City changed during this time; rather, such drops are accounted for by discretionary enforcement practices on the part of city enforcement agencies.

Potential enforcement actions against vendors include vendor sweeps, criminal or civil ticketing, inspections, and confiscations, only some of which result in a formal summons. DSNY and NYPD enforcement actions mainly rely on community complaint data for targeting vending enforcement—including 311, Community Boards, elected officials, and "major stakeholders."²² Though NYPD has no official role in the enforcement of vending, the agency's involvement is ongoing. According to the department, "the NYPD will seek to work with vendors to ensure compliance. Enforcement actions may follow if there is chronic non-compliance."²³ NYPD also noted that because the agency has no official role in vending enforcement, the amount of agency cost and resources spent on vending is not centrally tracked. Thus, though some enforcement costs are borne by NYPD, there is no tracked information available from the agency to determine what such costs may be or what the impact of a more permissive legal environment for vending would be on NYPD enforcement costs.

Enforcement Costs. Additional enforcement costs are not necessarily anticipated should the City move to create a more permissive legal vending environment. IBO assumes that most of the initial entry to permitted vending would be individuals who are already vending without permits; this switch would not likely generate additional enforcement costs, because law enforcement officers are already employing a set amount of resources to monitor and enforce the existing vendor population. The City could decide to increase law enforcement spending targeted at vendors, but that would not necessarily result from eliminating the cap on street vendor permits.

DSNY is the primary agency responsible for enforcing street vending regulations in the City and does so through the designated OSVE. DSNY currently has \$2.9 million budgeted for OSVE, and a budgeted headcount of 40 employees, as of the Fiscal Year 2024 Adopted Budget. The budget is set to increase to \$4.7 million by fiscal year 2027.

Figure 7

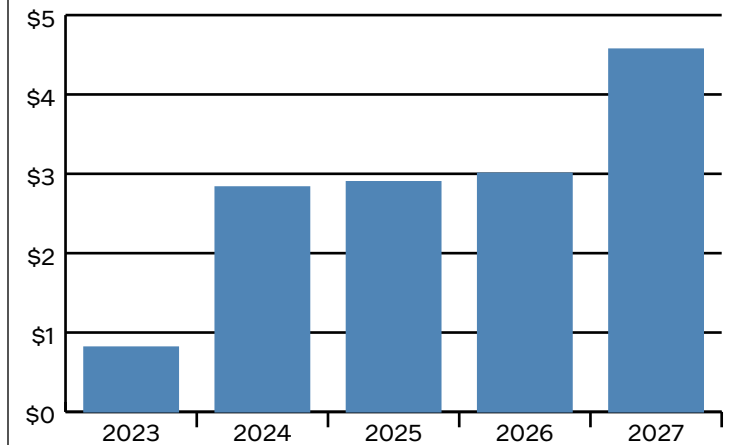
Criminal Summonses for Vending

SOURCE: NYPD Criminal Summons data
New York City Independent Budget Office

Figure 8

Department of Sanitation Enforcement Costs

Dollars in millions



SOURCE: New York City Department of Sanitation data
New York City Independent Budget Office

Economic Impact

The main economic impact of removing the cap on vendor permits and licenses would come from formalizing the economic activity of currently unpermitted street vendors. If an unpermitted vendor gains a permit, the vendor will be required to pay taxes on income and business revenue that is currently not taxed.

Bringing vendors into the formal economy would also likely generate slightly higher GDP for the City, since their business income would now be counted rather than unreported. The effect would be small; if 100 percent of both waitlists were to gain permits, IBO expects that the effect on New York City's GDP would be an increase of about \$17 million, or 0.0042 percent.²⁴

Any broader economic impact from this policy would depend on whether it inspires people to begin street vending instead of choosing to participate in other sectors. To address this question, IBO reviewed academic literature that explores what factors lead to growth in street vending and other informal markets both in the United States and in other countries. Most academic literature concludes that participation in the informal economy is driven mainly by macroeconomic factors (such as limited access to other job opportunities), cultural factors, or both, rather than the licensing structure in a municipality. Because of this, IBO does not expect that eliminating the cap on vendor permits would lead to many additional people choosing to become street vendors.

Among academic literature on the topic, Hassan and Schneider (2016) claim that, globally, participation in the informal economy is driven by high tax burden, high regulatory burden, high unemployment rate, high self-employment rate, and poor quality of local institutions.²⁵ Al-Jundi et al. (2022) conclude that poverty, lack of education, immigration status, lack of employment prospects, and lack of access to finance are the primary forces that drive people to choose to be street vendors.²⁶ Kelmanson, Kirabaeva, and Medina (2021) point out that in developed economies, macroeconomic factors may be more important than institutional factors when predicting the size of the informal market.²⁷ Other studies note that some vendors are willing to accept lower business scale in exchange for avoiding the costs of formalization, including onerous tax declarations and time-intensive licensing processes (Bromley 2000, Recchi 2020, Pileri 2021).²⁸

Although IBO expects that the broad economic impact of removing vendor permit caps would be modest, the policy could have significant positive effects for individual vendors—particularly those who spend tens of thousands of dollars a year on leasing a permit from a current permit-holder. If vendors in this position could instead secure a city-issued permit for the notably lower cost of the City's licensing fee, they could increase their annual profits by thousands of dollars. It is also possible that acquiring a permit could allow vendors to access capital markets in new ways, potentially leading to new business expansion and higher incomes for street vendors. Similarly, should newly permitted vendors have more profitable businesses, they may use fewer public benefit resources or invest some of their new earnings into the local economy. All these scenarios, however, are impossible to model in any way beyond speculation, due to the lack of data.

Conclusion

This report explores the potential fiscal impacts of eliminating the caps on GV and MFV permits issued by New York City. IBO's analysis predicts that the overall fiscal impact of eliminating vendor permit caps would be positive but small. Compared to the total city budget, currently set at \$110.5 billion, the potential new revenue from adding street vendor permits is not large. Permitting more street vending, however, would likely have a major impact for participants in the industry currently operating without permits due to the capped number of authorized permits.

The scale of this policy's fiscal impact depends on the number of street vendors who choose to become permitted. Since this number is impossible to predict accurately, IBO presents the expected fiscal impacts of 10 percent of the current GV and MFV waitlists choosing to become permitted. Readers can build their own fiscal impact estimates based on their assumptions for how many street vendors would choose to get permits if there were no limits on applying.

Lastly, if the City were to raise the caps on the number of vending permits and licenses, it would not unilaterally address the challenges that street vendors face. To operate fully within the law, street vendors must avoid many streets across the City. If vendors fail to comply with complicated rules about where they vend, they may be penalized with steep fines. Permitted food vendors must use city-licensed commissary locations to store and clean their units; however, limited commissary space may make it difficult to follow this regulation. Also, any outstanding fines would make a street vendor ineligible for a permit, under current rules. Therefore, while lifting the cap on permits and licenses would likely benefit many vendors and provide a positive fiscal impact to the City overall, it is unlikely to immediately bring all street vendors into the formal economy.

Appendix: Methodology

Street Vendor Project Survey Data

IBO received data from the Street Vendor Project (SVP) containing the results of an extensive survey administered to 2,060 vendors. This survey is the only known survey of its kind both in scale and level of detail on individual vendors in New York City. Because of a lack of comparable data on the informal economy of street vending, IBO chose to assume that the sampling of vendors within the survey data was representative of the overall vending population within the City, for the purposes of this analysis. IBO was not involved in the collection or verification of the data, but considers it likely the best available information on an otherwise-unquantified industry sector. As stated previously, the use of this dataset in no way implies that IBO supports or opposes SVP's advocacy agenda.

It is likely that the SVP data overrepresents individuals connected with the Street Vendor Project's organizing in the City and underrepresents vendor types who tend to be less involved in the organization such as high-earning vendors and franchised food trucks.

The survey data was collected in 2021, which was a year highly affected by the Covid-19 pandemic. Vendors reported profits from both before and during the pandemic in the summer and winter. The business expenses, however, were only reported in one variable, and vendors did not have the option to report changes in their business expenses from before and after the pandemic or on a seasonal basis. IBO considered the pre-pandemic vending numbers to be more aligned with the current state of vending in New York City, but also recognized that central business districts have not reached the same weekday occupancy and foot traffic as prior to the pandemic.

Vendors estimated their profits and business expenses in ranges. IBO used the midpoint of the range for our calculations. In calculating annual profits, IBO assumed six months of winter profits and six months of summer profits for each year. Annual revenue was calculated by adding the annual business expenses to the annual profits both before and during the pandemic for each individual vendor.

IBO included Restricted Area Permits for MFVs in our calculation of costs and revenue under the current permitting system. Restricted Area Permits require vendors to have a lease agreement with a private property owner; the vendor cannot vend widely within the City. IBO assumed that fine revenue, fees, and administrative costs included Restricted Area Permits and thus incorporating them into overall permit numbers in the model results in more accurate estimates of cost and revenue per vendor. Currently there are roughly 358 Restricted Area Permits. These permits are unlimited and not represented in the 5,100 vending permit cap for MFVs.

Sales Tax Revenue

To calculate the effect of new vendor permits on sales tax revenue, IBO started with vendors' reported annual profits and business expenses, from the SVP survey. IBO summed the reported profits (for six months of winter and six months of summer) and business expenses for each vendor to reach an estimate of total business revenue for each vendor. IBO then estimated average annual revenue for all vendors and for each vendor category: MFV and GV. Because the SVP survey data asked for vendors' profits and expenses in 2019, IBO adjusted business revenue figures for inflation from June 2019 through September 2023 using the Consumer Price Index in the New York-Newark-Jersey City metropolitan area.

To determine total sales revenue received by new vendors, IBO multiplied the average revenue estimate for each vendor type by new vendors equivalent to 10 percent of that vendor type's waitlist. Because many food vendors sell produce, which is not subject to sales tax, IBO then adjusted the vendor revenue estimate to remove greengrocer vendors. According to the SVP survey data, 25 percent of mobile food vendors list "produce" as their primary fare, and 27 percent of MFV revenue accrues to food vendors who specialize in produce sales. Taking the average of these two percentages, IBO decreased the total food vendor sales by 26 percent to account for the sale of sales-tax-exempt items. IBO then applied the local sales tax rate of 4.5 percent to determine the amount of new sales tax revenue received by the City. IBO's model assumes that vendors will continue to have a similar distribution of sales revenue as the number of permitted vendors grows.

Finally, according to research by the United States Internal Revenue Service (IRS), tax evasion by cash-based sole proprietorships is widespread. The IRS has estimated that sole proprietors evade paying taxes on up to 57 percent of their cash sales.²⁹ With no further clarity on the rate of tax noncompliance by street vendors, IBO assumed that street vendor tax noncompliance will fall at the midpoint between 0 percent and 57 percent. Therefore, IBO's estimate of expected sales tax revenue was decreased by 28.5 percent.

Income Tax Revenue

To calculate the effect of new vendor permits on income tax revenue, IBO began by looking at the reported profits of all vendors who reported non-zero profits in the SVP survey. IBO considered "profits" in the survey as a stand-in for "income," because most street vendors are sole proprietors, and their business profits will equal personal income.

Based on vendors' reported profits/income, IBO arranged each vendor into the appropriate 2019 personal income tax bracket. For the purposes of these calculations, IBO assumed that all vendors would file income taxes as single filers or as married filing separately. This approach is meant to approximate the average income tax liability for individual street vendors in New York City, because the SVP survey did not capture information on spousal income. IBO then subtracted the standard deduction of \$8,000 from each vendor's income to arrive at a figure of taxable income for each vendor. Based on income tax brackets, IBO applied the appropriate income tax rate to each vendor's taxable income to determine individual and average income tax liabilities for street vendors in 2019.

IBO then determined how many people are represented by 10 percent of the vendor waitlists. To find the number of total MFV workers expected from these new permits, IBO found the ratio of MFV license-holders to MFV permit-holders (3.09). Because individuals are allowed to work at a mobile food cart after receiving a MFV license (even if they do not hold a permit), IBO assumed that the ratio of MFV license-holders to MFV permit-holders would stay the same in a scenario in which the cap on permits were lifted. Therefore, on average the total number of new income taxpayers for any additional MFV permit would be just over three people. IBO's income tax calculations account for this observed employee multiplier effect from MFV permits.

IBO then multiplied the average vendor income tax liability calculated above by 10 percent of the GV waitlist and by 10 percent of the MFV waitlist, with the MFV waitlist scaled up to account for additional workers as discussed above.

IBO accounted for the fact that certain percentages of city street vendors will live outside the City, and therefore will not pay New York City income tax. Based on the combined street vendor waitlists, IBO estimated that about 3.5 percent of GVs and 14.3 percent of MFVs live outside New York City. IBO adjusted the income tax estimates downward to account for non-resident vendors.

IBO used the Consumer Price Index for all items in the New York-Newark-Jersey City metropolitan area to adjust the average income tax liability for inflation from June 2019 through September 2023. IBO's model assumes that vendors will continue to have a similar distribution of profits and income tax liability as the number of permitted vendors grows.

Finally, as with sales tax, IBO's income tax estimates account for a certain amount of tax noncompliance. Again, based on IRS estimates of tax noncompliance rates by cash-based sole proprietorships, IBO assumes that street vendors will underreport their revenues and profits by 28.5 percent when filing income taxes. As a result, expected income tax revenue was adjusted down by 28.5 percent.

Fine Revenue

IBO's calculation of fine revenue was based on civil summons fine data provided to IBO by OATH. The fine data spanned from January 2013 through September 2023 and included separately provided files for food vendor, health, and GV violations. The Health Code Violations were for all health violations over the past 10 years. IBO reviewed each violation type and selected those that appeared to pertain to vending.

First, any fines recorded with negative values in balance due or balance paid were removed from the data. IBO looked first at the types of violations that were most common in the data, before adding up the total paid and unpaid balances and dividing them by the number of current permitted vendors in the City. The number of current permitted vendors was based on how many active licenses and permits there are, not permit caps. This is because there is some turnover and delay within the agencies so not all permits/licenses are active at any given time.

IBO's fine revenue estimates may have undercounted health violations by vendors. Since there is no way to know what percentage of general violations were from mobile food vendors, IBO assumed that only vending-related health violations were revenue-generating. There could be small fine revenue growth in other general health code violations as a result of a more permissive legalization regimen.

Mobile Food Vendor Fees

To calculate total fees from MFV permits and licenses, IBO found the average fees collected from MFV permits and licenses during fiscal years 2018, 2019, and 2022. IBO did not include 2020 or 2021, because they were low outliers following the COVID-19 pandemic. The average fees collected in the years studied was about \$960,000.

Because this figure contains fees from both MFV permits and licenses, IBO disaggregated the fees collected from each of these categories.

There are currently 16,806 active MFV licenses. Since these licenses need to be renewed every two years, IBO modelled that about 8,403 MFV licenses will be renewed each year. When a vendor first applies for a food vending license, the vendor must pay the \$50 license fee as well as a \$53 fee for a food safety training course, or \$103 total. Based on the long-term average number of new food vendor licenses granted in the six years before the pandemic (from 2014 through 2019), IBO estimated that about 8 percent of food license grantees would pay the first-time license price in a given year. The remaining 92 percent of vendors in a given year would pay the license renewal fee of \$60. Therefore, IBO assumed that the total average license fee paid per vendor would be \$63.52, a weighted average of the two fee amounts above. The total annual license fees—8,403 licenses times \$63.52 per license—equals about \$530,000. For 10 percent of the MFV waitlist, IBO multiplied the expected fee per license by the expected number of additional license-holders that would be generated by 10 percent of the MFV waitlist becoming permitted.

After subtracting license fees, the remainder of the total MFV fees in an average year would be about \$420,000. This amount represents the total fees from MFV permitting in an average year. IBO then divided the MFV permitting fees by the total number of MFV paid permits (4,113) to reach an estimate of average annual fees per MFV permits collected by the City. The estimate is \$102.90, about half of \$200, which is the highest vendor permit fee. IBO multiplied this fee estimate by 10 percent of the MFV waitlist to arrive at an estimate of additional fees from new MFV permits. IBO summed expected new fees from permits and expected new fees from licenses to calculate expected overall new fees if the number of MFV permits were to increase.

General Vendor Fees

IBO's calculation of expected GV fees relied on the current fee structure for GV licenses, which expire on September 30 of each odd year. The longest a GV license can be valid is two years. License fees range from \$50 to \$200, depending on how far away the next expiration date is. IBO assumed that most new general vendors would pay \$200 per license application or renewal in order to hold the license for the full two-year period. To calculate total expected fees from 10 percent of the GV waitlist becoming permitted, IBO multiplied the average fee per vendor by 10 percent of the GV waitlist.

DOHMH Administrative Costs

IBO relied on DOHMH budget and personnel data from fiscal year 2023 to calculate increased administrative costs. Administrative costs were assumed to be linear, increasing on a per vendor basis. Our administrative cost calculation per vendor was created by summing the cost of permit issuance, the cost of license issuance, and the cost of the health inspection. To estimate cost of license issuance, we applied a permit multiplier of three to represent additional license issuance that would result from a single new permit. IBO assumed the administrative DOHMH staff costs to be evenly split between permitting and licensing. IBO divided the total annual personnel costs by the average number of permits issued each year and the average number of licenses issued each year which led to a permit cost of \$273 per permit and a license cost of \$96 per license.

To get the cost of the health inspection, IBO divided the permitting processing staff costs by the number of carts inspected each year, provided by DOHMH (about 4,200 unique units inspected). DOHMH pays intracity funds to DCWP to run the licensing centers. Such costs were factored in here as costs to DOHMH as they are costs for MFV permitting and paid to DCWP by DOHMH.³⁰ Importantly, without operational expertise on the software and behind-the-scenes processing of permits and licenses, it is impossible to know where economies of scale may exist in the permitting/licensing process. The potential existence of economies of scale may drive down the cost of processing per license or permit.

DCWP Administrative Costs

To calculate DCWP administrative costs, IBO relied on agency budget and personnel data from fiscal year 2023 and DCWP Open Data on licensing. IBO assumed a linear increase to personal costs per license issued.

IBO determined the cost of all GV licenses by multiplying the percentage of all licenses issued by DCWP for general vending by the cost of all license issuances for DCWP. That cost was then divided by the number of GVs to get the average cost per license.

Glossary

DCWP: The Department of Consumer and Worker Protection (DCWP) licenses more than 45,000 businesses in more than 40 industries and enforces key consumer protection, licensing, and workplace laws. The agency also conducts research and advocates for public policy that furthers its work. DCWP also issues GV licenses.

DOHMH: The Department of Health and Mental Hygiene (DOHMH) is responsible for public health along with issuing birth certificates, dog licenses, and conducting restaurant inspection and enforcement. DOHMH also issues MFV permits and licenses.

DSNY: The Department of Sanitation (DSNY) is responsible for garbage collection, recycling collection, street cleaning, and snow removal. The DSNY is the primary operator of the New York City waste management system.

Expressive Materials: Expressive materials include materials or objects with expressive content, such as newspapers, books or writings, or visual art such as paintings, prints, photography, sculpture, or entertainment. Expressive materials are allowed to be sold by street vendors under the First Amendment.

First Amendment Vendor: A First Amendment vendor is a person who sell newspapers, magazines, music, books, and art on the street. However, you still must abide by the City's many restrictions on where you put your table, and there are many streets where you cannot vend at all. You must also abide by the New York State tax law by getting a tax ID ("certificate of authority") and by collecting and paying sales taxes on what you sell.

General Vendor: A general vendor is a person that sells, leases, or offers to sell or lease non-food goods or services in a public space that is not a store.

General Vendor License: A General Vendor license is required for anyone that will sell, lease, or offer to sell or lease goods or services in a public space that is not a store. The maximum number of General Vendor Licenses that DCWP issues to non-veterans is limited by law to 853. DCWP's waitlist for non-veteran applicants is currently closed. The following individuals may submit an application for a General Vendor License: an individual with a valid waitlist number issued by DCWP; an honorably discharged veteran residing in New York State; or the surviving spouse or domestic partner of an honorably discharged veteran residing in New York State.

Mobile Food Vendor: A mobile food vendor is a person who sells food (or distributes it free of charge) from a mobile food vending unit in any public, private or restricted space.

Mobile Food Vendor License: The Mobile Food Vending License is issued to an individual who will prepare and/or serve food from a permitted mobile food vending unit (truck or pushcart). The license is issued by DOHMH as a photo ID badge. There are no waitlist to apply for the Mobile Food Vending License. All applicants for a Mobile Food Vending License must pass the Food Protection Course for Mobile Food Vendors before they are issued a license.

Mobile Food Vendor Permit: A mobile food vendor permit is documentation issued by DOHMH that qualifies a mobile food vending unit. The permit allows the mobile food vending unit to sell or distribute food legally. DOHMH is limited by law in the total number of street vending permits that may be issued. There are waitlists to apply for a permit unless you plan to operate a Restricted Area Food Vending Permit.

Mobile Food Vending Unit: A mobile food vending unit is a food service establishment within a pushcart or vehicle that is used to store, prepare, display, serve or sell food — or distribute it free of charge — for consumption in a place other than in or on the unit. Any such pushcart or vehicle is considered a mobile food vending unit, whether it's operated indoors or outdoors on public, private or restricted space.

NYPD: The Police Department (NYPD), officially the City of New York Police Department, is the primary law enforcement agency within New York City.

OATH: The Office of Administrative Trials and Hearings (OATH) is the City's central independent administrative law court; it is not part of the state court system. The OATH Hearings Division is the division of OATH that is responsible for holding hearings on summonses issued by a variety of City enforcement agencies.

OSVE: The Office of Street Vendor Enforcement (OSVE) is a dedicated vending law enforcement unit that exclusively enforces vending laws. OSVE was created as part of Local Law 18. Originally part of DCWP, the office was moved to DSNY when the Sanitation Department took over street vendor enforcement in 2023.

Restricted Area Permit: The Restricted Area Mobile Food Vending Permit authorizes mobile food vending on private property in a commercially zoned area or on property under the jurisdiction of the Department of Parks and Recreation and is exempt from the statutory limits which apply to public street vending. This permit type is exempt from the limits imposed on public street vending and does not require being on a waitlist. Examples of situations which qualify as "outdoors on private property" include: a private commercial parking lot; an outdoor shopping mall or shopping strip; a vacant fenced-in lot area; the area within a gasoline station. The sidewalk in front of someone's store is considered public space, not private property, and therefore does not qualify.

Endnotes

¹Stefanos Chen and Raúl Vilchis, “[They Make Some of New York’s Best Food. They Want the Right to Sell It](#),” New York Times, August 5, 2023.

²It is difficult to accurately determine permit leasing costs incurred by vendors. The practice is not legal and thus reported costs vary based on the individuals surveyed. The Street Vendor Census data, used by IBO in this report’s calculations, show an average cost of \$17,000 (with a similar indicated median cost).

³Tanaz Meghiani, “[Food Vendors Protesting City Hall Say Things Are Worse After New Law Was Supposed to Make Them Better](#),” The City, September 29, 2022.

⁴See Haidee Chu, “Crackdown Continues at Corona Plaza, Where Vendors Had Thrived,” The City, August 10, 2023, and John Leland, “[Politics, Police, Pozole: The Battle for Sunset Park](#),” The New York Times, May 14, 2023.

⁵Nicole Hong and Ana Ley, “[Turning to Street Vending, New Migrants Find a Competitive World](#),” New York Times, October 10, 2023.

⁶Bluestone, Daniel. (1991). “The Pushcart Evil: Peddlers, Merchants, and New York City’s Streets, 1880-1940. *Journal of Urban History*. 18 (1): 68-92.

⁷Devlin, R. T. (2010). *Informal Urbanism: Legal Ambiguity, Uncertainty, and the Management of Street Vending in New York City*. Doctoral dissertation, University of California, Berkeley.

⁸Devlin. 31.

⁹See New York City Local Law 77 of 1977 and New York City Local Law 50 of 1979.

¹⁰Devlin. 60.

¹¹Mike Allen, “[Giuliani to Bar Food Vendors on 144 Blocks](#),” New York Times, May 24, 1998.

¹²See New York State General Business Law Article 4, Section 35.

¹³See Robert Bery et. al. v. City of New York et. al.

¹⁴According to a statement by the NYPD in a letter from Mayor Adams’s administration sent to the Comptroller on the rollout of Local Law 18 of 2021, dated September 27, 2023.

¹⁵In the first two years of implementing Local Law 18, DOHMH has issued the 890 vending applications that were legally required to be released. Only 342 vendors submitted their application, and DOHMH has approved all of them. The 342 vendors who now have a supervisory license can apply for a vending permit at any time—the permit authorizes use of a food cart or truck and there is no deadline to apply. As of December 2023, 108 of the 342 licensees have initiated a supervisory license permit application. Fifty of those have so far received the permit and the others are in the process of completing their applications. The remaining licensees may apply for the permit at any time.

¹⁶For additional reporting, see Arya Sundaram, “[After street vendor crackdown, Corona Plaza market is a changed place](#),” Gothamist, September 13, 2023.

¹⁷Chen and Vilchis, “They Make Some of New York’s Best Food. They Want the Right to Sell It.”

¹⁸The following waitlists have been open in the last two years: Green Carts (five waitlists), Seasonal, Supervisory License for U.S. veterans and people with a disability. Green cart and seasonal waitlist applications were open to any person with a MFV license.

¹⁹Civil summonses are issued by various enforcement agencies. Fine amounts are established by the enforcement agency responsible for regulating the violation(s) charged on the summons. Those fines are set by law either through enforcement agency rulemaking, local law, or state law.

²⁰There is no fee for an honorably discharged veteran of the U.S. Armed Services or the surviving spouse or domestic partner of such veteran.

²¹[Letter from Adams Administration announcing Office of Street Vendor Enforcement Transfer from DCWP to DSNY](#), March 20, 2023.

²²Letter to Comptroller Regarding Local Law 18, 2021. September 27, 2023.

²³Ibid.

²⁴IBO reviewed a study completed in 2015 [Institute for Justice](#). The analysis sought to measure the economic impacting of current street vending in New York City but did not model the fiscal impact to the city or economic impact of increased legalization. The Institute for Justice’s work is a potential jumping off point for measuring economic impact of vending in the city, though any future analyses would require a larger sample size than what their initial analysis relied on (n=209 vendors).

²⁵Hassan, M. and Schneider, F. (2016). “Size and Development of the Shadow Economies of 157 Countries Worldwide: Updated and New Measures from 1999 to 2013.” IZA Discussion Paper no. 10281. Bonn: Institute for the Study of Labor.

²⁶Al-Jundi, S., Al-Janabi, H., Sala, M. A., Bajaba, S., Ulla, S. (2022). “The Impact of Urban Culture on Street Vending: A Path Model Analysis of the General Public’s Perspective.” *Frontiers in Psychology* 12.

²⁷Kelmanson, B., Kirabaeva, K., and Medina, L. (2021). “Europe’s Shadow Economies: Estimating Size and Outlining Policy Options”, in Delechat, C., and Medina, L. “The Global Informal Workforce.” Washington, D.C.: International Monetary Fund, pp. 71-85.

²⁸Bromley, R. (2000). *Street Vending and Public Policy: A Global Review*. *International Journal of Sociology and Social Policy*, 20, 1-29; Recchi, S. (2020); “Informal street vending: a comparative literature review.” *International Journal of Sociology and Social Policy* 41 (7/8), pp. 805-825; Pileri, J. (2021); “Who Gets to Make a Living? Street Vending in America.” *Georgetown Immigration Law Journal* 36, pp. 215-259.

²⁹Internal Revenue Service Research, Applied Analytics & Statistics. “Federal Tax Compliance Research: Tax Gap Estimates for Tax Years 2014-2016.” Publication 1415 (Rev. 08-2022). Washington, DC. August 2022, p. 20.

³⁰Intracity funds are funds spent by one city agency to purchase services from another city agency. In the case of vending, DOHMH pays DCWP so that licensing/permitting for MFVs can be accessed at DCWP in-person licensing centers.

REBNY Testimony | May 6, 2025

The Real Estate Board of New York to The City Council Committee of Consumer Affairs and Protection

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate.

For much of New York City's history, street vending has been an inherent and enduring feature of the urban landscape. REBNY recognizes that street vending is, and will continue to be, part of the fabric of City life. However, it is not unreasonable to expect that clear rules are in place and consistently enforced — and that the legitimate needs and concerns of property owners, businesses, and taxpayers are given due consideration. Before the City contemplates expanding the number of vendors or introducing new licensing schemes, it is essential to ensure that the current enforcement system is functioning effectively.

REBNY is proud to have participated in the Street Vendor Advisory Board (SVAB) established under LL18 and several of the proposals under consideration stem from recommendations and discussions held within the SVAB. We look forward to continuing collaborative conversations around these proposals to strengthen equity, education, and enforcement in the street vending space.

REBNY stands ready to work with the Committee to identify solutions that align with the shared goals of property owners, vendors, and brick-and-mortar businesses. However, we must acknowledge the difficult economic reality facing New York City's retail and hospitality sectors. Employment in these industries remains below pre-pandemic levels, and new cost pressures, including tariffs, threaten to make goods more expensive.

One of the most significant features of LL18 was its creation of a phased approach to issuing vending supervisory licenses over ten years. This was designed to dismantle the underground market for vending licenses in a measured way, while also enabling the City to establish the Office of Street Vendor Enforcement. We are still in the early stages of this carefully designed phase-in. As the City continues to adapt its enforcement strategies to today's challenges, we strongly urge the

Council to allow this process to unfold before accelerating the phase-in or lifting the existing cap on vending licenses.

Rather than addressing the significant enforcement needs with the current number of vendors on the streets, the City Council is currently considering legislation — including Int. 431-2024 — that would expand the number of street vendor permits. This “Street Vendor Reform Legislative Package” has been promoted as a step toward fairness, but in practice, it risks destabilizing an already fragile retail environment.

Local Law 18 was intended to add 4,450 new vendor permits and strengthen enforcement, yet much of this has not been realized. Many of the promised new permits have not been issued, and unlicensed vendors continue to overwhelm our streets and public spaces, with little visible enforcement. Despite this, the Council is now weighing an even greater expansion by increasing permits to 7,500 and ultimately seeking unlimited permitting, effectively formalizing the widespread, unmanaged vending activity currently taking place on our sidewalks.

According to the Street Vendor Project, there are currently an estimated 23,000 unlicensed vendors operating in the City, including over 20,500 unlicensed food vendors. These unlicensed operations often cluster together, selling similar goods side by side, without coordinated placement, sanitation oversight, or tax contributions. This creates a “free-for-all” on sidewalks, congesting pedestrian pathways, compromising accessibility, and straining public sanitation systems.

For brick-and-mortar businesses — which pay rent, property taxes, and comply with extensive regulations — the unchecked growth of unlicensed vending is a major threat. It reduces foot traffic to storefronts, drives down demand for retail space, and contributes to rising vacancy rates. Meanwhile, the public is exposed to unregulated food operations that lack basic health inspections and safety oversight.

REBNY is particularly concerned that our City agencies currently lack the capacity to enforce the existing vending laws, and that expanding the number of vendors through Int. 431-2024 will only further undermine enforcement. Allowing unlimited permits with minimal regulatory oversight risks accelerating job losses, business closures, and neighborhood decline.

REBNY remains committed to engaging constructively with the Council, vendors, and small business stakeholders to identify balanced, thoughtful solutions that strengthen our local economy and preserve the character of our neighborhoods. Thank you for the opportunity to submit this testimony. We look forward to continuing dialogue on this critical issue

CONTACT:

Dev Awasthi

Vice President of Government Affairs
Real Estate Board of New York
dawasthi@rebny.com



**Testimony of Transportation Alternatives
to the Committee on Consumer and Worker Protection:
Street Vendors
May 6, 2025**

Thank you to Chair Menin for holding today's hearing. Transportation Alternatives (TA) advocates for safe, equitable, and vibrant streets across the five boroughs. Today we submit the following testimony in support of New York's street vendors.

Street vendors are part of the lifeblood of New York City, providing tens of thousands of jobs and microbusinesses, and supporting immigrants, people of color, and military veterans. They work every day in New York's public spaces as an essential part of the fabric of neighborhoods and streetscapes across each borough.

Transportation Alternatives supports **Intro 431**, which would increase the number of food vendor supervisory licenses and general vendor licenses, and then also lift the cap on licenses. Due to the arbitrary nature of the current cap on license, many street vendors – 75 percent of mobile food vendors and 37 percent of general vendors – operate without business licensing. Implementing Intro 431 would address the unfair, chaotic status quo and ensure a fair system for all. TA also supports **Intro 408**, which creates an office of street vendor services within SBS to lead on education, training, and outreach for NYC's smallest businesses.

TA urges the City Council to pass these two bills as part of the Street Vendor Reform Package.



**The Arab American
Association of
New York**

**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is Maryam Khaldi, and I am the Advocacy & Civic Engagement Manager at the Arab American Association of New York (AAANY). I want to thank Chair Menin and the Committee for the opportunity to submit this testimony in strong support of Intros 431 and 408, part of the Street Vendor Reform legislative package.

AAANY is a grassroots, immigrant-led organization based in Bay Ridge, Brooklyn. We serve thousands of immigrants throughout the New York City metro area with legal services, youth programs, social support and civic engagement.

For many New Yorkers, particularly those we serve, street vending is not just work, it's survival. It's the only pathway to providing for their families when other doors remain closed due to legal status, language barriers, or discrimination. The vast majority of street vendors in New York are born in a country outside of the United States and they provide the lifeblood of our great city.

Street vendors contribute nearly \$192 million in wages, \$292.7 million in goods and services, and \$71.2 million in taxes annually to our city's economy. Despite this significant economic contribution, only a fraction of food vendors possess the necessary permits to operate legally. Consequently, many are subjected to unfair arrests, harassment, and are often treated as disposable. These vendors reflect the incredible diversity and resilience of our city; they are immigrants, women, people of color, and community members who show up every day to support their families and care for their communities.

At AAANY, we see street vending as a form of survival, dignity, and economic justice, and we are proud to stand in support of vendors who deserve the same recognition and protection as any small business owner in New York City.

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408, as part of the Street Vendor Reform legislative package.

Intro 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors. By bringing vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses, ensuring a fair system that requires vendors to comply with vending regulations including strict siting and health code rules to maintain their permitting. This will give New York's smallest businesses a real chance to thrive in our local economy.

Currently, while there are more than 5 agencies that do street vendor enforcement, there is no city agency leading on educational resources to vendors. **Intro 408** would create an office of street vendor services within SBS,

ensuring that street vendors as our City's smallest businesses have access to training, education, and outreach to support business compliance and growth.

Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

At AAANY, we are especially concerned about the immigration consequences tied to the criminalization of street vending. The vast majority of street vendors in New York are immigrants, and every ticket or arrest issued by the NYPD increases the risk of ICE involvement, detention, and even deportation. We've seen members of our community face devastating consequences simply for trying to earn an honest living. City policies must reflect our values, not replicate the fear-driven, punitive agenda of past administrations. Enacting Intros 431 and 408 is not just about economic fairness—it's about protecting immigrant families and reaffirming New York City's commitment to being a true sanctuary for all.

Thank you for accepting our testimony today. It is AAANY's hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

Maryam Khaldi
Advocacy & Civic Engagement Manager
Arab American Association of New York (AAANY)

Dear New York City Council,

My name is Noah Allison, and I am submitting this testimony as a New York City resident and scholar of urban life.

I write in strong support of the Street Vendor Reform Package, particularly Intro 431 and Intro 408. These bills are critical steps toward creating a fair, predictable, and supportive framework for the smallest and essential businesses in our city.

Street vendors are not just economic actors; they are indispensable to the liveliness, accessibility, and cultural richness of New York City. From tamales in Corona to halal carts in Midtown, vendors bring affordability and vibrancy to our sidewalks, offering residents and visitors alike a taste of the varied groups comprising New York City—often for just a few dollars. Their presence is part and parcel of the city's public life, reflecting its diversity and energy.

By ensuring access to requisite licenses (Intro 431) and creating a dedicated division within the Department of Small Business Services (Intro 408), the City Council has the opportunity to replace a punitive, confusing system with one that supports legal compliance and economic dignity. These reforms would allow vendors to operate with the legitimacy, dignity, and support they deserve to sustain their livelihoods, while ensuring safe and organized streets for everyone.

Supporting these bills is a vote for justice, for small businesses, and for a city that claims to value the everyday labor that makes New York New York.

Thank you for the opportunity to testify.

Sincerely,



Noah Allison, Ph.D.
Term Assistant Professor
Urban Studies Program
Barnard College-Columbia University
nallison@barnard.edu
1.310.425.9026

Testimony of Lisa Sorin
New York City Council Hearing on Int. 431-2024
May 6, 2025

Good morning, Chair Menin and esteemed members of the City Council. My name is Sorin, President of the Bronx Chamber of Commerce, representing thousands of small businesses across the borough and the city.

We support legal, licensed street vending as part of New York City's vibrant small business ecosystem. However, Intro. 431-2024 seeks to expand street vendor licenses and permits while failing to address a deeply rooted issue: the unchecked proliferation of illegal street vending.

Today, more than 23,000 unlicensed street vendors operate citywide—many without health inspections, safety oversight, or adherence to location restrictions. This undermines licensed vendors and puts our brick-and-mortar businesses—who pay high rents and taxes, employ residents, and follow strict rules and regulations—at a competitive disadvantage. If not handled appropriately, this will result in the continuation of shuttered storefronts, declining retail corridors, and diminished community investment. We strongly oppose any consideration of uncapping the number of street license vendors as this would negatively impact the retail and restaurant businesses in New York City.

We have grave concerns - - as it stands now, city agencies do not have the capacity and resources to enforce existing laws. Without a real enforcement plan, increasing street vendor licenses now risks further weakening compliance and worsening street-level conditions, especially in underserved areas like the Bronx, where sidewalks are already overcrowded and quality-of-life concerns are mounting.

City agencies have demonstrated that they have been unable to implement the components of local law 18 passed in 2021. Therefore, the Bronx Chamber respectfully urges the Council to PAUSE legislation that further expands street vendor licenses until there is a comprehensive and fully

resourced enforcement strategy in place. Let's get enforcement right first—so all businesses, vendors, and residents can thrive in a fair and safe commercial environment.

Thank you for your leadership and the opportunity to testify today.



Chinese-American Planning Council
Testimony Before the Committee on Consumer and Worker Protections
Chair, Council Member Julie Menin
Intro. 431 and Intro. 408
May 6th, 2025

Thank you Chair Menin and members of the City Council for the opportunity to testify today in support of Intros. 431 and 408. My name is Pamela Franco Lara, and I am a Learn and Earn student from Franklin Delano Roosevelt High School as part of the Chinese-American Planning Council (CPC). The mission of the Chinese-American Planning Council, Inc. (CPC) is to promote social and economic empowerment of Chinese American, immigrant, and low-income communities. CPC was founded in 1965 as a grassroots, community-based organization in response to the end of the Chinese Exclusion years and the passing of the Immigration Reform Act of 1965. Our services have expanded since our founding to include four key program areas: Childhood Development, Education & Career Services, Senior Services, and Community Services.

CPC is the largest Asian American social service organization in the U.S., providing vital resources to more than 80,000 people per year through more than 50 programs at over 30 sites across Manhattan, Brooklyn, and Queens.

The Chinese-American Planning Council (CPC) is part of the Street Vendor coalition and strongly supports Intros. 431 and 408. As allies and partners in serving New York City's immigrant community, CPC has enjoyed a longtime partnership with the Street Vendor Project (SVP) at the Urban Justice Center. In 2020, when SVP launched the Vendor-Powered Food Distribution Program, CPC collaborated with SVP to distribute nutritious meals cooked by SVP's local member vendors to our community members in Sunset Park, Brooklyn.

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408, as part of the Street Vendor Reform legislative package.

Throughout my childhood, my parents presented themselves as pillars of perseverance and unwavering strength. Their smiles, warm and constant, illuminated my innocent perception of the world. However, as a first-generation child of Mexican parents, I now reflect with clearer eyes. I see what once eluded me: beneath the curve of their lips, their eyes portrayed a silent exhaustion, a hidden grief. My parents remain oblivious to the fact that I am aware of the burden they carry. Yet, I've come to read the tensions in their gaze when the evening news flickers across the screen, casting a heavy silence over the room.

Both my mother and father are street vendors, and I carry this truth not with shame but with unwavering pride. In a world that often associates vulnerability with weakness, I find strength in their struggle and labor. Their sacrifices are not flaws within my narrative; rather, they are the



foundation upon which I build my voice and purpose. My father, who cannot read or write, and my mother, whose English is limited, endure daily acts ranging from quiet cruelty to overt discrimination as they try to make a living to support my family.

To various individuals, they are seen as outsiders and even threats. However, to me, their ability to meet hatred not with hostility but instead with gentle smiles and kindness in their voices depicts the striking image of resilience. I stand here today not just as their daughter, but as an embodiment of the sacrifices they made in order to provide me with a better future. In this society, many often devalue the invisible labor of people like my parents. I commit myself to illuminating their worth—through voice, action, and the unshakeable belief that their story, like so many others, deserves to be seen.

Intro. 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors. By bringing vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses, ensuring a fair system that requires vendors to comply with vending regulations including strict siting and health code rules to maintain their permitting. This will give New York's smallest businesses a real chance to thrive in our local economy.

Currently, while there are more than 5 agencies that do street vendor enforcement, there is no city agency leading on educational resources to vendors. Intro. 408 would create an office of street vendor services within SBS, ensuring that street vendors as our City's smallest businesses have access to training, education, and outreach to support business compliance and growth.

Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

Thank you so much for the opportunity to testify on issues that greatly impact our communities. If there are any questions or concerns, feel free to reach out to Ashley Chen, Policy Analyst at achen9@cpc-nyc.org.



**Testimony: New York City Council
Committee on Consumer and Worker Protection**

Testimony by *Debipriya Chatterjee*
Senior Economist, Community Service Society of New York
May 6, 2025

Thank you to Chairperson Menin and to all the members of the Committee for the opportunity to testify today. My name is Debipriya Chatterjee, and I am a senior economist with the Community Service Society of New York (CSS), a long-time nonprofit dedicated to improving the lives of low-income New Yorkers through research, advocacy, and direct services. CSS has been involved with Street Vendor Justice coalition since 2021 and today I would like to voice our support for Intros [431](#) and [408](#).

For over two centuries, each new wave of immigrants arriving in our city turned to street vending as a means of finding an economic foothold. Today, street vendors continue to be a vital part of our economy. A [study](#) by the non-partisan Institute for Justice found that street vendors contribute \$71 million in local, state, and federal taxes. We estimate that the city is home to 23,000 street vendor small businesses, collectively contributing \$192 million in wages, \$292.7 million in goods and services, and \$71.2 million in taxes to our city. And yet, despite their contributions, street vendors continue to be [harassed and marginalized](#) by the administration.

It is imperative that the Council pass Intro 431 to take the first meaningful step toward formalizing street vending and integrating it into the city's mainstream economy. Currently, 75 percent of mobile food vendors and 37 percent of general vendors [operate without](#) business licenses—not due to disregard for the law, but because of arbitrary caps that have frozen licenses for decades. With official waitlists closed, many street vendors are forced to turn to underground markets or operate without a license, leaving them vulnerable to exploitation. Permits and licenses cost only a few hundred dollars in administrative fees, but vendors typically have to pay \$6,000 to \$8,000 thousand dollars on the black market to rent a permit. Many vendors accrue considerable debt to make this payment, often resorting to informal and predatory lenders to borrow the money and are forced to live in a state of chronic financial precarity, especially when their annual earnings are estimated to be around \$30,000.

These vendors clearly meet [real economic demand](#). By failing to recognize and regulate them, the city, state, and federal governments not only miss out on sales tax revenue, but also neglect to ensure fair and safe working conditions, including enforcement of operating and siting rules, and oversight of the quality of food and merchandise offered. According to the Independent Budget Office, the net fiscal benefit of ensuring vendors can access licenses is [\\$59 million](#)—revenue the city could urgently use in this challenging budget environment.

Intro 431 would expand access to business licenses while ensuring regulatory compliance of all mobile food and merchandise, creating a more orderly, regulated street vending system while providing economic opportunities for our city's smallest businesses.

Meanwhile, Intro 408 would establish a Division of Street Vendor Assistance within the Department of Small Business Services to provide street vendors with training, education, and outreach to support business compliance and growth. While more than five agencies conduct street vendor enforcement, no city agency is tasked with vendor education or support.

Passing these two bills would do more than strengthen the street vending industry—it would uphold the city's values of equity, economic opportunity, and community. Because the majority of street vendors are immigrants, they are currently at a higher risk of being targeted by federal immigration enforcement. City policy should support our economy while uplifting our residents and the City Council must enact policies to protect New Yorkers.

Street vendor justice is also a gender justice issue. [Nearly half of all street vendors are women](#), yet women are far less likely than men to hold business licenses. Among mobile food vendors, only 27 percent of permit holders are women, and among licensed general vendors, only 14 percent are women. Expanding access to vendor business licenses would open critical economic pathways for women entrepreneurs.

Street vendors are our city's smallest businesses. They reflect the great diversity of our communities and are a true embodiment of the entrepreneurial spirit of our city. Innovating, creating, and investing in our local economies, vendors show up every day to support their families and serve their neighbors. Instead of criminalizing their efforts, the City must cut unnecessary red tape and create a healthy regulatory environment that allows these essential workers to thrive.

Thank you for this opportunity. Please reach out to me at dchatterjee@cssny.org if you have any questions.



Written Testimony of the Fifth Avenue Association

New York City Council Committee on Consumer and Worker Protection

May 6, 2025

My name is Ed Pincar and I am President of the Fifth Avenue Association (FAA), the business improvement district (BID) charged with keeping Fifth Avenue—the world’s most iconic retail corridor and an engine of prosperity for New York City—safe, clean, and vibrant. New Yorkers and visitors from around the world flock to Fifth Avenue to shop, stay, eat, and enjoy only-in-New York experiences at landmarks and cultural institutions. Keeping our sidewalks clean, clear, and organized is essential to FAA’s mission to make Fifth Avenue shine even brighter.

Street vendors play an important role in the overall New York City experience. Unfortunately, the current street vending system is a hodgepodge of regulations that are hard for vendors to understand and harder for city agencies to enforce. FAA urges the City Council to explore and enact real reform to the existing rules to make them clearer and fairer for vendors, and easier for city agencies to enforce against persistent bad actors.

Considering this pressing need for improvements to the status quo, FAA respectfully suggests that Intro 431, which proposes to expand and ultimately eliminate the cap on mobile food and vendor permits, is premature. Neighborhoods throughout the city—and especially Midtown Manhattan—would benefit from updated street vending criteria that better account for current pedestrian volumes and other street furniture and activities. Before making any changes to the existing caps, FAA recommends that the City Council work with a broad set of stakeholders, including BIDs, community boards, businesses, and street vendors to target the existing deficiencies in the system and create a fairer, more accountable framework moving forward.

Pedestrians are the lifeblood of our city. Their experience can be degraded, and their safety may be endangered, if vendors fail to follow placement rules and create bottlenecks on our sidewalks. Increasing the existing cap, which has not even been reached yet, before larger issues within the vending framework are addressed will stretch enforcement even further and could lead to increased non-compliance and safety issues.

While FAA appreciates the City Council’s interest in this challenging topic, the approach outlined in Intro 431 could lead to unintended negative outcomes for pedestrians, businesses, and street vendors themselves. FAA is happy to work with the City Council toward the common goal of making New York City’s streets safer, cleaner, and more attractive for all who use them.

Thank you for your consideration.

FLATIRON NOMAD PARTNERSHIP TESTIMONY**NEW YORK CITY COUNCIL
COMMITTEE ON CONSUMER AND WORKER PROTECTION**

Oversight - Business Licensing and Regulatory Compliance of Mobile Food and
General Vendors; Int. 0431-2024

Date: May 6, 2025

Chair Menin and Members of the New York City Council, my name is James Mettham, and I am the President of the Flatiron NoMad Partnership Business Improvement District. Our organization represents the interests of businesses within the Flatiron and NoMad districts, areas known for their vibrant commercial activity and unique character. We are here today to express our concerns regarding the proposed Int 0431-2024, which aims to amend the administrative code of the city of New York in relation to ensuring business licensing and regulatory compliance of all mobile food and general vendors.

While we recognize the importance of supporting small entrepreneurs, including street vendors, we believe that the proposed legislation, which seeks to significantly increase the number of vendor licenses, will have adverse effects on our local businesses and shared neighborhood spaces. Our concerns are as follows:

1. **Enforcement and Regulation:** The current system for regulating street vendors is already strained. The changes introduced by Local Law 18 of 2021, which included increased enforcement and impact studies, have not been fully realized. Introducing more licenses without addressing the existing enforcement challenges will exacerbate the situation, leading to overcrowded streets and potential conflicts between vendors and storefront businesses.
2. **Public Safety and Accessibility:** Ensuring clear pathways for pedestrians and maintaining accessibility is crucial for the safety and convenience of residents and visitors. The proposed legislation does not adequately address the need for strict siting criteria and other regulations to prevent obstruction and ensure a harmonious coexistence between vendors and the community.

3. **Economic Development and Neighborhood Vibrancy:** Our districts thrive on the unique mix of storefront businesses that contribute to the neighborhood's character and vibrancy. While we support licensed vendors who adhere to regulations, an uncontrolled increase in vendor licenses could disrupt the balance and threaten viability of our storefront businesses that are the backbone of our mixed-use community.

In conclusion, we urge the Council to reconsider the proposed Int 0431-2024 and to focus on strengthening the existing regulatory framework before expanding the number of vendor licenses. We welcome a continued dialogue with the bill sponsor and other stakeholders to find a balanced approach that supports our local

Thank you for your attention to this matter.

James Mettham
President
Flatiron NoMad Partnership



FOOD INDUSTRY ALLIANCE OF NEW YORK STATE, INC.

111 Washington Avenue - Suite 200, Albany, NY 12210 (518) 434-1900

Testimony from the Food Industry Alliance of New York NYC Council Committee on Consumer and Worker Protection Hearing

May 6, 2025

Thank you, Chair Menin, and members of the Committee on Consumer and Worker Protection for the opportunity to submit testimony today regarding industry concerns related to Int. 431-2024. The Food Industry Alliance of New York (FIA) is the premier trade association representing the full spectrum of the retail food industry. Our members include chain and independent retailers that account for a significant share of the city's retail food market and the grocery wholesalers that supply them.

Int 431 - In relation to ensuring business licensing and regulatory compliance of all mobile food and general vendors.

New York City's supermarkets and grocery stores serve as critical neighborhood anchors. Our members provide consistent access to fresh, affordable food and offer stable employment opportunities to local residents, including thousands of proud union members. These businesses are not just retailers, they are employers, community partners, and vital components of the City's food infrastructure. Yet, they are challenged by some of the highest operating costs in the country and must contend with razor-thin profit margins. In this environment, all we ask is for fairness and a level playing field.

Int. 431 proposes changes to the regulation of mobile food vendors that, while well-intentioned, risk undermining recent efforts already underway. In 2021, the City Council passed a comprehensive legislative package to increase the number of mobile food vendor permits and to establish the Office of Street Vendor Enforcement. That framework was the product of years of negotiation and compromise, and it has *not yet been fully implemented*. Permits have not been issued, enforcement remains inconsistent, and the Office is still in its formative stage.

Rather than layering new legislation on top of an incomplete system, we believe the City should prioritize fully standing up the existing framework and assess the impact of those changes. Introducing more sweeping regulatory shifts now threatens to destabilize an

already fragile balance and sends a mixed message about the City's commitment to fair enforcement.

Our members are not opposed to street vending -we support economic opportunity for all New Yorkers and respect entrepreneurship in all forms. But our City's vital grocery stores work 24/7 to maintain New Yorkers' access to good food, investing millions of dollars in the spaces, equipment and workers that make this possible. Unless there are fair standards and proven enforcement practices, mobile vendors can directly compete with brick-and-mortar food retailers without adhering to the same safety, tax, wage, and sanitation requirements. Many of our members feel that they are being asked to compete under one rulebook while another group is permitted to operate under an entirely different, and far less stringent, one. This is not a matter of competition; it is a matter of equity and compliance. We urge the Council to evaluate how the 2021 reforms are working, or not, before considering additional legislation that would further alter the balance. Let's ensure the City's enforcement mechanisms are effective and equitable before expanding or modifying them.

Thank you for your time and for your commitment to balancing economic opportunity with thoughtful regulation. The Food Industry Alliance and our members remain eager to be part of any discussions on food access, public space, and fair business practices in New York City.

Respectfully submitted,

A handwritten signature in cursive script, reading "mauracallahan".

Maura Callahan
Government Affairs Coordinator
Food Industry Alliance of NYS, Inc.



FOR THE RECORD

**TESTIMONY BY WILMA ALONSO, PRESIDENT AND CEO – FORDHAM ROAD BID
NYC COUNCIL COMMITTEE ON CONSUMER AND WORKER PROTECTION
TUESDAY, MAY 6, 2025**

Thank you, Chairwoman Menin, for the opportunity to testify before you here today. My name is Wilma Alonso, and I am the President and CEO of the Fordham Road BID (the BID). I have been promoting the economic vitality of Fordham Road for more than 30 years, including the last 20 years with the BID. As the BID approaches its 20th anniversary since it was founded later this summer, we face tremendous challenges largely due to vending.

To be perfectly honest, the street vending situation on Fordham Road is the worst I have seen in 20 years, which is why—among many other factors—we strongly oppose Intro 431. Fordham Road has lost several anchor tenants largely because of vending and there are other small businesses threatening to leave for the same reason. Intro 431 could be the nail in the coffin for numerous reasons.

First, the city is finishing a report called the **NYC Street Vending Landscape** study by the NYC Dept. of Small Business Services and the Mayor's Office for Economic Opportunity, which is going to provide recommendations to improve pathways to legal operation. It is our belief that any new legislation should be put on hold until that report is released and its findings that can be thoroughly reviewed. We have no idea citywide how many vendors there are, how many permits have already been distributed, where vendors are geographically located and so forth, so that report could provide some invaluable insight for all stakeholders.

Second, Intro 431 fails to acknowledge that existing City rules and regulations prevent street vending on restricted streets Monday through Saturdays. Fordham Road is one such restricted street, meaning general merchandise vending is not permitted here. To ensure clarity and effective enforcement, any future legislation should explicitly define this term. As such, until comprehensive enforcement is in place, no licenses inclusive of both food and street vending, should be permitted for use on restricted streets.

Third, on Fordham Road, most food vendors are unlicensed, take up huge swaths of sidewalk space, obstruct the right of way and public space, and engage in illegal dumping for which our businesses get fined. Just a few weeks ago after months of frustration, the NYC Dept. of Sanitation confiscated 12,000 pounds of food from unlicensed vendors in a single day. I thought it was initially a typo when they told me 12,000. This legislation must address consistent daily

enforcement, including a mechanism to secure more sanitation enforcement officers, to enforce current rules.

Four, the city is requiring BIDs to containerize all trash instead of leaving them on the sidewalks for collection. The proliferation of vendors on Fordham Road makes compliance with containerization impossible since on some days, we see more than 350 vendors with no room to add additional containers.

In conclusion, Fordham Road is hurting. We agree the vending system needs an overhaul but legislating it in the past, without an adequate enforcement mechanism has failed. This time, legislating it could be a death sentence for other businesses. We welcome further dialogue with the City Council and our community partners to develop solutions that are equitable for our small businesses.

###

**May 6, 2025
Committee on Consumer and Worker Protection
10:00 a.m.
Council Chambers, City Hall**

Good morning members of the Committee. I am Barbara Blair, president of the Garment District Alliance, a BID in midtown Manhattan and I am here to testify against Intro 431.

The time has come for well-grounded legislation which addresses the City's wild, wild west vending policy, or lack thereof. Despite repeated calls from the community for regulation of this pervasive public realm disorder, the Council persists in introducing legislation that allows for more vendors but lacks fundamental guardrails to regulate their activities.

To be clear, we are not against vendors. In fact, issue as many licenses as you want, the number is irrelevant. What is relevant is having guardrails that regulate time, place and manner that are enforceable and are in fact rigorously enforced.

Lack of common sense and consideration for the public wrapped in the guise of good intentions has led to a failed system that compromises safety and quality of life in the dense business and pedestrian environments of the Garment District and midtown Manhattan among other areas.

This bill, which adds vendors to the streets but does not specify regulations or ample funding and staffing to enforce them, will only complicate the chaos in our neighborhoods and make rule enforcement more challenging. It's time to re-imagine our communal spaces and their impact on our lives by voting down this proposal and going back to the drawing board to design a new vending framework.

First consider that neighborhoods are different and that midtown vending rules, because of pedestrian, bike and vehicular congestion, should be different for public safety and quality of life reasons. The Garment District has some of the narrowest sidewalks in NYC, but some of the highest pedestrian counts. Adding vendors does not help.

There should be room on the streets for vending but planned in the context of other users such as pedestrians, cafes, emergency services, and brick and mortar businesses wanting clear access to their stores, room for bike docking, delivery vehicles, ev charging stations, possible toilets to name a few. For our part, we request that any vendors be located in the curblane, not on the sidewalk. The argument that vendors will need to step out into traffic is ridiculous, all drivers step out into traffic when getting out of a parked car. Caution is advised.

The bill does not address enforcement which should be dramatically more rigorous than it now is. Woefully inadequate to begin with, any vending bill adding licenses should automatically provide for incremental increase of enforcement agents. As it currently is, vendors in our area act with impunity and shrug off citations. Summonses are wallpaper. They have no meaning.

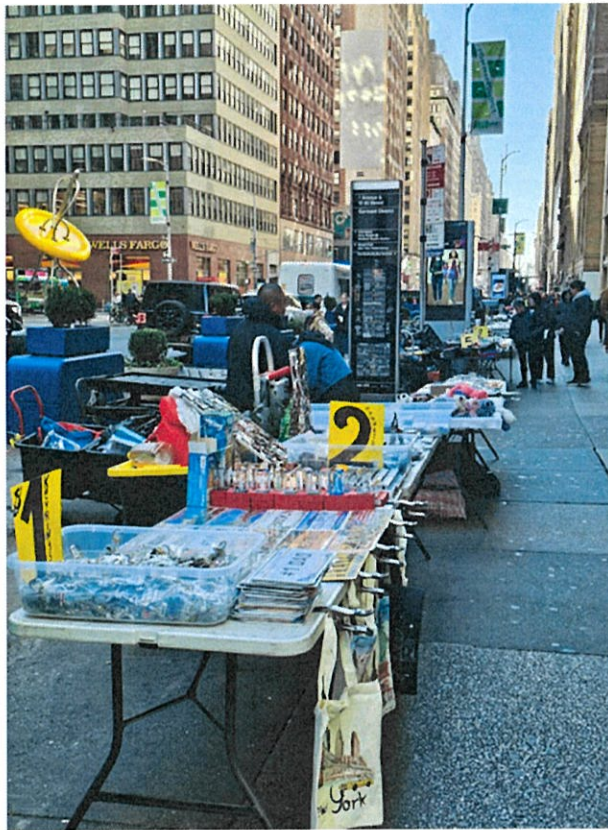
Already crowded with legitimate vendors, our sidewalks become lined with illegal vendors every evening. People openly vending illegally should have their goods confiscated immediately and destroyed. The city should not be burdened with safeguarding counterfeit, unregulated or illegal goods. A message of decisive action will benefit the legal vendors.

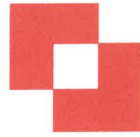
If you are serious about educating vendors, require that they pass a test, similar to DMV to obtain a license.

As a business improvement district, we work with the city to manage the public realm for the use and enjoyment of all. As the disorder escalates, we now need the city to work with us, to listen to our experiences with vendors, and to create a new model of vending regulation that is not based solely on the principle of “more is more”.

Thank you for this opportunity to testify. This is New York, we ought to be able to do better.

Illegal Vending, Garment District, Spring 2025





Peter S. Kalikow
Chairman

Grand Central
PARTNERSHIP

Alfred C. Cerullo, III
President/CEO

**Testimony of the Grand Central Partnership, Inc. on Street Vending in NYC
before the New York City Council Committee on Consumer and Worker
Protection**

May 6, 2025

The Grand Central Partnership (GCP) is a Business Improvement District (BID) serving an approximately 70 square block area in Midtown East in Manhattan.

Street vendors are a critical part of the fabric of our city. But the current system does not work for vendors, local businesses, or for our communities.

As the Council considers these several street vending bills, our message is this: let's fix our broken enforcement and compliance system first *before* further expanding the number of vendor licenses.

As an organization that identified thousands of instances of illegal and unlicensed vending in our community last year, we can tell you that enforcement is inconsistent at best and absent at worst.

In 2021, the Council approved Local Law 18, which required an incremental increase in the number of licenses for vending along with increased enforcement and periodic impact studies. However, these changes mandated by Local Law 18 have yet to be fully realized. Any further expansion of the pool of vending licenses, such as those authorized by Int. 431, without any analysis of the impact is a recipe for disaster that will only worsen sidewalk congestion and promote the growth of unregulated vending to the detriment of licensed vendors and brick-and-mortar retail businesses.

Int. 1164, which would allow for better cross-agency coordination of vendor enforcement, is a step in the right direction. But a more comprehensive approach

is needed. For example, the city is in dire need of consistent enforcement of siting criteria and other existing regulations to ensure clear path for pedestrians and distance from storefront businesses.

Regarding Int. 408, the Partnership urges the Council to mandate diverse stakeholder representation — including residents, vendors, and local businesses — in the new vendor division.

While the Partnership applauds the Council for taking on this challenging issue, we urge you to reconsider expanding an already broken system. By focusing first on fixing the system, we all can ensure that future growth will be sustainable, equitable, and enforceable.

Thank you for your consideration.

**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection**

May 6, 2025

We are writing this testimony as business owners of Grand Tea and Imports, located at 298 Grand Street, New York NY 10002. Every immigrant comes to America with the same dream--to be able to make an honest living. But with limited English and cultural skills, physical abilities, educational background etc., plus getting a normal salaried job is not possible for many, which leaves opening a business as one of the only avenues of earning income. But even so, not everyone has the capital and social connections to open a brick and mortar immediately, especially in a place like NYC, where speculation inflates rent prices to be nearly unattainable for new businesses, and little to no protection is offered to commercial tenants. Moreover, in this tumultuous economy, even the most entrepreneurial new business is almost destined for failure. This can be easily seen in the loads of vacant storefronts littered throughout the city.

By ensuring vendors can access permits to operate, we will give our most vulnerable population a chance to make a living free from begging, robbing, or scamming. We believe that their self-starting spirit of trying to open a business despite having extremely limited resources is something that we should support so that through their own abilities and hard work, folks may be able to work their way up to a brick and mortar business. We at Grand Tea and Imports are proof of that success.

Sincerely,

Mr. and Mrs. Liu

Owners

Grand Tea and Imports 佛運玄 | 好茶水



Hudson Square Business Improvement District

180 Varick Street, Suite 422
New York, NY 10014

212.463.9160
HudsonSquareBID.com
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Council Member
ERIK BOTTCHER

NYC Council

Committee on Consumer Affairs and Worker Protection

Oversight – Street Vending: Int. 431, 408, 1164

May 6, 2025

I am Samara Karasyk, President of the Hudson Square Business Improvement District (HSBID) and am writing to submit written comments on Int. 431, 408, and 1164 regarding street vending enforcement and the issuance of licenses pursuant to Local Law 18 of 2021.

Since 2009, HSBID has overseen the transformation of Manhattan's former Printing District into a thriving creative hub. The area we manage is generally bounded by Clarkson in the north, 6th Avenue in the east, Canal Street in the south, and West Street in the west. Our mission is to bring the spirit of innovation and energy thriving in our commercial spaces into the public realm, while promoting social, economic, and environmental sustainability. HSBID's primary function is to undertake capital and place-making projects that improve the neighborhood's conditions with respect to pedestrian safety (and sanity), streetscape, and retail (ground-floor) environments.

Unlike other BIDs that focus mostly on sanitation and security, we were founded to implement streetscape improvements by planning, building and maintaining capital projects that make Hudson Square a place where people are prioritized on our streets and sidewalks. To that end, the BID has installed over 500 Hudson Square Standard Trees with enlarged tree pits and permeable pavers, expanded and renovated a 7 block stretch of Hudson Street with wider sidewalks, a protected bike lane, greening and seating, and created new open spaces at Spring Street Park and Freeman Plazas.

Given HSBID's role in managing the public realm in Hudson Square, we are concerned about how Int. 431 could impact the pedestrian experience in our public spaces as the bill would expand the number of street vending licenses to 7,500 over the next 5 years and then an "unlimited" number after that. Since Local Law 18 was passed in 2021, our neighborhood has not seen an increase in enforcement or any analysis of the vending impact, both of which were required by that bill. Basic enforcement to ensure that vendors allow for pedestrian clear



path and distance from streetscape amenities and storefront businesses has been notably lacking. HSBID does not support an increase in new vending licenses until basic restrictions around permitted times, locations, and fire safety are enforced.

While we value and appreciate the important role that street vendors play in our urban landscape, we hope that key government agencies, BIDs, and other key neighborhood stakeholders are consulted before any action to increase the number of licenses. In New York City, there are many actors that need access to our streets and sidewalks and we must take a comprehensive look at all user needs to balance them appropriately and enhance the urban environment thoughtfully. We look forward to working with our colleagues in government to ensure that our streets continue to be places for all people so that everyone can take advantage of the rich street life that our wonderful city has to offer.



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How to move from first page to second page:

You cannot type seamlessly because text indents are different. When you reach the end of the first page, manually stop there and type on this page instead.

Hudson Yards Hell's Kitchen Alliance
412 W 42nd Street, 3rd Floor
New York, NY 10036
212-239-1619



NYC Council Testimony
Hearing on Tuesday, May 6th, 2025

Re: Intro 431

To whom it may concern:

Everyone agrees that street vending in New York City is broken. However, Intro 431 simply doubles down on that brokenness.

Street vending is a PRIVATE, FOR PROFIT business taking place on PUBLIC LAND. The city has the right to regulate street vending. In fact, the city has a duty to regulate it.

If the vendor cap is lifted, our streets and sidewalks will become a dumpster fire. All areas with high foot traffic will be inundated with vendors, choking sidewalks and local businesses. If that happens, I will look forward to returning to this room when your successors propose reinstituting the current cap.

Here's a thought: why not test this limitless vendor idea in a small part of the city, perhaps in a busy commercial area represented by one of the bill's supporters? That's not a rhetorical question? Why not? I'll tell you why not. Because no council member would sacrifice their district to test a plan that's destined to fail.

I have 30 more seconds and your attention, so please allow me to make one more point. Under city law, any truck driver caught idling for over three minutes is subject to a hefty ticket. And yet we allow thousands of food vendors to run gas-powered generators all day everyday within inches of pedestrians. These generators are loud, polluting, and stain the sidewalks. Please fix this hypocritical loophole and expressly prohibit street vendors from using gas-powered generators.

Thank you,
Daniel Scorse
Vice President of Operations
Hudson Yards Hell's Kitchen Alliance (HYHK)



ILR School

Andrew B. Wolf
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Cornell University
ILR School
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Ithaca, NY 14853
Andrew.wolf@cornell.edu

May 9, 2025

Dear New York City Council Members,

We are Andrew Wolf, an Assistant Professor in the Department of Global Labor & Work at the Cornell ILR School, and Dylan Hatch, an MS candidate and research assistant at Cornell ILR. We are writing in support of Intros 431 and 408 which we believe are practical solutions to critical issues facing street vendors in New York City.

We recently co-authored a report through the Cornell ILR Worker Institute, “Evaluating the Regulation and Reform Implementation of Street Vending Law in New York City,”¹ which highlights the persistent challenges vendors face in the City in light of incomplete reform efforts.

This report evaluates the regulatory environment that street vendors face, investigating the implementation of these reform efforts and the disparate impacts and costs of vending enforcement. Key findings include:

- Heavy and duplicative regulatory environment: Perhaps no industry in New York City faces regulation from as many agencies and departments as street vending. Nearly every agency, from Police to Transportation and Health to Parks, has some authority. The result is duplicative efforts to regulate vendors and high exposure to ticketing.
- Enforcement is costly and ineffective: While many enforcement efforts that involve issuing citations and fines in New York City generate revenue, all available evidence indicates street vendor enforcement operates at a large deficit. For example, in 2024 the Department of Sanitation spent \$21.85 on every \$1 recovered or a \$20.85 loss.
- Reform efforts have failed to meet targets: Reform efforts, including expanding the number of available licenses, provide a valuable lifeline to vendors by creating financial stability, reducing criminalization, and reducing exposure to the expensive secondary permit market. However, these reforms fail to meet their goals on time.
- Extreme racial disparities in the impacts of ticketing vendors: Comparing where violations occur to where those receiving tickets live unveils a clear pattern of racialization. Most tickets are issued in wealthy white neighborhoods in Manhattan while most vendors receiving tickets are minorities who live in low-income immigrant neighborhoods in Queens, the Bronx, and Brooklyn.

Intros 431 and 408 will ease the burden on the City’s vendors, helping to provide a regulated, predictable, and enforceable system. This package of bills will help to undo the criminalization

¹ Wolf, A. & Hatch, D. (2025). “Evaluating the Regulation and Reform Implementation of Street Vending Laws in New York City. The Worker Institute, Cornell ILR, April. Permalink: <https://hdl.handle.net/1813/116768>.

and bureaucratization we found in our study and be a significant step in the right direction to meet the City's goals and build a safe and open system.

Thank you providing the opportunity to submit this testimony. We hope that the City Council takes the critical step of passing Intros 431 and 408 as part of the Street Vendor Reform Package.

Sincerely,

Andrew B. Wolf

Andrew B. Wolf, PhD
Assistant Professor of Labor Relations
Cornell University | ILR School
E: Andrew.Wolf@Cornell.edu

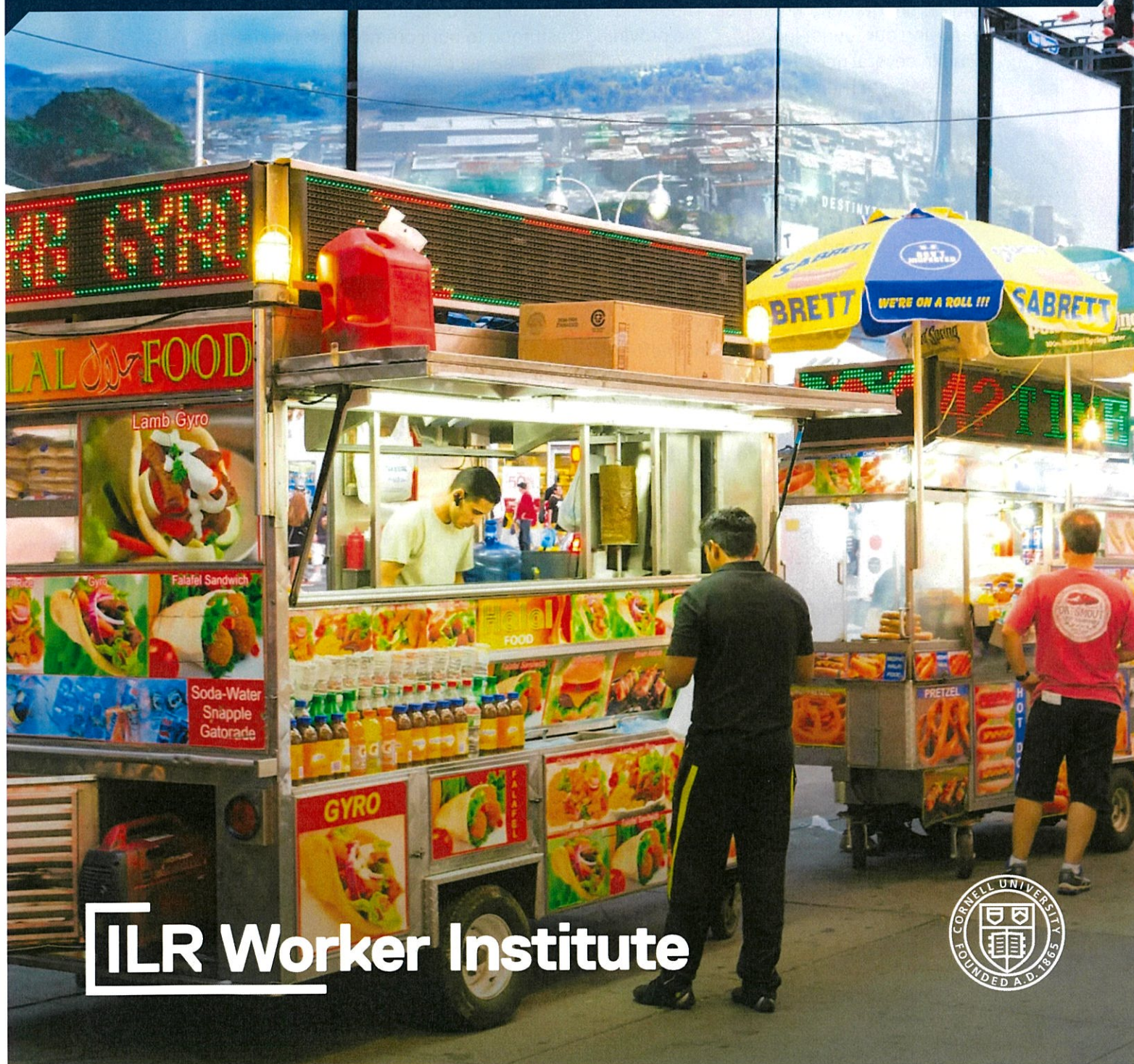
Dylan Hatch

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Evaluating the Regulation and Reform Implementation of Street Vending Laws in New York City

By ANDREW B. WOLF & DYLAN HATCH

April 2025



EVALUATING THE REGULATION AND REFORM
IMPLEMENTATION OF STREET VENDING LAWS IN NEW YORK CITY

A Publication of the ILR WORKER INSTITUTE

By ANDREW B. WOLF & DYLAN M. HATCH

April 2025

Executive Summary

Street vending has long been an important entry point to the local labor market for New York City's immigrant communities. Thousands of New Yorkers build their livelihoods around servicing our tourist industries and providing fresh food to our communities. For the first time in several decades, New York City engaged in a series of limited reform efforts aimed at addressing barriers to accessing food vendor permits and attempts to limit the criminalization of street vending in the City. This report evaluates the regulatory environment that street vendors face, investigating the implementation of these reform efforts and the disparate impacts and costs of vending enforcement.

Key findings include:

- **Heavy and duplicative regulatory environment:** Perhaps no industry in New York City faces regulation from as many agencies and departments as street vending. Nearly every agency, from Police to Transportation and Health to Parks, has some authority. The result is duplicative efforts to regulate vendors and high exposure to ticketing.
- **Enforcement is costly and ineffective:** While many enforcement efforts that involve issuing citations and fines in New York City generate revenue, all available evidence indicates street vendor enforcement operates at a large deficit. For example, in 2024 the Department of Sanitation spent \$21.85 on every \$1 recovered or a \$20.85 loss.
- **Reform efforts have failed to meet targets:** Reform efforts, including expanding the number of available licenses, provide a valuable lifeline to vendors by creating financial stability, reducing criminalization, and reducing exposure to the expensive secondary permit market. However, these reforms fail to meet their goals on time.
- **Extreme racial disparities in the impacts of ticketing vendors:** Comparing where violations occur to where those receiving tickets live unveils a clear pattern of racialization. Most tickets are issued in wealthy white neighborhoods in Manhattan while most vendors receiving tickets are minorities who live in low-income immigrant neighborhoods in Queens, the Bronx, and Brooklyn.

Introduction

Street vending is a vital source of employment and an essential public service in New York City. Vendors play an integral role in supporting the City's tourism industries and providing fresh food to communities throughout the City. Since the 19th century, street vending has been an important entry point to the local economy for new immigrants. During the pandemic, the New York City Council engaged in a series of limited reforms to the City's street vendor licenses and operation laws. This represented the first major regulatory change to the industry since Mayor Koch's efforts in the 1980s. This report evaluates these reforms and the city's management and enforcement of street vending laws. It explores the regulatory authority of the industry, evaluates the expenditures and returns of this enforcement, and investigates the desperate socio-economic impacts of vendor ticketing.

This study primarily evaluates the City's own data. Firstly, we compiled data from the New York City Office of Administrative Trials and Hearings (OATH) for civil summons and NYPD Criminal Court data for criminal summons to examine the patterns of tickets issued for street vending. We examined civil and criminal summonses, the issuing departments, fine amounts, and violation locations. Secondly, we utilized public expenditure data to observe spending trends for each agency. FOIL requests were submitted for additional budget data but yielded minimal information and response as of publication.

Overall, this report finds that street vending in New York City is very complicated, financially ineffective, and results in primarily criminalizing the City's low-wage immigrant workforce. Additionally, we find efforts to reform the licensing process have not met their goals. Firstly, vending management and enforcement is complicated, spanning nearly every agency in the City. No other industry is so exposed to government oversight. The result is a nearly impossible web of regulations and bureaucracy for this primarily low-income immigrant workforce to navigate. Secondly, the enforcement of vending regulations is not financially effective. Through enforcement efforts, the City spends more than it earns on vending enforcement. Thirdly, we find that efforts to reform the food vendor licensing and permitting process have not met the goals laid out in the Council's reform bills. The licensing has been delayed, and far fewer licenses have been issued than the Council had called for. Fourth, the patterns of where vending tickets are issued and who is ticketed indicate a racialized pattern. Vendors are primarily fined in the City's wealthy white neighborhoods, while those fined tend to live in the City's poorest immigrant and minority neighborhoods. Vending tickets has a huge impact on these workers and their communities. Since 2000, the City has issued roughly 196,000 tickets costing vendors \$103 million.

Background of Reforms

In 2020, Mayor de Blasio enacted a series of police reforms to reduce interactions between officers and New Yorkers, including minimizing the NYPD's role in street vending enforcement. Codified in Local Law 18 (1116) in 2021, the Office of Street Vendor Enforcement was created to monitor street vendors, and the responsibility of the Office was designated to the Department of Consumer and Worker Protection (DCWP). Furthermore, the Bill established increased "supervisory licenses" that would increase the number of legal street vendors by 445 each year until 2032, eventually increasing the total number of licensed and permitted food vendors to 4,450.

Instead of reducing interactions with officers, the DCWP and NYPD worked together to enforce street vending regulations – creating a 33% increase in fines between 2019 and

2022.¹ To promote coordination across agencies on vendor regulation and enforcement, the Council created the Street Vendor Advisory Board under the authority of DCWP. The Board was composed of vendor, government, restaurant, and real estate representatives and was tasked with making reform recommendations to the Council. The Board produced a report outlining several consensus reforms² and now the board only meets once a year, with most of the proposed reforms remaining at a standstill as of early 2025.

In 2023, enforcement moved again when the OSVE transferred from the DCWP to the DSNY, despite wide condemnation by street vendors that enforcement was again being transferred back from a civil agency to officers. Ticketing increased throughout 2023. Massive crackdowns occurred in 2023 where centralized vendor markets developed during the pandemic, from Corona Plaza to Sunset Park. Voters then approved Ballot Proposal 2 in November 2024, which according to the measure will, “expand and clarify the Department of Sanitation’s power to clean streets and other City property.” This will likely result in higher enforcement over street vendors in 2025 and beyond. The removal of enforcement from DCWP also created a vacuum of which agency would do education outreach to vendors. This has nominally been separated from DSNY and given to the Department of Small Business Services, but it is unclear from our research how much outreach and technical assistance has been provided. The current state of the reform efforts remains unclear and the overall confusing web of vendor regulations across many agencies remains in effect.

Overview of Agency Authority

New York City oversees street vending through a complex network of agencies, each with respective jurisdiction and responsibilities. The dynamic political climate surrounding street vending enforcement contributes to the challenge of deciphering each agency’s role. As of March 2025, each of these agencies plays distinct roles in the process of permitting, policing, and educating vendors, as outlined in Table 1.

Department of Consumer & Worker Protection (DCWP)

When a prospective street vendor wishes to legally sell food on the streets of NYC, their journey begins by submitting an application to the DCWP. The DCWP issues general vendor licenses (while DOHMH oversees licensing for vendors selling food) and administers in-person licensing and permitting centers. DCWP previously handled vending enforcement from 2019 to 2022. After enforcement transferred to Sanitation (DSNY), DCWP transferred uniform positions to support DSNY’s new jurisdiction. DCWP also housed the Office of Street Vending Enforcement (OSVE), which briefly oversaw street vending enforcement with policy recommendations and several inspectors (from 8 in 2021 to 14 in 2023).³ DCWP has 31 staff dedicated to processing all DCWP and DOHMH license applications including for restaurants and street vendors.

¹ Parra, D. (2022). “Street Vending Tickets Went Up During First Year of New Enforcement Policy,” City Limits, Aug 4. Accessed March 13, 2025, at <https://citylimits.org/2022/08/04/street-vending-tickets-went-up-during-first-year-of-new-enforcement-policy/>.

² Street Vendor Advisory Board. (2022). “Street Vending in NYC: Overview and Recommendations from the Street Vendor Advisory Board.” Street Vendor Advisory Board. Accessed Mar 23, 2025 at <https://www.nyc.gov/assets/dca/downloads/pdf/partners/SVAB-Report-2022.pdf>.

³ Parra, D. (2023). “Street Vendors Decry City’s Move to Put Sanitation Dept. in Charge of Enforcement,” City Limits, March 24. Accessed March 13, 2025, at <https://citylimits.org/2023/03/24/street-vendors-decry-citys-move-to-put-sanitation-dept-in-charge-of-enforcement/>.

Department of Health and Mental Hygiene (DOHMH)

The Department of Health and Mental Hygiene administers the Food Protection Course for Mobile Food Vendors, and issues licenses and permits for mobile food vendors (MFVs) after they apply to DCWP. DOHMH also administers pre-permit, operational, and compliance inspections on MFVs. Currently, DOHMH has only four staff members that handle all DOHMH-issued licenses and permits.

Department of Sanitation (DSNY)

Since April 2023, DSNY has housed the OSVE and an Enforcement division known as the New York City Sanitary Police Corps (NYSPD). NYSPD, also known as the "Sanitation Police," deploy armed officers to issue arrests and criminal summonses. With an enforcement budget projected to increase from \$897,672 in 2023 to \$3.8 million in Fiscal 2027, DSNY serves as the primary agency for street vending enforcement in the City.⁴ DSNY launched with 40 employees when the Vending Bureau was created – now grown to 87 Sanitation Police officers, 24 lieutenants, and three inspectors involved in vending enforcement.⁵

Police Department (NYPD)

Despite the shifting enforcement responsibilities between agencies, the NYPD still plays an increasing role in vending enforcement. In addition to issuing criminal violations, the NYPD has issued the most civil violations for MFVs than any other agency every year since 2021. In 2024, NYPD issued 9,376 tickets to vendors - 5 times higher than in 2019, when NYPD was the primary enforcement agency.⁶

Department of Parks and Recreation (Parks)

The Parks Department of Parks and Recreation issues civil and criminal violations to vendors operating in City parks.

Office of Administrative Trials & Hearings (OATH)

OATH adjudicates civil violations and penalties that MFVs receive for violating the Health or Administrative Code through their vending operations.

Department of Small Business Services (SBS)

SBS states that they provide outreach and education to street vendors, considering them "microbusinesses." These programs are sometimes held in conjunction with other agencies, including DSNY and DOHMH, and educational topics include safety, regulation compliance, and permitting. SBS houses NYC Business Express Services (NYC BEST), which provides support and regulation guidance for MFVs. However, street vendor advocates argue that these programs are inadequate and uncommitted to meeting the needs of street vendors, with even Commissioner Dynishaal Gross testifying to the City Council that there is no formal assignment of responsibility for small business outreach.

⁴ Lane-Lawless, A. (2023). "Report to the Committee on Finance and the Committee on Sanitation and Solid Waste Management." Department of Sanitation. Accessed March 21, 2025, at <https://council.nyc.gov/budget/wp-content/uploads/sites/54/2023/05/DSNY.pdf>

⁵ Parra, D. (2025). "NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024," City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

⁶ Parra, D. (2025). "NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024," City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

Table 1. Overview of New York City Agency Authority Over Street Vending Industry

Department	Acronym	Role	Actions
Health and Mental Hygiene	DOHMH	Permitting, Regulation, & Education	Issues permits for MFVs; Administers pre-permit, operational, and compliance inspections; Educates MFVs
Consumer & Worker Protection	DCWP	Permitting	Issues general vendor licenses; Administers in-person licensing and permitting centers
Sanitation	DSNY	Enforcement	Houses the Office Street Vending Enforcement; Confiscates vendors' carts and goods; Can issue criminal violations but has testified in City Council that they intend not to.
Police	NYPD	Enforcement	Issues civil and criminal violations; Confiscates vendors' carts and goods as well as make arrests.
Parks and Recreation	PARKS	Enforcement	Issues civil and criminal violations to vendors in City parks as well as make arrests.
Administrative Trials & Hearings	OATH	Hearings	Adjudicates street vendors' civil violations
Small Business Services	SBS	Education	Provides support and regulation guidance for vendors; Educates MFVs on safety, regulation compliance, and permitting; Houses NYC Business Express Services

Methods

We collected *issuance data* from the New York City Office of Administrative Trials and Hearings via NYC OpenData. After collecting all issuances since 2000, we narrowed the results to fines including relevant phrases such as "vending." We then manually reviewed all the data to ensure the relevancy of the results. We also analyzed NYPD criminal summonses data, also accessed on NYC OpenData.

We received *funding and staffing data* from the NYC Independent Budget Office. After pulling all data from 1985, we then reviewed the fiscal plans for each agency to contribute data from the most recent years alongside the projections for future spending. We combined these sources into a single dataset to generate the graphs in this report. Projected budgets from 2024 are noted with asterisks.

We gathered *demographic data* from the Economic Neighborhood Profiles of 2018, the most recent report of its type from the Office of the New York City Comptroller. Our *poverty data* is derived from the 2023 American Community Survey from the U.S. Census Bureau. We also received *racial demographic data* from the Population Division's 2020 Census.

Expenditures and Cost of Street Vendor Enforcement

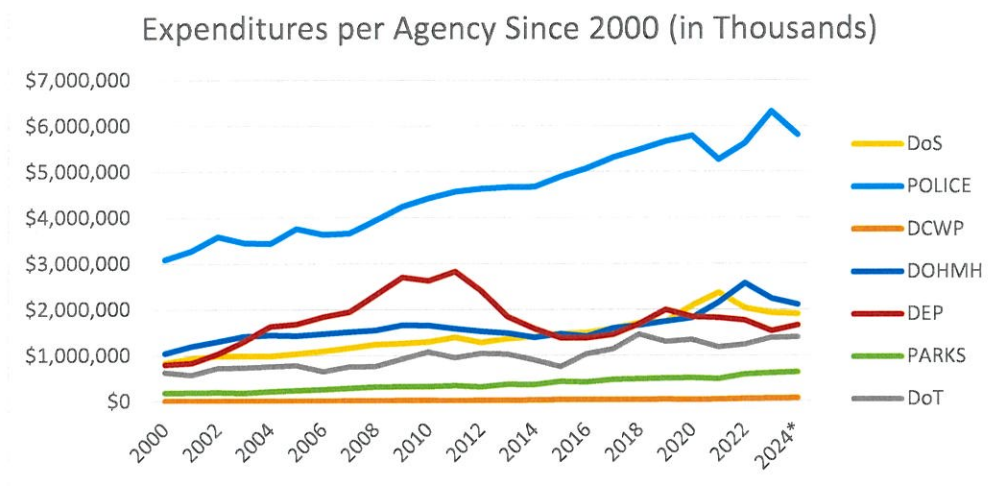
The complicated web of enforcement across agencies means a lot of time, money, and resources are spent on street vending enforcement. This section investigates the potential costs of these efforts. It is difficult to calculate how much the City spends on vendor enforcement with just the publicly available data. The New York City Independent Budget

Office has not attempted to quantify the costs since 2009 and even they noted the difficulty of amassing the necessary data across all agencies.

This report is not capable of fully parsing the costs and, as a result, represents estimates based on the limited available data. These estimates, relying on data we know to undercount the true costs, indicate the resources spent on issuing vendor tickets largely cost more than the City earns from these tickets. This is aligned with the City's 2009 IBO report which found enforcement expenditures of around \$7.4 million but only generated \$1.4 million in revenue.⁷ Our analysis found no evidence that vending enforcement is profitable for the City. When combined with the racial disparities in ticketed vendors, this data paints a picture of an expensive program to criminalize the City's vulnerable immigrant populations.

Looking first at the broader picture of the agencies with the most authority over vending enforcement, the NYPD is the only agency that received massive budget growth over the last two decades (Figure 1). The NYPD can issue civil and criminal summons to vendors.

Figure 1. Expenditures per Agency Since 2000



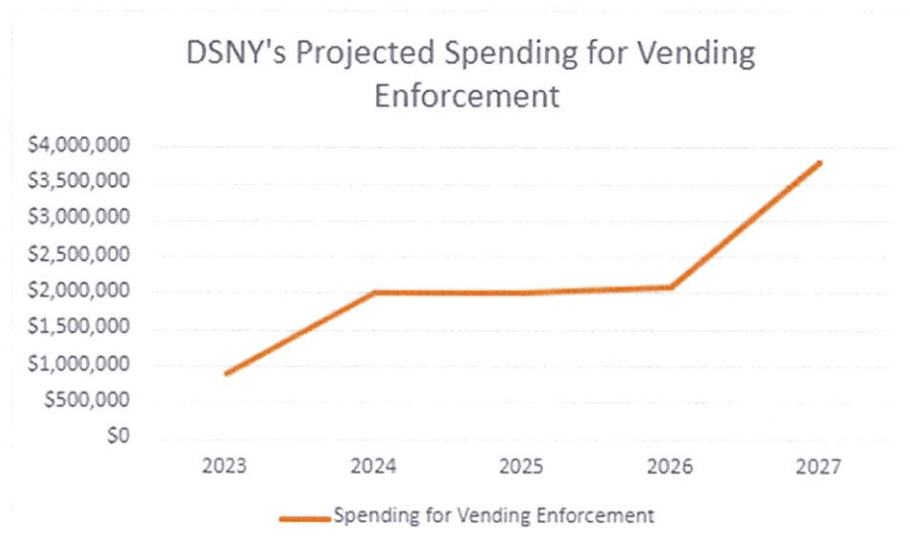
Since DSNY was given primary authority over street vendor enforcement by Mayor Adams, DSNY created a new Vending Bureau with nearly 40 employees. As of November 2024, DSNY reported having 87 Sanitation Police officers, 24 lieutenants, and 3 inspectors.⁸ DSNY is the only department for which clearly delineated budget expenditures have been made public (Figure 2). Their proposed budget is presented in the following chart.

⁷ Turetsky, D., Vega, E., & O'Brien, B. (2010). *Street Vendor Regulations Are Costly, Confusing, and Leave*

Many Disgruntled, New York Independent Budget Office. Accessed March 13, 2025, at <https://www.ibo.nyc.ny.us/iboreports/peddlingnovember2010.pdf>.

⁸ Parra, D. (2025). "NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024," City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

Figure 2. DSNY's Projected Spending for Vending Enforcement



In 2024, DSNY's first year of primary enforcement, the agency announced it would spend \$2,000,000 on enforcement. Based on publicly available OATH data, this enforcement resulted in 1,502 tickets being issued in 2024. Of this, around \$200K in penalties were imposed but only \$91K was recovered. This amounts to the City spending \$21.85 for every \$1 recovered or a \$20.85 loss. While the governmental goals of issuing tickets go beyond merely raising revenue, the loss contrasts with most other agencies' enforcement efforts which are revenue generators.⁹ In fact, a 2017 Comptroller audit of fine revenue showed Sanitation is usually one of the top revenue-generating departments, in contrast to the loss we found in the first year of their vending enforcement.

No other agency gives specific expenditure data on their street vending enforcement efforts. One means of providing low estimates of the expenditure costs is to consider the salary costs per violation issuance. We estimate the cost of issuing a ticket by utilizing the publicly available City civil service pay scales for the front-line positions that issue vendor tickets. We do this by assuming that the time it takes to issue a ticket would be 30 minutes to one hour. These ranges are presented in Table 2, with red values indicate a loss. The agency with the highest rate of return was the DCWP, which currently does not lead vending enforcement.

These numbers indicate the return on tickets issued in most cases barely covers the costs of the salary of the person issuing the ticket, if at all. These are low estimates and include the salary of the issuer only for the time they are issuing the ticket. This lacks the cost of the individuals' benefits, the other administrative costs the agency must cover, or the costs of the OATH hearing around the ticket. Based on these estimates, we can conclude street vending enforcement does not generate revenue for the City and likely operates at a loss.

⁹ Murphy, M. (2017). *"NYC Budget Brief: New York City Fine Revenues Update"*, NYC Comptroller. Accessed March 13, 2025, at <https://comptroller.nyc.gov/wp-content/uploads/documents/New-York-City-Fine-Revenues-Update.pdf>.

Table 2. NYC's Vendor Fine Return Per Dollar Spent on Enforcers' Wages (2019-2024)

Agency	Year	Violations Issued	Hourly Pay	0.5/hr \$ Return	1/hr \$ Return
DCWP	2021	71	\$31.23	\$2.09	\$1.05
DCWP	2022	1063	\$31.23	\$4.38	\$2.19
DCWP	2023	600	\$31.23	\$3.70	\$1.85
DOHMH	2019	1369	\$31.16	\$3.54	\$1.77
DOHMH	2020	770	\$31.16	\$3.31	\$1.65
DOHMH	2021	233	\$31.16	\$2.84	\$1.42
DOHMH	2022	559	\$31.16	\$2.20	\$1.10
DOHMH	2023	1212	\$31.16	\$2.42	\$1.21
DOHMH	2024	1287	\$31.16	\$1.57	\$0.78
PARKS	2019	722	\$21.97	\$0.14	\$0.07
PARKS	2020	243	\$21.97	\$0.20	\$0.10
PARKS	2021	374	\$21.97	\$0.17	\$0.08
PARKS	2022	423	\$21.97	\$0.22	\$0.11
PARKS	2023	617	\$21.97	\$0.25	\$0.13
PARKS	2024	754	\$21.97	\$0.06	\$0.03
POLICE	2019	1699	\$40.40	\$0.96	\$0.48
POLICE	2020	511	\$40.40	\$1.94	\$0.97
POLICE	2021	254	\$40.40	\$1.06	\$0.53
POLICE	2022	1180	\$40.40	\$1.20	\$0.60
POLICE	2023	1900	\$40.40	\$1.59	\$0.79
POLICE	2024	3297	\$40.40	\$1.16	\$0.58

Other Performance Metrics for Vending Reforms

Permit & License Issuances

Mobile street vendors selling food require three types of authorization from the DOHMH, each imposing costs to prospective vendors and revenue for the City. Firstly, vendors must have a Mobile Food Vendor (MFV) license, which costs \$50 plus \$53 for the required course. Vendors must update their licenses every two years and pay a \$50 renewal license fee. Additionally, mobile street vendors require a permit. While there is no limit on MFV licenses issued, the number of supervisory licenses and supervisory license permits is capped at a limited level compared to demand. Supervisory license permits can cost \$17,000 or more on illegal secondary markets.¹⁰ Vendors must renew licenses and permits every two years.

Despite the low number of street vending permits issued, permitting caps remained relatively stagnant in the early 1980s – a phenomenon contributing to the growth of an informal economy and costing the City money that it would otherwise receive if the revenue

¹⁰ Mosher, E., & Turnquist, A. (2024). "Fiscal Impact of Eliminating Street Vendor Permit Caps in New York City." New York City Independent Budget Office. Accessed March 13, 2025, at ibo.nyc.ny.us/iboreports/Fiscal_Impact_of_Eliminating_Street_Vendor_Permit_Caps_Jan2024.pdf.

expanded.¹¹ The cap on MFV permits modestly increased from 3,000 in 1983 to 5,100 in 2024. Meanwhile, a waitlist of almost 11,000 people accumulated to obtain new MFV permits from the City.¹² Nearly 10,000 people are also on the waitlist to receive a General Vendor License. A study by the Independent Budget Office found that the City would gain a net revenue of about \$1.7 million if only 10 percent of waitlisted applicants received permits or licenses. At 100 percent of the waitlist receiving permits or licenses, the net impact would increase to about \$17 million.¹³ The number of General Vendor licenses is capped at 853 while citywide Mobile Food Vendor permits have hovered around 3,000 since 1983.

Local Law 18 of 2021 fundamentally shifted the permitting and licensing framework. LL18 increases the number of mobile food vendors by creating a new license called a "Supervisory License." Under the law, all vendors with a Supervisory License are entitled to apply for a Supervisory License permit, and all food carts and trucks must have a supervisory license physically present during business operations. LL18 created two classifications of supervisory licenses - citywide permits that include Manhattan and outer-borough-only permits that exclude Manhattan. Under this law, the DOHMH will annually issue 445 "Supervisory Licenses" until 2032, eventually increasing the total number of licensed and permitted food vendors up to 4,450. Of the new 445 permits each year, 100 are for selling citywide, 300 are just for the boroughs outside of Manhattan, and another 45 are reserved for people with disabilities and United States veterans. Initial Supervisory License applications have no initial fee but require a \$438 fee upon renewal every two years.

However, the rollout of these supervisory licenses and permits has been slow in the past years. The City missed the law's first two deadlines in 2022 and 2023, and only four vendors received new permits between March and May 2023.¹⁴ By March 2025, 713 vendors had obtained their supervisory licenses, and 452 had started the process for a permit.¹⁵ Only 371 vendors have received their supervisory license and permit by March 2025, of the over 1,300 that should have been issued by then. The delays in implementation of LL18 have resulted in lost revenue for the City while continuing to leave many vendors vulnerable to enforcement or exploitation on the black market.

Street Vendor Outreach

SBS does some work with street vending outreach and education. In 2022, SBS conducted a large mailing to 22,100 licensed street vendors to ensure they were aware of SBS services and business solution centers. SBS translated this letter into 10 languages for accessibility. Vendor advocates complain there is no available data on what their outreach looked like beyond this one mailer.

¹¹ Mosher, E., & Turnquist, A. (2024). "Fiscal Impact of Eliminating Street Vendor Permit Caps in New York City." New York City Independent Budget Office. Accessed March 13, 2025, at ibo.nyc.ny.us/iboreports/Fiscal_Impact_of_Eliminating_Street_Vendor_Permit_Caps_Jan2024.pdf.

¹² *ibid*

¹³ *ibid*

¹⁴ NYC Comptroller. (2023) "NYC Comptroller Lander Presses City Hall for Answers Regarding Street Vendor Sweeps and Delayed Implementation of Local Law 18." Press Release, Sept 12. Accessed March 13, 2025, at <https://comptroller.nyc.gov/newsroom/nyc-comptroller-lander-presses-city-hall-for-answers-regarding-street-vendor-sweeps-and-delayed-implementation-of-local-law-18/>.

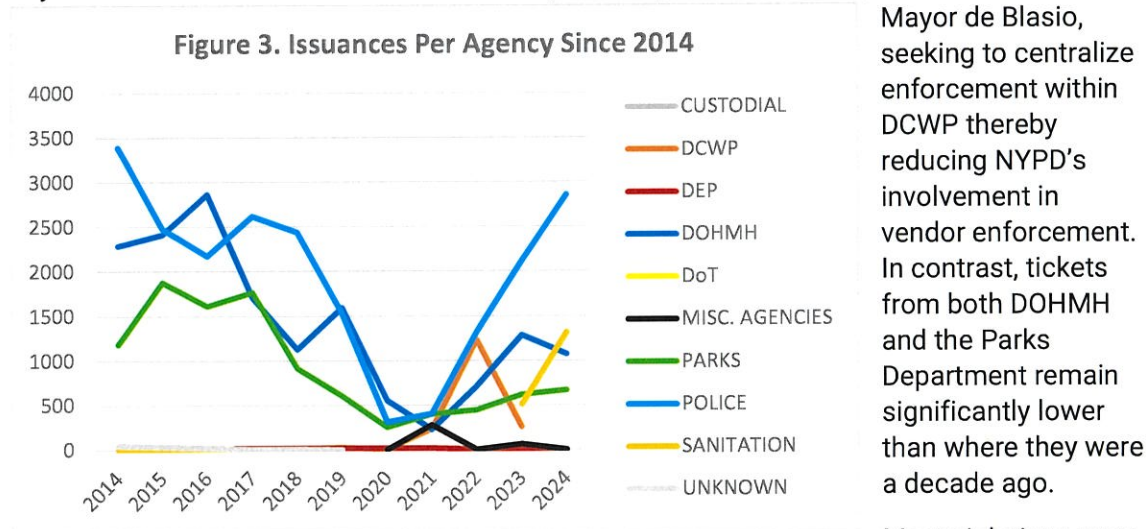
¹⁵ Parra, D. (2025). "NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024," City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

The NYC Business Express Services (NYC BEST) is among the largest public programs for educating all small businesses generally, including street vendors. The team consists of six compliance advisors and five small business advocates, servicing almost 3,000 businesses in 2024. Although not all these businesses are street vendors, SBS considers MFVs “micro-businesses” that partially compose their constituencies. Services include permitting and license support, inspection support, and regulation guidance. Some of their programs operate in conjunction with other agencies, such as collaborating with the Department of Environmental Protection to instruct MFVs on how to dispose of grease and oil. NYC BEST also offers a module on outdoor vending in their NYC BEST Boot Camp. However, this course is only offered in English and is online - resulting in very low rates of attendance, according to street vendor advocates. Furthermore, the City’s Program to Eliminate the Gap (PEG) spending cuts targeted SBS programs aimed at supporting street vendors in fiscal years 2024 and 2025 – further reducing the expenditures for the programs.¹⁶

Patterns of Street Vending Violations

While the above analysis shows that street vending is complicated and inefficient and that reform efforts are not meeting their goals, this section highlights the disparities in vending violations. An analysis of both civil and criminal summons of street vendors shows a program that disproportionately impacts immigrant communities of color. Where race was reported 90% of criminal summons were issued to non-white vendors since 2009.¹⁷ Additionally, most tickets are issued in the City’s wealthy white neighborhoods. It paints the picture of an expensive program to criminalize immigrant and minority populations primarily for operating in predominantly white spaces.

Looking at violations by agency since 2014 (Figure 3), the NYPD remains the largest source of tickets for vendors. While tickets plummeted during the pandemic for all agencies, they skyrocketed for the Police since. This is despite many reform efforts, particularly under



Mayor de Blasio, seeking to centralize enforcement within DCWP thereby reducing NYPD’s involvement in vendor enforcement. In contrast, tickets from both DOHMH and the Parks Department remain significantly lower than where they were a decade ago.

Most violations were issued in Manhattan (65%) since 1985 (Figure 4), with roughly equal enforcement between the other boroughs (11% in Queens, 12% in Brooklyn, 10% in Bronx). There have not been

¹⁶ Martelloni, G. (2024). "Report on the Fiscal 2025 Preliminary Plan and the Fiscal 2024 Preliminary Mayor’s Management Report." Department of Small Business Services. Accessed March 21, 2025, at council.nyc.gov/budget/wp-content/uploads/sites/54/2024/03/801-SBS.pdf

¹⁷ Only criminal summons list race and, in many cases, the race category was left blank.

significant trends in this data, and it remains relatively comparable to the previous years since 1985.

Figure 4. Percentage of Violations per Borough Since 1985

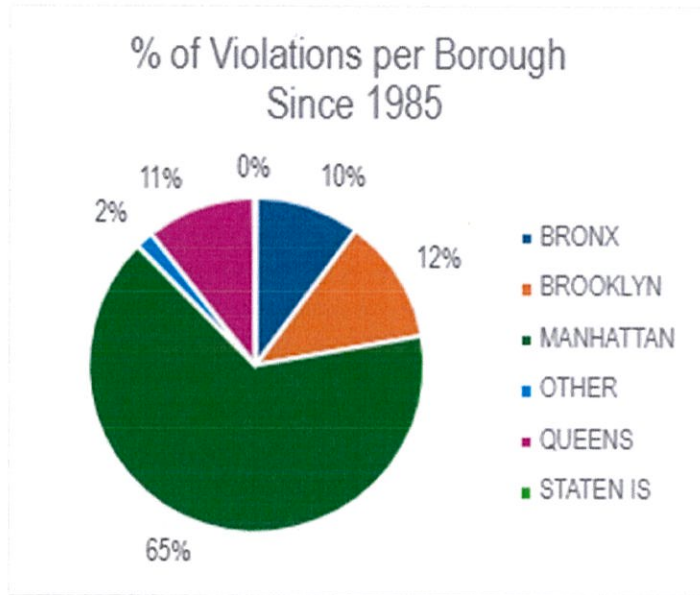


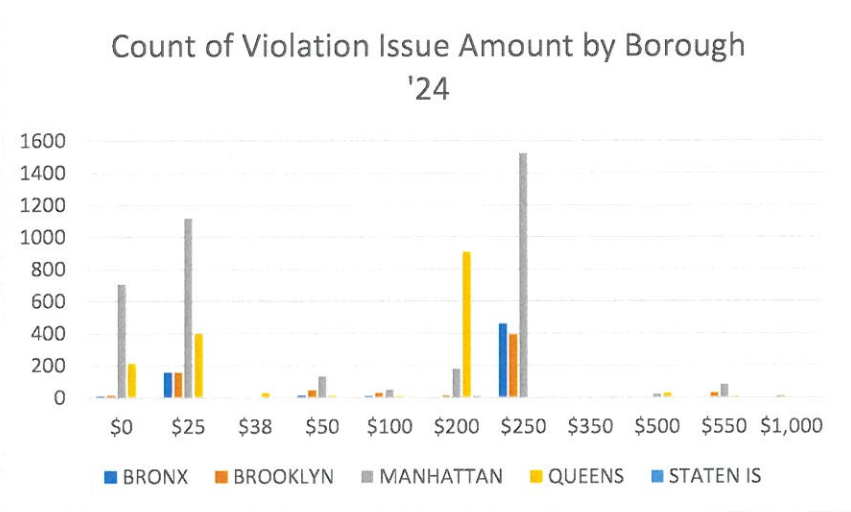
Table 3. Top Civil and Criminal Ticket Violations in 2024

Top Civil Tickets	Count	Top Criminal Tickets	Count
UNLICENSED GENERAL VENDOR INCLUDING CONT D		UNLICENSED GENERAL VENDOR	897
UNLICENSED ACTIVITY 1ST	1794		
VENDING ON SIDEWALK LESS THAN 12 FT., OR NOT AT CURB	809	UNLICENSED VENDOR	405
VENDING IN BUS STOP, SIDEWALK NEXT TO A HOSPITAL OR HEALTH FACILITY	801	VENDOR: FAIL TO DISPLAY PERMIT	95
UNLAWFUL VENDING	800	VENDOR: FAIL TO DISPLAY PRICES	84
UNLICENSED GENERAL VENDOR INCLUDING CONT D			
UNLICENSED ACTIVITY 1ST	550	VENDOR: UNLICENSED	71
PUSHCART TOUCHING OR LEANING AGAINST BUILDING	372	FAIL TO WEAR WHILE VENDING	45
VENDING AT TIME OR PLACE PROHIBITED	312	VEND-RESTRICTIONS ON PLACEMENT	41
FAILURE TO WEAR LICENSE CONSPICUOUSLY WHILE VENDING 1ST	257	VEH/PUSHCARTS	18
VENDING IN PROHIBITED ZONE OR AREA 1ST	173	VENDOR: (OTHER)	16
VEND AT TIMES PLACES RESTRICTED BY VENDOR REVIEW PANEL 1ST	143	VENDOR: DISP MERCHANDISE ON SIDEWALK	12
VENDING NEAR FIRE HYDRANT OR IN SAFETY ZONE 1ST	129	VENDOR WITHOUT A LICENSE	2
VENDING NON-FOOD ITEMS	119	VENDING ON PARKING METER	1
		NO VENDING MACH. DISCLOSURE	1

Looking at the top violations for both civil and criminal summons for 2024 (Table 3), we see that most violations were due to unlicensed or unlawful vending. This indicates the persistent problem of not issuing enough licenses quickly enough. Many of the other top violations were for so-called “quality of life” violations. These are where the vendor improperly sets up their vending operation according to the myriad and often confusing regulations. There was no discernible pattern across Boroughs for violation type. The same handful of common violations were prevalent throughout the City.

Looking at the cost of fines in 2024, we could only evaluate civil data as the criminal summons do not list the fine amount (Figure 5). This is unfortunate as the criminal penalties are often larger than the civil summons resulting in the data presented here representing a large undercount of the impact of vending tickets on vendors. For civil fines in 2024, most tickets impose either zero financial penalty, a \$25 penalty, or a \$200-250 penalty. These larger penalties seemed to represent the most common outcome across Boroughs and the Bronx seemed to have higher penalty issuances relative to the rest of the City. The fines for 2024 seem to be lower than historical data. Since 2000 about 50% of fines were for \$1,000 or more with \$1,000 being the fine for unpermitted food vending.

Figure 5. Count of Violation Issue Amount by Borough for 2024



Looking at the total cost, \$893,564 in civil penalties were issued against street vendors in just 2024 (Table 4). While most tickets were issued in Manhattan the average cost of fines is higher—often considerably so—in the outer Boroughs. Since 2000, NYC has issued 196K civil fines against vendors costing them \$103 million. Given the lack of penalty data on criminal fines, we know these figures to be large undercounts of the true cost on vendors.

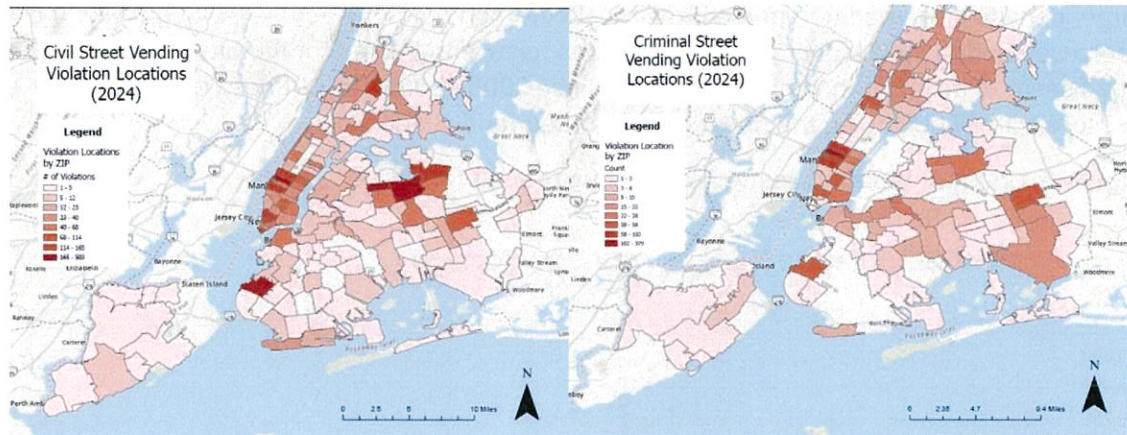
Table 4. Total and Average Penalty Cost by Borough of Civil Fines in 2024

Civil Fines 2024	Count of Violation Location (Borough)	Sum of Penalty Imposed	Avg Penalty Per Ticket
MANHATTAN	3,827	\$452,154	\$118.15
QUEENS	1,620	\$208,320	\$128.59
BROOKLYN	684	\$117,565	\$171.88
BRONX	660	\$110,800	\$167.88
NOT NYC	62	\$3,075	\$49.60
STATEN ISLAND	8	\$1,650	\$206.25
Grand Total	6,861	\$893,564	\$130.24

There is a great contrast between where violations occur and where those tickets are being issued. Looking first at where violations occurred in 2024, we see it is mostly in the wealthy white neighborhoods of Manhattan where enforcement actions are taken against vendors (Figure 6). Outside of Manhattan, enforcement is concentrated in three high-profile locations: Corona Plaza in Queens, Sunset Park in Brooklyn, and Fordham Road in the Bronx.

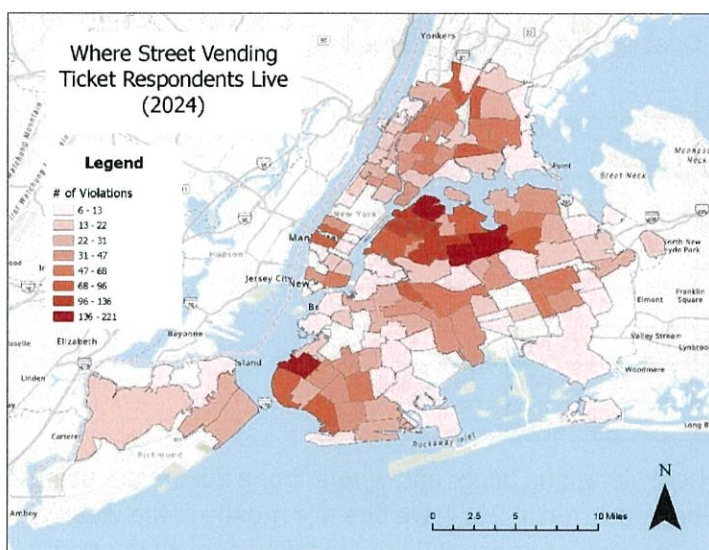
These three locations have had high-profile battles between vendors and the City over whether vending should occur in these locations and what form it should take.

Figure 6. Map of Where Civil and Criminal Vending Tickets Were Issued by ZIP Code in 2024



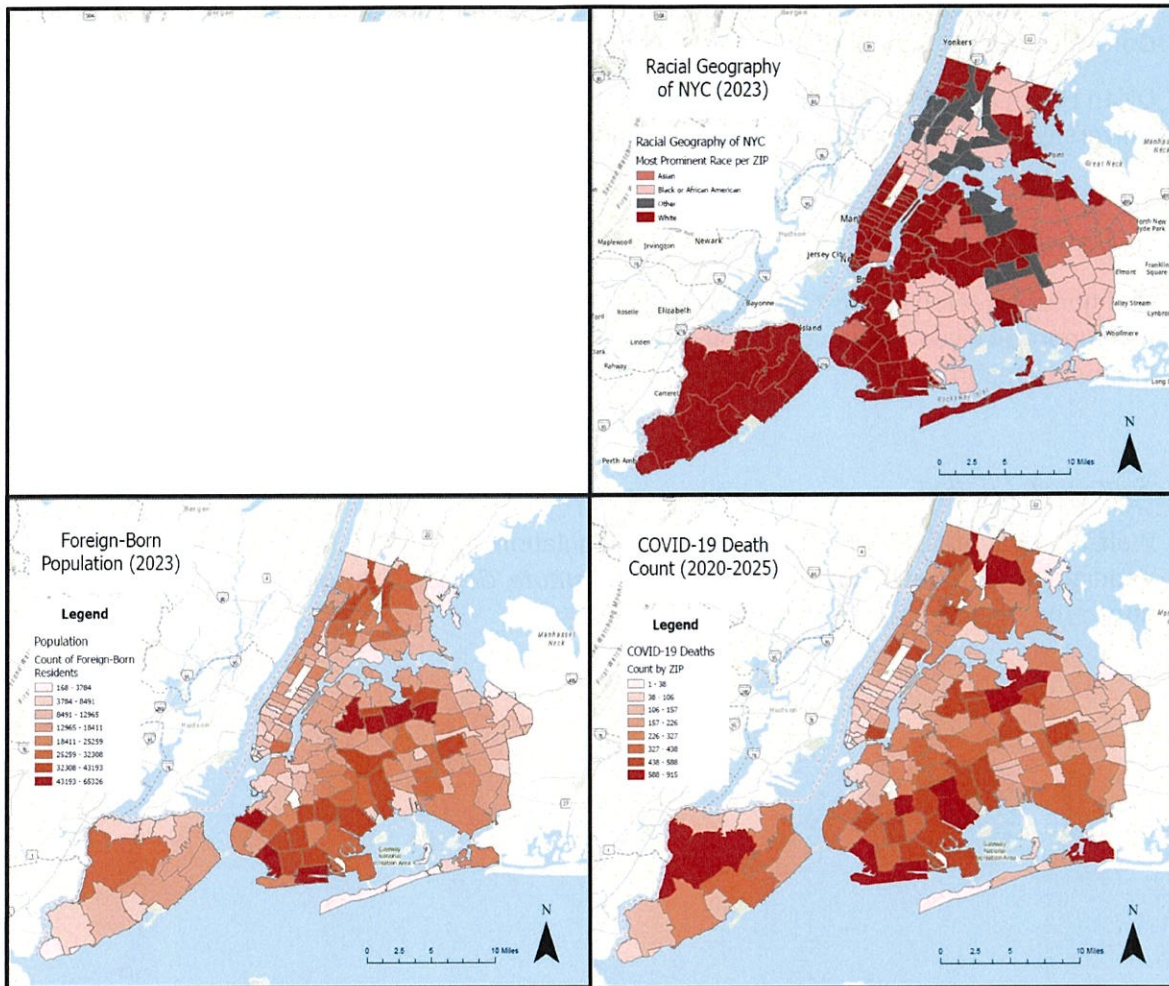
In contrast to the most violations taking place in the wealthy neighborhoods in Manhattan, most ticketed vendors list their residency in high-poverty neighborhoods in the outer boroughs. The following map shows where respondents to violations live (Figure 7) and compares them to ZIP code maps showing poverty rate, percentage of foreign-born residents, dominant racial group, and health disparities as measured by COVID-19 death counts (Figure 8). Looking at where violations occur, 10 of the top 25 ZIP codes are within the top 2 poverty quintiles. In contrast, 12 of the top 25 ZIP codes where those ticketed live are in the bottom 2 quintiles. Violations occurred throughout the City but 56% of violations occurred in ZIP codes in the top 3 quintiles. This means most violations happen in the richer neighborhoods while most vendors live in the poorer neighborhoods. Just over half of all tickets issued in 2024 were given to vendors living in the bottom 2 poverty quintiles.

Figure 7. Map of Where Civil Vending Ticket Respondents Live by Zip Code in 2024



The pattern is clear. Most vendors live in poor immigrant and minority neighbors which were hardest hit by COVID-19. Street vending enforcement in NYC presents a highly racialized pattern of violations mostly occurring in wealthier white neighborhoods against low-income immigrant and minority populations from disadvantaged areas. Furthermore, enforcement is a money-losing proposition for the City that exposes this vulnerable immigrant population to the criminal legal system.

Figure 8. Map of Select Demographic Variables by ZIP Code



Conclusion

Street vending is a vital source of employment for the most vulnerable populations in New York City. Vending is an essential service providing fresh food and supporting the all-important tourism industry throughout the City. The recent efforts to expand access, streamline enforcement, and shield vendors from police enforcement which can expose them to immigration consequences all represent important steps in reforming the industry. This report found New York City has a long way to go in meeting these goals. The maze of regulations facing vendors is still extensive and the role of the NYPD has not diminished despite the stated goals of the City. Unlike most ticketing programs in the City, vending enforcement is not a revenue generator and is likely operating at a large loss. The attempts to expand licensing are not meeting their stated goals and are delayed. Finally, we found a racialized pattern to enforcement where most fines are issued in wealthy white neighborhoods against vendors from the City's poor immigrant communities.

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**New York City Council Committees on Immigration and on Criminal Justice
May 6, 2025**

**City Council Committee on Consumer and Worker Protection
“Street Vendor Reform Package”**

Testimony of Jonathan Valenzuela Mejia, Immigrant Defense Project

Thank you to the Committee on Consumer and Worker Protection for holding this hearing. My name is Jonathan Valenzuela Mejia and I submit this testimony on behalf of the Immigrant Defense Project. IDP was founded over 25 years ago to combat the targeting of immigrants for mass deportation and to fight for justice for ALL immigrants - in particular, those caught at the intersections of the racist and cruel criminal and immigration systems.

We are here today in support of Intros 431 and 408, which both would make New York City more equitable for immigrant street vendors and would help take steps against the heightened criminalization and intimidation of street vendors we are seeing in our city. These bills would facilitate a more equitable licensing process for street vendors and create a division within Small Business Services focused on supporting street vendors.

As an organization dedicated to fighting for justice for immigrant New Yorkers, we recognize these pieces of legislation as critical to support immigrant workers at a time of increased fear. When immigrants at risk of deportation have encounters with police, their risk of being funneled to ICE increases. This is because encounters with the NYPD can result in fingerprint sharing - whether that person is charged with a crime or not. In particular, in any case where fingerprints are taken, they are sent via the FBI to ICE, to determine whether the person is a target for deportation. For these reasons, this mayoral administration's choice to criminalize street vendors rather than support them to thrive is especially dangerous.

We know from street vendors and advocates that they face many challenges in obtaining licenses and in accessing support. Equitable licensing and support for street vendors is essential to combat harmful policing and instead allow for our city's most vulnerable communities and allow for stronger and safer communities to exist and thrive.

The City Council must pass these bills to build a more equitable New York and ensure that the people and businesses which make our city what it is continue to thrive and contribute to our city.

Jonathan Valenzuela Mejia on behalf of the Immigrant Defense Project



INSTITUTE FOR JUSTICE

**New York City Council Committee on Consumer and Worker Protection
Testimony in Support of Local Law 431**

May 6, 2025

To the New York City Council Committee on Consumer and Worker Protection:

My name is Dylan DelliSanti, and I am a Policy Associate at the Institute for Justice (IJ). IJ is a non-profit, public interest law firm that works to secure the civil liberties that allow all Americans to pursue their dreams, including the right to pursue an honest living.

Through our National Street Vending Initiative, IJ has worked in courts, in city councils, and in the streets to help improve vending conditions in cities across the United States. We have published extensively on the benefits that street vendors provide, the barriers that too often stand in their way, and how cities can reform their laws to secure the many benefits that a vibrant vending community can engender.¹ We are experts on national best practices and for years, have been deeply concerned about New York City's destructive permit caps, which keep untold numbers of hard-working entrepreneurs out of work or in the shadows. Not only do the caps frustrate the efforts of energetic, entrepreneurial people, but they encourage a black market in vending permits that diverts huge sums of money away from value-creating activities, like business expansion and job creation, that could benefit all New Yorkers.

Local Law 431 Is Long Overdue

Lifting the caps on food and general vendor licenses will allow New Yorkers to pursue their economic aspirations while enabling them to work within the framework of the law. The current situation, in which there are more vendors than there are licenses, is unnecessary, untenable, and fails to serve the needs of vendors, their customers, and the larger community. It is estimated that there are 20,000 street vendors in New York City. However, 75% of food vendors and 37% of general vendors are operating without the proper permit.² Some who are especially desperate to be legal seek permits in the underground market that can reportedly cost upwards of \$20,000.³ Those forced to operate in a legal gray area are unable to expand or invest in their businesses. These are undue and expensive burdens to place on New Yorkers who are doing nothing more than providing for their families and serving their customers.

¹ See, e.g., *Streets of Dreams: How Cities Can Create Economic Opportunity by Knocking Down Protectionist Barriers to Street Vending*, available at www.ij.org/vending.

² Street Vendor Project. "History." Urban Justice Center. <https://www.streetvendor.org/history>.

³ Lew, I., & Chatterjee, D. (2022). *Testimony: Formalizing the Street Vending Industry in Large Cities*. Community Service Society of New York. Retrieved from <https://www.cssny.org/news/entry/testimony-formalizing-street-vending-industry>

As demonstrated by the years of outpouring of support for lifting the caps from the vending industry itself: these entrepreneurs want to be legal.

By maintaining a cap on the number of licenses, New York City prevents entrepreneurs from being able to effectively meet consumer demand. New Yorkers have shown they value what street vendors offer: for decades, they have sustained a robust informal market, keeping thousands of unpermitted vendors in business despite the cap.

Street Vending and New York City's Economy

Street vending is an important, and underappreciated, node in the larger New York City economy. Street vendors are home-grown businesses who often work with local suppliers, provide jobs to fellow New Yorkers, and spend their hard-earned dollars at other New York City businesses.

In our study *Upwardly Mobile: Street Vending and the American Dream*, we include an important case study on New York City's vending industry.⁴ The study found that in 2012, vendors employed 16,332 full- and part-time workers, including business owners themselves, and paid \$78.5 million in wages. By turning raw materials into finished products—like preparing food or assembling goods—vendors also created \$82 million in additional economic value, known as “value added.”

The study also examined the *indirect* effects of street vendors – how much economic activity they generated by purchasing intermediate goods from suppliers. When street vendors buy produce from a local market, cleaning supplies from a local bodega, or rent a garage from a local storage space company, those businesses are also able to hire and produce goods too. The study found that suppliers employed an estimated 1,150 people and paid \$80.3 million in wages to provide goods and services to the city's vendors. Those goods and services contributed \$155 million in value added to the local economy.

Finally, the study examined the *induced* effects of street vending, the amount of money spent by street vendors, their employees, and their suppliers in their capacity as household consumers and found that personal spending by New York City vendors' employees and suppliers' employees supported 478 jobs, \$33.5 million in wages and \$55.7 million in value added in 2012.

All told, street vending contributed 17,960 jobs, \$192.3 million in wages and \$292.7 million in value added to the New York City economy in 2012 alone—numbers which have surely grown along with the increase in street vending in the intervening years.

Street vendors' impact is disproportionally concentrated in the local economy. Larger establishments are already at a competitive advantage relative to mom-and-pop street vendors since they can more deftly navigate bureaucratic hurdles. We should not disadvantage street vendors further by making it illegal for them to pursue an honest living.

⁴ Carpenter, D.M. (2015). *Upwardly Mobile: Street Vending and the American Dream*. Institute for Justice. Retrieved from <https://ij.org/report/upwardly-mobile/>.

Street Vending and Brick-and-Mortar Businesses

Research indicates that street vendors do not harm brick-and-mortar businesses, despite the unfounded claims often made to the contrary. A 2022 study by the Institute for Justice used 12 years of county-level census data to explore whether growth in the number of food trucks resulted in fewer restaurants.⁵ It found that as food trucks took off, the restaurant industry continued to grow. Digging deeper, statistical analysis shows food truck growth is *not* followed by restaurant decline—precisely the opposite of the detractors’ predictions. These results strongly suggest that food trucks (and their peers, street vendors) have been unfairly maligned.

This makes sense: street vendors bring more foot traffic to an area, thus benefiting the surrounding businesses. For instance, in Washington, D.C.’s office-heavy Farragut Square neighborhood, the food trucks drew so much foot traffic that four brick-and-mortar restaurants opened across the street.⁶ Street vendors, as rational entrepreneurs, recognize that it makes sense to locate in areas where their goods are complementary to the surrounding neighborhood. Street vendors also offer a different kind of product and experience than brick-and-mortar restaurants: if you’re in the mood for fine dining, you’ll probably prefer to go to a restaurant with a server, tablecloth, and air conditioning, even if the street vendor down the block sells the same style of cuisine at a cheaper price.

Food Trucks and Carts Are as Clean and Safe as Restaurants

Importantly, food served by street vendors is every bit as safe as that produced by restaurants. In *Street Eats, Safe Eats: How Food Trucks and Carts Stack Up to Restaurants on Sanitation*—later published in the peer-reviewed journal *Food Protection Trends*—the Institute for Justice analyzed more than 260,000 food-safety inspection reports from seven large cities.⁷ In each of those cities, mobile vendors are covered by the same health codes and inspection regimes as restaurants and other brick-and-mortar businesses, allowing an apples-to-apples comparison. The report found that in every city examined, food trucks and carts did as well as or better than restaurants; and in six out of seven cities, food trucks and carts averaged *fewer* sanitation violations than restaurants, and the differences were statistically significant.

Caps on permits do not make street food safer—they just make it harder to get. In New York City, street vendors who are able to obtain a permit are subject to an initial inspection, while those operating on the black market or illegally are not. Lifting the caps would subject more street-food vendors to initial inspection, ensuring the safety of their food is consistent with our study’s findings.

⁵ Carpenter, D.M. & Sweetland, K. (2022) Food Truck Truth: Why Restaurants—and Cities—Have Nothing to Fear from Mobile Food Businesses. Institute for Justice. Retrieved from <https://ij.org/report/food-truck-truth/>

⁶ DMV Food Truck Association. (n.d.). Food Truck Facts. Retrieved from <https://web.archive.org/web/20210415231408/https://www.dmvfta.org/food-truck-facts>

⁷ Erickson, A. C. (2014). *Street Eats, Safe Eats: How Food Trucks and Carts Stack Up to Restaurants on Sanitation*. Institute for Justice. Retrieved from <https://ij.org/wp-content/uploads/2015/03/street-eats-safe-eats.pdf>

Street Vending as a Gateway to Greater Economic Advancement

Street vending provides an entrepreneurial outlet for thousands of hardworking individuals. Many vendors are immigrants who bring rich traditions, resourcefulness, and a strong work ethic to their businesses. Street vending offers a low-cost, accessible way to launch or grow a business, contributing to both household income and the city's culture.

A 2024 study by the Immigration Research Initiative found that a street vendor working 50 weeks a year can expect to earn roughly \$50,000. This is roughly 50% greater than the annualized income of a minimum wage job and just ahead of the New York City poverty rate income of \$44,000.⁸

That same study also found that “95 percent of street vendors reported enjoying being a vendor.” The high rate of satisfaction could be ascribed to many sources, but one factor that probably weighs heavily is that street vendors, as they have some leeway to be “their own boss” and to set their own hours and allocate time to taking care of children and other family members.

The story of New York's economy can scarcely be told without including the entrepreneurs who started with nothing but a hand-cart before expanding to brick-and-mortar locations—perhaps most famously Nathan Handwerker who first sold hot dogs at the corner of Surf and Stillwell Avenues on Coney Island in 1916.⁹

Conclusion

We firmly support Local Law 431 and lifting caps on food vendor supervisory licenses and general vendor licenses. Lifting the caps will empower New Yorkers of modest means to pursue an honest living. The vitality of a city economy rests on its ability to provide opportunities for advancement, especially for those on the first rungs of the economic ladder.

Sincerely,

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⁸ Immigration Research Initiative. (2024). *Street Vendors of New York*. Retrieved from <https://immresearch.org/publications/street-vendors-of-new-york/>

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May 6, 2025

Statement by Monica Blum, President of the Lincoln Square Business Improvement District, to the NYC Council Committee on Consumer and Worker Protection regarding the oversight of street vending enforcement and related bills, Int. 431-2024, 408-2024, 1164-2025, and 1251-2025

Thank you to Council Member Julie Menin, Chair; Council Members Abreu, Brewer, and other members of the Consumer & Worker Protection Committee for the opportunity to submit testimony regarding the recent package of bills pertaining to street vending in NYC. My name is Monica Blum and I am the President of the Lincoln Square Business Improvement District (BID). We represent some 250 businesses, not-for-profit, and cultural organizations on the Upper West Side of Manhattan. Our district extends from The Shops at Columbus Circle at 58th Street and along Broadway, Columbus Avenue and Amsterdam Avenue up to 70th Street and, of course, includes Lincoln Center for the Performing Arts and Deutsche Bank Center. Annually, Lincoln Square draws millions of visitors who, along with residents, employees, commuters, street furniture, and vendors create extremely congested sidewalks in our district. The Columbus Circle subway station is the 7th busiest in New York City with an annual ridership of almost 16 million people. DOT, in its Pedestrian Mobility Study, has designated Broadway, the spine of our district, as a Global Corridor – the busiest rating, that requires a 12-foot clear path on the sidewalk for pedestrian circulation.

At the outset, I would like to state that I have been working on this issue for almost 30 years starting in 1996 when our BID was created. Every City Council has attempted to address street vending, enforcement and siting, and always in a piecemeal fashion. Many years ago, a bill was introduced into the Council that focused on the real issue – siting of vendors – but like so many other bills it did not pass. Absent real siting – identified locations for vendors – lifting the cap and creating more vending licenses will just create more chaos on our already congested sidewalks.

Yes, there are restrictions on vendor cart placements – distance from entrances to a retail establishment, distance from a crosswalk, distance from a hydrant, etc., but these are not siting requirements. As many of you know, vendors handle siting themselves – vendors believe they “own” a spot on a public sidewalk and if another vendor sets up nearby often times a fight, sometimes violent – ensues. In Lincoln Square, we have a vendor hot spot – Calabrese and Keegan Plaza at Broadway & 60th Street, which serves as a perfect example. Currently there are 8 mobile food vendors at this location – and if a new vendor dares to set up here – the others will either demand payment for use of the public space or chase them away, forcing the new vendor to look elsewhere. Vendors need designated spots, and we would support a system whereby long-established existing vendors, could be given priority for the locations where they have been for 10, 20, and even 30 years. We have one such food vendor right outside the BID’s office. We work with that vendor, and with almost all the other vendors in our district; for the most part, they follow the rules and do not illegally dump trash and observe required clearances.

My testimony today, in many ways similar to what I said a year ago, focuses primarily on the impact of these bills on the sidewalks. Over the years, we have developed good working relationships with most of our vendors. We have worked with our partners at the NYC Departments of Sanitation, Consumer & Worker Protection and Health and Mental Hygiene, as well as the 20th Precinct, to ensure that vendors in Lincoln

Square comply with the various complex laws and regulations. Three years ago, we did a walk through in our district with DCWP who visited every vendor to explain the rules. The no longer new DSNY enforcement unit, in particular, has been helpful with the vendors particularly at Calabrese and Keegan Plaza at Columbus Circle, which has been a vending hot spot for many years. In addition to working with DSNY's Enforcement Unit, we worked closely with the Department of Health and Mental Hygiene, and DCWP to address a handful of vendors whose permits had expired and those who left carts unattended overnight.

A key element to ensuring that vendors comply is enforcement. Just last week, we had a vendor set up on a narrow side street. His hot dog cart was in violation of a number of regulations – most importantly his cart violated clearances and was too close to the entrance of a business and a hotel loading zone. Our Vice President of Operations notified the vendor that his cart was in violation of a number of regulations and that he could not be at that location. He ignored us. We then notified NYPD and DSNY via 311. The NYPD visited him and told him to leave. The vendor ignored the NYPD. The NYPD returned a few hours later and the vendor still remained and returned the next day. And then, on the third day, he decided to set up in front of a very busy business a few blocks away right in front of the entrance to the business crammed between a planter and DOT signage. Again, the vendor was told that he could not remain at that location. We reached out to DSNY and the NYPD again, and he is still there. **If additional licenses are issued, there must be increased, commensurate enforcement to cover the entire city.** We recommend that the DSNY Enforcement unit be expanded and educational programs be expanded. While we understand the concerns that some are raising, prematurely lifting the cap on vending licenses before implementing and funding a comprehensive plan to fully address this complex issue would seriously harm our neighborhood and the entire City.

As many of you know, our streets and sidewalks are already cluttered. BIDs, including ours have installed Citibins in the curb in an effort to remove trash bags off the sidewalks, which is a new mandate and an initiative of great importance from DSNY. We require access to these bins in order to put our trash bags in them and cannot have sidewalk obstructions. In some cases, Citibins are actually located on sidewalks. These bins must be accessible from the street so that DSNY can empty them, and from the sidewalk so that we can load the bins with the public's garbage that we sweep up. Surely, we don't want to replace garbage bags with multiple vendor carts.

As we stated in our testimony last year, we are generally opposed to lifting the cap on licenses for vendors (previous Intro 1270-2023, similar to Int 431-2024 & 1251-2024) until a thorough evaluation of regulations and existing conditions are reviewed and a true siting system is put in place.

Since I last testified, the retail market in Lincoln Square has improved somewhat, but our brick and mortar businesses, particularly our cafes and coffee shops continue to face challenges. Our brick-and-mortar businesses, restaurants, and delis face many challenges with new Sanitation rules, constant legislative mandates, and increased competition from vendors, meal delivery services, and e-commerce, not to mention the increased cost of doing business with congestion pricing and the new tariffs being imposed at the federal level. Increasing the number of mobile food vendors and licenses would increase the burden on our brick-and-mortar businesses who provide valuable goods and services to our communities. We note that most of the new businesses that are opening and doing well are small cafes, bakeries, and small specialty food shops.

As I have said repeatedly, a major shortcoming of the current bills is, once again, there is no mechanism for the siting of vendors, which is something that is critical if the numbers were to increase. Our sidewalks are a precious commodity and are becoming increasingly crowded; they are for public use and not for private use absent appropriate input, stakeholder notification, and agency review. As we all know, often times food vendors set up directly in front of brick and mortar businesses and sell similar food products.

Lincoln Square still has a vending “hot spot” at Calabrese and Keegan Plaza (not an official plaza), an incredibly congested sidewalk area at the main entrance to the 7th busiest subway station, Columbus Circle/59th Street, where some 8 vendors compete for limited space daily with bike hawkers, a weed seller, street performers and the general public, including tourists, going to and from Central Park, the Shops at Columbus Circle, Lincoln Center, Mt. Sinai West, John Jay College, and Fordham University, among other places. Thanks to the efforts of DSNY, this location is slightly better controlled but it is still a hot spot with mobile food vendors set up on subway grates, not abutting the curb and generally impeding pedestrian flow. The new unit ensured that all the vendors at that location were in compliance with the existing rules, were close to the curb, and were not blocking busy crosswalks as they had been doing. Calabrese and Keegan Plaza is far less crowded, crosswalks are no longer blocked, and pedestrians can move about safely and still get their drinks and assorted food. While this location is not perfect, it has improved thanks to the enforcement efforts. We urge increased funding for the Enforcement Unit before any cap is lifted. As the Mayor and Police Commissioner launch the new Quality of Life Division, lifting the cap will make it even more difficult to enforce “everyday” issues. New York City and our streets and sidewalks have changed dramatically in recent years. There has been a tremendous increase in street furniture, including new and improved bus shelters and newsstands, the addition of wayfinding signage, benches, trash and recycling receptacles, bike share stations, bike racks, bike lanes, and the addition of a million trees and Citibins and waste receptacles and now 5G, and that does not include the new Outdoor Dining program that has just started and maintains clear pedestrian path siting requirements. **In our district, sidewalk cafes on Broadway must leave a 12-ft pedestrian path clear of obstructions.** E-commerce such as Amazon in residential neighborhoods such as ours bring huge trucks with delivery people trying to cross crowded sidewalks to bring goods to residents, too. People are also eating out less and getting food delivered by bike couriers who often leave bikes on the sidewalks.

I commend the Council for taking on the complex issue of street vending in NYC, but I urge you to do it right. I have been working on this issue as the head of Lincoln Square since 1996 and know how complicated this is. However, I do not think that piecemeal changes such as lifting the cap and increasing the number of vendors – general or food - without clear siting locations is the solution. One option that was proposed a number of years ago was a warrant system, or “locations by lottery” that could also give priority to vendors who have been at established locations for many years. Over the years there have been a number of legislative changes, but they were cherry picking, as it were rather than a comprehensive plan that includes designated locations. **We need an expanded enforcement unit, a comprehensive review of current restrictions, a database of all vendors, and a neighborhood specific siting plan with designated locations for all vendors that makes New York City sidewalks a model rather than a chaotic jumble of pedestrian obstacles.** One-off changes such as lifting the cap will not solve the problems, and the use of our already congested sidewalks requires a comprehensive plan. You cannot un-ring the bell. Thank you for your thoughtful consideration of our concerns.



**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is Oumaima Benyahya and I am the Organizing Fellow at Malikah. I would like to thank Chair Menin and the Committee for the opportunity to testify in support of Intros 431 and 408.

Our organization is a nonprofit initiative that serves the immigrant women and youth in our community, through self defense, mental health, economic empowerment, and community organizing initiatives. Street vendor rights are instrumental to our community as we serve the SWANA diaspora, which is heavily impacted by such legislation provided the industries they occupy.

Street vendor rights enable our community to achieve economic stability and get access to halal food across NYC, serving youth, entrepreneurs, and the rest of the city population. Street vendors also allow the MENA community in New York to receive visibility, another major project of ours in the making through recent bills. As our City's smallest businesses, street vendors reflect the great diversity of our communities, and are a true embodiment of the entrepreneurial spirit of our city. Innovating, creating, and investing in our local economies, vendors are out every day to provide for their families and feed their neighbors—often targeted and criminalized for doing so.

This package of bills will let vendors provide the services New Yorkers want - in a regulated, predictable, enforceable system - and give them a real chance to build wealth in their neighborhoods. The City must not criminalize street vendors for trying to provide for their families, but instead cut the red tape and facilitate a healthy regulatory environment for our smallest businesses to thrive.

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408, as part of the Street Vendor Reform legislative package.

Intro 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors. By bringing

vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses, ensuring a fair system that requires vendors to comply with vending regulations including strict siting and health code rules to maintain their permitting. This will give New York's smallest businesses a real chance to thrive in our local economy.

Currently, while there are more than 5 agencies that do street vendor enforcement, there is no city agency leading on educational resources to vendors. **Intro 408** would create an office of street vendor services within SBS, ensuring that street vendors as our City's smallest businesses have access to training, education, and outreach to support business compliance and growth.

Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

Malikah is a grassroots nonprofit dedicated to combating gender and hate-based violence, and gender justice is a crucial part of our mission in street vendors rights. Today, nearly half of street vendors are women, yet women are far less likely than men to hold business licenses and are disproportionately impacted by the lack of available permits. Among mobile food vendors, only 27 percent of permit holders are women, and among general vendors, only 14 percent of those who are licensed are women. Women entrepreneurs would see a big gain if able to access vendor business licenses. Additionally, intersectionality matters. A sizable portion of street vendors are women of MENA descent, which is an identity that has been overlooked by the system for far too long. Not only have women been overlooked, but so has their ability to participate as part of the MWBE.

Thank you for accepting our testimony today. It is Malikah's hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

Oumaima Benyahya, Malikah

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**Testimony to the
New York City Council
Committee on Consumer and Worker Protection
on behalf of the
Meatpacking District Management Association
City Council Chambers
May 6, 2025**

Good day, Chair Menin and Councilmembers. My name is Evan Sweet, and I'm the Director of Neighborhood Operations for the Meatpacking District Management Association, the Business Improvement District responsible for managing and maintaining one of New York City's premier live, work, and play cultural districts on Manhattan's West Side.

The Meatpacking BID provides a comprehensive range of supplemental public services, including sanitation, landscaping maintenance, public space management, safety, and marketing programs, which collectively ensure our neighborhood is vibrant and remains clean, safe, and welcoming to residents, businesses, and visitors alike.

These services are undermined by a proliferation of mobile food vendors and goods vendors, which seriously infringes on the pedestrian right of way, frequently blocks access to storefronts and fire hydrants, pollutes catch basins with cooking grease, and undermines investments in the public realm that have made the Meatpacking District's public spaces so successful.

While some believe the existing mobile food vending rules are enough to deal with limited bad actors, our daily experience managing New York's public realm tells a different story. Each day, mobile food vending creates a list of issues that are unaddressed by the City and outside of the BID's ability to change. If it were any other industry, the matter would be swiftly addressed and legislation proposed to fix not further fumble the matter.

We understand that properly regulated mobile food vendors are an important component of our city's diverse economy and cultural fabric, and for many, a mobile street vending permit is a path to economic opportunity. However, we believe that simply expanding the number of permits without substantial structural changes to the City's vending policy will further complicate street vending and lead to worse outcomes across the five boroughs.

Any legislation must directly address the City's inability to enforce existing vending rules and should provide a comprehensive framework for integrating mobile food vendors into the urban landscape, so as not to be a detriment to brick-and-mortar businesses, public realm stewards, and the pedestrian experience.

Today's legislation falls short and thus will only exacerbate the range of challenges directly caused by poorly regulated street vending, which BIDs and communities across the City struggle to manage.

Before considering today's proposed changes, we urge this committee to consider implementing reforms that:

- Establish and enforce simple, clear siting criteria that prevent sidewalk congestion;
- Create simple and effective enforcement mechanisms and provide adequate resources to allow City Agencies to effectively address issues created by vendors;
- Apply the same stringent public realm siting regulations to vendors that BIDs and other entities must follow when siting streetscape improvements and similar.

Without these foundational changes, the expansion of mobile food vending will continue to make the work of BIDs and similar organizations ever more difficult, and continue to degrade the City's streetscape and neighborhood conditions.

Thank you for your consideration of these concerns. The Meatpacking District Management Association stands ready to collaborate with the City Council to develop solutions that balance the needs of all stakeholders in our vibrant urban ecosystem.



May 6, 2025

**Comments of the
National Supermarket Association (NSA)**

Before the

New York City Committee on Consumer and Worker Protection

Regarding

Street Vending Enforcement and License Issuance

Thank you Chair Menin and members of the Committee for the opportunity to submit testimony from the National Supermarket Association (NSA). NSA is a trade organization representing the interests of independently owned supermarkets in New York City and beyond. In the five boroughs, NSA advocates for more than 600 supermarkets and 15,000 employees.

NSA members are predominantly immigrant and minority entrepreneurs who have built their businesses from the ground up. Our member stores are local, family-owned businesses—many passed down from one generation to the next—that serve as economic engines, community anchors, and lifelines for healthy, affordable food in neighborhoods across the city. Our members employ thousands of workers, pay local taxes, and invest directly in the communities where they live and work.

The Problem

We submit these comments today not to oppose street vendors—many of whom share similar backgrounds to our members—but to call for a functional, fair, and enforceable vending system that works for all New Yorkers: vendors, small business owners, pedestrians, and the neighborhoods we all share.

The current system of street vending in New York City is deeply flawed. Overcrowded sidewalks, unregulated vending, and inconsistent enforcement have created an untenable situation for both permitted vendors and brick-and-mortar businesses. The rules on the books are applied

unevenly, if at all, creating confusion, resentment, and conflict on our streets. Additionally, the proliferation of illegal food vendors raises serious public health and sanitation concerns. Without proper food safety handling, sanitary conditions, or temperature controls, there is a heightened risk of contamination and foodborne illnesses such as E. coli and salmonella—putting consumers at risk and undermining the standards that brick-and-mortar food retailers are required to uphold.

For supermarkets in particular, the consequences are serious. Vague siting rules allow vendors to operate directly outside of store entrances, which not only affects visibility and access but also creates real liability risks. Under law, supermarkets are responsible for maintaining the sidewalks in front of their stores and are legally liable for incidents that occur there. If a pedestrian slips and falls on a crowded sidewalk cluttered with unregulated vending activity, the supermarket—not the vendor—is held liable. This unfairly shifts financial and legal responsibility onto small business owners. In effect, our businesses are subsidizing an informal economy over which they have no control. With insurance premiums already spiking citywide—particularly for incidents related to sidewalk injuries—this is simply unsustainable with the challenging retail environment.

Our Position on Current Legislative Proposals

The National Supermarket Association supports reform. But reform must be comprehensive, coordinated, and enforceable. We are concerned that Int 431 (Sanchez), which would raise the cap on supervisory licenses and eventually eliminate it, is being advanced as a standalone measure—without the critical safeguards and enforcement tools needed to make such a change viable.

We understand the permit cap has been in place since 1983 and has contributed to a dysfunctional permitting process. Raising or eliminating the cap without accompanying reform will only exacerbate the problems we face today. It would increase vending activity on already congested sidewalks, while doing nothing to address siting conflicts, illegal operations, or the exploitation of workers by underground permit-holders.

Similarly, while we support the intent of Int 408 to establish a centralized Mayor's Office of Street Vending, that proposal must be paired with the resources and enforcement capacity needed to address the reality on the ground.

NSA's 5-Point Plan

The National Supermarket Association has developed a practical five-point plan to guide meaningful reform. We urge the Council to adopt this plan in full—not in fragments. Each component is essential, and together they offer a blueprint for a system that can work for everyone.

1. **Expand Enforcement Resources:** Allocate \$10 million to hire an additional 118 DSNY enforcement agents—two per community board—to ensure educated, year-round, proactive oversight. Enforcement must be civil, consistent, and coordinated. Just as importantly, the City must establish a framework for suspension and revocation of licenses for vendors who repeatedly violate the rules. Without real consequences, bad actors will continue to dominate the system. An equal amount of money should be allocated towards street vendor training.
2. **Raise the Permit Cap—With Guardrails:** We support the phased increase of supervisory licenses as laid out in Int 431, culminating in full cap removal in five years. But this cannot happen in isolation. Any increase must be accompanied by increased enforcement, clearer siting rules, and administrative oversight to prevent chaos and abuse.
3. **Set Clear and Enforceable Siting Requirements:** We call for a minimum 50-foot buffer between mobile vendors and supermarket entrances. It is the only way to protect public access, prevent operational disruptions, and shield our members from legal and financial liability for incidents they cannot control.
4. **Decriminalize Violations While Maintaining Accountability:** We support the decriminalization of street vending violations and urge the Council to shift enforcement from criminal to civil processes. Many vendors are immigrants, and unnecessary criminalization can cause lasting harm. But civil enforcement must still be real, with escalating penalties and meaningful consequences for repeat violations.
5. **Create a Mayor's Office of Street Vending:** We support the intent of Int 408 (Public Advocate) to centralize coordination of the many agencies involved in street vending operations. A dedicated office would ensure cross-agency coordination, provide education and training for vendors, and create a one-stop shop for permitting, complaints, and enforcement.

We urge the City Council to view this issue as more than just a permitting question. This is about the shared use of public space, the sustainability of small businesses, and the need for a regulatory framework that serves the entire city.

Lifting the cap without addressing siting, enforcement, and oversight will only make the current situation worse. It will further erode trust in the system, increase conflict on the streets, and leave both vendors and brick-and-mortar businesses to operate in a climate of uncertainty and unfairness.

The NSA calls on the Council to adopt this 5-point plan as a unified package. Anything less risks perpetuating the fragmented, ineffective system we all agree is broken.

Thank you for your time and consideration of this testimony.



**New York City Council
Committee on Consumer and Worker Protection**

**NEW YORK CITY COUNCIL FISCAL YEAR 2026
PRELIMINARY BUDGET HEARING**

**Testimony of the New York Immigration Coalition on
The Street Vendors Reform Package.**

May 6, 2025

Good morning, Chair Menin and members of the Consumer and Worker Protection Committee. My name is Vladimir Tlali, and I serve as the Senior Policy Strategist at the New York Immigration Coalition, a statewide umbrella policy and advocacy organization with over 200 immigrant-serving members and partner organizations. Thank you for the opportunity to testify regarding the Street Vendor's Reform Package.

New York City is home to an estimated 23,000 street vendor small businesses who annually contribute \$192 million in wages, \$292.7 million in goods and services, and \$71.2 million in taxes to our city. 96% of all street vendors in New York City are immigrants. They represent our smallest businesses, reflecting the diversity and entrepreneurship of immigrant communities. Street vendors not only serve food and culture, but they also create connections and socialization spaces that keep our vibrant city alive. The millions of dollars they collectively generate in wages, services, and taxes keep our city finances running.

This is a challenging time for immigrant communities in New York City as we get ready to face the weaponization of federal funding by the current administration. Yet, instead of being supported and celebrated as pillars of New York City culture and resilience, immigrant vendors are consistently marginalized, criminalized, and left vulnerable to immigration detention, deportation, and family separation.

Instead of supporting our communities as they deserve, Mayor Adams has cut essential funds to provide life-saving services for immigrants in New York City. This is why we stand here today in solidarity with fellow activists, organizations, and New Yorkers to denounce Mayor Adams' participation in a shameful quid pro quo to collude with the Trump administration to deport immigrant New Yorkers while dedicating full attention and city resources to Trump's draconian immigration enforcement agenda in exchange for his federal corruption charges being dropped.

Mayor Adams has undermined his ability to lead this city with genuine autonomy and eroded our trust in his capacity to make critical decisions for all New Yorkers. Our city deserves



leaders with conviction who stand up to temptation and threats, uphold the city's integrity and institutions, and prioritize the interests of the communities they are sworn to serve over self-preservation and self-interest. Instead, Mayor Adams has opted to target our immigrant families, the very same people he has cynically used as scapegoats to justify his brutal cuts to essential public services and programs.

Targeting street vendors, many of whom are immigrants, for NYPD arrests and tickets puts them at increased risk of ICE arrests, resulting in immigration detention and deportation. Our city's policies should support our economy while uplifting our values, rather than imitating the Trump administration's cruel agenda. City Council can and must enact policies that protect New Yorkers against Trump's mass deportation agenda. Enacting these bills will reinforce our commitment to the values that define New York and ensure the well-being of New York families, businesses, and communities.

That is why the Street Vendor Reform Package is needed today more than ever. Particularly, Intros 432 and 408 are critical. Intro 432 will expand access to vending licenses, finishing with the unfair and decades-long cap that locks thousands of people out of the street vending system. Instead of criminalizing and harassing people for working, Intro 408 will provide much-needed education, support, and outreach to street vendors, just like the entrepreneurs they are.

We celebrate New York City as a vibrant and diverse place full of opportunities. This city that proudly claims itself as the world's capital has long ago recognized that its role as a beacon and haven for the global community underpins its status as a cultural and financial leader nationally and globally. In short, our city is crucial to the prosperity of our state and country, and immigrants are essential to New York City's success.

We urge the Council to protect the rights of all New Yorkers and do everything in their power to ensure that everyone in the city, regardless of their immigration status, can thrive in safe communities. Now is the time to ensure that our investments are protected, our people are taken care of, and that we maintain and sustain the services that enable all New Yorkers to flourish.

Thank you for the opportunity to testify. The New York Immigration Coalition hopes that the City Council will take the critical step of passing Intros 431 and 408 as part of the Street Vendor Reform Package.

Submitted by:
Vladimir Tlali
Senior Policy Strategist
New York Immigration Coalition



Regarding Street Vending; Intros 408, 431, 1164, 1251

Good morning. My name is Kathleen Reilly Irwin, and I am the NYC Government Affairs Manager for the New York State Restaurant Association. We are a trade association representing food and beverage establishments in New York City and State. We are the largest hospitality trade association in the State, and we have advocated on behalf of our members for 90 years.

Thank you to the Committee on Consumer and Worker Protection for holding today's hearing, and thank you to Council Member Sanchez's office for including NYSRA in the stakeholder engagement you have organized in preparation for today's hearing. We would like to take this opportunity to share feedback from the perspective of brick-and-mortar food service establishments regarding street vending. First, we recognize that street vendors, like restaurant operators and staff, are hard-working people trying to make a living. We recognize that street vendors, like restaurant operators and staff, often have immigrant backgrounds, and that working with and selling food is a transferrable skill that many people follow to find their first employment in New York City.

Restaurants are subject to regulation by many city agencies, and besides their compliance obligations, they are subject to extremely high rent payments, property taxes, utilities, and the commercial rent tax for those south of 96th street in Manhattan – all expenses related to their fixed location, their right and responsibility to operate in their neighborhoods, keep their sidewalks clean and clear, and serve their communities. Street vendors also certainly have a part to play in feeding and serving their communities. For there to be order, fairness, and navigability in the streetscape, New York City has siting guidelines that regulate where street vendors can be located: only on sidewalks with a 12-foot clear path, more than 20 feet from a building entrance, and more than 10 feet from a crosswalk or subway entry. However, restaurants regularly observe non-compliance with siting guidelines in their communities. Brick-and-mortar restaurants' top priority is proper enforcement of current street vendor regulations.

Shifting focus to the set of proposals under consideration today, NYSRA supports Intro 408, which would dedicate more city assistance through SBS to the street vendor community. We know SBS can be an extremely valuable resource for small business operators, and we would wholeheartedly support extending and specializing that business assistance to serve the needs of street vendors.

NYSRA also strongly supports Intro 1164, which would facilitate better collaboration and transparency for the various agencies who interact with street vendors and conduct enforcement. While the Office of Street Vending Enforcement currently resides within the Department of Sanitation (DSNY), we know that agencies including Consumer and Worker Protection (DCWP), Health and Mental Hygiene (DOHMH), Environmental Protection (DEP), Transportation (DOT), Parks & Recreation (Parks), Small Business Services (SBS), and the Mayor's Office of Immigrant

Affairs (MOIA) all have a part to play in interacting with street vendors, and it would benefit their individual and joint efforts to have a shared interagency portal to track and search that engagement. The success of the Office of Street Vendor Enforcement is especially important to NYSRA because it is empowered to prioritize congested areas and places that receive a high number of complaints.

Intro 1251 would facilitate the phase-in of the already-approved number of new licenses set to be made available under Local Law 18 of 2021. Intro 1251 would clarify that the number of new licenses approved to be added each year is 445; because license applications may not always result in licenses, there may be the need to allow for more than 445 applications in order to achieve 445 licenses. This Intro does not raise the number of licenses beyond what Local Law 18 of 2021 provides, but does hopefully address one bureaucratic shortcoming that could prevent the successful phase-in of these new licenses. NYSRA understands that the street vendor community has been frustrated with the phase-in of new licenses thus far, and we therefore support Intro 1251.

Finally, we would like to discuss Intro 431. This proposal would increase both the number of new street vending licenses awarded and the pace of the phase-in compared to what is called for under Local Law 18 of 2021: rather than 445 new vending licenses per year for 10 years, Intro 431 calls for 1,590 new licenses per year for five years. Then, by July of 2029, Intro 431 would eliminate the cap on street vending licenses. We understand that Council Member Sanchez's office has written amendments to Intro 431 based on stakeholder feedback that would also increase enforcement resources for DSNY and provide clear standards for suspension and revocation of licenses. Despite these amendments, NYSRA has serious concerns about Intro 431.

NYSRA's top priority is compliance with street vending regulations. Before we can be supportive of further raising the cap of street vending licenses, we would need to see proven success with achieving compliance through enforcement of the current street vending regulations and the current licensed vendors.

Local Law 18 of 2021 attempts to redirect some of the volume of street vending to the outer boroughs, by issuing some new licenses that can be used in any borough but a higher number of new licenses that are specific to the outer boroughs. Intro 431 maintains this geographical distinction in its language, but then goes on to eliminate the cap on vending licenses. By removing the cap on vending licenses, Intro 431 would undo the positive step of directing more new street vendors to the outer boroughs; if vending licenses are unlimited, they are all eligible for use in Manhattan. Yet we know that public space where vending is legally allowed is limited – especially in Manhattan. Why would the city create an unlimited set of vendors all equally entitled to limited vending space in Manhattan, and then task the DSNY and other agencies to enforce that vendors are properly sited within that competitive, lucrative environment?

Furthermore, Intro 431 proposes suspension or revocation of a vending license as an effective consequence for enforcing vending regulations. How can the brick-and-mortar small business community believe in the effectiveness of suspension and revocation when the city's own data show the extremely pervasive problem of people vending without a license? If today, people are

more than willing to risk vending without a license, what would change, under Intro 431, to make loss of license a meaningful consequence?

Thank you for taking the time to consider our testimony today. We share the priority of creating a fair set of regulations to cultivate vibrant streetscapes and neighborhoods in New York City, and the New York State Restaurant Association looks forward to being a continued partner on this issue moving forward.

Respectfully Submitted,

Kathleen Reilly Irwin

NYC Government Affairs Manager

New York State Restaurant Association

401 New Karner Road

Albany, New York 12205



TESTIMONY BEFORE NYC COUNCIL – COMMITTEE ON CONSUMER AND WORKER PROTECTION
Oversight – Street Vending; Int. 431, 408, 1164
May 6th, 2025

Chair Menin and Members of the New York City Council, my name is Erin Piscopink, and I am Co-Chair of the NYC BID Association. I'm also the Executive Director of the Soho Broadway BID in Manhattan. The Association is comprised of the 76 Business Improvement Districts across New York that are as diverse as the city itself. BIDs are on the frontlines of economic development, neighborhood vibrancy, and public realm management. It is therefore critical that BIDs have a seat at the table when making public policy decisions about our streetscape, including vending.

We understand that New York City has always had street vendors, small entrepreneurs who are trying to make a living and support their families. The same motivation drives our storefront businesses, including the small shops and restaurants that make our communities unique. As stewards of vibrant neighborhoods, BIDs welcome licensed street vendors who play by the rules in their districts. Some have voluntarily added vendors to their boards. However, BIDs are also deeply concerned about the lack of enforcement when it comes to common-sense time, place, and manner restrictions on vending.

We welcome and have supported commonsense changes to laws that will make it easier for street vendors to make a living, but only in conjunction with the enforcement of siting criteria and other regulations meant to ensure things like clear path for pedestrians and distance from storefront businesses. We are also not philosophically opposed to issuing new vending licenses, but don't believe the city should double down on a broken system.

Specifically, Int. 431 would require the city to make available over 7,500 new vendor licenses over the next 5 years, and then an "unlimited" number after that. The changes in Local Law 18 of 2021 – which requires a gradual increase in the number of licenses along with increased enforcement and impact studies - have yet to be fully realized. We respectfully believe that the new supervisory license system and Office of Street Vendor Enforcement should be given more time and resources to roll-out before the number of licenses is increased. We also believe that an unlimited number of vending licenses will create many more problems than it will solve. We welcome a continued dialogue with the bill sponsor CM Sanchez who we know is committed to working on this issue.

On Int. 408 – The Association defers to our partners at SBS on whether it has the administrative resources to comply.

On Int. 1164 – The Association supports additional reporting mechanisms for vending enforcement.

On Int. 1251 – The Association does not oppose authorizing DOHMH to issue additional permits to reach the number of licenses suggested under LL18. While the Association opposed LL18 as written when it passed, we understand the need to start addressing the backlog of vending applications.

We look forward to continuing our work with the Council and administration on this important policy discussion. Thank you.



May 6, 2025

Testimony of Sandra Jaquez

President

New York State Latino Restaurant Bar & Lounge Association (NYSLRBLA)

Before the

New York City Council Committee on Consumer & Worker

Regarding

Street Vending in NYC

Chair Menin and members of the Committee on Consumer and Worker Protection, thank you for the opportunity to share comments today on the issue of street vending in NYC. My name is Sandra Jaquez, and I serve as President of the New York State Latino Restaurant Bar & Lounge Association. We represent Hispanic and minority-owned restaurants, bars, and nightlife establishments throughout the five boroughs.

Our members are small business owners—many of whom are immigrants—who have invested their time, money, and energy into building neighborhood establishments that serve as cultural anchors, economic drivers, and community gathering places. These businesses operate in compliance with city laws and regulations, and continue to persevere despite the significant challenges facing the hospitality industry—including inflation, rising commercial rents, and labor shortages.

We are submitting this testimony to express concern about the state of New York City's street vending system. The current lack of effective enforcement has led to widespread disorder. The system is failing, and in its current form, it increasingly disadvantages brick-and-mortar establishments. What we see today is not a balanced or well-regulated system—it is a proliferation of vending activity with minimal oversight and inconsistent consequences.

Before the City considers any expansion of street vendor permits, it must first demonstrate that a functional, effective enforcement structure is in place. That means consistent, coordinated, and well-resourced enforcement. It also means acknowledging that weak enforcement is not neutral—it has a direct and damaging impact on small business owners who are playing by the rules and paying the price.

Raising the vendor cap without fixing enforcement will not resolve the underlying problems. It will only deepen them. Restaurants and nightlife establishments deserve a level playing field in the public realm, where rules are applied fairly and enforced evenly. Our members are subject to rigorous inspections and must comply with strict health and safety standards, particularly regarding food handling and preparation. For the sake of public health, it is critical that food vendors operating on city streets be held to the same level of scrutiny.

We urge the Council to prioritize strong, proactive enforcement of existing vending laws before advancing any legislation to expand vendor permits. We also urge improved interagency coordination among the Department of Sanitation, the NYPD, the Department of Consumer and Worker Protection, and other relevant agencies, so that enforcement is not fragmented or ineffective. Additionally, we support the creation of reasonable distance requirements between vendors and storefront businesses to reduce overcrowding and promote public safety.

We appreciate the Committee's attention to this important issue and respectfully ask that the concerns of small businesses—particularly minority- and immigrant-owned businesses—be fully considered in this policy discussion.

Thank you for the consideration of this testimony.

Testimony to the New York City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431

May 6th, 2025

Hello. My name is Jonathan Forgash, the founder of Queens Together. I thank the committee for the chance to speak today in support of Intros 431 and 408.


Queens Together is a nonprofit organization that provides neighbors facing food insecurity with culturally appropriate meals through our mom-and-pop restaurant partners.

I'm here today for the street vendors. Street vendors are micro business owners, and like small business owners, they are a vital part of our city's fabric—contributing to entrepreneurship, job creation, and the broader economy. Entrepreneurship is one of the few pathways to the middle class, especially in the food service sector.

Street vendors have always been part of the New York City landscape. They were here when my great-grandparents arrived from Eastern Europe in 1920, and they're still here today. For over 100 years, vendors have faced stigma, harassment, a lack of security and regulation. Yet the true constants have been economic development, job creation, a vibrant international food scene, and business owners supporting their families while serving the public. It's time to recognize these truths—and move forward.

Annually, street vendors contribute \$192 million in wages, \$292 million in goods and services, and \$71 million in taxes. These are not small numbers. It's time to pass these bills, regulate the industry, level the playing field for all business owners, and support the success of every entrepreneur in New York City.

Thank you for allowing me to speak today.



Jonathan Forgash, Founder
Queens Together

Jonathan@queensitogether.org



Dear New York City Council Members,

As small business owners, we strongly support the Street Vendor Reform Package, four pieces of legislation in front of New York City Council that will allow street vendors to provide the services New Yorkers want - in a regulated, predictable, enforceable system. We see street vendors as small business owners and job creators like us, whose efforts are the lifeblood of New York City's culture and economy, and who pay millions of dollars in taxes, exactly the type of hard-working entrepreneurs New York should encourage. Yet we need comprehensive reform to overhaul the dysfunctional status quo.

The history of street vending in the City of New York showcases its significance in the city's economy, as iconic businesses like Russ & Daughters, Evelia's Tamales, The Halal Guys, and FUBU began as street vendors. Yet, the current way the city regulates street vendors often leaves many in the shadows, harassed, and unregulated. Vendors operating without licenses means vendors without access to proper information and education on how to do their work in ways that are harmonious with our communities and promote health, safety, and public well-being. [Recent reporting](#) reveals that only one-quarter of mobile food vendors have been able to secure a permit for their business, and women vendors are especially likely to be blocked from obtaining a license.

The Street Vendor Reform Package would create a pathway to entrepreneurship for the primarily immigrant, women, and military veteran New Yorkers who manage street vending businesses, repealing criminal liability, formalizing their market-driven activity, and ensuring vendors may obtain permits to operate their businesses in accordance with the law. New York City's governance of street vending is broken, and it is time for City Council to fix it.

We, the undersigned business owners, strongly support the Street Vendor Reform Legislative Package, which includes the following four pieces of legislation that put both regulation and opportunity first:

- **Access to Business Licensing - Councilmembers Pierina Sanchez and Amanda Farias ([Int. 431](#))** - The proposed legislation would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. This bill will gradually expand access to licenses and permits to all street vendors, and institute a more detailed, permissive governance regime that would bring street vending out of the shadows and into the formalized economy.
- **Reduce Criminal Liability for General and Mobile Food Vendors - Councilmember Krishnan ([Int. 47](#))** - The proposed legislation would reduce the criminal liability on food and merchandise vending so that our city's smallest businesses cannot receive misdemeanor charges for street vending violations

- **Create a Division of Street Vendor Assistance Within NYC SBS - Public Advocate (Int. 408)** - A local law to amend the New York City Charter to create a division within the Department of Small Business Services to assist street vendors and require the commissioner of small business services to update the department's programs to facilitate services specifically for street vendor small businesses.
- **Reform Public Siting - De La Rosa (Int. 24)**- Siting rules and regulations for licensed and permitted vendors are strictly enforced, noting the time, place, and manner in which vendors must operate. The proposed legislation continues this tradition but amends the particular rule requiring vendors to place their carts or tables within 18 inches of the curb, as it creates a safety hazard, to allow for vending units to be placed within 2 feet from the curb. Where an obstruction prevents such placement, vending units are to be placed as close as possible to the obstruction, provided the sidewalk is 12 feet or wider.

The City must not criminalize street vendors for trying to provide for their families, but instead cut the red tape and facilitate a healthy regulatory environment for our smallest businesses to thrive. By bringing vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses. We urge you to support the Street Vendor Reform Package and bring these critical pieces of legislation to fruition.

Sincerely,

1. Achilles Heel, 180 West St, Brooklyn 11222
2. A-Pou's Taste, 963 Grand St, Brooklyn, NY 11211
3. Arepa Lady, 77-17 37 Ave, Jackson Heights, NY 11372
4. Bánh by Lauren, 42 Market St, New York, NY 10002
5. Bé Bép, 961 Bergen Street, Brooklyn, NY 11216
6. bluestockings, 116 Suffolk Street, New York, NY 10002
7. Bolivian Llama Party, 44-14 48th Ave, Sunnyside, Queens 11377
8. Bonnie's, 398 Manhattan Ave, Brooklyn, NY 11211
9. Book Club Bar, 197 E 3rd St, New York, NY 10009
10. Border Town, 189 Nassau Ave, Brooklyn, NY 11222
11. Borgo, 124 E 27th St, New York 10016
12. Buunni Coffee, 542 Barretto Street, Bronx, NY 10474
13. Café Colmado, 286 Broome Street New York, NY 10002
14. Caracas Arepa Bar, 106-01 Shorefront Parkway, Queens, NY 11694
15. Carreau Club, 68 34th St, Brooklyn, NY 11232
16. Cervo's, 43 Canal St, New York, NY 10002
17. Cocina Consuelo, 130 Hamilton Pl, New York, NY 10031
18. Diner, 85 Broadway, Brooklyn 11249
19. Edy's Grocer, 136 Meserole Ave, Brooklyn, NY 11222
20. Eel Bar, 252 Broome St, New York, NY 10002
21. El Mariachi, 602 Seneca Ave, Ridgewood, NY, 11385
22. Taqueria Molcajete, 566 Seneca Ave, Ridgewood, NY 11385

23. Elm Roastery, 8330a Broadway, Queens, NY 11373
24. Evelia's Tamales, 96-09 Northern Blvd, Corona, NY 11368
25. Golden Diner, 123 Madison Street, New York, NY 10002
26. Golden Hof, 16 W 48th St, New York, NY 10036
27. Grand Tea & Imports, 298 Grand St, New York, NY 10002
28. Greens Hill Food Co-op Board of Directors, 1083 Fulton St. Brooklyn, NY, 11238
29. Organic Lounge 11, 438 E 11th St, New York, NY 10009
30. Hart's, 506 Franklin Ave, Brooklyn, NY 11238
31. Insa, 328 Douglass St, Brooklyn, NY 11217
32. La Cantine, 60 St. Nicholas Ave, Brooklyn, NY 11237
33. La Fonda LLC, 169 E. 106th Street, New York, NY 10029
34. La Sirena, 27 E 3rd St, New York, NY 10003
35. Lai Rai, 76 Forsyth St, New York, NY 10002
36. Little Egg, 657 Washington Avenue, Brooklyn, NY 11238
37. Loisada Realty, 428 E 10th St, New York, NY 10009
38. Hekate Cafe & Elixir Lounge, 167 Avenue B, New York, NY 10009
39. Makina Cafe, 3647 30th Street, Long Island City, NY, 11106
40. Marlow & Daughters, 95 Broadway, Brooklyn 11249
41. Mermaid's Garden, 644 Vanderbilt Ave, Brooklyn, NY 11238
42. M&V Provisions, 1827 Flushing Ave, Ridgewood, NY 11385
43. No. 7 Restaurant, 627 Vanderbilt Avenue, Brooklyn, NY 11238
44. NY Kimchi, 16 W 48th St Lower Level, New York, NY 10036
45. Ollin.NYC, 339 E. 108 Street, New York, NY 10029
46. Patio Tropical NYC, El Patio, 234 Grand St, Brooklyn, NY 11211
47. Phoenix Palace, 85 Bowery, New York, NY 10002
48. Pixie Scout, 925 Bergen St, Brooklyn, NY 11238
49. Plaza Piaxtla Bakery, 663 Seneca Ave, Ridgewood, NY 11385
50. Potluck Club, 133 Chrystie St, New York, NY 10002
51. Rolo's, 853 Onderdonk Ave, Ridgewood, NY 11385
52. Roman's, 243 Dekalb Ave, Brooklyn 11205
53. Salty Lunch Lady's Little Luncheonette, 565 Woodward Ave, Ridgewood, NY 11385
54. She Wolf Bakery, 141 Flushing Ave, Brooklyn 11205
55. Strange Delight, 63 Lafayette Ave, Brooklyn, NY 11217
56. The Boogie Down Grind Cafe, 868 Hunts Point Ave, Bronx, NY 10474
57. The Connected Chef, 49-09 5th St, Long Island City, NY 11101
58. The Fly, 549 Classon Ave, Brooklyn, NY 11238
59. The Queensboro, 80-02 Northern Blvd, Jackson Heights, NY 11372
60. The Snail, 544 Manhattan Ave, Brooklyn, NY 11222
61. Third Falcon, 360 Myrtle Ave, Brooklyn, NY 11205
62. Ursula, 387A Nostrand Ave, Brooklyn, NY 11216
63. World's Borough Bookstore, 34-06 73rd Street, Jackson Heights, NY 11372
64. Xallitic Tattoo Corp, 174 Wyckoff Ave, Brooklyn, NY 11237
65. Yafa Cafe, 4415 4th Ave, Brooklyn, NY 11220
66. Yun Hai Shop, 170 Montrose Ave, Brooklyn, NY 11206



Testimony to the New York City Council City Council Committee on Consumer and Worker Protection

May 6, 2025

Good afternoon. My name is Carina Kaufman-Gutierrez and I am the Deputy Director at the Street Vendor Project. I would like to thank Chair Menin and the Committee for the opportunity to testify today, in support of Intro 431, 408 and 1251 — legislation that will empower entrepreneurship, support working families, and be beneficial to the city's coffers, righting the wrongs of the existing ineffective public policy.

Perhaps no industry in New York City faces enforcement from as many agencies and departments as street vending. There are at least 7 city agencies that play a role in enforcement -NYPD, DSNY police, Parks enforcement patrol, DOHMH, DCWP, Parks, FDNY, DEP. The amount of summons issued, both civil and criminal - just keeps climbing. NYPD was the agency that issued the highest number of summonses in 2024, 9,376 total, and this was five times higher than in 2019 when the agency was **actually** the agency in charge of vendor enforcement.¹ This was also twice as many as in 2023, when the police issued about 4,213 tickets to vendors. The NYPD issued 2,037 criminal summonses to street vendors in 2024 — far surpassing the 1,244 it gave out in all of 2023, a nearly 64% increase.²

In 2024 DSNY conducted more confiscations than tickets: 4,323 versus 4,144, respectively. This ticketing is “costly and ineffective,” – researchers with Cornell University found DSNY operates at a nearly \$21 loss per \$1 recouped.³

¹ Parra, D. (2025). “NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024,” City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

² Chu, Haidee. “NYPD Dragging Many More Vendors to Criminal Court, Data Shows.” *THE CITY - NYC News*, 27 Jan. 2025, www.thecity.nyc/2024/02/05/nypd-vendors-criminal-summonses-court-spike/.

³ Wolf, Andrew B., and Dylan M. Hatch. 2025, *Cornell University, ILR Worker Institute*, <https://ecommons.cornell.edu/server/api/core/bitstreams/a6ba4425-d925-4750-9561-d7303b7bddc1/content>. *Data compiled from the New York City Office of Administrative Trials and Hearings (OATH) for civil summons and NYPD Criminal Court data for criminal summons to examine the patterns of tickets issued for street vending.*

So that begs the question - what agency is supporting these smallest of businesses to achieve compliance, avoid fines, and ultimately save the City money? There is not a single city agency that conducts outreach, education, or compliance with the small businesses. At a hearing on January 30th of this year, Commissioner Gross stated when asked if SBS leads in conducting street vendor outreach and education, quote “I wouldn’t say we have been assigned responsibility for it.”⁴

Having equal institutional support for small businesses is not only fair, it’s better for the city. We’ve seen incredible success in community education outreach--when we can equip vendors with information, tools and a clear path to follow, they know how to operate and can focus on what they love: making their food and serving their community. Additionally, equal access to permitting will increase gender equity among small business owners in New York City. According to the Immigration Research Initiative, nearly half of street vendors are women, yet women are far less likely than men to hold business licensing and are disproportionately impacted by the lack of available permits.⁵ 48% of MFV are women, but they hold only 27% of permits. 33% of general vendors are women, but only 14% hold licenses. Passing Intro 408 will do just that, in tandem with Intro 431 and the remaining bills of the Street Vendor Reform Package.

Now should the council not act - what is the impact of this costly and ineffective enforcement?

1. Immigration Risks: 96% of street vendors are immigrants. Increased NYPD policing equals increased risk of ICE policing. As long as the current outdated vending system is in place, this Council is putting street vendors at risk of interactions with law enforcement, emulating Trumpian policies at a local level. When immigrants who are at risk of deportation have encounters with police, *for any reason*, their risk of getting funneled into detention and deportation increases regardless of the outcome of this case. This is because encounters with the NYPD can result in fingerprint sharing - whether that person is ever even charged with a crime. Additionally, many applications for immigration relief and defenses to deportation include a discretionary element. Therefore, any arrest or ticket, even where a case is dismissed, has the potential to be used as a negative factor impacting one's case.

How does this play out in real life? One of our members received a criminal court ticket for vending without a permit. The day of her court appointment, her daughter was sick at school.

⁴ “SBS’s Role in Street Vendor Outreach and Education: Committee on Small Business: New York City Council: January 30, 2025.” *Committee on Small Business | New York City Council | January 30, 2025*, citymeetings.nyc/meetings/new-york-city-council/2025-01-30-0130-pm-committee-on-small-business/chapter/sbss-role-in-street-vendor-outreach-and-education/. Accessed 30 Jan. 2025.

⁵ Settle, Shamier. “Street Vendors of New York.” *Immigration Research Initiative*, 17 Sept. 2024, immresearch.org/wp-content/uploads/Street-Vendor-Survey-Final.pdf.

She had the impossible choice to make between taking her daughter to the hospital, or showing up in criminal court, because if she didn't show, a warrant would automatically be issued for her arrest. I respectfully ask this council, what would you do, when faced with a sick child or a warrant?

Vendors are terrified that any number of enforcement agencies who approach them could actually be Immigration and Customs Enforcement. The uniforms of ICE and DSNY police are strikingly similar, increasing fear that every single day that vendors go out to work, they may not make it home to their families.

2. And number two: it is loss to the cultural fabric of New York City. Street vendors are a huge part of our identity as a cosmopolitan city. Through cuisine, they're able to spread culture and diversity, an integral part of what makes New York a coveted place to live. But due to the lack of available licensing and over-policing, New York's culinary landscape suffers. In the last year alone, I've spoken with entrepreneurial vendors who opened - and then closed - businesses selling unique dishes like Jordanian knafeh, Chinese mooncakes, Ecuadorian ceviche, due to lack of licensing available. To all in the hospitality industry, this should be a wake up call - reform is needed to keep New York as an ever growing culinary capital.

Now is the opportunity to change, to not just protect, but uplift immigrant New Yorkers. Pass the Street Vendor Reform Package. Thank you.

Sincerely,

Carina Kaufman-Gutierrez
Deputy Director
Street Vendor Project
Urban Justice Center

IMMIGRATION & CUSTOMS ENFORCEMENT (ICE)



DEPARTMENT OF SANITATION POLICE (DSNY)



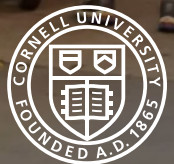
Evaluating the Regulation and Reform Implementation of Street Vending Laws in New York City

By ANDREW B. WOLF & DYLAN HATCH

April 2025



ILR Worker Institute



EVALUATING THE REGULATION AND REFORM IMPLEMENTATION OF STREET VENDING LAWS IN NEW YORK CITY

A Publication of the ILR WORKER INSTITUTE

By ANDREW B. WOLF & DYLAN M. HATCH

April 2025

Executive Summary

Street vending has long been an important entry point to the local labor market for New York City's immigrant communities. Thousands of New Yorkers build their livelihoods around servicing our tourist industries and providing fresh food to our communities. For the first time in several decades, New York City engaged in a series of limited reform efforts aimed at addressing barriers to accessing food vendor permits and attempts to limit the criminalization of street vending in the City. This report evaluates the regulatory environment that street vendors face, investigating the implementation of these reform efforts and the disparate impacts and costs of vending enforcement.

Key findings include:

- **Heavy and duplicative regulatory environment:** Perhaps no industry in New York City faces regulation from as many agencies and departments as street vending. Nearly every agency, from Police to Transportation and Health to Parks, has some authority. The result is duplicative efforts to regulate vendors and high exposure to ticketing.
- **Enforcement is costly and ineffective:** While many enforcement efforts that involve issuing citations and fines in New York City generate revenue, all available evidence indicates street vendor enforcement operates at a large deficit. For example, in 2024 the Department of Sanitation spent \$21.85 on every \$1 recovered or a \$20.85 loss.
- **Reform efforts have failed to meet targets:** Reform efforts, including expanding the number of available licenses, provide a valuable lifeline to vendors by creating financial stability, reducing criminalization, and reducing exposure to the expensive secondary permit market. However, these reforms fail to meet their goals on time.
- **Extreme racial disparities in the impacts of ticketing vendors:** Comparing where violations occur to where those receiving tickets live unveils a clear pattern of racialization. Most tickets are issued in wealthy white neighborhoods in Manhattan while most vendors receiving tickets are minorities who live in low-income immigrant neighborhoods in Queens, the Bronx, and Brooklyn.

Introduction

Street vending is a vital source of employment and an essential public service in New York City. Vendors play an integral role in supporting the City's tourism industries and providing fresh food to communities throughout the City. Since the 19th century, street vending has been an important entry point to the local economy for new immigrants. During the pandemic, the New York City Council engaged in a series of limited reforms to the City's street vendor licenses and operation laws. This represented the first major regulatory change to the industry since Mayor Koch's efforts in the 1980s. This report evaluates these reforms and the city's management and enforcement of street vending laws. It explores the regulatory authority of the industry, evaluates the expenditures and returns of this enforcement, and investigates the desperate socio-economic impacts of vendor ticketing.

This study primarily evaluates the City's own data. Firstly, we compiled data from the New York City Office of Administrative Trials and Hearings (OATH) for civil summons and NYPD Criminal Court data for criminal summons to examine the patterns of tickets issued for street vending. We examined civil and criminal summonses, the issuing departments, fine amounts, and violation locations. Secondly, we utilized public expenditure data to observe spending trends for each agency. FOIL requests were submitted for additional budget data but yielded minimal information and response as of publication.

Overall, this report finds that street vending in New York City is very complicated, financially ineffective, and results in primarily criminalizing the City's low-wage immigrant workforce. Additionally, we find efforts to reform the licensing process have not met their goals. Firstly, vending management and enforcement is complicated, spanning nearly every agency in the City. No other industry is so exposed to government oversight. The result is a nearly impossible web of regulations and bureaucracy for this primarily low-income immigrant workforce to navigate. Secondly, the enforcement of vending regulations is not financially effective. Through enforcement efforts, the City spends more than it earns on vending enforcement. Thirdly, we find that efforts to reform the food vendor licensing and permitting process have not met the goals laid out in the Council's reform bills. The licensing has been delayed, and far fewer licenses have been issued than the Council had called for. Fourth, the patterns of where vending tickets are issued and who is ticketed indicate a racialized pattern. Vendors are primarily fined in the City's wealthy white neighborhoods, while those fined tend to live in the City's poorest immigrant and minority neighborhoods. Vending tickets has a huge impact on these workers and their communities. Since 2000, the City has issued roughly 196,000 tickets costing vendors \$103 million.

Background of Reforms

In 2020, Mayor de Blasio enacted a series of police reforms to reduce interactions between officers and New Yorkers, including minimizing the NYPD's role in street vending enforcement. Codified in Local Law 18 (1116) in 2021, the Office of Street Vendor Enforcement was created to monitor street vendors, and the responsibility of the Office was designated to the Department of Consumer and Worker Protection (DCWP). Furthermore, the Bill established increased "supervisory licenses" that would increase the number of legal street vendors by 445 each year until 2032, eventually increasing the total number of licensed and permitted food vendors to 4,450.

Instead of reducing interactions with officers, the DCWP and NYPD worked together to enforce street vending regulations – creating a 33% increase in fines between 2019 and

2022.¹ To promote coordination across agencies on vendor regulation and enforcement, the Council created the Street Vendor Advisory Board under the authority of DCWP. The Board was composed of vendor, government, restaurant, and real estate representatives and was tasked with making reform recommendations to the Council. The Board produced a report outlining several consensus reforms² and now the board only meets once a year, with most of the proposed reforms remaining at a standstill as of early 2025.

In 2023, enforcement moved again when the OSVE transferred from the DCWP to the DSNY, despite wide condemnation by street vendors that enforcement was again being transferred back from a civil agency to officers. Ticketing increased throughout 2023. Massive crackdowns occurred in 2023 where centralized vendor markets developed during the pandemic, from Corona Plaza to Sunset Park. Voters then approved Ballot Proposal 2 in November 2024, which according to the measure will, “expand and clarify the Department of Sanitation’s power to clean streets and other City property.” This will likely result in higher enforcement over street vendors in 2025 and beyond. The removal of enforcement from DCWP also created a vacuum of which agency would do education outreach to vendors. This has nominally been separated from DSNY and given to the Department of Small Business Services, but it is unclear from our research how much outreach and technical assistance has been provided. The current state of the reform efforts remains unclear and the overall confusing web of vendor regulations across many agencies remains in effect.

Overview of Agency Authority

New York City oversees street vending through a complex network of agencies, each with respective jurisdiction and responsibilities. The dynamic political climate surrounding street vending enforcement contributes to the challenge of deciphering each agency’s role. As of March 2025, each of these agencies plays distinct roles in the process of permitting, policing, and educating vendors, as outlined in Table 1.

Department of Consumer & Worker Protection (DCWP)

When a prospective street vendor wishes to legally sell food on the streets of NYC, their journey begins by submitting an application to the DCWP. The DCWP issues general vendor licenses (while DOHMH oversees licensing for vendors selling food) and administers in-person licensing and permitting centers. DCWP previously handled vending enforcement from 2019 to 2022. After enforcement transferred to Sanitation (DSNY), DCWP transferred uniform positions to support DSNY’s new jurisdiction. DCWP also housed the Office of Street Vending Enforcement (OSVE), which briefly oversaw street vending enforcement with policy recommendations and several inspectors (from 8 in 2021 to 14 in 2023).³ DCWP has 31 staff dedicated to processing all DCWP and DOHMH license applications including for restaurants and street vendors.

¹ Parra, D. (2022). “Street Vending Tickets Went Up During First Year of New Enforcement Policy,” City Limits, Aug 4. Accessed March 13, 2025, at <https://citylimits.org/2022/08/04/street-vending-tickets-went-up-during-first-year-of-new-enforcement-policy/>.

² Street Vendor Advisory Board. (2022). “Street Vending in NYC: Overview and Recommendations from the Street Vendor Advisory Board.” Street Vendor Advisory Board. Accessed Mar 23, 2025 at <https://www.nyc.gov/assets/dca/downloads/pdf/partners/SVAB-Report-2022.pdf>.

³ Parra, D. (2023). “Street Vendors Decry City’s Move to Put Sanitation Dept. in Charge of Enforcement,” City Limits, March 24. Accessed March 13, 2025, at <https://citylimits.org/2023/03/24/street-vendors-decry-citys-move-to-put-sanitation-dept-in-charge-of-enforcement/>.

Department of Health and Mental Hygiene (DOHMH)

The Department of Health and Mental Hygiene administers the Food Protection Course for Mobile Food Vendors, and issues licenses and permits for mobile food vendors (MFVs) after they apply to DCWP. DOHMH also administers pre-permit, operational, and compliance inspections on MFVs. Currently, DOHMH has only four staff members that handle all DOHMH-issued licenses and permits.

Department of Sanitation (DSNY)

Since April 2023, DSNY has housed the OSVE and an Enforcement division known as the New York City Sanitary Police Corps (NYSPD). NYSPD, also known as the “Sanitation Police,” deploy armed officers to issue arrests and criminal summonses. With an enforcement budget projected to increase from \$897,672 in 2023 to \$3.8 million in Fiscal 2027, DSNY serves as the primary agency for street vending enforcement in the City.⁴ DSNY launched with 40 employees when the Vending Bureau was created – now grown to 87 Sanitation Police officers, 24 lieutenants, and three inspectors involved in vending enforcement.⁵

Police Department (NYPD)

Despite the shifting enforcement responsibilities between agencies, the NYPD still plays an increasing role in vending enforcement. In addition to issuing criminal violations, the NYPD has issued the most civil violations for MFVs than any other agency every year since 2021. In 2024, NYPD issued 9,376 tickets to vendors - 5 times higher than in 2019, when NYPD was the primary enforcement agency.⁶

Department of Parks and Recreation (Parks)

The Parks Department of Parks and Recreation issues civil and criminal violations to vendors operating in City parks.

Office of Administrative Trials & Hearings (OATH)

OATH adjudicates civil violations and penalties that MFVs receive for violating the Health or Administrative Code through their vending operations.

Department of Small Business Services (SBS)

SBS states that they provide outreach and education to street vendors, considering them “microbusinesses.” These programs are sometimes held in conjunction with other agencies, including DSNY and DOHMH, and educational topics include safety, regulation compliance, and permitting. SBS houses NYC Business Express Services (NYC BEST), which provides support and regulation guidance for MFVs. However, street vendor advocates argue that these programs are inadequate and uncommitted to meeting the needs of street vendors, with even Commissioner Dynishal Gross testifying to the City Council that there is no formal assignment of responsibility for small business outreach.

⁴ Lane-Lawless, A. (2023). “Report to the Committee on Finance and the Committee on Sanitation and Solid Waste Management.” Department of Sanitation. Accessed March 21, 2025, at <https://council.nyc.gov/budget/wp-content/uploads/sites/54/2023/05/DSNY.pdf>

⁵ Parra, D. (2025). “NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024,” City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

⁶ Parra, D. (2025). “NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024,” City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

Table 1. Overview of New York City Agency Authority Over Street Vending Industry

Department	Acronym	Role	Actions
Health and Mental Hygiene	DOHMH	Permitting, Regulation, & Education	Issues permits for MFVs; Administers pre-permit, operational, and compliance inspections; Educates MFVs
Consumer & Worker Protection	DCWP	Permitting	Issues general vendor licenses; Administers in-person licensing and permitting centers
Sanitation	DSNY	Enforcement	Houses the Office Street Vending Enforcement; Confiscates vendors' carts and goods; Can issue criminal violations but has testified in City Council that they intend not to.
Police	NYPD	Enforcement	Issues civil and criminal violations; Confiscates vendors' carts and goods as well as make arrests.
Parks and Recreation	PARKS	Enforcement	Issues civil and criminal violations to vendors in City parks as well as make arrests.
Administrative Trials & Hearings	OATH	Hearings	Adjudicates street vendors' civil violations
Small Business Services	SBS	Education	Provides support and regulation guidance for vendors; Educates MFVs on safety, regulation compliance, and permitting; Houses NYC Business Express Services

Methods

We collected *issuance data* from the New York City Office of Administrative Trials and Hearings via NYC OpenData. After collecting all issuances since 2000, we narrowed the results to fines including relevant phrases such as “vending.” We then manually reviewed all the data to ensure the relevancy of the results. We also analyzed NYPD criminal summonses data, also accessed on NYC OpenData.

We received *funding and staffing data* from the NYC Independent Budget Office. After pulling all data from 1985, we then reviewed the fiscal plans for each agency to contribute data from the most recent years alongside the projections for future spending. We combined these sources into a single dataset to generate the graphs in this report. Projected budgets from 2024 are noted with asterisks.

We gathered *demographic data* from the Economic Neighborhood Profiles of 2018, the most recent report of its type from the Office of the New York City Comptroller. Our *poverty data* is derived from the 2023 American Community Survey from the U.S. Census Bureau. We also received *racial demographic data* from the Population Division’s 2020 Census.

Expenditures and Cost of Street Vendor Enforcement

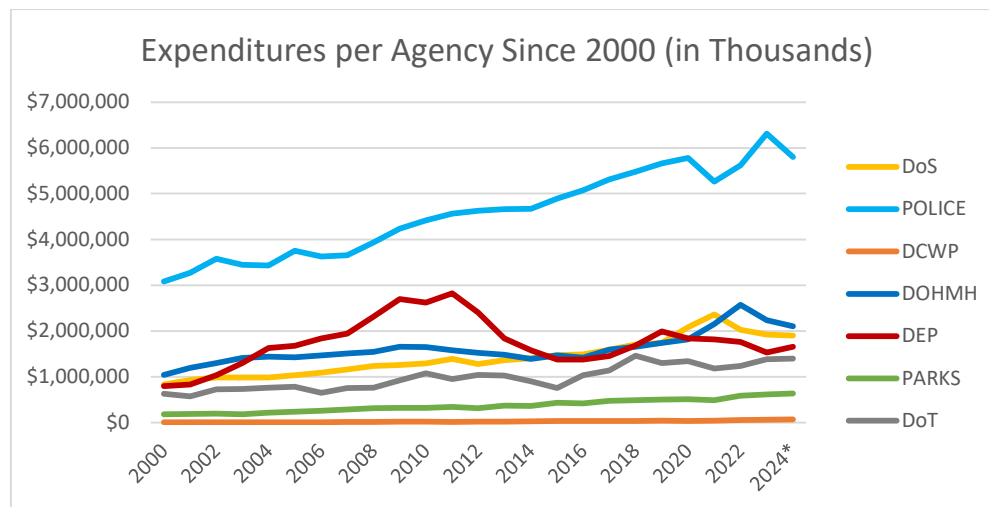
The complicated web of enforcement across agencies means a lot of time, money, and resources are spent on street vending enforcement. This section investigates the potential costs of these efforts. It is difficult to calculate how much the City spends on vendor enforcement with just the publicly available data. The New York City Independent Budget

Office has not attempted to quantify the costs since 2009 and even they noted the difficulty of amassing the necessary data across all agencies.

This report is not capable of fully parsing the costs and, as a result, represents estimates based on the limited available data. These estimates, relying on data we know to undercount the true costs, indicate the resources spent on issuing vendor tickets largely cost more than the City earns from these tickets. This is aligned with the City's 2009 IBO report which found enforcement expenditures of around \$7.4 million but only generated \$1.4 million in revenue.⁷ Our analysis found no evidence that vending enforcement is profitable for the City. When combined with the racial disparities in ticketed vendors, this data paints a picture of an expensive program to criminalize the City's vulnerable immigrant populations.

Looking first at the broader picture of the agencies with the most authority over vending enforcement, the NYPD is the only agency that received massive budget growth over the last two decades (Figure 1). The NYPD can issue civil and criminal summons to vendors.

Figure 1. Expenditures per Agency Since 2000

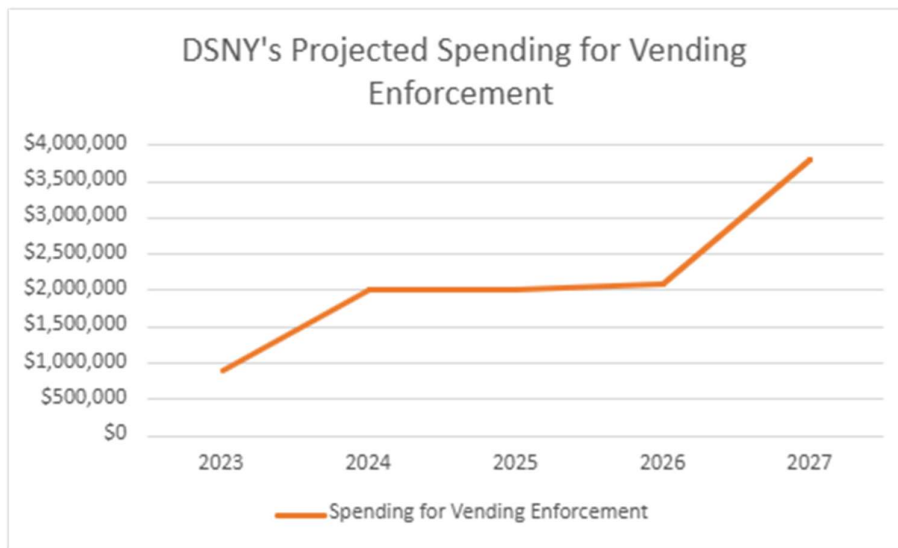


Since DSNY was given primary authority over street vendor enforcement by Mayor Adams, DSNY created a new Vending Bureau with nearly 40 employees. As of November 2024, DSNY reported having 87 Sanitation Police officers, 24 lieutenants, and 3 inspectors.⁸ DSNY is the only department for which clearly delineated budget expenditures have been made public (Figure 2). Their proposed budget is presented in the following chart.

⁷ Turetsky, D., Vega, E., & O'Brien, B. (2010). *Street Vendor Regulations Are Costly, Confusing, and Leave Many Disgruntled*, New York Independent Budget Office. Accessed March 13, 2025, at <https://www.ibo.nyc.ny.us/iboreports/peddlingnovember2010.pdf>.

⁸ Parra, D. (2025). "NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024," City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

Figure 2. DSNY's Projected Spending for Vending Enforcement



In 2024, DSNY's first year of primary enforcement, the agency announced it would spend \$2,000,000 on enforcement. Based on publicly available OATH data, this enforcement resulted in 1,502 tickets being issued in 2024. Of this, around \$200K in penalties were imposed but only \$91K was recovered. This amounts to the City spending \$21.85 for every \$1 recovered or a \$20.85 loss. While the governmental goals of issuing tickets go beyond merely raising revenue, the loss contrasts with most other agencies' enforcement efforts which are revenue generators.⁹ In fact, a 2017 Comptroller audit of fine revenue showed Sanitation is usually one of the top revenue-generating departments, in contrast to the loss we found in the first year of their vending enforcement.

No other agency gives specific expenditure data on their street vending enforcement efforts. One means of providing low estimates of the expenditure costs is to consider the salary costs per violation issuance. We estimate the cost of issuing a ticket by utilizing the publicly available City civil service pay scales for the front-line positions that issue vendor tickets. We do this by assuming that the time it takes to issue a ticket would be 30 minutes to one hour. These ranges are presented in Table 2, with red values indicate a loss. The agency with the highest rate of return was the DCWP, which currently does not lead vending enforcement.

These numbers indicate the return on tickets issued in most cases barely covers the costs of the salary of the person issuing the ticket, if at all. These are low estimates and include the salary of the issuer only for the time they are issuing the ticket. This lacks the cost of the individuals' benefits, the other administrative costs the agency must cover, or the costs of the OATH hearing around the ticket. Based on these estimates, we can conclude street vending enforcement does not generate revenue for the City and likely operates at a loss.

⁹ Murphy, M. (2017). "NYC Budget Brief: New York City Fine Revenues Update", NYC Comptroller. Accessed March 13, 2025, at <https://comptroller.nyc.gov/wp-content/uploads/documents/New-York-City-Fine-Revenues-Update.pdf>.

Table 2. NYC's Vendor Fine Return Per Dollar Spent on Enforcers' Wages (2019-2024)

Agency	Year	Violations Issued	Hourly Pay	0.5/hr \$ Return	1/hr \$ Return
DCWP	2021	71	\$31.23	\$2.09	\$1.05
DCWP	2022	1063	\$31.23	\$4.38	\$2.19
DCWP	2023	600	\$31.23	\$3.70	\$1.85
DOHMH	2019	1369	\$31.16	\$3.54	\$1.77
DOHMH	2020	770	\$31.16	\$3.31	\$1.65
DOHMH	2021	233	\$31.16	\$2.84	\$1.42
DOHMH	2022	559	\$31.16	\$2.20	\$1.10
DOHMH	2023	1212	\$31.16	\$2.42	\$1.21
DOHMH	2024	1287	\$31.16	\$1.57	\$0.78
PARKS	2019	722	\$21.97	\$0.14	\$0.07
PARKS	2020	243	\$21.97	\$0.20	\$0.10
PARKS	2021	374	\$21.97	\$0.17	\$0.08
PARKS	2022	423	\$21.97	\$0.22	\$0.11
PARKS	2023	617	\$21.97	\$0.25	\$0.13
PARKS	2024	754	\$21.97	\$0.06	\$0.03
POLICE	2019	1699	\$40.40	\$0.96	\$0.48
POLICE	2020	511	\$40.40	\$1.94	\$0.97
POLICE	2021	254	\$40.40	\$1.06	\$0.53
POLICE	2022	1180	\$40.40	\$1.20	\$0.60
POLICE	2023	1900	\$40.40	\$1.59	\$0.79
POLICE	2024	3297	\$40.40	\$1.16	\$0.58

Other Performance Metrics for Vending Reforms

Permit & License Issuances

Mobile street vendors selling food require three types of authorization from the DOHMH, each imposing costs to prospective vendors and revenue for the City. Firstly, vendors must have a Mobile Food Vendor (MFV) license, which costs \$50 plus \$53 for the required course. Vendors must update their licenses every two years and pay a \$50 renewal license fee. Additionally, mobile street vendors require a permit. While there is no limit on MFV licenses issued, the number of supervisory licenses and supervisory license permits is capped at a limited level compared to demand. Supervisory license permits can cost \$17,000 or more on illegal secondary markets.¹⁰ Vendors must renew licenses and permits every two years.

Despite the low number of street vending permits issued, permitting caps remained relatively stagnant in the early 1980s – a phenomenon contributing to the growth of an informal economy and costing the City money that it would otherwise receive if the revenue

¹⁰ Mosher, E., & Turnquist, A. (2024). "Fiscal Impact of Eliminating Street Vendor Permit Caps in New York City." New York City Independent Budget Office. Accessed March 13, 2025, at ibo.nyc.ny.us/iboreports/Fiscal_Impact_of_Eliminating_Street_Vendor_Permit_Caps_Jan2024.pdf.

expanded.¹¹ The cap on MFV permits modestly increased from 3,000 in 1983 to 5,100 in 2024. Meanwhile, a waitlist of almost 11,000 people accumulated to obtain new MFV permits from the City.¹² Nearly 10,000 people are also on the waitlist to receive a General Vendor License. A study by the Independent Budget Office found that the City would gain a net revenue of about \$1.7 million if only 10 percent of waitlisted applicants received permits or licenses. At 100 percent of the waitlist receiving permits or licenses, the net impact would increase to about \$17 million.¹³ The number of General Vendor licenses is capped at 853 while citywide Mobile Food Vendor permits have hovered around 3,000 since 1983.

Local Law 18 of 2021 fundamentally shifted the permitting and licensing framework. LL18 increases the number of mobile food vendors by creating a new license called a “Supervisory License.” Under the law, all vendors with a Supervisory License are entitled to apply for a Supervisory License permit, and all food carts and trucks must have a supervisory license physically present during business operations. LL18 created two classifications of supervisory licenses - citywide permits that include Manhattan and outer-borough-only permits that exclude Manhattan. Under this law, the DOHMH will annually issue 445 “Supervisory Licenses” until 2032, eventually increasing the total number of licensed and permitted food vendors up to 4,450. Of the new 445 permits each year, 100 are for selling citywide, 300 are just for the boroughs outside of Manhattan, and another 45 are reserved for people with disabilities and United States veterans. Initial Supervisory License applications have no initial fee but require a \$438 fee upon renewal every two years.

However, the rollout of these supervisory licenses and permits has been slow in the past years. The City missed the law’s first two deadlines in 2022 and 2023, and only four vendors received new permits between March and May 2023.¹⁴ By March 2025, 713 vendors had obtained their supervisory licenses, and 452 had started the process for a permit.¹⁵ Only 371 vendors have received their supervisory license and permit by March 2025, of the over 1,300 that should have been issued by then. The delays in implementation of LL18 have resulted in lost revenue for the City while continuing to leave many vendors vulnerable to enforcement or exploitation on the black market.

Street Vendor Outreach

SBS does some work with street vending outreach and education. In 2022, SBS conducted a large mailing to 22,100 licensed street vendors to ensure they were aware of SBS services and business solution centers. SBS translated this letter into 10 languages for accessibility. Vendor advocates complain there is no available data on what their outreach looked like beyond this one mailer.

¹¹ Mosher, E., & Turnquist, A. (2024). “Fiscal Impact of Eliminating Street Vendor Permit Caps in New York City.” New York City Independent Budget Office. Accessed March 13, 2025, at ibo.nyc.ny.us/iboreports/Fiscal_Impact_of_Eliminating_Street_Vendor_Permit_Caps_Jan2024.pdf.

¹² *ibid*

¹³ *ibid*

¹⁴ NYC Comptroller. (2023) “NYC Comptroller Lander Presses City Hall for Answers Regarding Street Vendor Sweeps and Delayed Implementation of Local Law 18.” Press Release, Sept 12. Accessed March 13, 2025, at <https://comptroller.nyc.gov/newsroom/nyc-comptroller-lander-presses-city-hall-for-answers-regarding-street-vendor-sweeps-and-delayed-implementation-of-local-law-18/>.

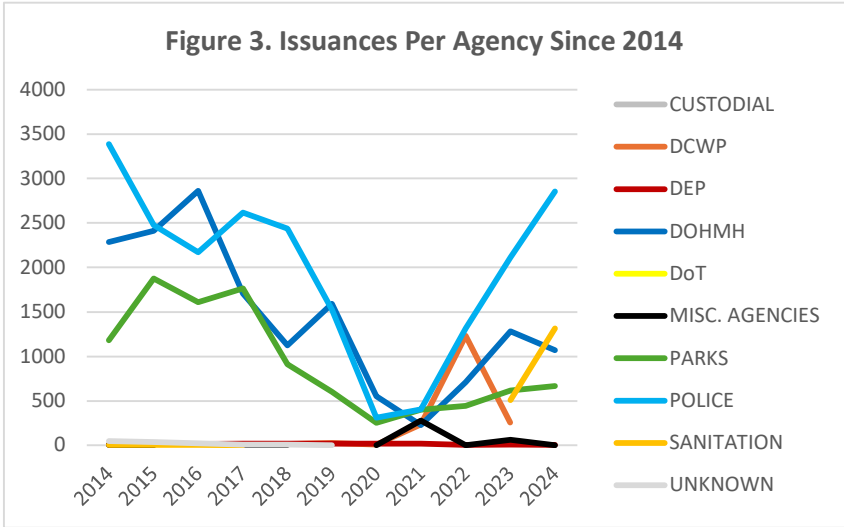
¹⁵ Parra, D. (2025). “NYC Issued Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024,” City Limits, March 18. Accessed March 21, 2025, at <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>

The NYC Business Express Services (NYC BEST) is among the largest public programs for educating all small businesses generally, including street vendors. The team consists of six compliance advisors and five small business advocates, servicing almost 3,000 businesses in 2024. Although not all these businesses are street vendors, SBS considers MFVs “micro-businesses” that partially compose their constituencies. Services include permitting and license support, inspection support, and regulation guidance. Some of their programs operate in conjunction with other agencies, such as collaborating with the Department of Environmental Protection to instruct MFVs on how to dispose of grease and oil. NYC BEST also offers a module on outdoor vending in their NYC BEST Boot Camp. However, this course is only offered in English and is online - resulting in very low rates of attendance, according to street vendor advocates. Furthermore, the City’s Program to Eliminate the Gap (PEG) spending cuts targeted SBS programs aimed at supporting street vendors in fiscal years 2024 and 2025 – further reducing the expenditures for the programs.¹⁶

Patterns of Street Vending Violations

While the above analysis shows that street vending is complicated and inefficient and that reform efforts are not meeting their goals, this section highlights the disparities in vending violations. An analysis of both civil and criminal summons of street vendors shows a program that disproportionately impacts immigrant communities of color. Where race was reported 90% of criminal summons were issued to non-white vendors since 2009.¹⁷ Additionally, most tickets are issued in the City’s wealthy white neighborhoods. It paints the picture of an expensive program to criminalize immigrant and minority populations primarily for operating in predominantly white spaces.

Looking at violations by agency since 2014 (Figure 3), the NYPD remains the largest source of tickets for vendors. While tickets plummeted during the pandemic for all agencies, they skyrocketed for the Police since. This is despite many reform efforts, particularly under



Mayor de Blasio, seeking to centralize enforcement within DCWP thereby reducing NYPD’s involvement in vendor enforcement. In contrast, tickets from both DOHMH and the Parks Department remain significantly lower than where they were a decade ago.

Most violations were issued in Manhattan (65%) since 1985 (Figure 4), with roughly equal enforcement between the other boroughs (11% in Queens, 12% in Brooklyn, 10% in Bronx). There have not been

¹⁶ Martelloni, G. (2024). "Report on the Fiscal 2025 Preliminary Plan and the Fiscal 2024 Preliminary Mayor’s Management Report." Department of Small Business Services. Accessed March 21, 2025, at council.nyc.gov/budget/wp-content/uploads/sites/54/2024/03/801-SBS.pdf

¹⁷ Only criminal summons list race and, in many cases, the race category was left blank.

significant trends in this data, and it remains relatively comparable to the previous years since 1985.

Figure 4. Percentage of Violations per Borough Since 1985

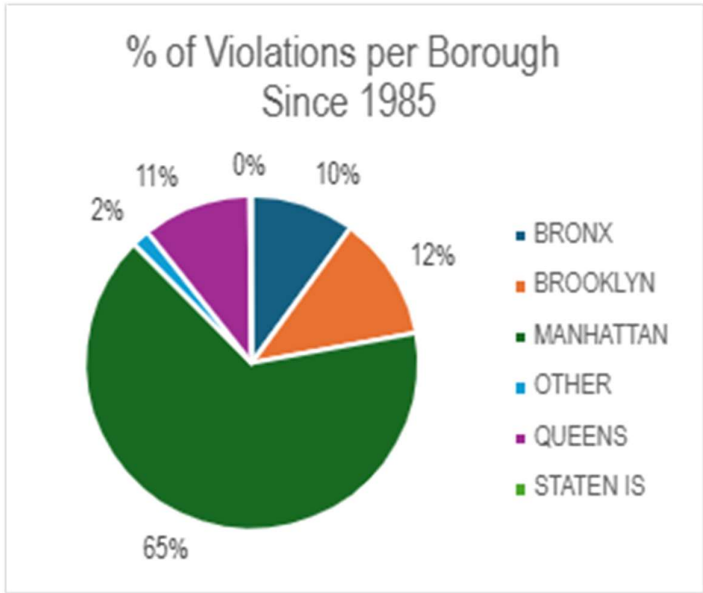


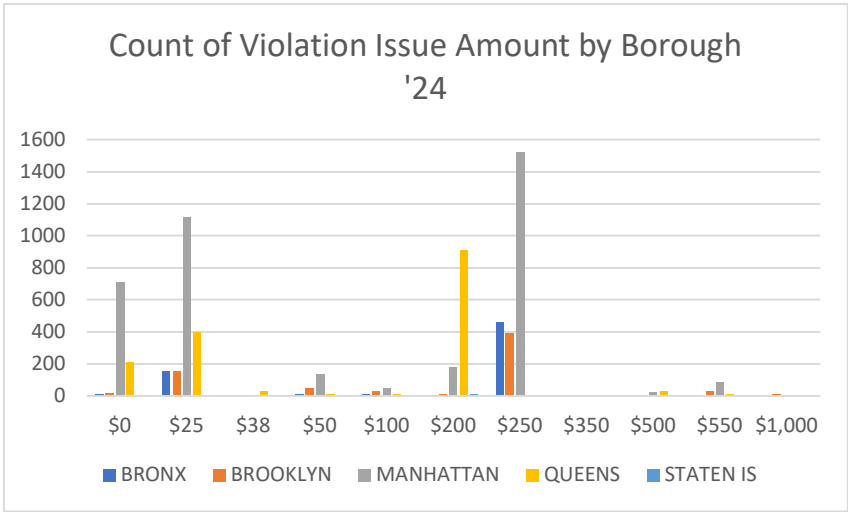
Table 3. Top Civil and Criminal Ticket Violations in 2024

Top Civil Tickets	Count	Top Criminal Tickets	Count
UNLICENSED GENERAL VENDOR INCLUDING CONT D UNLICENSED ACTIVITY 1ST	1794	UNLICENSED GENERAL VENDOR	897
VENDING ON SIDEWALK LESS THAN 12 FT., OR NOT AT CURB	809	UNLICENSED VENDOR	405
VENDING IN BUS STOP, SIDEWALK NEXT TO A HOSPITAL OR HEALTH FACILITY	801	VENDOR: FAIL TO DISPLAY PERMIT	95
UNLAWFUL VENDING	800	VENDOR: FAIL TO DISPLAY PRICES	84
UNLICENSED GENERAL VENDOR INCLUDING CONT D UNLICENSED ACTIVITY 1ST	550	VENDOR: UNLICENSED	71
PUSHCART TOUCHING OR LEANING AGAINST BUILDING	372	FAIL TO WEAR WHILE VENDING	45
VENDING AT TIME OR PLACE PROHIBITED	312	VEND-RESTRICTIONS ON PLCMET VEH/PUSHCARTS	41
FAILURE TO WEAR LICENSE CONSPICUOUSLY WHILE VENDING 1ST	257	VENDOR: (OTHER)	18
VENDING IN PROHIBITED ZONE OR AREA 1ST	173	VENDOR: DISP MERCHANDISE ON SIDEWALK	16
VEND AT TIMES PLACES RESTRICTED BY VENDOR REVIEW PANEL 1ST	143	VENDOR WITHOUT A LICENSE	12
VENDING NEAR FIRE HYDRANT OR IN SAFETY ZONE 1ST	129	VENDING ON PARKING METER	2
VENDING NON-FOOD ITEMS	119	NO VENDING MACH. DISCLOSURE	1

Looking at the top violations for both civil and criminal summons for 2024 (Table 3), we see that most violations were due to unlicensed or unlawful vending. This indicates the persistent problem of not issuing enough licenses quickly enough. Many of the other top violations were for so-called “quality of life” violations. These are where the vendor improperly sets up their vending operation according to the myriad and often confusing regulations. There was no discernible pattern across Boroughs for violation type. The same handful of common violations were prevalent throughout the City.

Looking at the cost of fines in 2024, we could only evaluate civil data as the criminal summons do not list the fine amount (Figure 5). This is unfortunate as the criminal penalties are often larger than the civil summons resulting in the data presented here representing a large undercount of the impact of vending tickets on vendors. For civil fines in 2024, most tickets impose either zero financial penalty, a \$25 penalty, or a \$200-250 penalty. These larger penalties seemed to represent the most common outcome across Boroughs and the Bronx seemed to have higher penalty issuances relative to the rest of the City. The fines for 2024 seem to be lower than historical data. Since 2000 about 50% of fines were for \$1,000 or more with \$1,000 being the fine for unpermitted food vending.

Figure 5. Count of Violation Issue Amount by Borough for 2024



Looking at the total cost, \$893,564 in civil penalties were issued against street vendors in just 2024 (Table 4). While most tickets were issued in Manhattan the average cost of fines is higher—often considerably so—in the outer Boroughs. Since 2000, NYC has issued 196K civil fines against vendors costing them \$103 million. Given the lack of penalty data on criminal fines, we know these figures to be large undercounts of the true cost on vendors.

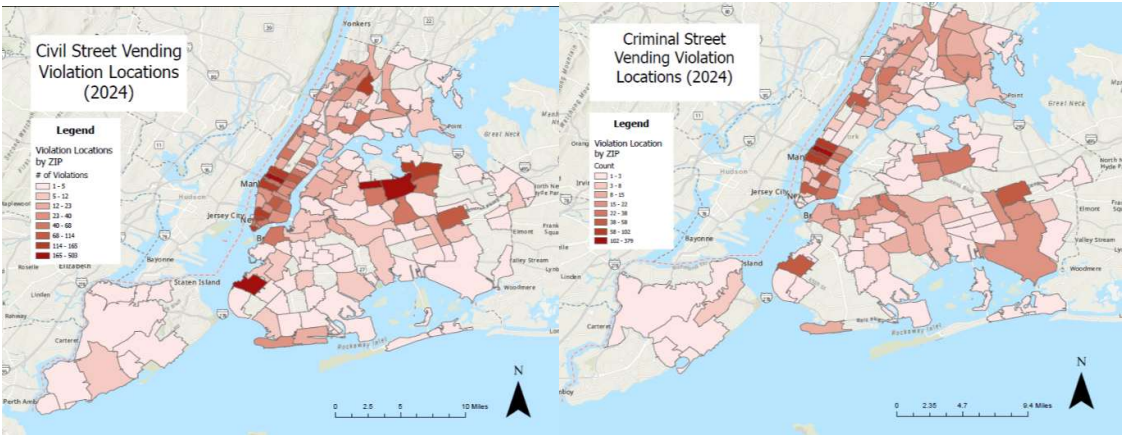
Table 4. Total and Average Penalty Cost by Borough of Civil Fines in 2024

Civil Fines 2024	Count of Violation Location (Borough)	Sum of Penalty Imposed	Avg Penalty Per Ticket
MANHATTAN	3,827	\$452,154	\$118.15
QUEENS	1,620	\$208,320	\$128.59
BROOKLYN	684	\$117,565	\$171.88
BRONX	660	\$110,800	\$167.88
NOT NYC	62	\$3,075	\$49.60
STATEN ISLAND	8	\$1,650	\$206.25
Grand Total	6,861	\$893,564	\$130.24

There is a great contrast between where violations occur and where those tickets are being issued. Looking first at where violations occurred in 2024, we see it is mostly in the wealthy white neighborhoods of Manhattan where enforcement actions are taken against vendors (Figure 6). Outside of Manhattan, enforcement is concentrated in three high-profile locations: Corona Plaza in Queens, Sunset Park in Brooklyn, and Fordham Road in the Bronx.

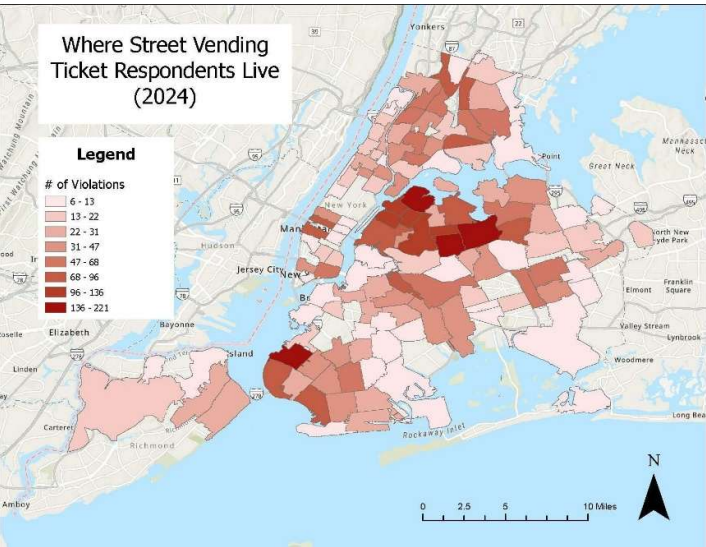
These three locations have had high-profile battles between vendors and the City over whether vending should occur in these locations and what form it should take.

Figure 6. Map of Where Civil and Criminal Vending Tickets Were Issued by ZIP Code in 2024



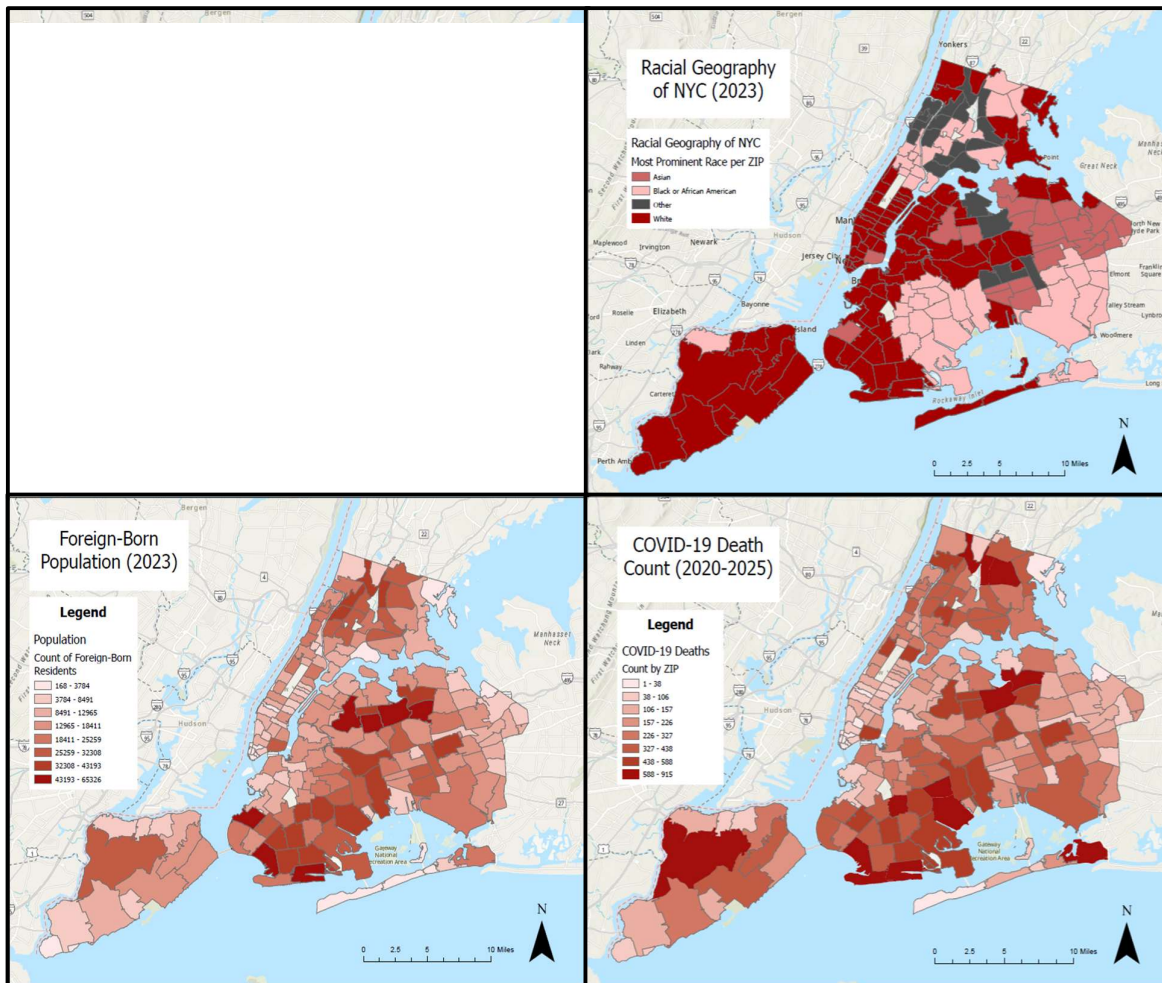
In contrast to the most violations taking place in the wealthy neighborhoods in Manhattan, most ticketed vendors list their residency in high-poverty neighborhoods in the outer boroughs. The following map shows where respondents to violations live (Figure 7) and compares them to ZIP code maps showing poverty rate, percentage of foreign-born residents, dominant racial group, and health disparities as measured by COVID-19 death counts (Figure 8). Looking at where violations occur, 10 of the top 25 ZIP codes are within the top 2 poverty quintiles. In contrast, 12 of the top 25 ZIP codes where those ticketed live are in the bottom 2 quintiles. Violations occurred throughout the City but 56% of violations occurred in ZIP codes in the top 3 quintiles. This means most violations happen in the richer neighborhoods while most vendors live in the poorer neighborhoods. Just over half of all tickets issued in 2024 were given to vendors living in the bottom 2 poverty quintiles.

Figure 7. Map of Where Civil Vending Ticket Respondents Live by Zip Code in 2024



The pattern is clear. Most vendors live in poor immigrant and minority neighbors which were hardest hit by COVID-19. Street vending enforcement in NYC presents a highly racialized pattern of violations mostly occurring in wealthier white neighborhoods against low-income immigrant and minority populations from disadvantaged areas. Furthermore, enforcement is a money-losing proposition for the City that exposes this vulnerable immigrant population to the criminal legal system.

Figure 8. Map of Select Demographic Variables by ZIP Code



Conclusion

Street vending is a vital source of employment for the most vulnerable populations in New York City. Vending is an essential service providing fresh food and supporting the all-important tourism industry throughout the City. The recent efforts to expand access, streamline enforcement, and shield vendors from police enforcement which can expose them to immigration consequences all represent important steps in reforming the industry. This report found New York City has a long way to go in meeting these goals. The maze of regulations facing vendors is still extensive and the role of the NYPD has not diminished despite the stated goals of the City. Unlike most ticketing programs in the City, vending enforcement is not a revenue generator and is likely operating at a large loss. The attempts to expand licensing are not meeting their stated goals and are delayed. Finally, we found a racialized pattern to enforcement where most fines are issued in wealthy white neighborhoods against vendors from the City's poor immigrant communities.

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SEPTEMBER 2024 / IMMIGRATION RESEARCH INITIATIVE

Street Vendors of New York

Overview

From the vendors who sell jewelry and souvenirs, to the classic hot dog stands and food trucks that serve tourists and attract foodies from across the world, to the women selling refreshing fruits to sustain working New Yorkers, street vendors are a staple of New York City life. The streets of New York have always provided a means to earn money for entrepreneurs who range from people with a small side-hustle to long-established small business owners.

For an industry that is characteristic of life in New York City, we have, until now, known surprisingly little about the vendors that provide the economic activity that ignites so many city streets. How many vendors work in New York City, how much do they earn, what countries are they from, what challenges are they facing, how old are they? This report for the first time gives a comprehensive, empirical answer to these questions.

The report is based on data collected from a comprehensive survey administered to more than two thousand street vendors in 2021 by the Street Vendor Project of the Urban Justice Center. The survey data was analyzed by the Immigration Research Initiative using statistical weights provided by Jonathan Auerbach from George Mason University so that the findings in this report represent the approximately 23,000 street vendors that operate in New York City. The following sections highlight the main findings of that analysis. Further details concerning the survey and the statistical weights are contained within the Methodology section.

23,000 Mobile Food and General Merchandise Street Vendors in NYC

Street vendors are often small business owners that have a significant economic impact on the New York City economy.¹ There is such a complicated patchwork of New York City and State laws and restrictions around vending that being a fully permitted and licensed vendor can be very difficult. This also makes it difficult to know the exact number of street vendors that operate throughout the city, as many vendors are unlicensed or unpermitted and are missing from administrative datasets. Additionally, it is difficult to identify street vendors from federal surveys, such as the American Community Survey administered by the Census Bureau.

Until now, there has not been a reliable estimate of the number of street vendors working throughout the city.² Using data from the Street Vendor Project's comprehensive survey, Jonathan Auerbach used ratio estimation, a common statistical technique for estimating populations, to calculate survey weights and determine the number of street vendors working in New York City, either as business owners or as people employed in those businesses. His study finds that there are approximately 23,000 street vendors operating throughout the five boroughs, the overwhelming majority of which are mobile food vendors (20,500). An additional 2,400 are general merchandise vendors. The total is rounded 23,000 vendors.

Professor Auerbach's analysis is summarized in the methodology section of this report. The full analysis can be found in "[Estimating the Number of Street Vendors in New York City](#)"³

What is a Street Vendor?

New York City has classified three types of vendors: Mobile Food Vendors (MFV) — those selling pre-packaged or prepared food and produce in a public space; General Merchandise Vendors (GMV) — those selling merchandise or non-food goods/services in a public place; and First Amendment Vendors — those selling expressive materials such as art, music, books, etc. For the purpose of this analysis, we focus on MFV and GMV categories.

Street vendors are subject to a medley of laws and rules by New York City and State. The city is also currently in the process of implementing reforms passed in 2021, which bring new levels of both opportunity and complexity to the food vending license and permit structure. Most permitted mobile food vendors in business today operate under the older permitting system; the new supervisory license system will fully phase in by 2032.

This complex system has created a long list of vending licenses and permits:

- General Vendor licenses
- General Vendor licenses for service-disabled veterans
- Mobile Food Vendor license or supervisory license (by individual)
- Mobile Food Vendor permit or supervisory license permit (by cart/unit)
- Special MFV permits (Restricted Area Permits, Park Permits, Seasonal/Temporary Permit, Green Cart Permit, Borough-Specific Permit, Disability/Veteran Specialized)

Who Are Street Vendors?

Nearly All Vendors Are Immigrants

The overwhelming majority of the small business owners and the people who work for them as merchandise and food vendors in New York are immigrants. Nearly all street vendors who are not military veterans, 96 percent, were born in a country outside of the United States. The U.S.-born share represents only 4 percent of street vendors or, put differently, only 4 out of every 100 street vendors, who are not veterans, were born in the United States. For a separate analysis of vendors who are military veterans, see the section “Vendors Who Are Veterans,” later in this report.

Street vending is a common pathway to entrepreneurship for many immigrants because of its comparatively low start-up costs and some other low barriers to entry. However, permitting and licensing caps can inhibit growth and prevent many from meeting the proper standards.⁴

Among immigrants who are mobile food vendors, 39 percent are naturalized citizens or permanent residents, 27 percent report that they are undocumented, and 30 percent prefer not to answer. Among general merchandise vendors who are immigrants, about two thirds (67 percent) are naturalized citizens or permanent residents, 13 percent report that they are undocumented, and 19 percent prefer not to answer.

Street Vendors Come from Across the World

Sixty countries were represented by the vendors who participated in this survey, and 16 of these countries were represented by 10 or more vendors.

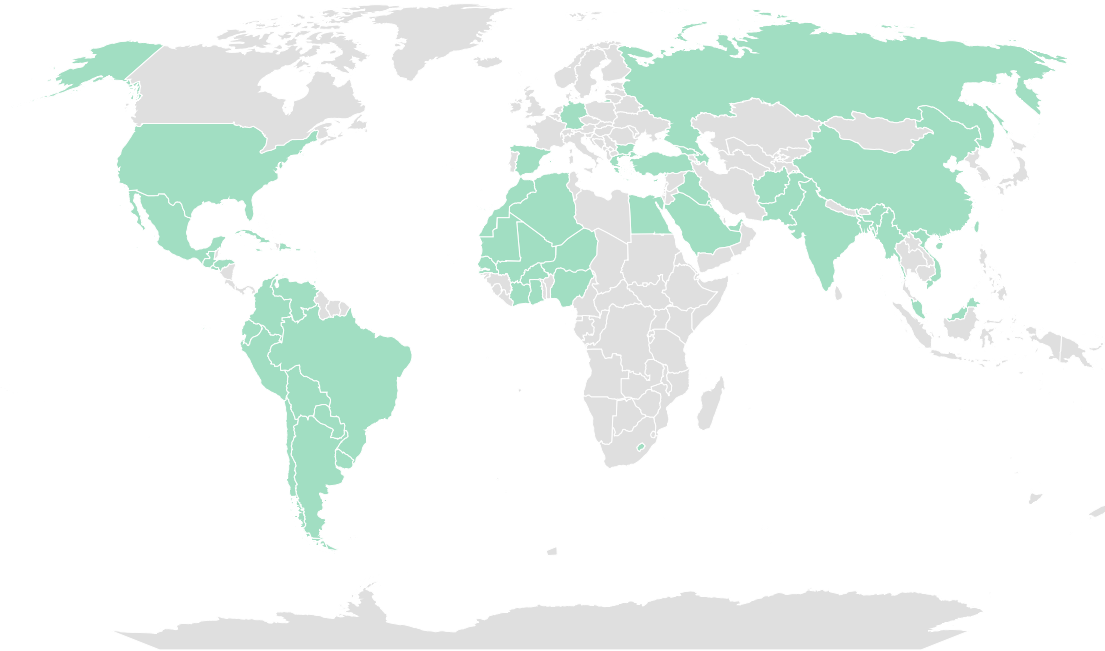
The majority of vendors in this survey hailed from Central and South American countries, as well as North and West Africa, and East and South Asia. The top five countries of origin for all street vendors are Mexico (30 percent), Ecuador (24 percent), Egypt (20 percent), Senegal (7 percent), and the United States (4 percent).

Caps on Licenses and Permits

Caps on available business licensing for Mobile Food Vendors (MFV) and General Vendors (GV) in New York City have contributed to an Informal vending economy, as well as an underground market for city permits. Since 1979 and 1983 respectively, the number of GV licenses has been capped at 853 (for non-veterans) and the number of MFV permits capped initially at 3,000, increasing to approximately 6,000 available since then due to a number of legislative reforms including the Green Cart permit program in 2008 and the passage of Local Law 18 of 2021.

The restriction of business licensing available has not stopped the growth of the industry, and new vendors have sprung up where there is clear demand, most recently during the COVID-19 pandemic and with the influx of migrants to New York City. When operating without the required permit or license, vendor entrepreneurs are subject to fines, arrest, and property confiscation. To decrease the risk of penalties from regulators, some vendors have subleased permits on a secondary market, which news reports suggest may cost tens of thousands of dollars each year, yet are not formal leasing agreements.

As of October 2023 the waiting list for general vendor licenses contains 10,992 individuals, and has been closed since 2016. The waiting list for mobile food vendor permits contains 9,878 individuals. The MFV waitlist is closed to new applications of vendors who obtained an MFV license prior to March 2017.

STREET VENDORS CAME TO NEW YORK CITY FROM ACROSS THE WORLD


STREET VENDORS ARE PREDOMINANTLY PEOPLE OF COLOR

All Street Vendors	
Black or African American	5%
East Asian	3%
Hispanic or Latino/a/x	60%
Middle Eastern and North African	22%
Southeast Asian or Indian Subcontinent	7%
White	2%
Total	100%

Note: This shows only one race; some people are more than one race.

Over half of all street vendors (60 percent) are Hispanic/Latino/a/x followed by Middle Eastern/North African vendors (22 percent) East/South East Asian vendors (7 percent), Black/African American vendors (5 percent), white vendors (2 percent), and Native American vendors (1 percent). This leaves many implications for enforcement and how that will disproportionately impact Black and Brown immigrants.

MOST MERCHANDISE VENDORS ARE BLACK, MOST FOOD VENDORS ARE LATINO/A/X

Race	Mobile Food Vendor	General Merchandise Vendor
American Indian or Alaska Native	1%	1%
Black or African American	1%	62%
East Asian	3%	1%
Hispanic or Latino/a/x	62%	33%
Middle Eastern and North African	23%	0%
Southeast Asian or Indian Subcontinent	8%	2%
White	2%	1%
Total	100%	100%

What type of vending people do differs significantly by race: the majority of mobile food vendors are Hispanic/Latinx while the majority of general merchandise vendors are Black or African American.

Permits and Licensing

There are an estimated 20,500 mobile food vendors and 2,400 general merchandise vendors. For mobile food vendors, the relevant question is whether they have permits; for general merchandise vendors, it is whether they have a license.

MOST MERCHANDISE VENDORS HAVE LICENSES; BUT ONLY A QUARTER OF FOOD VENDORS HAVE PERMITS

Mobile Food Vendor		General Merchandise Vendor	
Permitted	Unpermitted	Licensed	Unlicensed
25%	75%	63%	37%

According to the survey analysis, about three-quarters of mobile food vendors are unpermitted, with about a quarter permitted. By contrast, most nonveteran general merchandise vendors are licensed: 63 percent have a license, compared with 37 percent who do not. (We assume all veteran general merchandise vendors are licensed since the license cap does not apply to veterans.)

The number of general vendor licenses that are issued to non-veterans is limited, by law, to 853. As of October 2023, [the waiting list for general vendor licenses contains 10,992 individuals and has been closed since 2016.](#)

TOP COUNTRIES OF BIRTH FOR VENDORS

Mobile Food Vendors		General Merchandise Vendors	
Mexico	28%	Senegal	55%
Ecuador	24%	Mexico	16%
Egypt	21%	Ecuador	10%
Bangladesh	7%	USA	6%
USA	4%	Peru	2%
Total	85%	Total	89%

Among people who work as mobile food vendors, the top countries of birth are Mexico (28 percent) Ecuador (24 percent), and Egypt (21 percent), Bangladesh (7 percent) and the United States (4 percent).

For general merchandise vendors, the top countries of birth are Senegal (55 percent), Mexico (16 percent), Ecuador (10 percent), the United States (6 percent) and Peru (2 percent).

Immigrant communities that have been in the United States for longer are more likely to have become established among vendors with permits. Immigrants who are undocumented are more likely to be unlicensed or unpermitted, though many vendors who report being undocumented do have licenses and permits. Vendors can apply for these city documents using an Individual Taxpayer Identification Number (ITIN), irrespective of their immigration status.⁵

Women play a big role as vendors, but are less likely to have licenses or permits

WOMEN MAKE UP HALF OF FOOD VENDORS AND TWO THIRDS OF MERCHANDISE VENDORS...

Gender	Mobile Food	General	All Vendors
	Vendor	Merchandise Vendors	
Men	51%	67%	52%
Women	49%	33%	48%
Total	100%	100%	100%

Overall men and women are equally represented amongst street vendors however women are more likely to be mobile food vendors vs. general vendors. The slight majority of mobile food vendors are men, 51 percent.

...BUT WOMEN ENTREPRENEURS ARE MOST LIKELY TO LACK PERMITTING OR LICENSES

	Mobile Food Vendor			General Merchandise Vendor	
	Permitted	Unpermitted		Licensed	Unlicensed
Men	73%	44%	Men	86%	34%
Women	27%	56%	Women	14%	66%
Total	100%	100%	Total	100%	100%

Women who are mobile food vendors are more likely to be unpermitted, only 27 percent of mobile food vendor permit holders are women. This is higher than the findings for women who are general merchandise vendors. Of general merchandise vendors only 14 percent of those who are licensed are women. Women are less likely to have licenses and permits, reflecting the difficulty that people face when trying to obtain a vendor permit.⁶

Vending in New York City

What Street Vendors Sell

Mobile food vendors reported selling 21 different types of foods, ranging from Latin American food, to classic American fast food like hot dogs. There are both similarities and differences in the goods sold by vendors who are permitted/licensed and those who are not.

Halal carts are prominent in the list of both food vendors with and without permits, topping the list and making up 26 percent of those with permits. Among permitted vendors, the other popular items are hot dogs and pretzels, bagels and muffins and coffee.

Among unpermitted carts, it's the Latin American foods that top the list, with 33 percent selling arepas, tacos, or chuzos. Cut fruits and ice cream are also high on the list among unpermitted food vendors.

TYPES OF FOOD SOLD BY VENDORS WITH AND WITHOUT A PERMIT

Mobile Food Vendor	
Permitted	Share
Middle Eastern / Halal Food (halal chicken & rice, falafel, etc)	26%
American Fast Food (hot dogs, pretzels)	15%
Latin American Food (arepas, tamales, tacos, chuzos, etc)	13%
Breakfast Carts (coffee, bagels, baked goods)	11%
Produce (fruits, vegetables)	11%
Unpermitted	Share
Latin American Food (arepas, tamales, tacos, chuzos, etc)	33%
Middle Eastern / Halal Food (halal chicken & rice, falafel, etc)	14%
Cut Fruits	13%
Ice Cream (ice cream truck, pushcart)	10%
Breakfast Carts (coffee, bagels, baked goods)	7%

TYPES OF MERCHANDISE SOLD BY VENDORS WITH AND WITHOUT LICENSES

General Merchandise Vendor	
Licensed	Share
Accessories (hats, scarves, jewelry, sunglasses, handbags)	79%
General Clothing (t-shirts, hoodies)	8%
Electronics (phone accessories, phone cover, headphones)	6%
Clothing specific to a country or culture (Mexican ponchos, African headwraps)	2%
Religious Items (incense, prayer rugs, etc)	2%
Unlicensed	Share
Accessories (hats, scarves, jewelry, sunglasses, handbags)	35%
General Clothing (t-shirts, hoodies)	29%
Flowers	14%
Clothing specific to a country or culture (Mexican ponchos, African headwraps)	10%
Toys	9%

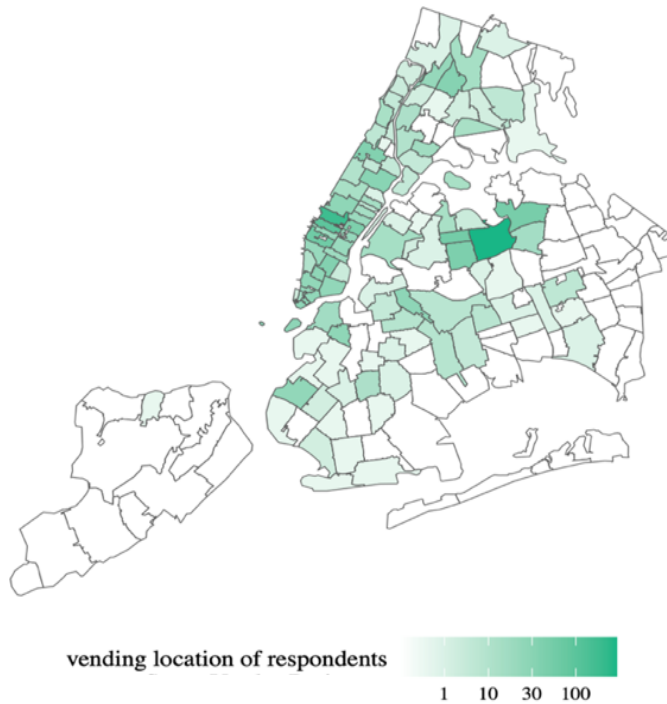
Note: This survey was done when many vendors were temporarily selling personal protective equipment, such as masks. These are excluded from this calculation.

The highest share of merchandise vendors sell accessories such as hats, scarves, jewelry, sunglasses or handbags: this is true for both licensed vendors (79 percent) and unlicensed (35 percent). The next highest category for both licensed and unlicensed vendors is general clothing (8 percent for licensed vendors, 29 percent for unlicensed). The biggest divergence between licensed and unlicensed vendors is that licensed vendors are more likely to sell electronics and religious items, while unlicensed vendors are more likely to sell flowers and toys. Both sell clothing specific to a country or culture.

This survey was done during the height of the COVID-19 pandemic, and many of the vendors, especially unlicensed vendors, were selling personal protective equipment, such as masks, during this time. That is not included in the analysis here since it was very specific to that time. But it is also interesting to note that vendors can be immediately responsive to specific needs that arise.

Where Vendors Work

There are vendors doing businesses all across the city, though there are clear areas where street vendors are clustered. Manhattan has the largest share of both mobile food vendors (46 percent) and general merchandise vendors (61 percent). The share is second highest in Queens (33 for mobile food vendors and 23 percent for general merchandise vendors). While there are some vendors located on Staten Island, the sample in this survey is too small for a full analysis. These findings are underscored by Professor Auerbach's report, which demonstrates that one third of vendors are located in the Queens zip codes: 11368 (16 percent), 11372 (3 percent), and 11354 (3 percent).

MANHATTAN AND QUEENS HAVE THE MOST VENDORS

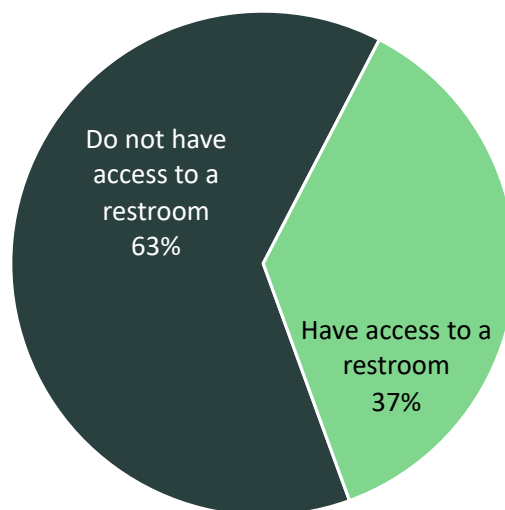
Source: "Estimating the Number of Street Vendors in New York City," Jonathan Auerbach.

The borough-level analysis gives a broad picture, but a neighborhood-by-neighborhood look gives a more detailed picture. Here, Corona, Jackson Heights and Flushing stand out for their high concentration of mobile food vendors, as does Harlem for general merchandise vendors.

Most Vendors Lack Access to a Restroom

Unlike business owners with storefronts who have physical shelter from conditions like inclement weather and extreme weather events, street vendors, by definition, do not have these protections. Street vendors also lack access to other basic amenities that come with working indoors such as access to restrooms. Overall, 63 percent of vendors lack access to a restroom. This is an issue that stands out especially for mobile food vendors; most general merchandise vendors reported that they do have access to a bathroom.

NEARLY TWO THIRDS OF ALL VENDORS DO NOT HAVE ACCESS TO A RESTROOM



Culture and Language

Nearly all vendors are immigrants, and immigration in New York is extraordinarily diverse. This is also reflected in the extensive number of languages street vendors speak. Over half of vendors (52 percent) list Spanish as their preferred language. The next most common languages are Wolof (15 percent), Arabic (14 percent), English (9 percent), and Bangala (5 percent). While a total of 15 preferred languages were mentioned in the survey, this top five list represents the vast majority, 95 percent, of vendors surveyed.

Perhaps even more striking, a large number, 46 percent, of vendors speak at least two languages, and some speak three or even four.

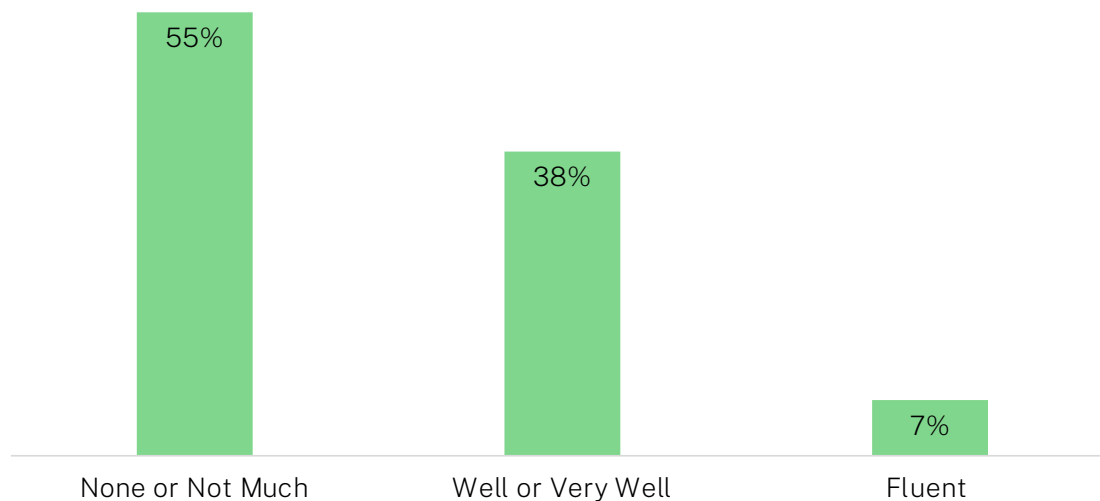
English is the second language for more than three quarters of the people who report speaking more than one language. But many people speak Arabic as a second language, one of the Quechuan languages, or Spanish, Mixtec, or French.

SPANISH, WOLOF, ARABIC, BANGLA: A NEW YORK RANGE OF LANGUAGES

Preferred Language	Share	Preferred Second Language	Share
Spanish	52%	English	77%
Wolof	15%	Arabic	4%
Arabic	14%	Quechuan Languages	3%
English	9%	Spanish	3%
Bangla	5%	Mixtec	2%
Total	95%	French	2%
		Total	92%

Most Street Vendors Are Not Confident in Their Ability to Speak English

Of the mobile food and general vendors surveyed, the majority, 55 percent, speak little to no English. Less than 10 percent speak English fluently and the remaining 38 percent of vendors speak English well or very well.

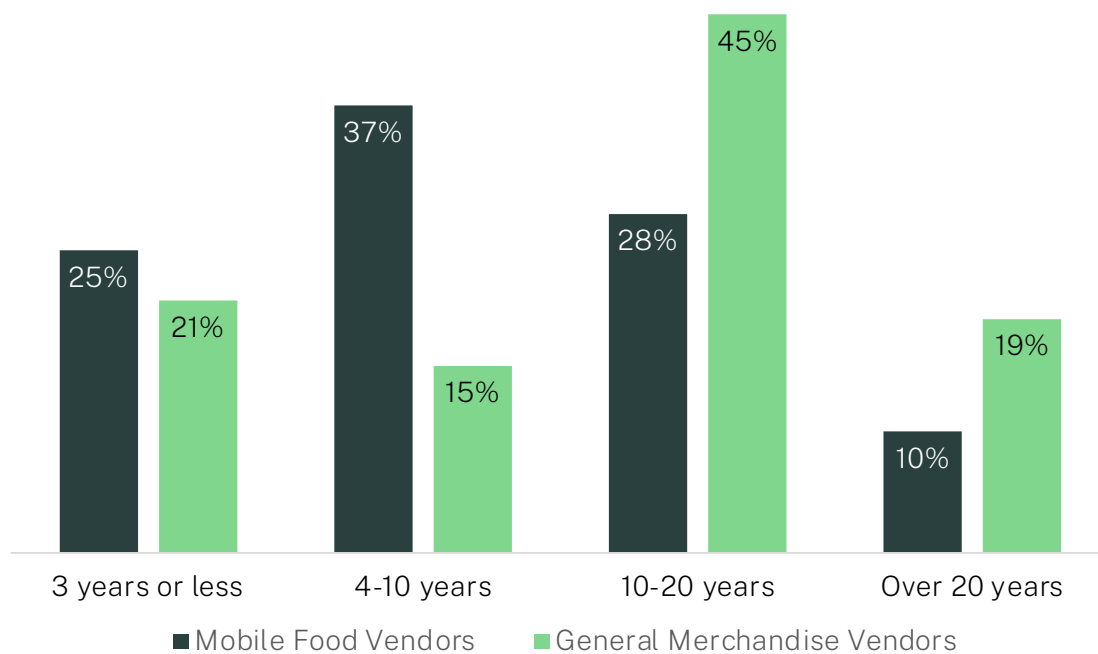
FEW VENDORS CONSIDER THEMSELVES FLUENT, BUT MORE THAN A THIRD SAY THEY SPEAK ENGLISH WELL


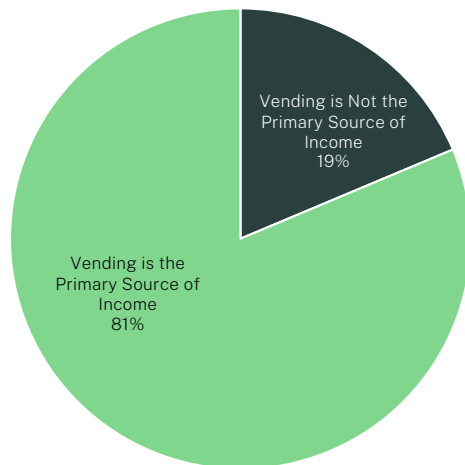
Vendors Are Small Business Owners

While vending can be part-time work to make additional income for some, for the majority of street vendors it is a longtime profession and primary source of income. Only one in four mobile food vendor survey respondents have been vending for 3 years or less. The remaining three out of four mobile food vendors, 75 percent, have been vending between 4 and 20 years. As shown below, 28 percent have been working at their business for over a decade, and 10 percent for over twenty years.

A similar pattern is also true for general merchandise vendors. Nearly one in five general merchandise vendors has been working as a vendor for over 20 years, 60 percent have been vending between four and 20 years, and the remaining 21 percent of general merchandise vendors have been vending for three years or less.

MOST MERCHANDISE AND MANY FOOD VENDORS HAVE BEEN AT THEIR BUSINESS OVER 10 YEARS



VENDING IS THE PRIMARY SOURCE OF INCOME FOR THE VAST MAJORITY OF VENDORS

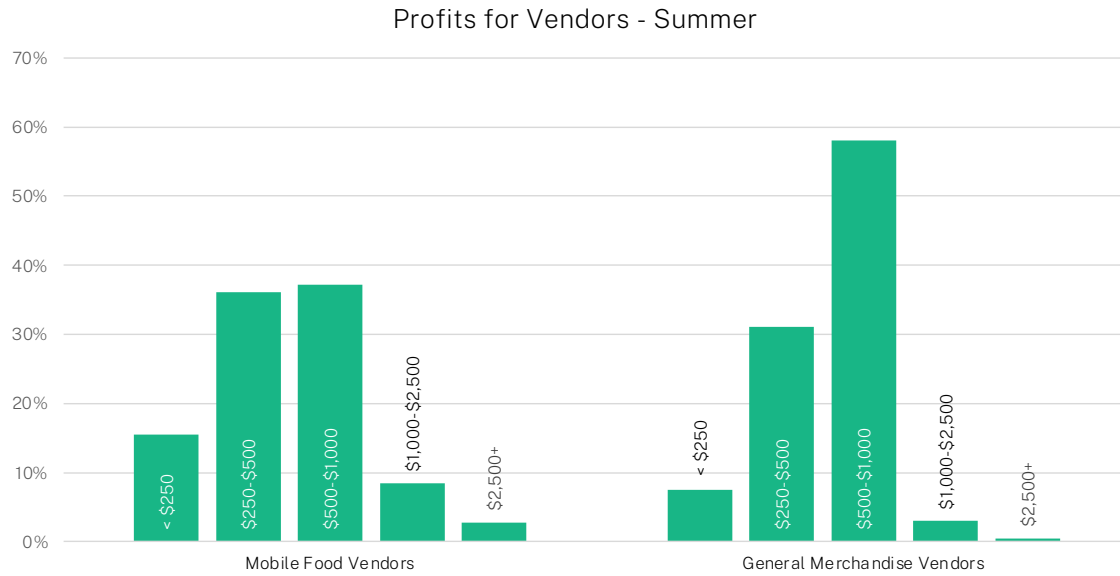
The large majority, 81 percent, of all vendors see vending as their primary source of income.

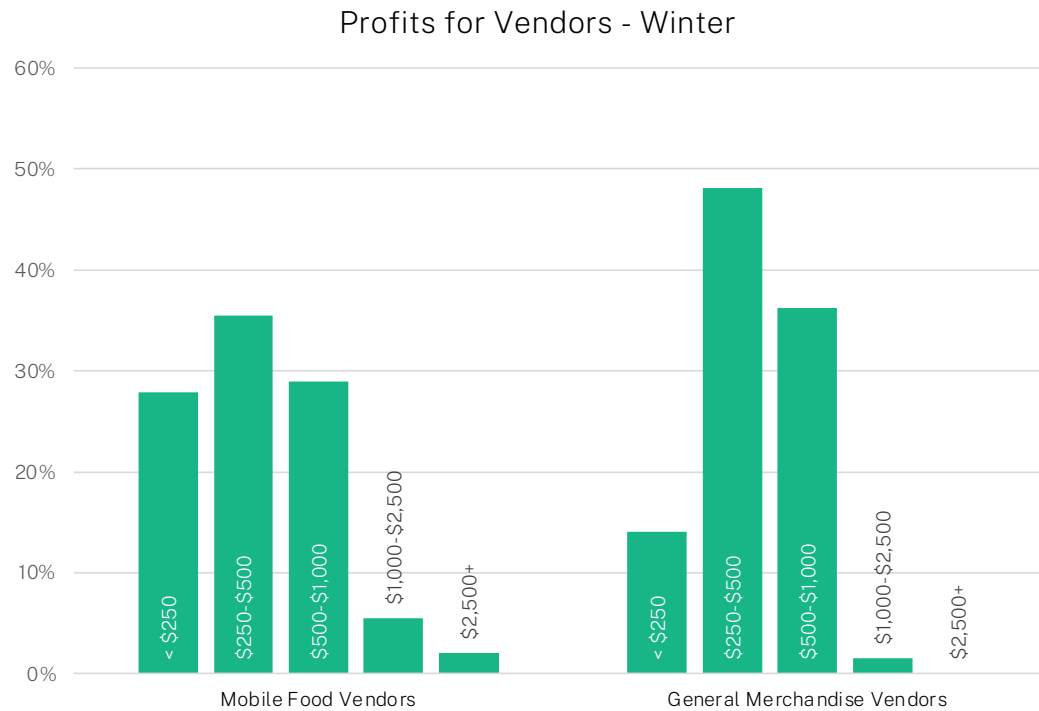
Vendors' incomes vary significantly depending on the season. Mobile food vendors are somewhat more stable: they are most likely to have profits of between \$250 and \$1,000 per week in both summer and winter, with more earning under \$250 per week in the winter. General merchandise vendors see a significant decline in winter: the majority earn \$500 to \$1,000 in summer, but by winter most earn under \$500.

Vendors may not be able to work full-time and year-round, but to give some sense of what these profit levels mean: a vendor earning \$250 per week who works 50 weeks per year would earn \$12,500 in profit; an individual making \$500/week in profit would make \$25,000/year, and an individual making \$1,000/week in profit would make \$50,000/year.

By comparison, the median annual earnings for New York City residents is \$49,000 for all workers, and \$67,000 for full-time, year round workers, according to an Immigration Research Initiative analysis of 2022 ACS 5-year data.

During the Covid-19 pandemic, earnings dropped drastically. The survey does not give data for the post-pandemic period, but these pre-pandemic levels give some gauge of likely profit levels today.

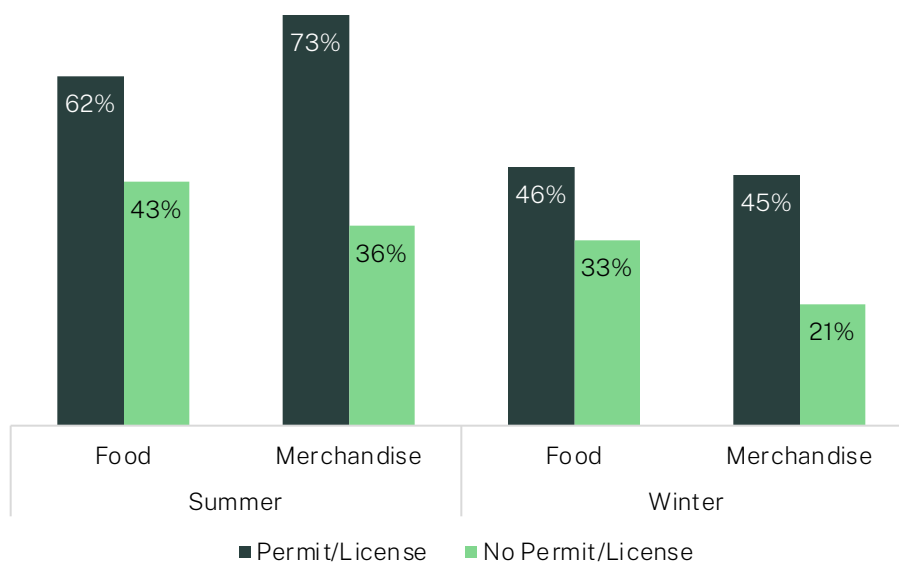
TYPICAL SUMMER PROFITS FOR VENDORS RANGE FROM \$250 TO \$1,000

TYPICAL WINTER PROFITS FOR VENDORS RANGE FROM \$250 TO \$1,000

Because of government limits, not all working vendors can obtain the permits or licenses necessary to operate formalized businesses.⁷ It is clear, though, that operating with these official documents makes a substantial economic difference. For mobile food vendors during the summer, 62 percent of those with a permit show a profit of over \$500 per week, compared to 43 percent of those without a permit. During that same season, for general merchandise vendors, 73 percent of those with a license show a profit of over \$500, compared to just 36 percent of those who do not have a license.

HAVING A LICENSE/PERMIT MAKES A HUGE DIFFERENCE IN PROFITABILITY...OR JUST BEING ABLE TO GET BY

Earning More than \$500/Week

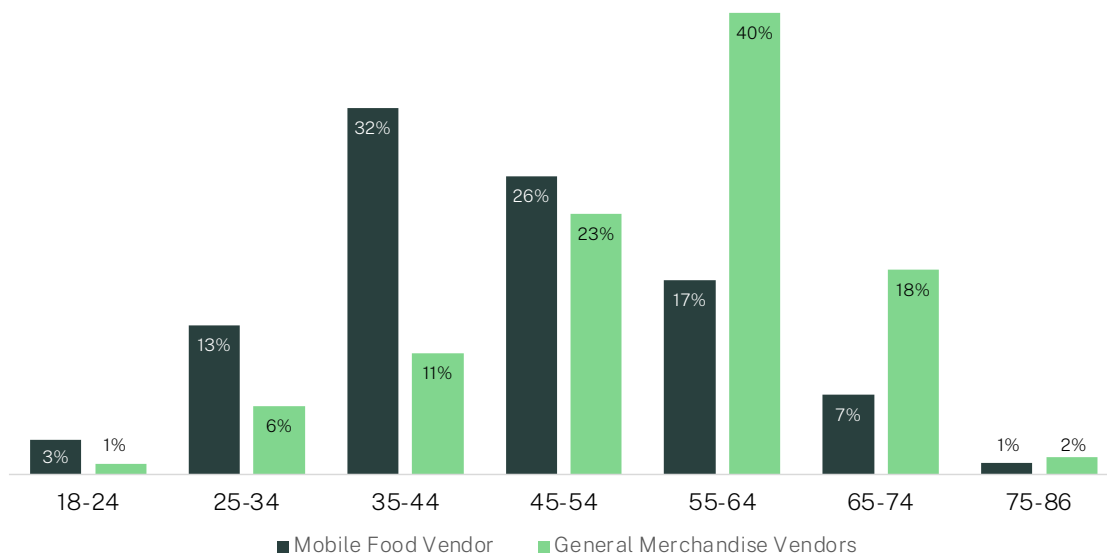


This trend also holds true during the winter months for both mobile food and general merchandise vendors. Having a license or permit is key to achieving higher levels of profitability in this industry. For many vendors who have not had the opportunity to own their own permit or license yet, they dream of one day being able to do so. (See Reflections on Being a Street Vendor Below).

Vendor Home Life

People working as street vendors are represented by nearly every generation: those surveyed ranged from 18 to 86 years old. About a third, 32 percent, of mobile food vendors are between 35 and 44 years old, and 40 percent of general merchandise vendors are 55 to 64 years old. This finding is in sync with the fact that most people surveyed have been vending for over a decade, and for many it is a primary business that supports a family. The average age of mobile food vendors is 45 and the average age of general merchandise vendors is 54.

FOOD VENDORS TEND TO BE 35-54 YEARS OLD, MERCHANDISE VENDORS 45 TO 64 AND ABOVE

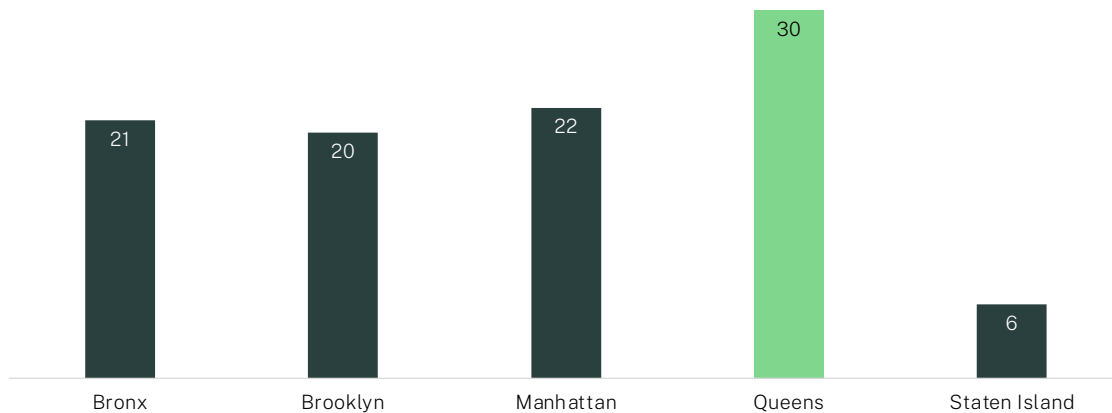


Most street vendors, 65 percent, live in households with one or more children. Only 35 percent of vendors live in households that do not have children.

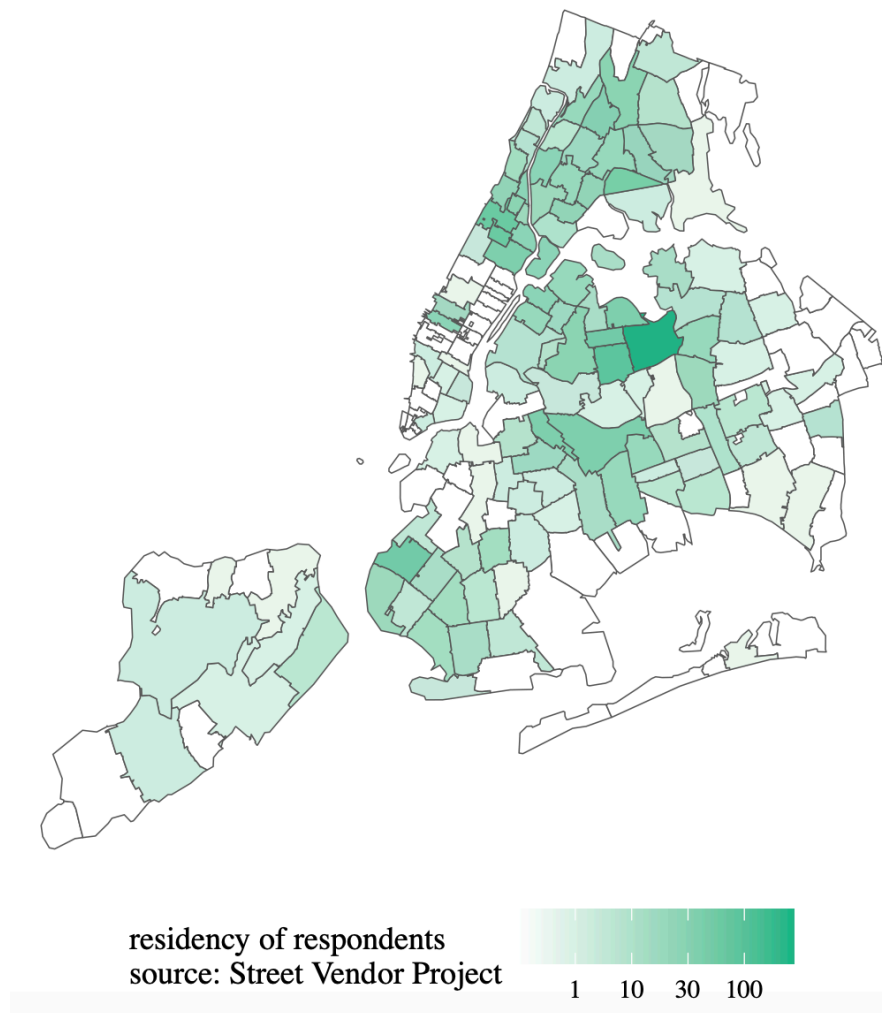
MOST VENDORS LIVE IN HOUSEHOLDS WITH CHILDREN

Number of Children Living in the Household	Share
No children in the household	35%
1 Child in the household	20%
2 or more children in the household	45%
Total	100%

The borough with the largest diversity of countries represented by its vendors was Queens, reflective of the borough's status as one of the most globally diverse locations not just in New York but across the globe.⁸

VENDORS LIVING IN QUEENS REPRESENT THE GREATEST RANGE OF COUNTRIES OF ORIGIN

Among those vendors living in New York City, about half of mobile food vendors (53 percent) and a quarter of general merchandise vendors (24 percent) live in Queens, 11 percent of mobile food vendors and 43 percent of general merchandise vendors live in Manhattan, 16 percent of mobile food and 23 percent of general merchandise vendors live in the Bronx, 18 percent of mobile food vendors and 9 percent of general merchandise vendors live in Brooklyn, and 2 percent of mobile food vendors and 1 percent of general merchandise vendors live on Staten Island. See map below.

RESIDENCY OF RESPONDENTS

Within each of the five boroughs, the range of countries where street vendors are originally from varied. In Manhattan, the majority of vendors working in the borough were born in Senegal, 55 percent, far outpacing any other country of origin. In Queens the top three countries of origin for vendors who work in the borough is Mexico (22 percent), Ecuador (20 percent), and Egypt (20 percent).

Reflections on Being a Vendor

Open-ended questions asked on the Street Vendor Project's survey garnered hundreds of unique responses. Many respondents shared that they became street vendors because they enjoy being entrepreneurs saying they did it so *"I can be my own boss"* and *"I can be a small business owner."* Some respondents shared that they had few other options for employment, saying that they became a street vendor *"because I could not find another job"* and *"I became a vendor because I had no job and no social security and not being able to talk English."* Other respondents shared simple reasons why they became street vendors such as *"Because I love the job,"* and because being a street vendor is a *"flexible job."* As the data from this survey has shown, 96 percent of street vendors were born abroad and shared that they became street vendors *"because when I came to this country, this was my first my job."*

Another open-ended question asked was, *"Why did you remain a vendor?"* As shown above, street vending is not just a seasonal or transitional job but a long-term career for most. Over the past five years street vendors have overcome a global pandemic, extreme weather events, and challenging policing however they have remained dedicated to their small businesses and have provided New Yorkers with a diversity of flavors and fabrics. Of the hundreds of reasons given for why they have remained dedicated to their businesses many vendors shared that being a vendor *"allows time with my kids,"* is their *"only source of income"*, *"is the only job I can do,"* and is *"all I have ever known."* Another theme that came up was that there were few other options to earn a living outside of vending. Some respondents have continued vending because they are *"older and have no education to do something else"* or due to their *"age"* and *"immigration status."* Others responded that they have chosen to remain a vendor because *"I like being my own boss and like to interact with the customers"* and simply, *"because I like it."*

Do you like being a vendor?

The business is tough, early mornings and late nights, difficulty finding restrooms, little protections from seasonal weather events, no benefits like paid leave, holidays, or health care, harassment by police, and the ever-constant vulnerability of working on the streets of New York. However, despite these challenges, this survey revealed that *95 percent of street vendors reported enjoying being a vendor.*

Dreams for the future of their business

TOP 5 RESPONSES REPRESENT ASPIRATIONS FOR 93 PERCENT OF VENDORS

What is your dream for your business or job?	Share
Open your own vending business	31%
Start a storefront (restaurant/retail)	29%
Expand your vending business	25%
Find non-vending job/ business	5%
Have my own permit/license	2%
Total	93%

The vendors surveyed also shared their future business goals. These responses show aspirations to move from being an employee to a business owner, with 31 percent of respondents sharing that they would like to open their own vending business. Twenty-nine percent of vendors dream of starting a storefront business, and 1 in every 4 vendors surveyed would like to expand their business by getting bigger or more carts/trucks to sell their products from. Only 5 percent of vendors surveyed responded that they dream of finding a non-vending job/business. The overwhelming majority of vendors enjoy their work and dream of a future where they can enjoy more success and expand their business. There are also vendors who dream of being able to operate their businesses with the proper permit and licenses required. The fifth most common response of all vendors surveyed was some variation of wanting to own a permit or the opportunity to get a license. For many, this would alleviate the burden of renting permits which would be a profound impact to their business and livelihoods.

Vendors Who are U.S. Military Veterans

Vendors who are U.S. military veterans are faced with a different set of circumstances and regulations than other vendors, so this report considers them separately from the analysis of other vendors. Veterans are not subject to the cap on licenses for general merchandise vendors, for example, and veterans who are disabled can get permits for mobile food vending outside city parks. There are 1,069 veterans of the U.S. military with active licenses as general vendors, according to a recent report from the Independent Budget Office, as well as a smaller number with food vendor permits.⁹

The Street Vendor Project survey gives some key insights into veterans who work as street vendors.

VENDORS WHO ARE MILITARY VETERANS ARE MOSTLY U.S.-BORN

Country of Birth	
United States	70%
Other Countries	30%

The majority of veterans who are vendors were born in the United States—70 percent overall, including seven percent who were born in Puerto Rico.

A significant majority, however, are U.S. military veterans who were born in other countries: Senegal, Guatemala, Ecuador, Bangladesh, Ghana, China, and many other countries.

THE LARGE MAJORITY ARE MEN

Female	13%
Male	87%

The large majority of vendors who are military veterans identify as men—87 percent of the total. Women are also military veterans, and also become street vendors, but not to nearly the same degree.

VETERANS ARE MOSTLY BLACK OR LATINX

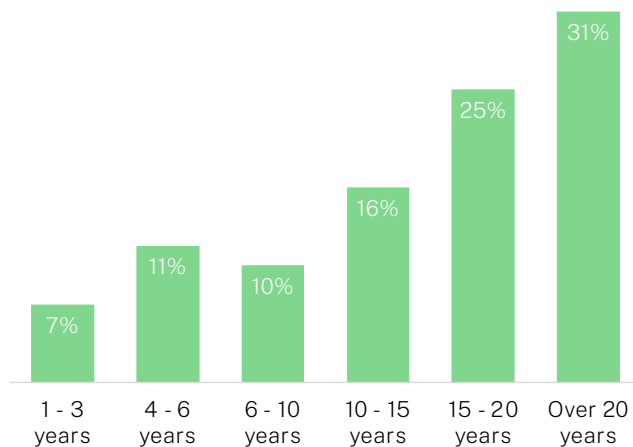
Black or African American	59%
Hispanic or Latino/a/x	25%
White	10%
East Asian	3%
American Indian or Alaska Native	2%
Southeast Asian or Indian Subcontinent	2%
Total	100%

The majority of veterans who are vendors identify primarily as Black or African American—59 percent of the total. Another 25 percent identify as Latinx, and 10 percent identify as white.

MOST VETERANS ARE GENERAL MERCHANDISE VENDORS

General Merchandise Vendor	66%
Mobile Food Vendor	31%
1st Amendment Vendor	3%
Total	100%

Two thirds of vendors who are veterans sell general merchandise, and almost all of the remaining third are mobile food vendors. A few also work as 1st Amendment Vendors, selling artwork or political buttons, for example.

MOST VENDORS WHO ARE VETERANS HAVE BEEN SELLING FOR 15 YEARS OR MORE

Every year there are some veterans who are new to vending. Seven percent have been vending for three years or less. But the majority of veterans who are vendors have been at the job for 15 years or more. Fully 56 percent have been selling for 15 years or more, including 25 percent selling for 15 to 20 years, and 31 percent selling for over 20 years.

Conclusion

The street vendors of New York are an exceptionally diverse group of entrepreneurs that have settled in New York from every corner of the world. Their small businesses offer goods and foods that are fast, convenient, and affordable. New Yorkers and visitors alike cherish the offerings of fashions and flavors that are typical of New York and from around the world.

Before this survey was undertaken much about these business owners was unknown. We now have an empirically grounded, large-scale survey that gives detailed insight into who vendors are and how they work and live.

This incredible diversity is a testament to the economic opportunity that this industry offers to immigrants and the City of New York that provides the setting for these communities as they establish roots and settle in America, and in the process add to the street life of the city.

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Methodology

This analysis was conducted in three parts: survey data collection by the Street Vendor Project, construction of statistical weights by Jonathan Auerbach so that the survey data reflect the population of street vendors in New York City, and analysis of the characteristics of street vendors, and writing of the report, by Immigration Research Initiative.

In 2021, the Street Vendor Project conducted a large-scale survey of vendors. The survey was administered in English, Spanish, Bangla, Wolof, Arabic, Mandarin, French, Cantonese, and Tibetan from January 2021 through November 2021, while distributing Coronavirus relief aid in 2021. The aid, provided by Robin Hood and Morgan Stanley, was a one-time payment of \$1,000, available to any individual who owned, operated, or was otherwise employed by a street vending business in New York City between 2020 and 2021, including food, merchandise and first amendment vendors. There were no limits based on the size of the business, the number of sales, whether licensed and/or permitted, and there was no requirement to be a member of the Street Vendor Project. All individuals eligible for aid were invited to complete a survey. SVP found aid-eligible individuals through membership lists, referrals, and canvassing operations in which SVP affiliates visited neighborhoods.

The survey was undertaken during the height of the COVID-19 pandemic and included both vendors who were actively vending and those who were not vending during that time. It includes both members of the Street Vendor Project and non-members, different types of vendors, and different geographic areas. This survey is broadly representative. The Street Vendor Project made substantial efforts to get aid to as many vendors as possible and trust in the project made it possible to break through many barriers that might make surveying this population challenging.

SVP then turned the raw data over to Immigration Research Initiative for an independent analysis. The first step of this analysis involved working with Professor Auerbach, who combined the survey data collected with administrative data in New York City government records to construct statistical weights and estimate the total number of street vendors in New York City. Since the survey includes questions about whether or not vendors have a license or permit, and New York City government counts how many people have licenses or permits, Professor Auerbach used ratio estimation, a common statistical technique, to project how many vendors there are in total. Details of Professor Auerbach's analysis are available in a research paper, "[Estimating the Number of Street Vendors in New York City](#)."¹⁰

Immigration Research Initiative used the same data set to analyze the characteristics of vendors. Where mobile food vendors and general merchandise vendors are combined, the statistical weights developed by Professor Auerbach were used to combine the two groups and give an overall number. In addition to the work with Professor Auerbach, the overall project benefitted from the significant input of Debipriya Chatterjee, senior economist, and Irene Lew, former analyst, at the Community Service Society.

The survey was undertaken during the height of the covid pandemic and included both vendors who were actively vending and those who were not vending during that time. It includes both members of

the Street Vendor Project and non-members, different types of vendors, and different geographic areas. This survey is broadly representative. The Street Vendor Project made substantial efforts to get aid to as many vendors as possible, and trust in the project made it possible to break through many barriers that might make surveying this population challenging.

Endnotes

¹ Dick M. Carpenter II, Upwardly Mobile: Street Vending and the American Dream, Institute for Justice, October 6, 2015, <https://ij.org/report/upwardly-mobile/>

²Previous analyses of street vendors and their economic impact in New York City include “Fiscal Impact of Eliminating Street Vendor Permit Caps in New York City,” by the New York City Independent Budget Office, available at https://ibo.nyc.ny.us/iboreports/Fiscal_Impact_of_Eliminating_Street_Vendor_Permit_Caps_Jan2024.pdf. And, for a more national overview, “Upwardly Mobile,” by Dick M. Carpenter II, published by the Institute for Justice, <https://ij.org/wp-content/uploads/2015/10/upwardly-mobile-web-final.pdf> “Upwardly Mobile” references about 17,000 vendors and people who work for vendors in New York City in 2016, an estimate based primarily on interviews and rough extrapolation from New York City data sources. The Independent Budget Office report writes “Though the number of street vendors in the City is unknown, some estimates suggest the total number of active vendors in the City may near or exceed 20,000.”

³ Jonathan Auerbach, “Estimating the Number of Street Vendors in New York City,” available at https://jauerbach.github.io/research/auerbach_vendor_2024.pdf.

⁴ For discussions of the barriers to entry for street vending, other than licensing or permitting, see Lacey Sigmon, “Advocating for Equitable Street Vending Policies,” *Progressive City*, or Joseph Pileri, “Who Gets to Make a Living? Street Vending in America,” *Georgetown Immigration Law Journal*, 2021, volume 1.

⁵ See Frank Lombardi, “Vendors Signed on Bill to Ban Immig Probe,” *New York Daily News*, July 12 2005, <https://www.nydailynews.com/2005/07/12/vendors-sold-on-bloomberg-signs-bill-to-ban-immig-probe/>

⁶ For more on the role of women in street vending, and the added challenges they face, see “Vulnerable in Itself: Results and Recommendations from a Study of Women Street Vendors in New York City, October 2019, Urban Justice Center, <https://www.scribd.com/document/432317126/Vulnerable-in-Itself>.

⁷ See the Independent Budget Office report, or also Mahsa Saidi, “Over 10,000 Applicants are Waiting for NYC Street Vendor Permits,” CBS News, June 7, 2024. <https://www.cbsnews.com/newyork/news/nyc-street-vendor-permits/>

⁸ World Economic Forum, Welcome to the Language Capital of the World: Queens, New York, February 2017. Available here: <https://www.weforum.org/agenda/2017/02/queens-in-new-york-has-more-languages-than-anywhere-in-the-world/>

⁹ Fiscal Impact of Eliminating Street Vendor Permit Caps in New York City, p. 4.

¹⁰ Jonathan Auerbach, “Estimating the Number of Street Vendors in New York City.”

STREET VENDOR PROJECT



ABOUT THE STREET VENDOR PROJECT

The Street Vendor Project (SVP) is a membership-based organization that champions the rights of street vendors as small businesses to earn a living and contribute to the culture and life of New York City. We strive to expand vending as a viable, lawful employment option for immigrants and other entrepreneurs. Through direct legal representation, small business training, organizing support, leadership development, and strategic legislative advocacy, SVP builds power and community among vendors.

Language access is ingrained in every aspect of our work, and our staff hold capacity in the seven most common languages spoken within the vending community: Arabic, Bengali, Mandarin, Spanish, Wolof, French, and English. Founded in 2001, SVP is a part of the Urban Justice Center, a nonprofit organization that provides advocacy and legal services to groups of marginalized New Yorkers.

OUR MEMBERS

Street vendors are NYC's smallest businesses and are primarily immigrants, people of color, military veterans, and women who sell food and merchandise from the city's streets and sidewalks. While vending is a vital part of our city's culture and economy, complex laws regulating street vending force most vendors to work without authorization and face arbitrary harassment by law enforcement.

For many, vending is a form of survival work as families have struggled to make ends meet in the aftermath of the COVID-19 pandemic, and as new New Yorkers seeking asylum turn to vending as they establish roots. The growth in the vending population has led to a 30% increase in SVP's membership in since 2021, hastening the need for an equitable economic development strategy that grows from the bottom up. Facing harsh enforcement in 2025, vendors are a particularly vulnerable population in urgent need of culturally resonant services and advocacy.



OUR 2024 IMPACT

COMMUNITY ENGAGEMENT

- 144: Number of zip codes we serve
- 703: Vendors engaged through street outreach
- 660: Individual consultations on topics including creating bank accounts, social media promotion, menu development, and business compliance

FINANCIAL EMPOWERMENT

- \$15,544.00: Amount vendors saved in fines with SVP's support
- 124: Vendors assisted with sales tax filing
- 47: Vendors supported to complete licensing applications
- 41: SVP members connected to catering opportunities
- 14%: Average growth in annual income for participants in catering program

MEMBERSHIP DEMOGRAPHICS

- 3000+: SVP members
- 96%: SVP members are immigrants
- 59%: SVP members are female

STREET VENDOR PROJECT

SMALL BUSINESS EMPOWERMENT PROGRAM

Since 2020, the Street Vendor Project (SVP) has been providing targeted, individualized small business services to vendors in seven languages as part of our Small Business Empowerment Program. This program provides vendors with the skills, tools, and resources to grow their businesses, focusing on business compliance, connections to e-payment systems, and marketing. In FY24 alone, we consulted with over 700 street vendors, advising them on street vending rules and regulations, saving each vendor an estimated average of \$800 a year, and assisted 47 vendors to apply for or renew Mobile Food Vendor licenses and permits, saving each vendor \$1000 in fines.



HIRE A VENDOR CATERING PROGRAM

In 2024, building on the high demand for these services among our members, SVP launched the Hire a Vendor Program to create diverse income sources for vendors through training and connections to catering opportunities. Through this holistic program, vendors learn to create menus and price lists, develop skills to cater large events, and project management. SVP also negotiates fair contracts for vendors and provides translation services between vendors and clients. Participating vendors earned an average of \$1,263 per event, for an average hourly income of \$315, increasing their annual income by an average of 14%.



SUCCESS STORIES

Ana Maldonado used to sell tamales from a shopping cart in Corona, Queens. In 2021, SVP supported Ana to access the NYS Excluded Workers Fund, which she used to purchase her own food truck. Since then, SVP has supported Ana to receive her Mobile Food Vendor license, set up e-payments and use social media marketing. In 2024 SVP connected Ana to four catering opportunities and negotiated and translated contracts from English to Spanish. Thanks to the popularity of Ana's tamales at these events, she now regularly receives direct catering requests.

MD Maruf Hossain runs a Bangladeshi halal cart in Manhattan's Financial District. During the pandemic, he was particularly hard hit because his clientele transitioned to remote work, forcing him to lay off his employees. In 2024, SVP connected MD Maruf to cater weekly events at MoMA PS1. Through the process, SVP taught MD Maruf to use e-payment systems, developed menu pricing with him, helped him to develop techniques for managing long lines of customers, and navigated and translated event contracts from English to Bangla.

CONCLUSION

Street vendors are an essential part of New York City's culture and economy, yet they have suffered longstanding exclusion from city services. When street vendors grow their businesses, they create jobs as well as financial stability for their families and reinvest in the local economy. Through the Small Business Empowerment and Hire a Vendor Programs, SVP is bringing our city's smallest business owners out of the shadows and helping them to integrate into the formal economy, build wealth, and thrive.

HISTORIC ADVOCACY VICTORIES

SVP has a deep history of collectively organizing with our members for strategic legislative change. In 2021, we won a historic campaign to reform the vending system for the first time in almost 40 years by passing **Local Law 18 of 2021**, lifting the cap on street vending permits and creating a civilian oversight agency. We have since successfully pressured the Dept. of Health to Implement the rollout of the new supervisory licenses to vendors.

As a co-founder and steering committee member of the **Fund Excluded Workers** coalition, SVP led a hard-hitting campaign to create the Excluded Workers Fund in 2021, a first-in-the-nation \$2.1 billion fund for New Yorkers Excluded from relief due to the nature of their work or immigration status.

PROGRAMS

Environmental Justice for Vendors, By Vendors: A vendor-led initiative to reduce the carbon footprint of New York City's food carts and trucks and support vendor health by exploring and testing alternatives to the harmful gasoline generators that most vendors use to power their food carts.

Small Business Empowerment Program: A holistic approach to small business development for vendors, providing them with the tools, resources, and skills needed to grow their businesses, including business compliance training, assistance with setting up bank accounts, e-payments, and using social media to market their businesses.

Hire a Vendor Program: Connecting vendors with opportunities to cater events across the city, supporting vendors to diversify their skillsets and experiences while connecting with New Yorkers in new ways.

Legal Services: Robust legal services to empower our member vendors to assert and defend their rights as workers in public space including providing advice and consultation on vending regulations, representing vendors in court for alleged vending violations, providing sales tax assistance, and assisting with license and permit renewals.

ORGANIZING

Street Vendor Reform Campaign: In 2024, we introduced four new pieces of legislation to the NYC Council that would reform and bring equity to the vending system by (1) Ensuring all vendors have access to business licensing; (2) Offering services for street vendors at NYC Small Business Services; (3) Repealing criminal liability for street vending; and (4) Establishing more legal locations for vending. These key demands were identified and voted on by our membership, who are leading the campaign alongside the NYC Street Vendor Justice Coalition, a group of organizations representing small businesses, public space, labor and immigrant rights advocates.

Leadership Development: SVP invests in the leadership development of our members as advocates and peer educators in their communities by holding quarterly skills-building and political education trainings at our monthly General Membership meetings, which are simultaneously translated into seven languages.

URBAN
JUSTICE
CENTER

Street
Vendor
Project



MEMBER TESTIMONIALS

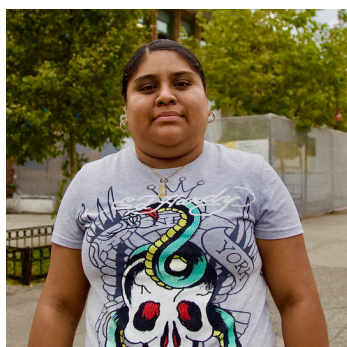


SAMYA ESKANDAR

I have been a food vendor since 2007 in different areas including Queens and Manhattan. Over the years I participated in many SVP campaigns, both big and small. With determination and hard work, we achieved successes like reducing fines from \$1000 to \$500, making supervisory permits available, and even removing planters blocking several vendors' spots. I'm a member of SVP because I want to continue this fight with you.

MOHAMMAD BISWAS

I am a general merchandise vendor in Jackson Heights. I have been working as a street vendor since 2018. I took over my dad's business because he could not work on the streets as he was getting older. My dad was always a big supporter of the Street Vendor Project and wanted to help as much as possible to help our community receive business licensing. I am a member of SVP because I want to continue my dad's dream to change this system for the better.

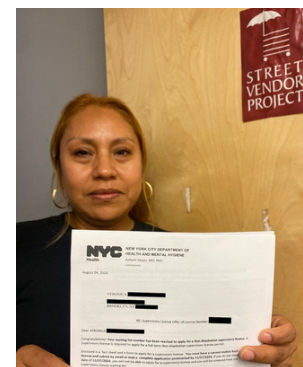


GUADALUPE SOSA

I sell piraguas (shaved ice), aguas frescas, cut fruit, and seasonal arrangements in East Harlem, Manhattan. I've been a street vendor for 11 years now. I'm a member of the Street Vendor Project because I want to be involved in decision making, planning, and strategizing on how to make our voices heard as vendors. I think the campaign to reform street vending is great and I have very high hopes that we will win it.

VERONICA GALICIA

The Small Business Program has helped me by applying for my permit and accompanying me to the licensing center and cart manufacturer. SVP's lawyer made the process much easier for me, telling me what documents I needed. By participating in catering events, I learned how to promote my business to new clientele, and coordinate travel and logistics more effectively. SVP and the Small Business Program have helped me by being aware of my rights as a vendor. I feel more confident when defending myself.



RECENT PRESS

"Migrant Vendors Park Carts as their American Dreams Slip Away," The City, 1/31/2025

"A Push to Help Street Vendors Leave the Shadows," New York Times, 2/28/2025

"New Report Provides the First Comprehensive Data on New York City's Iconic Street Vendors," Bronx Daily, 9/17/2024

"Street Vendors Rally for Protection and Resources to Work" Spectrum News/NY1, August 15, 2024

Contact: Rachel Aimee, Development Director
RAimee@urbanjustice.org, 646-923-8395

40 Rector Street, 9th Floor | New York, NY | 10006

MYTHS vs FACTS

STREET VENDOR REFORM

There is a strict system of street vending regulation - the issue is that no one can enter that system, and so operate outside of it. We're advocating for the Street Vendor Reform Package, sensible legislation to regulate the shared sidewalk spaces we all deserve to access. This will overhaul the dysfunctional status quo, and maintain a regulated, predictable, enforceable system that serves all New Yorkers.

As NYC's smallest yet most visible businesses, there are plenty of myths about this workforce of primarily immigrant entrepreneurs. Let's clear them up!



MYTH

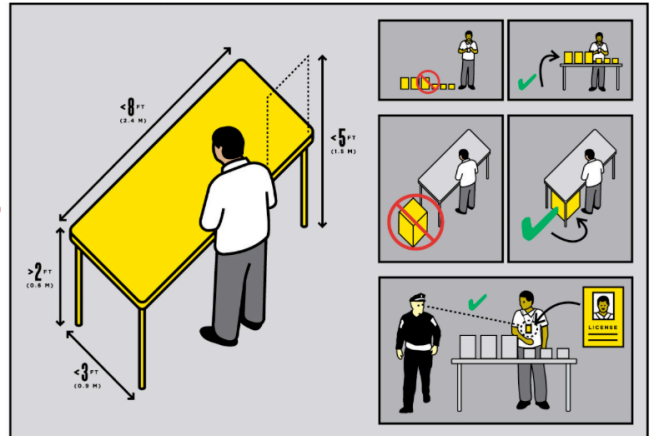
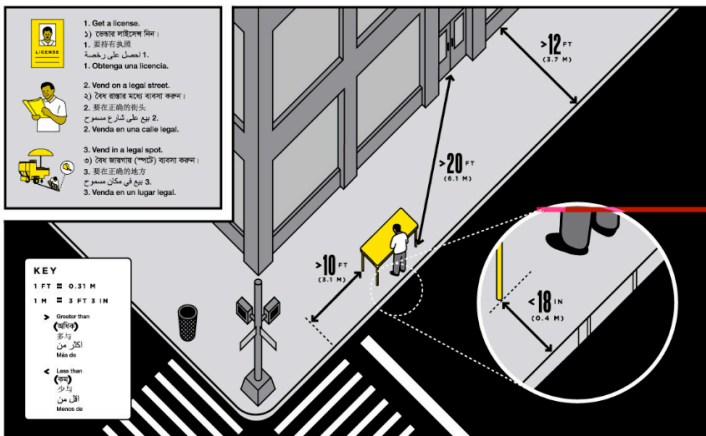
Street vendors don't have to follow any rules



FACT

Licensed vendors must follow strict siting rules & regulations for the time and place in which they operate. Vendors may only work

on sidewalks 12 ft or wider (less than 20% of sidewalks); must be 10 ft from crosswalks, subway entrances, and driveways; 20 ft from a building entrance; and cannot operate in bus stops, taxi stands, or hospital no standing zones. One inch off and vendors face fines and potential permit revocation for repeat violations.



MYTH

Vendors don't pay taxes, fees or overhead



FACT

Vendors, like any other businesses, have business expenses that match the scale of their revenues, paying more than \$71.2 million in city, state, and federal taxes annually. Vendors must pay:

- Parking rental fees at commissary kitchens and garages (\$500-\$2000/month)
- Sales and income tax
- Employee salaries, workers compensation & disability insurance
- Licensing & permitting fees
- Utilities including electricity & gasoline to run generator
- Water usage & trash disposal
- Travel expenses for cart & supply delivery
- Cart repair and maintenance



MYTH

Vendors steal business from brick & mortar



FACT

There are frequent claims that brick-and-mortar small business owners face “unfair” and “direct” competition from nearby street vendors. However, on the contrary, they provide essential services and products that complement their neighborhoods, increase foot traffic, and serve community needs. In areas with Green Carts vendors, **fresh produce sold in all businesses like bodegas was proven to actually increase by 20%** (Source: Politico, “How Mike Bloomberg Got New York to Eat Its Veggies”)



MYTH

Having more licenses will open the flood gates, vendors will be everywhere



FACT

There are an estimated 23,000 currently operating in NYC. Reporting by Immigration Research Initiative shows **75% of food vendors and 37% of merchandise vendors currently operating do not have business licensing**. Creating an accessible licensing regime will ensure that vendors become licensed legitimate businesses, and must follow siting rules to maintain their permitting.



MYTH

Vendors don't want to follow the rules



FACT

NYC's outdated licensing caps force vendors to operate in a legal grey area just to make an honest living. There are only 853 license for merchandise vendors, and ~6,000 permits for food vendors.

To survive, many vendors pay exorbitant fees to rent permits through an underground market. Others vend without a permit, risking \$1,000 fines that amount to the entire weekly sales of a typical vendor. There's waitlists of nearly 20,000 for licenses – waitlists that have been closed since 2016/2017. **When vendors receive their business licenses they tend to follow all the rules to keep their license in a good standing status.**



MYTH

There's not enough enforcement on vendors



FACT

Street vending is one of the most enforced industries in NYC, and enforcement is overseen by DSNY, NYPD, Parks Department, DOHMH, and DCWP. In fact, the number of NYPD tickets in 2024 was five times higher than in 2019 (pre-pandemic). In total, the NYPD issued 9,376 tickets to vendors in 2024. Like the NYPD, the DSNY also increased the number of tickets issued to vendors in 2024, doling out 4,144 tickets, and issuing 4,323 confiscations.



Street
Vendor
Project

**NYC City Council Committee on Consumer and Worker Protection
May 6, 2025**

Testimony of Matthew Shapiro, Esq.
Legal Director, Street Vendor Project at the Urban Justice Center

Hello, my name is Matthew Shapiro and I am the legal director of the Street Vendor Project at the Urban Justice Center. The Street Vendor Project (SVP) is a membership-based organization of over 3,000 street vendors who work in NYC's public spaces. These include a large community of immigrant vendors as well as native-born and veteran street vendors. We organize vendors to have their voices heard when it comes to policies that affect them, as well as provide legal and small business services to maintain and grow their businesses.

We are here today to talk about economic justice and relief for the 23,000 vendor-small business owners who are currently selling food and merchandise in our public spaces, serving New Yorkers and visitors alike. Eighty one percent of all vendors use vending as their primary source of income. The problem, as you well know, is that there is currently almost no legal pathway for vendors to formalize their business and obtain the required licenses and permits to operate.

In 1979 and 1983 the number of food vendor permits and general vendor license was capped with a modest additional amount of only food vendor permits being released every year due to the passage of Local Law 18 in 2021. However, every week, vendors come into our office either asking how they can get a license and permit to sell food or merchandise, or they come with multiple \$1,000 tickets because they took a risk selling tacos, ice cream, or cut mangos to support their family. These high fines are in addition to having their food seized and disposed of by the NYPD or Department of Sanitation. 800,000 pounds of food from vendors was seized by DSNY in 2024 alone.

Vendors cannot even get on a waiting list for a license which has thousands of names and is also closed. Intro 431 is the solution. Gradually increasing the number of licenses available for a multi-year period will allow those vendors who are currently working to formalize their business and work legally.

Some who oppose this legislation may say this will "open the floodgates" with "vendors everywhere." Quite the opposite. By giving vendors a license and permit, compliance with the

numerous sidewalk placement laws will increase since vendors now have “skin in the game” and an incentive to have a legal business (without fear of \$1000 fines and property confiscation) while following reasonable rules. There simply cannot be “unlimited” vending in New York City since 80% of New York City sidewalks are less than 12 feet wide and are therefore restricted for vending. Also, there are numerous restricted streets and sidewalk placement rules that, when fairly enforced, will ensure that vendors keep adequate clearance from crosswalks, bus stops, taxi stands, and brick-and-mortar entrances.

Street vending has been an economic pathway for small businesses since New York City was founded. For far too long the City has placed insurmountable barriers for vending, instead prioritizing strict enforcement and criminalization. It is time for the City to allow vendors to formalize. Vendors, brick-and-mortars, and all New Yorkers will be better off.



Testimony to the New York City Council City Council

Committee on Consumer and Worker Protection

Mohamed Attia

Managing Director, Street Vendor Project at the Urban Justice Center

May 6th, 2025

Good afternoon. My name is Mohamed Attia, I am the Managing Director of the Street Vendor Project. I would like to thank Chair Menin and the Committee for the opportunity to testify today.

The Street Vendor Project (SVP) is a membership-based organization with more than 3,000 vendor members. We strive to support street vendors across the 5 boroughs by providing direct services such as small business consultations, legal representation and access to a wide variety of resources. We also organize to build power to the vendor community across the city and ensure that their voices are heard, and they have a seat at the table when policies and rules are being developed that will impact their livelihoods. Vast majority of our members are immigrants who hail from across the globe. Given the diversity of our membership, our services are offered in 7 different languages, Arabic, Bangla, English, French, Mandarin, Spanish and Wolof, thanks to the diversity of our small team.

Street vending in NYC has a long history, as the smallest model of small businesses. When you read the city's history, you learn that this industry served your ancestors when they came here without any means to survive or make a living. Street vending was one of the platforms that allowed them to not only survive but also thrive.

In the 1600s people sold oysters in the city's streets. In the 1800s the first pushcart market was created by Jewish immigrants from East Europe in Hester Street in the Lower East Side, thousands of immigrants and minorities coming to the city followed suit to make a living, thrive in our city and live the American Dream.

When we think of street vendors, we think of Russ and Daughters, Macy's, Nathan's, the Halal Guys and other big and small business names. We think of the American Dream. We think of families moving up the economic ladder, sending their kids to college so they can have a better future, becoming community leaders and elected officials, while serving their communities and providing affordable products and services.

We're here today to discuss a topic that has been neglected for almost half a century, a topic that the city government has been trying to address with the minimal effort and the least interest to resolve.

The topic is the inadequate street vending system.

For decades now, the street vending system has been set up to fail everyone. Not only to fail vendors, but to fail New Yorkers, residents and customers, other small businesses, such as the brick-and-mortar, even the enforcement agencies.

We hear it over and over again, it's not working for anyone, yet not everyone wants to do the hard work to actually fix this system and make it work once and for all.

Nothing is more cruel, disingenuous, or pathetic, than sending enforcement officials to crack down on hardworking people and ask them to follow the law, while these people are not allowed by the government to be in compliance with the law.

Some groups, elected officials, enforcement agents or others like to blame the vendors for the City's failure. They blame the vendors for not having the appropriate business license, despite the fact that vendors have been asking the city to offer them these licenses for many years.

It's the job of the City Council to change the local laws and make these licenses available, make the whole system work, so vendors can actually follow the law.

It's ridiculous to prevent people from following the law, while they want to.

This legislation, intro 431, is a huge step forward to address this dilemma that vendors and New Yorkers are dealing with. This legislation is desperately needed for our city, so we can finally address the most challenging obstacle in the vending system.

Creating licenses and permits for all vendors means creating opportunities for the vendors who are out there in our streets running their businesses and creating incentives for these small businesses to be in compliance with the law.

For decades, the city has been trying to target vendors with nothing but heavy enforcement, and it hasn't worked!

Constant enforcement of the inequitable laws means nothing but keeping these communities in a vicious circle of poverty. They can't survive, and they're not allowed to follow the law.

Everybody is losing, we're losing on creating opportunities, creating thousands of jobs, generating hundreds of millions of dollars in the local economy, and millions more in taxes.

Today, you'll hear from some groups who will articulate their complaints very well, some of them have a PHD in complaining about vendors. But none of them is interested in finding real solutions. They're all about enforcing the unfair nonsense laws that exist right now.

And we have seen how ineffective enforcement is, as long as the system isn't working.

Others would encourage you to take sides, and not support vendors as they compete with the brick and mortar businesses. I would ask you to seriously think about this. Is this actually the government's job to regulate based on competition and favor one group of businesses over the other? Legally speaking, this isn't allowed.

This bill offers a different approach; it offers a solution to one of the most complex issues for the smallest businesses in our city. It offers a chance for the system to finally work, hopefully for everyone.

The millions of New Yorkers who rely on vendors everyday deserve a fair system, residents of the city deserve a functioning system, even enforcement officers deserve a predictable enforceable system, even the opposition groups deserve a reasonable system that encourages compliance and order, and off course, the vendors deserve a fair chance and opportunities to operate their businesses without fear of displacement, or being targeted.

Some folks are under the illusion that this bill will add more vendors to our city's streets, however, the fact is in our city 75% of food vendors are operating without the permit, and 37% of merchandise vendors operate without the license.

This bill will not add more vendors to our city, it will actually formalize the existing vending businesses, it will create thousands of jobs, it will generate millions of dollars in the local economy and in taxes to all levels of government.

As shown in a recent report issued by the Independent Budget Office, the fiscal impact of offering licenses to everybody on the waiting list will be a net positive of \$59 Million.

After the passage of Local Law 18 of the year 2021, and after 3 years of full implementation, we learned that the number of new permits created isn't enough, as there are 10,000 people waiting for the new 4,000 permits. Also, the roll out has been extremely slow, as we're seeing an uptake of roughly 30% of the newly created Supervisory Licenses applications made available, actually being completed by vendors.

The bottle-neck here is the waitlist, that is slowing down the entire process and getting in the way of vendors to access the business licenses they need to formalize their businesses in a timely manner.

Also, I would like to thank Majority Leader Farias, for introducing intro 1251, a legislation that will ensure that DOHMH is offering the Supervisory Licenses and permits to vendors in a timely manner, and ensure that these opportunities are made available. Moving this bill in tandem with intro 431 will ensure that DOHMH is required to follow through offering the licenses available for vendors.

This year, this City Council has the opportunity to make a real difference. A real change. You have the opportunity to make things work.

By passing this bill, and the rest of the Street Vendor Reform Package (intros 431, 408, 47 & 24) you will ensure that we have a functioning system for our smallest businesses.

Thank you for receiving my testimony. I'm happy to answer any questions you may have.



**Testimony to the New York City Council
Committee on Consumer and Worker Protection
Regarding Intro 408 & Intro 431
May 6, 2025**

Good afternoon, Chair Menin, and esteemed members of the Committee. My name is **David DeVaughn** and I am the **Founder and Managing Principal of StrivEquity Consulting LLC**, a racial equity consulting firm focused on leadership development, systems change, and organizational strategy. Thank you for the opportunity to testify in staunch support of Intro 431 and Intro 408.

Standing Against Xenophobia and Racist Tropes

In the current political climate, we are witnessing a disturbing trend where brick-and-mortar businesses and landlords, with the backing of xenophobic and anti-immigrant sentiment, are attempting to leverage racist tropes to silence vendors and their allies. These forces seek to weaponize the language of “quality of life” to marginalize street vendors—often immigrants and people of color—who have long been integral to New York’s economic and cultural fabric.

By framing vendors as threats to public safety or cleanliness, these campaigns promote a dangerous narrative that treats our streetscape as if it were a highly manicured lawn, devoid of community life and diversity. This view signals prestige and exclusivity at the expense of the hardworking people who sustain our local economies, especially immigrants. It is an effort to disguise a lack of moral integrity and decency in business practices, replacing inclusive, people-centered policies with exclusionary tactics rooted in racial bias.

At StrivEquity, we believe this framing is both harmful and unjust, and we firmly stand against these efforts to criminalize and marginalize the most vulnerable New Yorkers. Instead, we support policies that recognize the vital economic and cultural contributions of street vendors and that offer equitable, sustainable, and community-driven solutions.

Deep Roots in the Street Vendor Justice Movement

My relationship with the Street Vendor Project (SVP) spans more than a decade. I proudly served on SVP’s Advisory Board from 2014 to 2017 and have remained an active partner since. Through my work, I’ve facilitated pro bono consulting to support policy and communications strategy for key initiatives like Raise the Caps, and the economic impact analysis that underpinned the campaign. Most recently, former colleagues and I collaborated with SVP on the Environmental Justice for Vendors by Vendors (EJVV) initiative—an innovative community-based research and advocacy project led by vendors themselves.

EJVV centers the experiences of street vendors as environmental justice leaders, those navigating climate vulnerability, long shifts in extreme heat, and urban design policies that neglect their safety. By organizing vendor-led climate storytelling, heat mapping, and advocacy, the project redefines who environmental expertise belongs to. It is exactly the kind of intersectional, community-rooted policy making our city needs more of.



Why StrivEquity Supports This Legislation

StrivEquity's mission is to equip leaders, especially those from historically marginalized communities—with the tools, relationships, and systemic leverage they need to thrive. The legislation before you today align with that mission.

- Intro 431 corrects the arbitrary and exclusionary cap system that has kept thousands of hardworking New Yorkers—many of them immigrants and women of color—from obtaining legal vendor permits. Legalization is not just a technical fix—it is a matter of dignity and access.
- Intro 408 takes the next necessary step: ensuring vendors have the infrastructure of support every business deserves. A dedicated Office of Street Vendor Services within SBS would give our city's smallest businesses access to regulatory guidance, training, and long-term capacity-building—not just tickets and fines.

Street Vending Is a Matter of Racial, Gender, Immigrant, and Environmental Justice

- **Women Vendors:** Women make up nearly half of all vendors but hold a disproportionately small share of permits. This legislation creates a fairer playing field and expands economic opportunity for women entrepreneurs.
- **Immigrant Protection:** Criminalization of vendors puts immigrant New Yorkers at heightened risk of ICE enforcement. By removing NYPD from vendor enforcement and investing in support structures, we reduce the criminal-legal exposure that too often leads to family separation.
- **Environmental Justice:** Vendors are front-line workers in the climate crisis—braving urban heat islands, lack of shade, and polluted air while supporting local economies. We must pass policies that not only legalize their work but also recognize and invest in their safety and wellbeing.
- **Fiscal Equity:** According to the Independent Budget Office, expanding permits could generate a net fiscal impact of \$59 million for the city—while bringing regulation, transparency, and fairness to our sidewalks.

Closing

For too long, street vendors have endured a system that extracts their labor while denying them protection, legitimacy, and support. The Council now has an opportunity to flip that paradigm. As someone who has collaborated with vendors for over a decade—as a board member, consultant, and collaborator—I urge you to pass Intros 431 and 408 as part of the Street Vendor Reform legislative package.

Thank you again for your leadership and for this opportunity to testify.

Sincerely,

David DeVaughn

Founder & Managing Principal
StrivEquity Consulting LLC

Business Office Location Address
STRIVEQUITY CONSULTING LLC
34-18 Northern Blvd
Long Island City, NY 11101





**New York City Council
Committee on Consumer and Worker Protection**

Tuesday May 6, 2025

**Brian McGinn, Vice President, Security
34th Street Partnership and Bryant Park Corporation**

Good afternoon, ladies and gentlemen of the council. I stand before you today on behalf of the 34th Street Partnership and Bryant Park Corporation, two business improvement districts in Midtown, in support of the BID Association's positions on Intros 408, 431, 1164, and 1251.

In the 34th Street District, which spans from 29th Street to 35th Street and from Park Avenue to 10th Avenue, we regularly observe both licensed vendors operating in prohibited areas and unlicensed vendors working illegally. Together, they pose a serious threat to pedestrian safety and quality of life in public spaces.

The most common complaint we hear from property owners is that vendors block storefronts and obstruct the pedestrian right of way on already crowded sidewalks. Even licensed vendors frequently ignore restrictions on where and when they are allowed to operate.

Our security staff works hard to protect pedestrians when vendors behave dangerously. In an alarming incident last year, a licensed vendor illegally operating in our district threatened one of our security guards with a knife.

We are deeply concerned that expanding the number of vending licenses, or eliminating the cap entirely, would have an immediate, harmful effect on pedestrian safety and quality of life in Midtown and across the city.



May 5, 2025

Dear Committee on Consumer and Worker Protection,

The Belmont Business Improvement District (BID) is dedicated to promoting and expanding the economic vitality of the Real Little Italy of The Bronx – a business and cultural gem that has defined our community for over a century. Through strong partnerships and unwavering local engagement, our nonprofit organization supports the thriving commercial district of Belmont. I write today in strong opposition to Int 0431-2024 and Int 0408-2024. Int 0431-2024, which proposes to increase the number of food and vendor supervisory licenses and general vendor licenses available over the next five years and ultimately lift the cap altogether poses serious risks to the health of small businesses across New York City. Int 0408-2024, which would create a Division of Street Vendor Assistance within the Department of Small Business Services (SBS) threatens to further the already deep divide between small businesses and street vendors, and take away resources from small businesses that contribute significantly to the City's economy.

Small businesses form the backbone of our neighborhoods and make up the fabric of their unique communities. They employ a local workforce, pay taxes, insurance, and regulatory fees. Yet, it's becoming harder and harder to own and operate a business in New York City. Brick-and-mortar businesses face mounting challenges including rising operational costs, strict regulatory and inspection burdens, inflation, competition from e-commerce and large retailers, and a slow recovery from the COVID-19 pandemic.

Street vendors, while part of the city's broader economy, do not face the same overhead, regulatory scrutiny, or enforcement of health, safety, and siting standards as brick-and-mortar businesses. Adding an influx of street vendors creates an uneven playing field and threatens the viability of small businesses already operating on thin margins. We do not want to see a future where small businesses are forced to shutter while tens of thousands of street vendors operate freely, often times ignoring the important rules of the city.

Regulations for street vendors are inconsistent and confusing, and have not addressed the underlying need for a comprehensive and fair plan that balances the needs of all stakeholders. In our commercial district, we've observed firsthand how vendors obstruct and clog sidewalks and streets, create unsanitary conditions, sell food directly in front of food service establishments (Exhibit 1, pictured below), and not follow siting regulations (Exhibit 2, pictured below). Further, vendor set ups, and/or their personal vehicles, take up essential parking spaces in our community (Exhibit 3 & 4, pictured below). Our commercial district engages with several million customers a year, over 80% of whom drive from between 10 and 40 miles away, generating millions of dollars in economic activity to the neighborhood and for the city. Access to parking availability is essential to our commercial ecosystem.

On Fordham Road, vendors routinely block the bus lane with their personal vehicles to access additional merchandise for re-stocking purposes. This slows down bus speeds and hinders transit efficiency, something the City Administration has been adamant about improving. Adding more vendors will create further congestion in similar areas that are equally important to be kept clear.

The Belmont BID is concerned the city lacks the resources and enforcement capacity to manage an increasing number of vendors over the next five years, let alone an unlimited number of licensees thereafter. A system that is already overwhelmed, with enforcement being shuttled from one agency to the next, cannot support the growth proposed as part of this bill. Licensing efforts with the best of intentions can lead to enterprises openly flouting various laws to the public's detriment. Commonsense changes must be made only in conjunction with the enforcement of siting criteria and other regulations meant to ensure things like clear path for pedestrians and distance from storefront businesses. The city should not double down on a broken system.

Int 0431-2024 does not seem to reflect the reality that there must first be a focus on modernizing and enforcing existing regulations. More so, it fails to acknowledge that existing City rules and regulations prevent vending on restricted streets, like Fordham Road. Just this year, this commercial strip lost three major chain stores at Fordham Plaza where unlicensed vending remains out of control. There must be accountability, consistent enforcement, and defining of restrictive streets before increasing the number of licenses. Creating a division within the Department of Small Business Services (SBS) focused on assisting street vendors as part of Int 0408-2024, seems counterintuitive to their small business support and advocacy services. SBS should focus on helping the small businesses that make neighborhoods thrive. The regulatory agencies that oversee business practices should do the same for street vendors; around public health, public safety, consumer protection, and siting. Any new division of street vending should include a range of community perspectives such as community boards, businesses, residents, and vendors.

Over 80 years ago, Mayor LaGuardia took vendors off streets and relocated them in to City Markets. We urge today's leadership to consider a thoughtful, structured approach that balances the needs of all stakeholders. The city has not taken a holistic approach to vendor placement. There are likely underutilized facilities and spaces across the city that may be suitable locations and activated for vendors. Wantonly opening up every block and corner in this city for vending is irresponsible. More should be invested into workforce training for vendors. Perhaps this would enable vendors to work in brick-and-mortar businesses which would benefit small businesses who are seeking employees, while also decreasing the unemployment rate. A street vending report through SBS is expected to be released later this year. Any legislation related to vending should be held off until community stakeholders are able to review and analyze the report's findings.

The Belmont BID, and BIDs across the city and nation, work tirelessly to support small businesses and enhance the districts we serve. We are deeply concerned about any wholesale lifting of the vending cap as part of Int 0431-2024 and creating a Division of Street Vendor Assistance within SBS as part of Int 0408-2024. We believe these bills will neither preserve nor strengthen our community. Instead, they risk further destabilizing our small businesses and widening the divide between them and street vendors—undermining the foundation we as a community have worked to build for over a century. There needs to be further dialogue around vending and policies need to be developed that are equitable, not punitive.

Sincerely,



Peter Madonia
Chairman
Belmont Business Improvement District
718-294-8259



Exhibit 1: A vendor sells food directly in front of two food service establishments.



Exhibit 2: A vendor not in compliance with siting regulations in regards to clear path sidewalk requirements, required distance from the entrance or exit of a building, and display requirements.



Exhibits 3 & 4: Vendors utilizing parking spaces as if the parking space is theirs as a right of where they operate their “business.”



**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Cooper Square Committee (CSC) appreciates the opportunity to submit written testimony in support of Intros 431 and 408.

The Cooper Square Committee's mission is to work with Lower East Side and East Village residents to contribute to the preservation and development of affordable, environmentally healthy housing and community/cultural spaces so that the Cooper Square area remains racially, economically and culturally diverse.

Street vendors are the City's smallest businesses and reflect the great diversity of our communities. They create, innovate, and invest in our local economies and work every day to provide for their families and feed our neighbors.

This package of bills will let vendors provide the services New Yorkers want - in a regulated, predictable, enforceable system - and give them a real chance to build wealth in their neighborhoods. The City must not criminalize street vendors for trying to provide for their families, but instead cut the red tape and facilitate a healthy regulatory environment for our smallest businesses to thrive

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408, as part of the Street Vendor Reform legislative package.

Targeting street vendors, many of whom are immigrants, for NYPD arrests and tickets puts them at increased risk of ICE arrests, resulting in immigration detention and deportation. Our city's policies should support our economy while uplifting our values. City Council can and must enact policies that protect New Yorkers. Enacting these bills will reinforce our commitment to the values that define New York and ensure the well-being of New York families, businesses, and communities.

Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

Thank you for accepting our testimony today. It is Cooper Square Committee's hope that the City Council takes the critical step of passing Intros 431 and 408 as part of the Street Vendor Reform Package.



TESTIMONY BEFORE NYC COUNCIL – COMMITTEE ON CONSUMER AND WORKER PROTECTION
Oversight – Street Vending; Int. 431, 408, 1164
May 6th, 2025

Chair Menin and Members of the New York City Council, my name is Pedro Suarez, and I am Executive Director of the HUB-Third Avenue Merchants District Management Association, Inc. d/b/a Third Avenue Business Improvement District in the Bronx. The Third Avenue BID is the oldest BID in the Bronx and one of the most heavily trafficked BIDs in the entire city – 3.3 million people visit our subway stop annually (E 149th Street/Third Avenue) and at least 55,000 people ride our buses daily. Our BID is on the frontlines of economic development, neighborhood vibrancy, and public realm management. It is therefore critical that BIDs have a seat at the table when making public policy decisions about our streetscape, including vending.

I understand that New York City has always had street vendors, small entrepreneurs who are trying to make a living and support their families. The same motivation drives our storefront businesses, including the small shops and restaurants that make our communities unique. As stewards of vibrant neighborhoods, the BID welcomes licensed street vendors who play by the rules in their districts. However, BIDs are also deeply concerned about the lack of enforcement when it comes to common-sense time, place, and manner restrictions on vending. According to the NYC Administrative Code § 20-465, “No general vendor shall vend on any street which is in a C4, C5, or C6 zoning district”. The Third Avenue BID is in a C4 zoning district and there continues to be dozens of unlicensed, unpermitted vendors in the district daily. It is my understanding that DSNY, the lead enforcement agency on street vending, only has approximately 40 enforcement personnel for an entire city where there are an estimated 23,000 street vendors.¹ If the city cannot handle the current state of street vending across its 76 business improvement districts, how can we consider new vendor licenses without significantly investing more resources in education and enforcement? If there are no serious commitments around enforcement, street vending will continue to have a negative impact on sidewalk congestion, sanitation, and public safety.

I welcome and have supported common sense changes to laws that will make it easier for street vendors to make a living, but only in conjunction with the enforcement of siting criteria and other regulations meant to ensure things like clear path for pedestrians and distance from storefront businesses. I am also not philosophically opposed to issuing new vending licenses, but don’t believe the city should double down on a broken system.

Specifically, Int. 431 would require the city to make available over 7,500 new vendor licenses over the next 5 years, and then an “unlimited” number after that. The changes in Local Law 18 of 2021 – which requires a gradual increase in the number of licenses along with increased enforcement and impact studies - have yet to be fully realized. I respectfully believe that the new supervisory license system and Office of Street Vendor Enforcement should be given more time and resources to roll-out before the number of licenses is increased. I also believe that an unlimited number of vending licenses will create many more problems than it will solve. I

¹ Immigration Research Initiative: [Street Vendors of New York - Immigration Research Initiative](#)

welcome a continued dialogue with the bill sponsor CM Sanchez who I know is committed to working on this issue.

On Int. 408 – The BID defers to our partners at SBS on whether it has the administrative resources to comply but have serious concerns around capacity.

On Int. 1164 – The BID supports additional reporting mechanisms for vending enforcement.

On Int. 1251 – While the BID is not opposed in theory to authorizing DOHMH in issuing additional permits to reach the number of licenses suggested under LL18, there continue to be concerns around enforcement and siting locations.

I also want to include some additional recommendations to help alleviate challenges with street vending in my district:

- In partnership with BIDs, DOT and SAPO, identifying opportunities for temporary vending permits in public plazas and open streets in communities that are receptive.
- Educating and incentivizing street vendors to form worker cooperatives so that they eventually have access to renting commercial space, which helps to decrease unemployment and storefront vacancy rates.

We look forward to continuing our work with the Council and administration on this important policy discussion. Thank you.

Respectfully,

A handwritten signature in black ink that reads "Pedro M. Suarez". The signature is written in a cursive, flowing style.

Pedro Suarez

Executive Director

Third Avenue BID

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**Testimony of the New York Civil Liberties Union
to
The New York City Council Committee on Consumer and Worker Protection
regarding
Oversight of Street Vendor Enforcement and Issuance of Licenses**

May 6, 2025

The New York Civil Liberties Union (NYCLU) respectfully submits the following testimony with respect to the New York City Council Committee on Consumer and Worker Protection hearing concerning street vendor enforcement and licensing.

The NYCLU, the New York State affiliate of the American Civil Liberties Union, is a not-for-profit, nonpartisan organization with eight offices across the state and over 100,000 members and supporters. The NYCLU defends and promotes the fundamental principles and values embodied in the Bill of Rights, the U.S. Constitution, and the New York Constitution, through an integrated program of litigation, legislative advocacy, public education, and community organizing.

Today's hearing concerns the ability of working New Yorkers to earn a living free from police harassment and the threat of deportation. New York City's street vendors are an essential part of our economy and social fabric. They are an unmistakable symbol of the city's vibrant street life, serving residents at all hours and demonstrating the diversity and resilience that distinguishes the five boroughs. There are by one estimate more than 23,000 street vendors operating in the city, the vast majority of whom were born outside of the United States.¹

Yet just as New York City benefits from street vendors culturally and economically, our city's policies and enforcement priorities put them at serious risk. Street vendors are notoriously overpoliced – a reality that has been exacerbated under the current mayoral administration. Last year, the NYPD issued 9,376

¹ Immigration Research Initiative, *Street Vendors of New York City*, Sep. 2024, p. 3, <https://immresearch.org/wp-content/uploads/Street-Vendor-Survey-Final.pdf>.

tickets to street vendors, more than double the number from the year before.² That was despite the fact that the primary enforcement rests with the Department of Sanitation (DSNY), which assumed that role from the Department of Consumer and Worker Protection (DCWP) in 2023. DSNY issued another 4,144 tickets to street vendors last year, also a marked increase from the year before, when the department had enforcement responsibilities for about eight months.³

This overenforcement is enabled by the sparing manner in which vending permits are issued. An estimated 75% of mobile food vendors in the city are unpermitted, and about 37% of general merchandise vendors are unlicensed.⁴ In 2021, the Council enacted legislation to ease the impact a longstanding cap on mobile street vendor permits by reopening a closed application process and adding 445 new permits per year over a period of 10 years.⁵ But rollout of the new scheme was slow from the start,⁶ and advocates have criticized the law as insufficient to meet the intense demand for permits even if properly implemented.⁷

In the present moment, the lack of available permits and the over-enforcement that it enables puts New York City's population of immigrant street in a precarious position. Nearly all of New York City's non-veteran street vendors are immigrants, and roughly a quarter are estimated to be undocumented.⁸ Any arrest, ticket, or criminal legal system encounter can become a negative factor in a person's efforts to obtain lawful immigration status or fight deportation. Under the Trump administration, which has abandoned all judiciousness and mercy in carrying out its mass deportation agenda, many street vendors live in fear that doing their jobs could cause them to be detained and removed from the country.⁹ By making it

² Daniel Parra, *NYC Issues Over 10,000 Street Vendor Tickets, Confiscated Tons of Food in 2024*, City Limits (March 18, 2025), <https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/>.

³ *Id.*

⁴ Supra note 1 at p. 5.

⁵ NYC Local Law 18 of 2021, *available at* <https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=3686667&GUID=A0683818-66E6-4651-8B31-3D65EE4D61B1&Options=ID|Text|&Search=>.

⁶ Stefanos Chen, *New York Has Issued 14 New Food Cart Permits. 10,000 Vendors Want Them.*, N.Y. Times (Oct. 13, 2023), <https://www.nytimes.com/2023/10/13/nyregion/food-vendor-permits-nyc.html#:~:text=In%202021%2C%20the%20City%20Council.law%20that%20enacted%20the%20changes.>

⁷ Jeanmarie Evely, *Lawmakers Seek More Changes to NYC's Street Vending Rules*, City Limits (Dec. 15, 2023), <https://citylimits.org/lawmakers-seek-more-changes-to-nycs-street-vending-rules/>.

⁸ Supra note 1 at p. 3.

⁹ Haidee Chu, *Migrant Vendors Park Carts as Their American Dreams Slip Away*, The City (Jan. 30, 2025), <https://www.thecity.nyc/2025/01/30/migrant-vendors-trump-deporations-arrests-immigrants-fears/>.

difficult for street vendors to work lawfully while simultaneously ramping up enforcement, the city is putting its street vendors in harm's way.

Today's hearing and the legislation before the committee is a step towards mitigating the risks to street vendors. Intro. 431 would expand and accelerate the issuance of permits and supervisory licenses to street vendors, and move up the date for full implementation of street vending reforms. Intro. 408 would create a new education and support mechanism for street vendors navigating the city's complicated permitting and licensing process, and bring transparency to the system by mandating better published resources on food vendor management.

Making it simpler and safer for street vendors to make a living is one of the most important steps the Council can take to protect immigrant residents from the harms of the Trump administration, and an important piece of reducing the impacts of over-policing. The legislation before the committee today is not all that needs to be done on this front. Critically, the Council must enact legislation to remove criminal penalties for street vending-related offenses and reduce the possibility that a summons will have negative immigration consequences. We look forward to working with the Council on these solutions.



www.thinkchinatown.org

May 5th, 2025

Dear New York City Council City Council Committee on Consumer and Worker Protection,

I am writing on behalf of Think!Chinatown, a cultural non-profit organization, to express our support of Intros 431 and 408. We also offer our research on Chinatown street vendors as context to your decision making.

Think!Chinatown is a place-based intergenerational non-profit in Manhattan's Chinatown, working at the intersection of storytelling, arts, neighborhood engagement, and creative placekeeping. Think!Chinatown is the team powering cultural neighborhood programs like Chinatown Night Market, Chinatown Block Parties, Chinatown Arts Festival, Chinatown Storytelling Festival and more. As part of our placekeeping work, we also produce research and writings about our neighborhood as a whole ecosystem, which includes urban planning, small/micro businesses, and policies.

In 2022, we published Manhattan Chinatown's Commercial District Needs Assessment (CDNA) in partnership with the NYC Small Business Services (SBS). As part of this report, we surveyed vendors in June and July of 2022 and found that 93% of vendors stated street vending was their only source of income and 66% work 6 or 7 days a week. Often excluded from the mainstream economy, many immigrants turn to small business ownership and/or street vending to make a living. Undervaluing their own labor and working on slim margins, small/micro business owners in Chinatown are in constant survival mode. Street vendors in Chinatown provide a large contribution to our local economy, and possess an enterprising nature by creating their own economic opportunities despite limited capital, language abilities, and business support.

Chinatown street vendors actively contribute to the vibrant streetscape of our neighborhood, attracting foot traffic and providing an enhanced sense of safety. Vendors tend to operate on major commercial corridors, and also carve out their own space by bringing economic vitality to what would otherwise be a neglected, underused area on Forsyth Street. Vendors along Forsyth Plaza organically cluster their stands to create a destination market featuring affordable fresh produce.

Street vending has provided a lifeline in the Chinatown community; during the COVID-19 pandemic, vendors continued to serve the community, and furloughed food service workers were able to take up street vending to make ends meet. 65% of surveyed vendors

named access to licenses and permits as the most important resource that would help their business grow. **Street vending is an essential part of Chinatown's local economy and should be incorporated in neighborhood planning, policies, development, and business services.**

Thank you for accepting our written testimony today. It is Think!Chinatown's hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

A handwritten signature in cursive script, appearing to read 'Yin Kong', written in a light gray or blue ink.

Yin Kong 5/5/2025
Executive Director, Think!Chinatown
1 Pike St, NYC 10002

Committee on Consumer and Worker Protection
Wednesday, May 6, 2025



I believe that we all agree that the vending system does not work for anyone- not for the vendors who are denied opportunities, and not for neighborhoods, where we have chaos because of unclear regulations and inconsistent enforcement of the time, place, and manner regulations necessary for our sidewalks to be passable. Addressing one problem without the other will only add to the chaos and confusion and ultimately will not help the vending community.

My name is Tom Harris, and I am the President of the Times Square Alliance, the organization that works to improve and promote Times Square – cultivating the creativity, energy, and edge that have made the area an icon of entertainment, culture, and urban life for over a century. We have worked in partnership with the Street Vendor Project and the Times Square vending community to try and maintain order amid a dysfunctional system. However, there are very real issues that urgently need attention. We thank Councilmember Sanchez and Public Advocate Williams for not accepting the status quo, and for working both to offer opportunity and increase compliance with existing rules. I also want to thank Councilmember Sanchez for her thoughtful approach to this issue, and for taking the time to hear and understand all sides of a very complex problem.

We appreciate the opportunity to offer testimony on Int. 431 and Int. 408, both intended to reform New York City's vending system. My comments today focus primarily on Int. 431, which would significantly expand—and ultimately eliminate—the cap on mobile food and general vendor licenses, while also strengthening training and compliance requirements.

We agree with the authors of these bills that street vendors are an essential part of New York City's fabric, providing economic opportunities for hardworking individuals—most of whom are immigrants with a more limited range of economic options—and a vibrant part of street life.

In Times Square, every day we see the consequences of an unregulated system. An illegal market flourishes here, exploiting disabled veteran vendors with legitimate permits. One veteran vendor is paid to stand by multiple carts to gain favorable siting. On one day in August 2023, we documented four separate vendor conflicts resulting in injuries, hospitalizations, arrests, and thousands of dollars being stolen from a vendor, demonstrating in no uncertain terms that the current system fails vendors and local businesses and endangers public safety.

So, we are here again talking about lifting the cap when we have not yet added the vending permits and licenses from the last “lift the cap” bill. But this is a distraction. The reality is the number of licenses or permits is not the issue. Our biggest problems in Times Square are not unlicensed vendors, but rather vendors not complying with time, place, and manner restrictions, and inconsistent enforcement of those regulations. The primary purpose of our sidewalks is to allow the safe passage of people. Time, place, and manner restrictions attempt to balance the competing uses of our sidewalks. Violations of time, place, and manner restrictions add to chaos, confusion, disorder, and diminish the experience for the hundreds of thousands who visit Times Square daily. We would be supportive of increasing the number of vendors if there was an enforcement scheme that demanded and achieved compliance with existing time, place, and manner restrictions or risk revocation of the license and/or permit.

Vendors in Times Square, out of compliance for months and knowingly violating the rules, complain when they are finally issued a summons— a summons that in the end has little consequence. In fact, on any given day, on any given block, you can find violations that make it difficult to walk through Times Square. Reporting a violation to 311 generates an autoreply saying the complaint will be responded to in up to thirty (30) days. No agency is accountable for solving the problem. The best you can expect is a summons to be issued, which vendors view as an annoyance and the cost of doing business.

I do not blame the vendors; they are looking to make a living and when rules are unclear and inconsistently enforced it creates an ecosystem where violating them is standard. Clearly communicating and consistently enforcing the rules that exist is the only way to create a vending scheme where we can lift and/or eliminate the cap.

Vendor violations are a low priority for the NYPD and for city agencies, and we agree they have larger challenges to deal with. Our suggestion is to gain compliance by applying existing tried-and-true enforcement options to vending.

We support the bill's intent to increase opportunities for legal vending as long it mandates compliance of existing time, place, and manner restrictions.

Considering this, we offer the following core recommendations:

Meld enforcement with expansion.

Enforcement is shuttled from one agency to another, and no one is accountable for compliance. From 2023-2024, we saw a 24% increase in 311 vendor-related complaints in our district. Neither DCWP nor DSNY were properly equipped to enforce the influx of tickets. Enforcement needs to be modernized. We enforce speeding, passing a red light and passing a loading or unloading school bus through camera technology. We allow citizens to enforce idling and amplified sound violations – currently when a vehicle is idling for more than 3 minutes, or a business has an amplified sound device, a citizen can file an affidavit that results in a fine. (It should be noted that DEP has allowed a bounty for these violations, which should not be considered for vending enforcement). Applying that system to vending would allow communities to self-regulate and minimize enforcement agencies' involvement.

When vendors are repeatedly issued summonses, the licensing agency must be given the responsibility to ensure conditions are corrected and the authority to revoke licenses when chronic non-compliance is evident.

Ensure designated vending areas are defined and guided by data and public safety.

The expansion of vending should be informed by rigorous criteria tied to pedestrian congestion, sidewalk width, and neighborhood needs.

The rules for parking are not merely published in a book or online. There is clear signage about where cars are allowed to park. Vendors should be given that same clarity with valid spots clearly marked by signage.

Integrate community-wide perspectives into any new Division of Street Vendor Assistance.

As the Council considers Int. 408, creating a new division within the Department of Small Business Services to serve vendors, we urge that the agency reflects the full spectrum of stakeholders affected by vending, including local businesses and residents. A collaborative and representative approach is essential to crafting policies that are responsive, equitable, and effective.

To be clear, any discussion of increasing the cap on vending must come with a firm commitment from the administration and the City Council for meaningful and effective enforcement of time, place, and manner restrictions. Absent a firm commitment, it would be irresponsible to add vending permits to an already dysfunctional system.

We thank the Council for taking on this important work and look forward to continuing the conversation in pursuit of thoughtful, balanced, and lasting reform.

A handwritten signature in black ink, appearing to read 'Tom Harris', with a long horizontal stroke extending to the right.

Tom Harris
President
Times Square Alliance



**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6, 2025

Good afternoon, my name is Andrew Gustafson, and I would like to thank Chair Menin and the Committee for the opportunity to testify today in support of Intros 431 and 408.

I am the vice president of Turnstile Tours, a social enterprise that works with nonprofit organizations to develop and operate tour programs across New York City. Over the past 15 years, our team has had the honor to work with hundreds of vendors while leading tours about the city's street food industry. We have hosted tens of thousands of visitors from around the world on our Food Cart Tours, sharing the food, stories, and struggles of this amazing community of workers and entrepreneurs.

New York street food is a globally recognized brand, something that people seek out from around the world. Some of the finest food this city has to offer is found on its streets. *New York Times* writer Pete Wells assembles a list of the 100 best restaurants in the city each year; in 2023, six street vendors made the list, and four did in 2024. Many, many more of the chefs and restaurateurs honored worked in mobile food vending at some point in their careers, or even started their restaurant concept as a food cart or truck.

On our tours, we use this amazing street food as a hook, but we also try to make visitors understand the experience of street vendors navigating the regulatory maze in New York City; not just the chapter and verse of the regulations, but how they play out in real life for vendors. The virtual impossibility of receiving a legal permit. The constantly shifting rules and arbitrary decisions of enforcement officers. The endless tickets and summons issued by a half dozen different agencies. The constant fear of having your livelihood, and perhaps even your freedom, taken away.

For many, street vending is not a chosen profession, but one borne of necessity, and often borne out of times of crisis. We are in the midst of an unprecedented global migration crisis, with more people now displaced from their homes than at any point in human history. New York City has been a refuge for so many people, and street vending is how they have survived, as over 95% of street vendors today are immigrants. We should be creating pathways for people to make better lives for themselves in this city and in this country. Instead, the current regulatory regime makes it harder for people to make a living, and it places vendors at greater risk for arrest and deportation. Bad street vending policy is bad immigration policy, and it makes the New York City government and this City Council complicit in the cruel, racist, and destructive mass deportation agenda of the Trump administration.



Placing an arbitrary cap on the number of street vending permits, which has been in place since 1983 and only modestly increased by the 2021 reforms—and at a rate far below the statutory requirements of that law—has forced the vast majority of street vendors to remain unpermitted.

What street vendors want, and what all New Yorkers want, is a clear, fair, and well-regulated system where small businesses can be successful and contribute to their communities. Vendors want to operate legally; these bills offer them a much more viable pathway to do that. Vendors want to follow the rules; these bills will provide them with the education and support services they need to do that. These bills will not lead to more street vendors, as critics may claim; the vendors are already there, but instead, they will be legal and regulated, thus better protecting the vendors themselves and the public.

On the ceiling of the City Council chambers, there is a quote from George Washington's farewell address in 1796: "our commercial policy should hold an equal and impartial hand." The passage reads further, "neither seeking nor granting exclusive favors or preferences; consulting the natural course of things; diffusing and diversifying by gentle means the streams of commerce, but forcing nothing; establishing ... conventional rules of intercourse, the best that present circumstances and mutual opinion will permit, but temporary, and liable to be from time to time abandoned or varied, as experience and circumstances shall dictate."

What the City of New York has done to street vendors has not been equal or impartial, it has granted exclusive favors and preferences, and it has not been temporary or dictated by experience and circumstances. Instead, we have allowed an arbitrary, capricious, and inflexible system to persist for decades, one that forces street vendors into lives of uncertainty, precarity, and fear. These bills, and the whole Street Vendor Reform Package, would just give street vendors equal services and opportunities that are afforded to other small businesses in New York City, and I hope that the Council will support them.

— Andrew Gustafson, Turnstile Tours



**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Oversight: Street Vending in NYC**

Tuesday, May 6th, 2025

Thank you, Committee Chair Julie Menin, and members of the Committee on Consumer and Worker Protection, for the opportunity to testify today in support of Intro 408 and Intro 431.

My name is Balanda Joachim, and I am a Campaign Organizer at the Association for Neighborhood and Housing Development (ANHD). I'm here today on behalf of United for Small Business NYC (USBnyc), a coalition of community organizations across New York City committed to protecting small businesses and non-residential tenants from the threat of displacement—particularly owner-operated, low-income, and BIPOC-run businesses that serve our city's low-income neighborhoods and communities of color.

Small businesses are cornerstones of our city and neighborhoods. They provide jobs, culturally relevant goods and services, and community, keeping our neighborhoods thriving and vibrant places to live. Our coalition supports some of the most iconic BIPOC and immigrant business corridors in the city from Jackson Heights to the Lower East Side and the Bronx, and our coalition members work directly with both brick and mortar businesses and street vendors.

The passage of Intro 408 would be a crucial tool for organizers conducting outreach and supporting vendors within their merchant associations. Creating a dedicated Street Vendor Division within the Department of Small Business Services (SBS) would ensure that street vendors—who are often integral parts of local commercial ecosystems—receive the resources, education, and support they need to operate safely and in compliance with regulations.

However, the effectiveness of this division depends on street vendors having proper access to permits and licenses. Currently, the cap on permits continues to push vendors into informal markets and exposes them to punitive enforcement and displacement. This not only harms vendors but also negatively impacts foot traffic and the economic vitality of nearby brick-and-mortar businesses. The passage of Intro 431, which

would lift the caps on vendor permits, is essential. By ensuring proper, legal access to permits, we empower vendors and allow USBnyc and its partners to more effectively support them as vital members of our city's commercial and cultural landscape.

Street vendors are among the city's smallest businesses, but they reflect the vast diversity and entrepreneurial spirit of New York. They innovate, invest in our communities, and show up every day to provide for their families and neighbors—often in the face of criminalization and systemic challenges.

We urge the City Council to pass Intro 408 and Intro 431 to build a more equitable, thriving, and supportive environment for all small businesses, including our street vendors.



**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is Nick Aquino, and I am a Staff Attorney with the Microenterprise Project at Volunteers of Legal Service (VOLS). Thank you to Chair Menin and the members of the Committee on Consumer and Worker Protection for the opportunity to testify today in support of Intros 408 and 431.

VOLS is a legal services nonprofit founded in 1984, dedicated to bridging the justice gap through pro bono legal services. Our Microenterprise Project helps entrepreneurs access free, high-quality transactional legal services. We assist clients with entity formation, contracts, and compliance with regulations, including those affecting street vendors. We partner with community-based organizations and City government, particularly Small Business Services (SBS), to connect with clients. Many of our clients are immigrants, veterans, and women entrepreneurs seeking to operate their businesses legally and with long-term success.

The entrepreneurs we support strive to run their businesses lawfully. But for aspiring street vendors, the path to compliance is often impossible, not because they refuse to comply, but because the current permitting system is broken. In nearly every case, we must tell clients that they cannot legally vend, despite their readiness to contribute to the local economy.

One of our clients, a disabled veteran in his 60s, has been on the waiting list for years. Although veterans are supposed to have some preference under the current system, the reality is that even with this benefit, he has been unable to secure a permit to run a food cart. His story is not unique. Over 75% of mobile food vendors and 37% of general vendors operate without a license, not by choice, but because the system provides no viable path to obtaining one.

We urge the Council to pass Intro 431, which addresses this inequity by expanding access to permits and ending arbitrary caps that keep thousands of vendors in legal limbo. This bill would bring order to the system while allowing the City's smallest businesses to thrive. It ensures that vendors are subject to siting and health regulations, just like any other business, while removing barriers to entry that currently exclude so many.

But access alone is not enough. Even when rare opportunities to apply for permits arise, vendors frequently lack the support to successfully complete the process. One of my clients, after years on the waitlist, was finally given the chance to apply. Due to a minor misunderstanding in the application process, he was denied and pushed to the back of the line



again. His dreams of financial independence and serving food to his community are delayed because of the broken regulatory scheme.

That is why Intro 408 is equally critical. It would create an Office of Street Vendor Services within SBS to provide vital education, outreach, and compliance support. While enforcement is currently carried out by five separate agencies, no agency is tasked with helping vendors succeed or comply. That must change. With proper training and resources, vendors can be fully integrated into the city's small business ecosystem.

Passing both Intros 408 and 431 would also advance gender and immigrant justice. Nearly half of street vendors are women, yet only 27% of mobile food vendor permits and 14% of general vendor licenses are held by women. Many vendors are immigrants, and current enforcement-focused approaches, particularly involving the NYPD, expose them to unnecessary risk of detention or deportation. Adopting a supportive regulatory framework would promote equality and safety for women and immigrant vendors, ensuring that the city's policies align with its commitment to fairness and protection for all.

These reforms would also benefit the City financially. Demand for permits is overwhelming, waitlists total nearly 20,000. According to the Independent Budget Office, expanding access to vendor licenses could generate \$59 million in net revenue, while improving compliance and safety on our sidewalks.

Street vendors are not the problem, they are part of the solution. They bring diversity, entrepreneurship, and vitality to our neighborhoods. Our laws should reflect that reality.

Thank you for the opportunity to submit this testimony. On behalf of myself and Volunteers of Legal Service, we urge the Council to pass Intros 408 and 431 to create a fair, supportive, and inclusive system for street vendors across New York City.



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Testimony from Joe Parisi on Intro 431

President, Gristedes Supermarkets

Hearing before the City Council's Committee on Consumer and Worker Protection

May, 6, 2025

My name is Joe Parisi and I am the president of Gristedes Supermarkets

Gristedes proudly operates over thirty supermarkets throughout Manhattan, Westchester and Brooklyn including a store on Roosevelt Island. Over the past two decades we have been frustrated by the lack of enforcement of vendors who have taken advantage of this laxity to enlarge their carts way over the legal limit, and store their produce in unsanitary "warehouse" trucks left all day on the street. As a supermarket chain we are subject to a considerable number of regulations-and many come with stringent penalties. Strict enforcement-especially involving perishables-should be the same for both sectors.

Over the past 20+ years, supermarkets have been disappearing in NYC:

"A continuing decline in the number of neighborhood supermarkets has made it harder for millions of New Yorkers to find fresh and affordable food within walking distance of their homes, according to a recent city study. The dearth of nearby supermarkets is most severe in minority and poor neighborhoods already beset by obesity, diabetes and heart disease."

(¹<http://www.nytimes.com/2008/05/05/nyregion/05citywide.html?ref=nyregion>)

And, more recently:

"Many of the city's grocers, large and small, have struggled to survive. Some have succumbed to high rent, narrow profit margins and increased competition from upscale supermarkets, online grocers and drugstore chains that have expanded their wares to include grocery items.

"It's depressing," said Charles Platkin, the executive director of the New York City Food Policy Center at Hunter College. "When a supermarket in your area closes, it feels like you're moving backward." (http://mobile.nytimes.com/2016/11/06/realestate/new-york-city-small-supermarkets-are-closing.html?_r=0&referrer=)

The situation got so bad that the city instituted the so-called Fresh program. Under the city's Fresh Program, the city recognizes that supermarket preservation is a key to improving health outcomes;

"The FRESH program is an interagency effort, catalyzed by the "Going to Market Study", which showed that many low-income areas across the city were underserved by full-line neighborhood grocery stores. The resulting lack of nutritious, affordable, fresh food in these neighborhoods has been linked to higher rates of diet-related diseases, including heart disease, diabetes, and obesity." (<http://www.nycedc.com/program/food-retail-expansion-support-health-fresh>)

"In response, the City has established the Food Retail Expansion to Support Health (FRESH) program. FRESH provides zoning and financial incentives to promote the establishment and retention of neighborhood grocery stores in underserved communities throughout the five boroughs." (<http://www.nyc.gov/html/misc/html/2009/fresh.shtml>)

Street vendors, by hurting supermarket retention and growth (a vendor can take anywhere from \$5,000 to \$7,000/week from supermarket gross revenues) harm food markets that sell not only produce but a wide range of other healthier foods.

Put simply, NYC needs to balance the needs of street vendors with those of supermarkets. Intro 431 in its current form falls short, but that can be remedied by a proposed amendment that will include clear enforcement, suspension, and revocation provisions.

Our view is that if the city is going to increase the number of vendor licenses, then legislation should also address the concerns of brick-and-mortar businesses like Gristedes. Increasing enforcement is essential to our support since it begins to balance the equities between vendors and brick and mortar stores.

One last point, we believe that the council's budget includes over \$7million in additional money for enforcement officers for Sanitation. (DSNY) We applaud this since we have been told by enforcement officers that they lack manpower. More officers and stricter enforcement would make the current enforcement regime stronger and more equitable, and we therefore support an amended version of Intro 431 that benefits both vendors and NYC's vital supermarket sector.

Joseph L. Parisi



Morton Williams Supermarkets

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Testimony from Steven Sloan on Intro 431

Owner, Morton Williams Supermarkets

Hearing before the City Council's Committee on Consumer and Worker Protection

May, 6, 2025

My name is Steven Sloan and I am one of the owners of Morton Williams Supermarkets, a family owned and operated business whose headquarters are in the Bronx. We currently operate 16 NYC markets and employ over one thousand New Yorkers-most of whom we hire from our Kingsbridge office. Most of these workers are union members with good living wage jobs along with pensions and benefits.

I am here to testify on, a bill sponsored by CM Pierina Sanchez that would increase the number of food vendor supervisory licenses and general vendor licenses available each year for five years, and then it would lift the cap on food vendor supervisory licenses and general vendor licenses. This bill would also expand training to include information related to the particular vending restrictions of the license holder.

We are not opposed to an increase in the number of street vendor licenses, a move that would legalize many vendors who are currently operating illegally, and that would give these vendors a strong incentive to follow the regulations. What we are concerned about is the nature of the current enforcement regime that, until very recently, was not very good at enforcing the regulations on the books.

However, we have been told that an amended version of this Intro will include clear enforcement, suspension, and revocation provisions. If this amendment is included for the hearing-and we advocate that it should-we will be enthusiastically in favor of its passage. Our view is that if the city is going to increase the number of vendor licenses, then legislation should also address the concerns of brick-and-mortar businesses like ours. Increasing enforcement is essential to our support since it begins to balance the equities between vendors and brick and mortar stores.

Morton Williams is the oldest family-owned supermarket chain in NYC. Over the past ten years produce vending has gotten out of hand while enforcement has become lax. We pay millions of dollars in real estate taxes, along with very expensive rents to provide New Yorkers with fresh



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foods of all kinds-all the while losing over \$6,000 a week per cart to vendors who enlarge their carts way over the legal limit, and store their produce in unsanitary "warehouse" trucks left all day on the street. It has become commonplace for vendor carts to be 20, 30 and 40 feet in length. Our stores are heavily regulated, and if we violate provisions of the NYC Health Code or other FDA rules, we are heavily fined. Strict enforcement-especially involving perishables-should be the same for both sectors.

I would like to add that over the past number of months DSNY enforcement has been very responsive to our referrals of illegal vending activities. In discussions with key enforcement officials at DSNY, however, we have been told that they lack the personnel to make enforcement effective.

Greater enforcement then is a must, but tougher rules without the sufficient manpower to enforce them fosters a lawless environment that incentivizes the flouting of those regulations. Hopefully, good news on this front is on the way with the City Council's budget request to give DSNY over \$7 million precisely for adding more enforcement officers.

In sum, we will enthusiastically support Intro 431 in an amended version that addresses enforcement.

Morton Williams has been dedicated to this city for 70 years, and we want to continue to grow, employ more New Yorkers, and supply the city with a full range of healthy products-especially the vital fruits and vegetables. Please make our task here easier by balancing the needs of vendors with those of store owners like myself who have contributed so much over the years to the city's economic and public health.

More licenses, greater enforcement, it's really that simple.

Thank you

Testimony Before the NYC Council – Oversight Hearing on Street Vendors



By: Von S. Del Valle, Candidate for Queens Borough President

VonNYC Innovating Our City 2025

Independent Conservative Committee (Innovate NYC)

<https://adventureairholdin.wixsite.com/vonnyc>

Date: May 6, 2025

Introduction

Good morning, Council Members. My name is Von S. Del Valle, and I'm not only a lifelong New Yorker and advocate, but I'm also running to be the next Queens Borough President. I'm here today because I care deeply about what New Yorkers are consuming and the environments in which our food is prepared.

Why Food Safety Matters

We have food safety rules for a reason—they exist to protect our residents. Too many times, I've walked by vending areas that are filthy or improperly maintained. I've spoken to people who got sick after eating street food but didn't know why. This isn't about punishment—this is about prevention.

We need to ensure:

- Safe food temperatures to prevent contamination.
- Regular training for vendors in proper handling, hygiene, and pest control.
- Clear guidance on what vendors must avoid—like trash-heavy zones or standing water.

Trusting the Street Food We Love

Let's be real—every New Yorker has craved a hot dog, a halal platter, or even a vegan empanada from a street cart. But trust is everything. People should feel safe eating from a vendor, not worried they'll get sick.

We need to:

- Put trust back into our vendors with training, clear labeling (especially for meats and dietary options), and proper inspections.
- Help vendors with resources, not just penalties—this includes access to pest control info, grants for equipment, and education in multiple languages.

After COVID, Health Is Non-Negotiable

We learned hard lessons during the pandemic. If a vendor is sick, they must take proper precautions and stay home. The city should:

- Provide guidelines for illness-related leave.
- Ensure vendors have PPE and sanitizers.
- Support vendors in maintaining a clean, safe workspace for everyone's health.

Supporting Small Businesses

Small food vendors are the soul of our streets. They feed our communities and make neighborhoods feel alive. But they also need:

- Support, not red tape.
- Help accessing training, permits, and safety resources.
- A city that sees them as part of the solution—not the problem.

Closing

Let's raise the standard—not just for regulation, but for respect. Because when a customer buys a hot dog, a taco, or a smoothie, they should feel safe, informed, and proud to support a local business. Thank you for your time and for caring about the safety, dignity, and future of New York City's food vendors.

Von S. Del Valle

Queens Borough President Candidate

VonNYC for Kosher & Hatzlacha laws for NYC , Protecting Our Residents & Improving Quality of life through Innovation and Action !

Abram Garfield Morris

5/5/2025

Street Vendors Are Our Neighbors

Attn: New York City Council Committee on Consumer and Worker Protection

I would like to thank Chair Menin for the opportunity to testify. Street Vendors are an integral part of our communities. We must help them succeed, not neglect them and criminalize them. My name is Abram Morris, and I am a constituent of Councilmember Menin, district 5.

On 81st Street between 1st and 2nd in Manhattan, we depend on the fruit stand at the end of the block. Growing up, the produce my family got from that stand made up a good portion of my diet. And the man who runs the stand, stays out day and night, cold and warm, rain or shine to deliver Yorkville residents fresh food.

Street vendors provide New Yorkers with convenient food and products. They are vital to the city economy, and their presence brings vibrancy of our streets. As a city we must stop pushing them to the sidelines.

The city and state punish street vendors for trying to make ends meet, while they reward large companies with security details. As the cost of living has become top of mind to New Yorkers, criminalizing vulnerable entrepreneurs makes life harder for all of us.

I put forth my support for the Street Vendor Reform Package, including Intro 431 and 408. Our street vendors make our streets fun places to be, and they make us safer with their eyes on the street. Demonizing and criminalizing people destroys our neighborhoods and breaks down communities. Do we want a sterile city with silent streets? If we do nothing to support our vendors, that is what we will get.

We need these laws to create a bold and transformative relationship between the city and our street vendors.

Intro 431 will expand the opportunities for street vendors to do their work within the law, rather than pushing them to the fringes. We need to integrate our vendors into our economy, not force them out!

Intro 408 will help our vendors to interface with the city and create buy-in with regulations. Vendors and patrons alike will benefit from more resources.

I ask that you move these bills out of committee to be voted on as soon as possible

A handwritten signature in black ink, appearing to read 'Abram Morris', with a stylized flourish at the end.

Abram Garfield Morris

Architecture Student at the City College of New York

From: [Ahmed Mourad](#)
To: [Testimony](#)
Subject: [EXTERNAL] The Rights and Protection of Street Vendors in New York City
Date: Wednesday, May 7, 2025 12:26:48 AM

[REDACTED]

Thank you for giving me this opportunity, and for your patience in listening to voices that often go unheard—voices from the sidewalks, from those who power this city's informal economy and fight every day just to survive.

My name is Ahmed Murad. I am a journalist, a resident of Brooklyn, and a proud member of the Street Vendor Project. What I bring to you today is not from a report or a press release—it comes from the field. From real stories I have documented over the years, stories that reflect the harsh and often unjust reality faced by thousands of street vendors in New York City, especially immigrants and working-class families.

1. When Help Is Needed, Silence Follows

Time and again, I've seen law enforcement ignore cries for help from vendors—when they are harassed, robbed, or targeted with hate. And yet, these same agencies show up swiftly and forcefully when it's time to issue a citation or confiscate a cart for minor infractions. This double standard sends a clear message: the law does not protect you—it punishes you.

Consider Mohamed Hussein, a 20-year-old vendor who was racially harassed on November 20, 2023, by former Obama advisor David B. Litt. The incident was caught on camera. When I spoke with Mohamed afterward, he was afraid—even to speak to the press—perhaps because he felt there was no legal shield to protect him.

2. The Trap of Unfair Fines

I've also witnessed a growing crisis: the imposition of excessive, unreasonable fines on vendors—often without warning or any room for negotiation. I've spoken with single mothers and elderly vendors who were handed \$1,000 citations for selling fruit or snacks. How is this justice?

A poor woman trying to feed her kids is treated like a corporate tax fraudster. When fines are this steep and punitive, they're not a tool of regulation—they're a tool of exclusion. They push people deeper into poverty and out of the only livelihood they have.

3. Where Is Safety Really Found?

On April 30, 2025, New York City was shaken by the shooting of Ayman Ghazala, a young restaurant worker in Times Square. I spoke to his manager and coworkers—they were devastated. But beyond their grief was fear: if this kind of violence can happen in the most heavily policed area in the city, what hope is there for vendors in less visible places?

4. The Child Mango Vendor

And then there was June 2, 2024. A horrifying video surfaced of a Park Enforcement Officer—Mr. Davids—brutally detaining a 14-year-old girl selling mangoes with her mother. There were screams. Tears. A cold metal cuff on a child's wrist. A bystander yelling, "What

are you doing? She's a kid!"

The result? A criminal fine for the mother, their fruit confiscated, and the girl now has a juvenile court case.

All this... for trying to bring home \$120.

—

In Closing:

These are not random incidents. They point to a deeper, systemic failure in how our city treats its most vulnerable. Street vendors are not asking for special treatment. They are asking for the bare minimum of justice and dignity.

My appeal to the City Council:

1. Reevaluate how law enforcement engages with vendors and ensure they respond quickly when vendors face threats or danger.
2. Reform the fine system so it is fair, proportionate, and non-punitive.
3. Establish clear legal protections against verbal abuse and racial discrimination.
4. Create open channels of communication with vendor representatives to hear their real concerns.
5. Designate legal, regulated spaces for vending—instead of constant ticketing and displacement.

Street vendors are not a nuisance. They are New Yorkers.

They are workers.

They are families.

They deserve better.

This testimony is not just a statement—it's a plea for justice, for humanity, and for a city that stands by all its people.

AHMED MOURAD

ARAB ASTORIA NEWS



**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is Allie, and I am a constituent in Councilwoman Menin's district. I would like to thank Chair Menin and the Committee for the opportunity to testify in support of Intros 431 and 408.

For work, I research economic policy; but today I write to you as a resident of the Upper East Side. I moved to the city about four years ago and moved to the city for the same reasons many do—for the energy, diversity, and unique community. Street vendors are a critical part of that. As both an economist and lover of street vendors I will address two points in my written testimony, though there are endless reasons why we should all support street vendors: (1) street vendors make my neighborhood safer, and (2) street vendors are good for the economy.

Street vendors make my neighborhood safer. Jane Jacobs is a renown urban planner and activist and would most definitely be in support of street vendors. One of her core principles for a vibrant city is vibrant street life. That entails having pedestrian-friendly streets and the presence of “eyes on the street” to promote safety and a sense of community. I have personal experience with how street vendors make me safer. For one, they are a friendly face as I semi-routinely go get my combo over rice. The lights from street vendors illuminate the streets as I walk home at night, which makes me feel safer as a woman in her 20s. This proved critical one night as I was walking home after seeing Harlem Shakespeare Company's *A Midsummer Night's Dream* and a man inappropriately touched me on the street. He ran away and I felt shaken, but the street vendor on 87th and Lexington helped me. I walked up to him and asked if I could stand by him for a little while to make sure I was safe to walk the rest of the way home. He said yes before I even told him what happened. After I did, he asked if I needed help or wanted help in reporting it to the police. I kindly said no and simply him staying with me was helpful in and of itself. I appreciate his kindness, and if it wasn't for him and his tireless work, I wouldn't have felt safe that night.

Street vendors are good for the economy. Not everything should have an economic angle, but as an economist I understand that it's important. So here are the facts: The history of street vending in New York City showcases its significance to our city's economy. New York City is home to an estimated 23,000 street vendor small businesses who annually contribute \$192 million in wages, \$292.7 million in goods and services, and \$71.2 million in taxes to our city. Street vending has played a vital role in the city's growth, supporting immigrants, people of color, and military veterans to successfully operate microbusinesses. Yet the current way the city regulates street vendors often leaves many in the shadows, harassed, unfairly arrested, and unregulated.

Thank you for accepting our testimony today. It is my hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

Allison Ma

Committee on Consumer and Working Protection
May 6, 2025
Oversight Hearing
Comment on
Street Vending in NYC

My name is Angel Hart, and I am testifying on behalf of the Long Island City BID to provide feedback specifically on Int. 431 that plans to increase the number of vendor licenses over the next five years.

The LIC BID represents a diverse network of brick-and-mortar businesses that face significant challenges operating in New York City. These small businesses work hard to stay compliant with ever-changing city regulations while shouldering the costs of rent, utilities, property taxes, and strict health and safety standards. Increasing the number of street vending permits—without reforming oversight and enforcement—risks further disadvantaging these businesses, which are already burdened by strict regulation.

With that said, the LIC BID does not oppose increasing the number of vendor licenses, however we strongly believe that there needs to be measures in place to fix the current enforcement strategy first, before this increase is made. We have supported common-sense legislation that makes it easier for street vendors to earn a living. Many vendors are entrepreneurs and vital contributors to our neighborhood's culture and economy. However, any expansion of permits must be paired with regulations governing where vending can take place, how compliance is monitored, and how conflicts with brick-and-mortar businesses are avoided. Without clear rules on siting, time of operation, sanitation, and enforcement, well-intentioned reforms risk worsening conditions for all stakeholders.

The current enforcement strategy is deeply flawed — in many cases, it is either nonexistent or excessively punitive, neither of which supports fair regulation. In LIC, we've seen repeated issues with unpermitted vending, sidewalk congestion, and sanitation concerns, yet enforcement has often failed to respond or applies inconsistent standards. Expanding the number of vendors under this broken enforcement system would only amplify existing tensions.

Thank you for your consideration on this matter.

Testimony from Ángel, Member of Make the Road New York
Street Vendor Reform Package Hearing
New York City Council
May 6, 2025

Spanish

Mi nombre es Ángel, y soy un miembro activo de Se Hace Camino Nueva York. Gracias a la comisión por darme la oportunidad de presentar mi testimonio.

He estado trabajando como vendedor ambulante en la ciudad de Nueva York durante cinco años, desde que la pandemia me obligó a hacerlo. Vivo en el Bronx y trabajo en diferentes áreas de la ciudad, tratando de ganarme la vida de manera honesta.

Estoy aquí para pedirle al Consejo que apruebe el paquete de reformas para vendedores ambulantes: los proyectos de ley 431, 408, 47 y 24. Necesitamos que se aprueben para poder trabajar sin miedo y con dignidad.

Los vendedores ambulantes contribuimos a la economía de Nueva York pagando impuestos personales y de ventas. Trabajamos duro, pero aún así, no recibimos ningún tipo de reembolso. Un ejemplo de esto es el cheque de \$0.01 que me enviaron, un recordatorio de lo poco que recibimos a cambio de nuestras contribuciones.

La venta ambulante es la única fuente de ingresos para mí y mi familia. No es solo un trabajo, es como sobrevivimos. Es mi salvavidas. Es como pongo comida en la mesa para mi familia, y no estoy pidiendo limosnas, estoy pidiendo el derecho a trabajar legalmente.

Estas reformas son muy importantes para mí porque nos darían la seguridad de hacer nuestro trabajo sin el miedo constante. Todos los días tengo miedo de ser multado o arrestado, solo por intentar ganarme la vida.

El departamento de salud nos dice que obtenemos una licencia, y cuando solicitamos, nos dicen que no pueden darnos más. Este es un ciclo cruel. Nos hacen pasar por obstáculos, y luego cierran la puerta.

Vivimos con miedo, especialmente durante la administración de Trump. En cualquier momento, podríamos ser arrestados por una violación que no podemos evitar, y ese cargo tiene el potencial de afectar nuestro estatus migratorio. Ese miedo pesa en nuestros corazones todos los días.

Queremos cumplir con las regulaciones, pero la ciudad no nos permite obtener los permisos y licencias que necesitamos. Estamos tratando de hacer lo correcto, pero estamos atrapados en un sistema que se niega a ayudarnos.

Los vendedores ambulantes no califican para programas del gobierno. Somos autosuficientes. No estamos pidiendo limosnas, solo queremos la capacidad de trabajar sin miedo, de mantener a nuestras familias y de contribuir a esta ciudad que amamos.

La aprobación de estas leyes traería orden a nuestras calles, nuestros vecindarios y nuestras comunidades. Pero lo más importante es que nos permitiría trabajar con dignidad, como siempre hemos intentado hacer.

Le pido al Consejo Municipal que apruebe ahora estos proyectos de ley para vendedores ambulantes, para que finalmente podamos trabajar con un permiso y sin miedo.

Gracias.

English

My name is Ángel, and I am an active member of Make the Road New York. Thank you to the commission for giving me the opportunity to present my testimony.

I've been working as a street vendor in New York City for five years—ever since the pandemic forced me into this line of work. I live in the Bronx, and I work in different areas of this city, trying to make an honest living.

I'm here today to ask the Council to pass the reform package for street vendors: House Bills 431, 408, 47, and 24. We need these reforms so that we can work without fear and with dignity.

Street vendors contribute to New York's economy by paying personal and sales taxes. We work hard, but still, we don't receive any type of refund. One example of this is a \$0.01 check that was mailed to me—a reminder of how little support we get in return for our contributions.

Street vending is the only source of income for me and my family. It's not just a job; it's how we survive. It's my lifeline. It's how I put food on the table for my family, and I'm not asking for handouts—I'm asking for the right to work with a vending permit.

These reforms are incredibly important to me because they would give us the security to do our work without constant fear. Every day, I fear being fined or arrested, just for trying to make a living.

The health department tells us to get a license, and when we apply, they tell us they can't give us any more. This is a cruel cycle. They make us jump through hoops, and then they close the door on us.

We live in fear, especially during the Trump administration. At any moment, we could be arrested for a violation we cannot avoid—and that charge has the potential to impact our immigration status. That fear is heavy on our hearts every single day.

We want to comply with the regulations, but the city won't allow us to obtain the permits and licenses we need. We are trying to do the right thing, but we are trapped by a system that refuses to help us.

Street vendors don't qualify for government programs. We are self-sufficient. We are not asking for handouts—we just want the ability to work without fear, to support our families, and to contribute to this city that we love.

The passage of these laws would bring order to our streets, our neighborhoods, and our communities. But most importantly, it would allow us to work with dignity, as we have always tried to do.

I am asking the City Council to pass these street vendor reform bills now, so that we can finally work with a permit and without fear.

Thank you.

Buen día, mi nombre es Belen Becerra.

He sido vendedor ambulante en la ciudad de Nueva York por 10 años.

Resido en el barrio de Queens y trabajo en el barrio de Corona.

Estoy aquí hoy para pedirle al Concejo que apruebe el paquete de reformas para vendedores ambulantes: Propuestas 431, 408, 47, y 24.

Soy madre soltera y mantengo a mis hijos saliendo a vender. No tengo ayuda del gobierno y sería de mucha ayuda que me puedan dar un permiso y licencia para vender y poder trabajar sin tener miedo que me puedan decomisar mi mercancía o que me pongan un tique.

Soy vendedora ambulante y pago mis impuestos y sigo reglas de la ciudad de Nueva York.

Nos merecemos la oportunidad de salir adelante y prosperar en nuestra comunidad.

Greetings Madam Chairperson and councilmembers. My name is Bill Bruno. I'm from Jackson Heights, a center of considerable street vendor activity, and I'm here to testify in favor of Intros 0408 and 0431. Street vending provides both important business income for the vendors and, given that they seem to be able to sell enough to keep going, meet a demand by consumers in the community. Since the sidewalk space serves many users, it's important to have a system that balances the needs of the various stakeholders.

The current approach of doubling down on enforcement does not do that. If it did, then the fact that, according to a March 2025 City Limits story, *"The number of NYPD tickets in 2024 was five times higher than in 2019, ... and twice as many as in 2023, when the police issued about 4,213 tickets to vendors."*, should've lead to a gradual solution to this issue.

<https://citylimits.org/nyc-issued-over-10000-street-vendor-tickets-confiscated-tons-of-food-in-2024/> These numbers also refute the case that enforcement has not been attempted.

Instead, not only do we have a needlessly punitive treatment of street vendors, we also don't have them in an organized system that would far better balance the interests of all stakeholders than what we have now. Intro 0431 would remove what is an arbitrary and unreasonably low cap on vendor permits. Arbitrary because it's unneeded to organize the street space. Removal of the permit cap does not get rid of the other requirements regarding leaving sidewalk space, not crowding doorways, etc.

Indeed, since the key is to strike that balance, these bills address that by 1) integrating street vendors, who very much want to be given an opportunity to get legal permits, into a legalized system and providing a carrot (the permit) for good behavior, 2) providing educational resources through the Division of Street Vendor Assistance, which 0408 would create, which would assist them in getting in line with their rights and obligations, and 3) refocusing such enforcement that may still need to be done on those items that impact the balance on the sidewalk.

That it's out of balance can be shown by an example from my neighborhood. According to the NYPD OATH summons data in Open Data NYC, just over 3/4s of the summonses done by my two local precincts (115, 110) in the first three quarters of 2024 were permit-related ((UNLICENSED GENERAL VENDOR, UNLICENSED MOBILE FOOD VENDOR, UNPERMITTED MOBILE FOOD UNIT, FAILURE TO WEAR LICENSE WHILE VENDING, UNAUTHORIZED VENDING) and just under 1/4 related to actual issues that impact sidewalk use

(i.e., VENDING UNIT AGAINST DISPLAY WINDOW OR 20 FT. OF ENTRANCE OR EXITS, VEND IN BUS STOP, NEXT TO HOSPITAL/10 FT OF DRIVE, SUBWAY, CROSSWALK, VENDOR ON SIDEWALK LESS THAN 12FT., OR NOT AT CURB, etc). Lifting the permit cap is not only just in and of itself, it will also require enforcement to focus on the latter set of issues since going after unpermitted vendors will not be possible. The only thing that citing someone for not having a permit does is punish them for an unconscionable shortage of available permits.

The economic dimensions show the benefit of working vendors into an organized system. According to the IBO, it would also raise up to \$17 million/year in revenues for the city. Street vendors draw foot traffic which benefits brick-and-mortar stores as well. The argument of unfair competition doesn't hold up under scrutiny. It's true that street vendors don't pay rent or other expenses, but they also don't have what many brick-and-mortar stores have—a climate-controlled environment, usually more space and greater inventory, a permanent location. In other words, there is some competition, but the balance of advantages and disadvantages hardly makes it unfair. There is a question of how much overlap there even is for customers. A person seeking fuchka or a momo plate is looking for a different experience than someone who wants a more elaborate take-out or sit-down dinner.

Street vending can be a step up for many people and an integrated part of a vibrant streetscape that benefits all stakeholders. To make that happen, however, they need to be thought of as something more than an enforcement problem. These bills are step towards that.

Written Testimony of the CUNY Urban Food Policy Institute Submitted to the New York City Council Committee on Consumer and Worker Protection May 6, 2025

Subject: Oversight Hearing on Street Vending & Proposed Legislation

Chair Velázquez and members of the Committee:

Thank you for the opportunity to submit testimony on behalf of the CUNY Urban Food Policy Institute. We are a research and action center within the CUNY Graduate School of Public Health and Health Policy. Our comments today stem from our recently completed citywide evaluation of the NYC Green Carts program, which has spent over 15 years bringing fresh produce to underserved neighborhoods while creating entrepreneurial pathways for immigrant vendors and others.

We are grateful for the Council's focus on mobile vendor legislation, particularly the bills under consideration today. While none of these bills explicitly addresses Green Carts, they will significantly impact the program's future, and might actually help reverse its ongoing decline.

Green Cart vendors operate under unique constraints. They work within designated precincts and are limited in the products they can sell, which limits their profitability. But like other street vendors, they struggle with complex and confusing permit processes, minimal technical support, expensive commissary requirements, and limited infrastructure access, making it nearly impossible to keep up with ever-changing health regulations.

One recent example are the new rules allowing vendors to sell cut fruit. Most Green Cart operators we spoke with as part of the evaluation research we conducted do not have the equipment or access to prep facilities needed to comply. Our interviews revealed that some vendors who want to sell cut fruit are caught between spending thousands on new carts that would support compliance or risking citations. This is not sustainable for a program designed to boost neighborhood-level food access.

Given these realities, we strongly support Int. 408's creation of a Street Vendor Assistance Unit within the NYC Department of Small Business Services (SBS). However, the current draft does not specifically include Green Carts or outline services tailored to their challenges. We urge the Council to amend Int. 408 to include:

- Specialized technical assistance for restricted-permit programs like the Green Carts program;
- Connections to affordable commissaries or storage networks;
- Support implementing EBT terminals and payment systems.

These adjustments would better align with the bill's goal of supporting vendor economic mobility while addressing the persistent hurdles we heard about from Green Cart operators in the Bronx, Brooklyn, Queens, and Manhattan.

We also support Int. 431's gradual license expansion and eventual cap removal by 2029. The bill wisely maintains the Green Cart exemption from supervisory license requirements, something we believe should continue. Most Green Cart vendors work independently with no additional staff, and

adding supervisory burdens would likely accelerate program attrition. That said, the bill could be strengthened by:

- Setting aside a percentage of new licenses for public health-focused programs like Green Carts
- Restarting permit outreach in areas where Green Carts have disappeared but demand persists, particularly near NYCHA developments, where our data shows more than half of housing sites lack a Green Cart within walking distance.

Regarding Int. 1164's enforcement portal, we appreciate the move toward transparency but have concerns about implementation. Green Cart vendors have historically faced uneven enforcement pressures. Our analysis of DOHMH records (2013-2023) showed disproportionate citation rates in Manhattan and Brooklyn, with roughly 21% of violations ultimately dismissed or withdrawn. A centralized portal will only help if paired with robust due process safeguards and vendor education, not if it becomes another surveillance tool.

Finally, on Int. 1251's supervisory license mandate, we support maintaining Green Cart exemptions from this structure. The vendors we surveyed are overwhelmingly sole proprietors already overburdened by paperwork. Adding supervisory requirements would likely push more out of the program entirely. Instead, we suggest exploring alternative compliance incentives like subsidies for regulation-compliant carts or location bonuses for vendors operating in high-need areas.

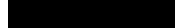
Lastly, our evaluation makes clear that the Green Cart waitlist approach is dysfunctional, opaque, outdated, and out of sync with vendor and community needs. Int. 431 aims to expand mobile food vending licenses and eventually remove the cap for general vendors, but it specifically excludes Green Cart permits, which are a separate category created under a different law and still capped at 1,000. This means the waitlist problem for those vendors remains completely unaddressed.

Based on our research, we believe that Green Carts are not failing because people do not want them. The customers we surveyed regularly buy produce from these vendors and wish there were more Green Carts available. The vendors themselves want to keep operating but need straightforward information, physical infrastructure, and policy backing that acknowledges their real-world constraints.

These bills can make a difference if the Council recognizes how City policies have inadvertently undermined programs like Green Carts. We ask that Green Cart vendors be explicitly included in the technical assistance, infrastructure support, and location planning these bills enable.

Thanks for your time. We are happy to share the data from our evaluation with any Council offices interested in developing vendor-focused implementation strategies for these reforms.

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CUNY Urban Food Policy Institute
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<http://www.cunyurbanfoodpolicy.org>

FOR THE RECORD

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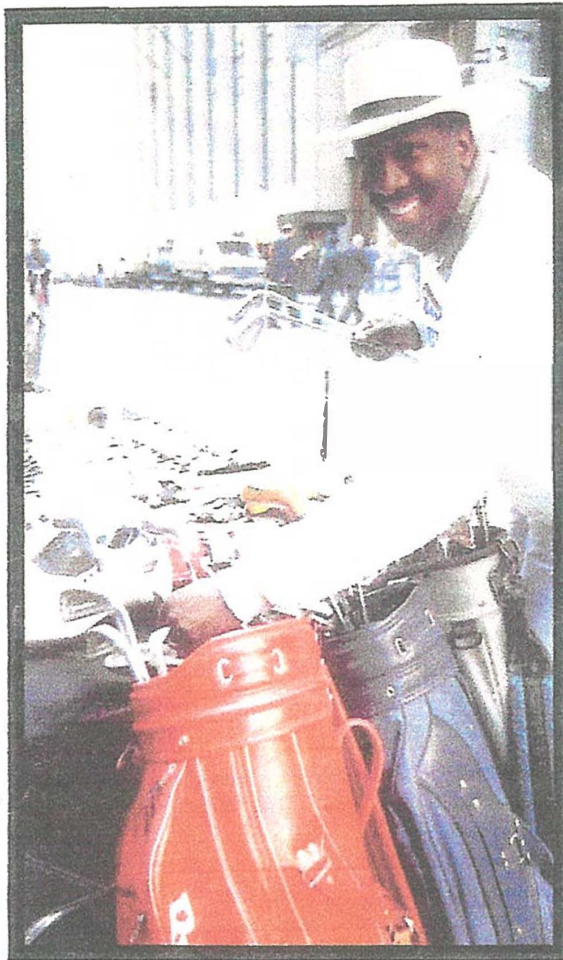
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I Saw Something and Said Something
Mayfirstthebook.com
Freedom is not Free.

Stock Distribution

“People come by and say, ‘Only in New York,’” says Duane Jackson, and no doubt many golf retailers hope that is indeed the case. Jackson is the proprietor of Duane’s of Wall Street, which has two prime Financial District locations, one on the corner of Wall and Williams sts., the other at Broad and Beaver sts. What’s so unusual? The shops are on the sidewalk.

In addition to the watches and wallets neatly displayed on his two-tabletop operation, Jackson, an affable ex-Navy man and chapter president of the National Association of Disabled Veteran Vendors, sells golf clubs, shoes, gloves and balls. His clientele includes such heavy hitters as employees of J.P. Morgan, Citibank, Goldman Sachs, the New York Stock Exchange, and the occasional New York City cop.

Like all who thrive on the Street, Jackson knows his market. He’s a low-rent dealer in a high-rent district, catering to the scores of new, business-minded golfers. Sixty percent of his sales come from used and sometimes knock-off product he buys from wholesalers, flea markets and two pro shops, for whom he sells on a consignment basis. A recent visit to the Wall Street operation found used sets of steel-shafted Tommy Armour 845s and Wilson Sam Snead Blue Ridge irons, a charmingly motley array of



used single clubs, a box of Bridgestone Precept EV Spin balls, and a few sample pairs of shoes and gloves.

“As you know, the market on new equipment isn’t that good,” says Jackson, who’s also a salesman for the company whose wireless credit card machine he uses. “But if I can buy a set for \$60 and sell it for \$100, that’s not too bad.” What for the past seven years had been more of a curiosity suddenly has blossomed into 30 percent of his total sales. “My golf business is absolutely the busiest it’s ever been,” says Jackson. “I can only see it growing from here.”

Jackson is no trend-riding opportunist. He took up the game at age 12, and family friend Herman Mitchell, Lee Trevino’s famous caddie, is his godfather. He was a par-shooter at age 22, and now plays bogey golf once a weekend. Along with the seemingly endless stream of back-slapping customers, a recent invite from an insurance company v.p. to play

Westchester CC, site of the Buick Classic, is a sign of his well-loved status.

Inventory issues are now the main problem for Duane’s of Wall Street, whose storeroom is an old Subaru station wagon. “My biggest limitation is space,” says Jackson. “Only four sets fit in the back of the car.” —Evan Rothman

PHOTO BY THOMAS INMACONNE



Get Bent

The Back Tee, from Global Link Associates, proudly admits it does squat for golfers — literally. This plastic device attaches onto the butt end of a club to tee up a ball for the bending-challenged. The process is as follows: (1) Place golf ball and tee into the Back Tee and tighten to set; (2) Place Back Tee on the end of the club; (3)



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Testimony from Eliana, Member of Make the Road New York
Street Vendor Reform Package Hearing
New York City Council
May 6, 2025

Spanish

Mi nombre es Eliana. Me siento orgullosa de ser miembro y líder de Se Hace Camino Nueva York y una miembro fundadora de Street Vendor Project. Tengo 43 años viviendo en la ciudad de Nueva York y he trabajado durante 39 años como vendedora ambulante, vendiendo legalmente con una licencia, pero nunca he podido obtener un permiso. Vivo sola, y así es como sobrevivo. No tengo un gran negocio ni un jefe que me proteja. Solo tengo mis propias manos y mi esfuerzo.

Incluso después de todos estos años, sigo recibiendo multas porque no tengo un permiso. Pero la verdad es: no podemos obtener uno. Cuando vamos a solicitarlo, la ciudad nos dice: "No hay licencias para ustedes". Luego nos castigan por no tenerlo.

Por eso estamos exigiendo que el Consejo Municipal apruebe los proyectos de ley de reforma para vendedores ambulantes 431, 408, 47 y 24. Estos proyectos finalmente darían a los vendedores ambulantes un camino para trabajar legalmente y sin miedo.

La venta ambulante no es solo un trabajo para mí. Es mi independencia. Es mi salvavidas. Me da el poder de sobrevivir por mi cuenta, con dignidad, después de décadas de contribuir a esta ciudad.

No dependemos de la ayuda del gobierno. Pagamos impuestos. Contribuimos a la economía. Queremos seguir la ley, pero la ciudad no nos deja.

Cada día que salgo a trabajar, llevo el miedo de ser multada, acosada o algo peor. Como mujer inmigrante trabajando sola, ese miedo es grande. Pero sigo adelante, mientras abogamos por permisos para formalizar nuestro trabajo.

Los vendedores ambulantes somos pequeños negocios. Servimos a nuestros vecindarios, nos mantenemos por nuestra cuenta y mantenemos esta ciudad vibrante y viva. Merecemos respeto. Merecemos protección. Merecemos el derecho a existir.

Consejo Municipal: ayúdenos a sobrevivir.

Porque detrás de cada carrito o puesto, hay una persona. Una historia. Una lucha. Y un sueño.

Gracias.

English

My name is Eliana Jaramillo. I am proud to be a member and leader of Make the Road NY and a longtime member of the Street Vendor Project. I have lived in New York City for 43 years. I have worked for 39 years as a street vendor, selling legally with a license, but I have never been able to obtain a permit. I live alone, and this is how I survive. I don't have a big business or a boss to protect me. I only have my own hands and my effort.

Even after all these years, I still receive fines because I don't have a permit. But the truth is: we can't get one. When we go to apply, the city tells us, "There are no licenses for you." Then they punish us for not having it.

That's why we are demanding that the City Council approve the street vendor reform bills 431, 408, 47, and 24. These bills would finally give street vendors a path to work legally and without fear.

Street vending is not just a job for me. It's my independence. It's my lifeline. It gives me the power to survive on my own, with dignity, after decades of contributing to this city.

We don't rely on government help. We pay taxes. We contribute to the economy. We want to follow the law, but the city won't let us.

Every day I go out to work, I carry the fear of being fined, harassed, or worse. As an immigrant woman working alone, that fear is heavy as we advocate for permits to formalize our work.

Street vendors are small businesses. We serve our neighborhoods, support ourselves, and keep this city vibrant and alive. We deserve respect. We deserve protection. We deserve the right to exist.

City Council: help us survive.

Because behind every cart or stand, there is a person. A story. A struggle. And a dream.

Thank you.

**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is Felicia Arriaga, and I am a professor and member of the DSA Immigrant Justice Working Group and I would like to thank Chair Menin and the Committee for the opportunity to testify today in support of Intros 431 and 408.

The Immigrant Justice Working Group is currently collaborating with campaigns to get NY out of the business of immigrant detention and to safeguard the rights of immigrant community members.

As socialists, we believe all people deserve a dignified existence, no matter their citizenship status. We reject the scapegoating of immigrant communities and the criminalization of undocumented community members. We affirm the rights of people to remain and thrive in the location of their choosing.

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408, as part of the Street Vendor Reform legislative package.

Intro 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors.

Currently, while there are more than 5 agencies that do street vendor enforcement, there is no city agency leading on educational resources to vendors. **Intro 408** would create an office of street vendor services within SBS, ensuring that street vendors as our City's smallest businesses have access to training, education, and outreach to support business compliance and growth.

- **IMMIGRATION:** Targeting street vendors, 96% of whom are immigrants, for NYPD arrests and tickets puts them at increased risk of ICE arrests, resulting in immigration detention and deportation. Our city's policies should support our economy while uplifting our values, rather than imitating the Trump administration's cruel agenda. City Council can and must enact policies that protect New Yorkers against Trump's mass deportation agenda. Enacting these bills will reinforce our commitment to the values that define New York and ensure the well-being of New York families, businesses, and communities.

Thank you for accepting our testimony today. It is the DSA Immigrant Justice Working Group's hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

Felicia Arriaga
DSA Immigrant Justice Working Group

Ibrahim Shehata testimony (translated from Arabic)

Good afternoon ladies and gentlemen, I want to thank you all for being here and for your time and attention. I was here with you at City Hall since 8am, when we met for the rally on the steps.

I am a food vendor, and this is the only source of income for my family of five. My son is 12 years old and has a disability, so he has a lot of different needs and caring for him takes a lot of time including going to the hospital, etc. Still, I say thank god. I work as a food vendor and I want to ask that the police leave us alone in certain places to make our living. We are working as vendors, not as criminals – we are not selling drugs. Please. There are many agencies that are so focused on us: vendors, vendors, vendors. We are working people, people struggling and working hard in our jobs. Everyone is trying and using his skills, but you'll find agents from the police or sanitation interrupting us and bothering us in our work. This happens even for those of us working on carts with a citywide permit, where we are in a legal location, everything is by the books, but the police still come to double check. The police, the sanitation, the health department. Police come and check my spot and give me a criminal ticket. I'm not a criminal, I'm not a thief, I'm not getting in a fight with anyone. This is how I make my living. My spot is at 34rd St. in Hudson Yards. They came and put trees in our spot without ever letting us know, displacing all of us who were selling there. The business we were running there was supporting families of 40 people. And they were all displaced from their business. Even until today I go to work but I am not able to pay my rent, cover all of my children's expenses, keep up with my bills. So please I'm asking you to look upon food vendors as hardworking people, people who are just trying to put food on the table. Vendors are going out to work, they are not stealing, they are not dealing drugs, they are not breaking car windows to steal what's inside. They are just trying to make a living.

One other thing I would like to add. On 33rd St. with 8th Avenue, there is a coffee cart. I was working there six or seven years ago. There was construction, and after the construction I didn't return because I was working on a smoothie cart. The coffee cart is able to enter every day, the security lets him in and out, and he doesn't have a different permit from me, it's the same citywide permit, not a private property or restricted area permit – it's the same permit I have. Please, the city should be paying attention to situations like this and protect us from people who want to treat vending unfairly and take more than their share. Because people like this are monopolizing vending, or maybe they are tired of vendors and don't want to respect their rights to vend. If you think that I am violating the rules, then you can take away my license! Take away the permit, like the way the health department scratches off permits and closes them. Each vendor is struggling and they have responsibilities – their children,

their families, their personal lives, their necessities, their family life. Thank you very much ladies and gentlemen for listening and for your time.

**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is Jack Feinberg, and I am a self employed private chef. I would like to thank Chair Menin and the Committee for the opportunity to testify today in support of Intros 431 and 408.

My name is Jack Feinberg, and I am a private chef in New York City. I work independently, creating meals and experiences for clients in their homes and events across the city. I operate with little direct oversight. My ability to work freely and legally is a privilege — one that everyone deserves and highlights the deep and painful contrast with how our city treats street vendors.

Street vendors are small business owners, entrepreneurs, and community members. They are also an intricate part of the very unique food culture that we have in New York City. Yet, unlike private chefs like myself, they face relentless scrutiny, unjust fines, and even arrest simply for trying to earn a living. Why are they being criminalized for doing what I do every day — providing food, service, and value to New Yorkers?

New York City is home to approximately 23,000 street vendor businesses, contributing over \$192 million in wages, \$292.7 million in goods and services, and \$71.2 million in taxes annually. These vendors are not on the margins of our economy — they are at the heart of it. Street vending has long served as an entry point for immigrants, veterans, and communities of color to build microbusinesses and pathways to stability. Yet our current regulatory system keeps them in a state of flux, denying them access to permits and licenses while subjecting them to policing, harassment, and unfair enforcement.

As someone who has built a career in food without the same barriers, I cannot stand by while street vendors — many of them immigrants — are left vulnerable to ICE detention or deportation because of a simple ticket or NYPD stop. That is not justice. By passing Intros 408 and 431, the Council has the opportunity to choose equity, economic empowerment, and public safety over cruelty and outdated policies.

Gender justice must also be central to this conversation. Nearly half of street vendors are women, yet they make up a small fraction of those who hold licenses. Just 27% of mobile food vendor permits and 14% of general vendor licenses are held by women. The permit cap, and the informal economy it has created, disproportionately harms women who are seeking to care for their families and grow their businesses with dignity.

We cannot ignore the fiscal reality either: increasing permit availability and reforming enforcement will generate new revenue and compliance, as confirmed by the Independent

Budget Office. At a time when the city faces budget challenges, why not unlock millions in revenue while improving food safety and fairness on our streets?

This is about more than economics — it's about values. Street vendors embody the creativity, resilience, and diversity that define New York. These vendors are the true faces of food culture and diversity all across the city. They feed our communities, just like I do — only without the same protection or respect.

Intros 408 and 431 are not radical bills — they are common sense. They will create a fair, enforceable, and transparent system where vendors can operate safely and legally. They will move us away from criminalization and toward dignity. They will help our city live up to the promises it makes — of opportunity, equity, and justice for all New Yorkers.

Thank you.

Jack Feinberg

**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431**

May 6th, 2025

Good afternoon. My name is James Irizarry, and I am a teacher from the Bronx. I would like to thank Chair Menin and the Committee for the opportunity to testify today in support of Intros 431 and 408.

I've spent many years teaching in my community and helping the children whose parents work to get by. In the current cost of living crisis, many parents work as hard as they can to ensure their children have as many opportunities as possible.

Street vendors are the backbone of New York City. As our City's smallest businesses, street vendors reflect the great diversity of our communities, and are a true embodiment of the entrepreneurial spirit of our city. They are parents working to make a living and vendors are out every day to provide for their families and feed their neighbors—often targeted and criminalized for doing so. Whether it's the people selling fruit, empanadas or the gentlemen selling halal food from their truck are integral members serving my community and I want to see them thrive.

This package of bills will let vendors provide the services New Yorkers want - in a regulated, predictable, enforceable system - and give them a real chance to build wealth in their neighborhoods. Vending is a lifeline for communities in need that are simply trying to support their families. The City must not criminalize street vendors for trying to provide for their families, but instead cut the red tape and facilitate a healthy regulatory environment for our smallest businesses to thrive. People deserve the right to make a living and support their families.

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408, as part of the Street Vendor Reform legislative package.

Intro 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors. By bringing vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses, ensuring a fair system that requires vendors to comply with vending regulations including strict siting and health code rules to maintain their permitting. This will give New York's smallest businesses a real chance to thrive in our local economy.

Currently, while there are more than 5 agencies that do street vendor enforcement, there is no city agency leading on educational resources to vendors. **Intro 408** would create an office of street vendor services within SBS, ensuring that street vendors as our City's smallest businesses have access to training, education, and outreach to support business compliance and growth.

Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

Targeting street vendors, many of whom are immigrants, for NYPD arrests and tickets puts them at increased risk of ICE arrests, resulting in immigration detention and deportation. Our city's policies should support our economy while uplifting our values, rather than imitating the Trump administration's cruel agenda. City Council can and must enact policies that protect New Yorkers against Trump's mass deportation agenda. Enacting these bills will reinforce our commitment to the values that define New York and ensure the well-being of New York families, businesses, and communities.

Thank you for accepting our testimony today. It is my hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

James Irizarry

FOR THE RECORD

TESTIMONIO (2 minutos máximo):

Buen día, mi nombre es Jessica A.

He sido vendedor ambulante en la ciudad de Nueva York por 10 años.

Resido en el barrio de Brooklyn y trabajo en el barrio de Brooklyn.

Estoy aquí hoy para pedirle al Concejo que apruebe el paquete de reformas para vendedores ambulantes: Propuestas 431, 408, 47 y 24.

Estas reformas son muy importantes para mí porque:

buena tarde
Necesito el permiso y Licencia
para poder vender en la calle.

* el 24 de diciembre del año 2021
no dejaron vender en la calle de
Brooklyn la Ley 431

* Nuestro Congreso es para servir a la Ciudad
de Nueva York.

* Soy madre soltera de 3 hijos de
42 años a Nueva York trabajo 20 años
en casa de familia podía 3 familia
después fui a trabajar en el trabajo
me salió de trabajo porque vendía
zapatos usados y los pos perdí.
Y la última oportunidad vendí frutas
en la calle de Brooklyn Ley 431, 408.



Ideas para temas de conversación (puedes elegir los que sean importantes para ti):

- La venta ambulante es única. No puedo depender de otros trabajos, pero sí de la venta ambulante porque me permite controlar mi horario de trabajo, mi tiempo y mi negocio.
- La venta ambulante es la única fuente de ingresos para mí (y mi familia).
- Mi negocio de venta ambulante genera empleo para mí (y para mi familia, mi comunidad, mis amigos, etc.).
- Los vendedores ambulantes pagamos impuestos y contribuimos a la economía.
- Como vendedores ambulantes, somos autosuficientes, no dependemos del gobierno.
- Los vendedores ambulantes desean cumplir con el reglamento, pero la ciudad no nos permite obtener los permisos y licencias que necesitamos.
- La policía y el departamento de Sanidad nos dicen que «vayamos a conseguir una licencia» o seremos multados, y cuando vamos a solicitar una licencia, la ciudad nos dice que «no tenemos licencias para ustedes».
- Ustedes, como ciudad, tienen la culpa de que no tengamos licencias, no nosotros como vendedores.
- Como no tenemos forma de cumplir con la ley de licencias para la venta tenemos miedo de trabajar bajo la administración de Trump. En cualquier momento, las autoridades de inmigración, la policía de Nueva York o la policía de sanidad podrían acusarnos de una infracción que no podemos evitar, y ese cargo podría significar nuestra detención o deportación.
- Al igual que cualquier otro negocio, nos merecemos el apoyo de las autoridades de nuestra ciudad.
- Nos merecemos la oportunidad de salir adelante y prosperar en nuestra ciudad.
- Brindamos servicios esenciales a neoyorquinos.
- La aprobación de estos proyectos de ley creará orden en las calles y garantizará que los vendedores cumplan la ley.

**Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection**

May 6, 2025

I am writing on behalf of Pixie Scout, a catering company of food and hospitality professionals creating and sharing food and beverage provisions in service of joyful food experiences. Our company has operated RFP-based concession kiosks in The Battery for five years and worked alongside a vibrant community of street vendors -- most of them operating outside the permit structure. I support the Street Vendor Reform Package and am testifying in support of Intros 431 and 408 today.

In our experience, the presence of these vendors enhanced the overall diversity of food options and contributed to a truly multicultural community enjoying the park ecosystem. We noticed, however, that operating outside the street vendor permit structure meant that many if not most of these vendors were competing with one another for space in the park, creating an intensity that compromised their focus on hospitality. Also they were often operating under extreme duress -- violent raids from different city agencies, infrastructure and product destroyed or thrown away, zero consistency of space or location, language barriers with customers, and many other obstacles that a bigger, more inclusive and organized Street Vendor program could help these businesses navigate.

Finally, our business was on its own to navigate diplomatic and collaborative markets / uses of space with the vendors in our immediate vicinity. Rather than focusing its resources on raids and other violent efforts to eradicate the vending community, we would have welcomed multilingual community facilitators and business incubators who could have helped organize the park ecosystem to better serve a vibrant consumer market -- allowing all the various models of business to thrive. In other words there is and was enough business for all the vendors but working TOGETHER would have helped create a safe, welcoming, fluid small business landscape.

Sincerely,

Katy McNulty

Pixie Scout

<https://www.pixiescout.com/>

DEPARTMENT OF NUTRITION & FOOD STUDIES

NYC Council, May 6, 2025

My name is Krishnendu Ray. I am a professor of Nutrition and Food Studies at NYU.

I do research and teaching around food provisioning in cities.

I am here to support Intro 431 & 408

My research shows that a well-regulated street vending system is an asset to cities in terms of safety and accessibility of food

Intro 431 – sponsored by Council-persons Pierina Sanchez and Amanda Farias

I support the increase in the number of supervisory food licenses and permits issued to US military veterans

I support the provision to provide 1,500 minimum supervisory food vendor licenses and permits per year for 5 consecutive years by the Department of Health and Mental Hygiene (DOHMH)

I support the requirement to provide 1,500 minimum general merchandise licenses for 5 consecutive years.

Intro 408

I think it is a good idea to extend the work of the department of small business services (SBS) to provide training, outreach, and education to all food and general merchandise vendors on business growth and compliance with all laws, rules, and regulations.

Both these bills will contribute to a well-regulated street vending system

Krishnendu Ray, Professor
Department of Nutrition & Food Studies, New York University
Krishnendu.ray@nyu.edu

City Council Committee on Consumer and Worker Protection
"Street Vendor Reform Package"
Tuesday May 6th, 10 AM in person & via Zoom

Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431

May 6th, 2025

Testimony to the New York City Council Committee on Consumer and Worker Protection

Intro 408 & Intro 431

Good morning. My name is Leeanne G-Bowley, a homeowner in Elmhurst Queens, voter, educator, and Director of Public Programs and Partnerships at a Corona cultural institution. I've served multiple terms on Queens Community Board 4, including on the executive and zoning committees. Thank you Chair Menin and the Committee for the opportunity to testify in support of Intros 431 and 408.

My daily walk to work from Elmhurst to Corona reveals the power of our community and the role street vendors play in our lives. Families gather for meals from street vendors before school, our streets feel safer at night because vendors and their customers light up our neighborhoods, and communities have safe places to come together during crises to help one another. Yet our city disincentivizes these small businesses that bring economic security and public safety to our streets.

The lack of available permits is weaponized against my community, leading to less safety, fewer economic opportunities, and weakening our social fabric—a community that survived flooding from Hurricane Ida and being the epicenter of the pandemic.

For decades, critics have tried to connect street vending with disorder while enforcing harsh measures on entrepreneurs. The City Council now has the opportunity to create a functioning regulatory system by passing Intros 431 and 408.

Intro 431 would ensure proper licensing and compliance of all mobile food and merchandise vendors. Currently, 75% of food vendors and 37% of general vendors operate without business licensing due to arbitrary caps. These bills will end the unregulated status quo by bringing vendors into a system that requires compliance with siting and health code rules.

Intro 408 would create an office of street vendor services within SBS, providing vendors access to training, education, and outreach to support compliance and business growth.

Let me share one concrete example: After Trump's first election, law enforcement dumped the contents of a vendor's cart outside the 7 train entrance at 82nd Street. Their justification? The vendor lacked a license—not because they didn't want one, but because none were available. I attended the next precinct community meeting and brought up the incident siting both intimidation and the mess this demonstration made in my neighborhood. I was told, "I know you think it's cute to get authentic food on the street, but they're breaking the law."

This isn't about being "cute." My family were once immigrant entrepreneurs. My great grandparents came to Queens from Italy and starting their own businesses. Their hard work supported my grandparents, 1st Generation Americans who attended Aviation and Long Island City High Schools. I personally have benefited from the entrepreneurial spirit of immigrants in Queens for generations. My great grandparents didn't face today's regulatory barriers.

Furthermore, I recognize intimidation fueled by bigotry. And let's talk about "breaking the law" We see it from our Mayor, who threatens compliance with illegal tactics "mass deportation" in collaboration with a Federal Government that continues to break the law and defy court mandates. Passing these intros directly addresses this fear-mongering and potential illegal actions from our government by getting rid of an arbitrary cap that puts our local small businesses at risk of police engagement. NOW you can take that weapon out of the hands of those who would do harm to the entrepreneurs in our community, by making it legal to provide these services that our community wants and needs.

Another indication that the city council should pass Intros 431 and 408, our local youth know it is the right thing to do. Last year local students produced a play reflecting their immigration stories. Central to the play was a character's struggle to support her family as a Street Vendor. The students enacted the trials of seeking a permit, combating fraud due to lack of appropriate government regulations and support, and facing discrimination from police. Their message was clear, regulations such as Intro 431 and 408 will make them and their families safer and our community more secure and vibrant.

These reforms also advance gender justice—nearly half of vendors are women, yet women hold only 27% of food vendor permits and 14% of general vendor licenses. The fiscal impact is positive too—with waitlists of nearly 20,000 people, the Independent Budget Office projects a net impact of \$59 million.

Thank you for accepting my testimony. I hope the City Council passes Intros 431 and 408 as part of the Street Vendor Reform Package.

Leeanne G-Bowley Homeowner and voter in Elmhurst Queens Director of Public Programs and Partnerships at local CIG Former member of Community Board 4 and Member of the Queens Borough President's Civic Engagement Committee

FOR THE RECORD

TESTIMONIO (2 minutos máximo):

Buen día, mi nombre es Lilia Gómez

He sido vendedor ambulante en la ciudad de Nueva York por 2 años.

Resido en el barrio de Brooklyn y trabajo en el barrio de Sunset park

Estoy aquí hoy para pedirle al Concejo que apruebe el paquete de reformas para vendedores ambulantes: Propuestas 431, 408, 47 y 24.

Estas reformas son muy importantes para mí porque:

Vender en las calles es mi único trabajo
soy madre soltera de un niño de 16 años
y una niña de 15 años, pido que me
dejen trabajar, para poder comprar
comida para mis hijas, pagar la renta
que es muy alta, no tengo licencia de
vendedor, si estuvieran disponibles
ya la habría solicitado, me he sentido
acosada por los policías, en una
ocasión que estaba vendiendo ellos
se acercaron a mí y de una manera
muy agresiva me pidieron licencia
y al ver que no tenía, me dijeron;
Si en media hora no te vas te
voy a poner una multa, así que
quiero ver que te ballas ahora,
y cuando ellos se fueron me puse
a llorar, pues me quede pensando
ahora como voy a pagar mi renta,
y ese mes no pude pagar mi renta
q1 no poder seguir vendiendo.

Ideas para temas de conversación (puedes elegir los que sean importantes para ti):

- La venta ambulante es única. No puedo depender de otros trabajos, pero sí de la venta ambulante porque me permite controlar mi horario de trabajo, mi tiempo y mi negocio.
- La venta ambulante es la única fuente de ingresos para mí (y mi familia).
- Mi negocio de venta ambulante genera empleo para mí (y para mi familia, mi comunidad, mis amigos, etc.).
- Los vendedores ambulantes pagamos impuestos y contribuimos a la economía.
- Como vendedores ambulantes, somos autosuficientes, no dependemos del gobierno.
- Los vendedores ambulantes desean cumplir con el reglamento, pero la ciudad no nos permite obtener los permisos y licencias que necesitamos.
- La policía y el departamento de Sanidad nos dicen que «vayamos a conseguir una licencia» o seremos multados, y cuando vamos a solicitar una licencia, la ciudad nos dice que «no tenemos licencias para ustedes».
- Ustedes, como ciudad, tienen la culpa de que no tengamos licencias, no nosotros como vendedores.
- Como no tenemos forma de cumplir con la ley de licencias para la venta tenemos miedo de trabajar bajo la administración de Trump. En cualquier momento, las autoridades de inmigración, la policía de Nueva York o la policía de sanidad podrían acusarnos de una infracción que no podemos evitar, y ese cargo podría significar nuestra detención o deportación.
- Al igual que cualquier otro negocio, nos merecemos el apoyo de las autoridades de nuestra ciudad.
- Nos merecemos la oportunidad de salir adelante y prosperar en nuestra ciudad.
- Brindamos servicios esenciales a neoyorquinos.
- La aprobación de estos proyectos de ley creará orden en las calles y garantizará que los vendedores cumplan la ley.

Cuando la policía me quita de esa manera, me sentí como una delincuente, como una criminal y yo lo único que estaba haciendo es trabajar.

Mahmoud Zaed Testimony

Hello everyone, and thank you for giving me the opportunity to speak today. My name is Mahmoud Zaed. I've been a food vendor since 2008, and in 2009, I started my own business. Since then, I've had to rent a permit through the black market, as I've never been able to obtain one under my own name. My business has grown over the years and we now operate carts and trucks in midtown, the Upper East Side, and Long Island City.

For years, I've been forced to pay thousands of dollars every two years to people who were able to get permits directly from the city—while they only pay a small fee, I am forced to shoulder a huge expense that ultimately is passed on to my customers. This system is unfair and unsustainable for small business owners like me.

We need the city to issue more permits, and Intro 431 is a clear answer to speed up the permitting process. I am number 1,259 on the waitlist, and so far the city has only reached 865. Intro 431 will get more permits to vendors faster. If all vendors could get permits under their own names, it would reduce our costs significantly. This would allow us to lower our food prices, which is going to help our customers by making street food more affordable for everyone. Also, the money we pay for our permits will go into the city budget instead of the pockets of permit owners, benefitting all New Yorkers. I urge city council to pass Intro 431 and the entire Street Vendor Reform Package. Thank you.

Testimony to the New York City Council City Council
Committee on Consumer and Worker Protection
Intro 408 & Intro 431

My name is Mandira Ghai, and I am an advisory board member of the Street Vendor Project. I would like to thank Chair Menin and the Committee for the opportunity to submit written testimony in support of Intros 431 and 408.

Having moved to New York City in 2011 to work grueling hours at an investment bank, street vendors in Midtown offered me a exciting break from the ubiquitous casual options that were often both more expensive and crowded by offering nourishing, fresh food made with care that added flavor and joy to my workday. When I frequently found myself needing meals while burning the midnight oil, I could rely on the halal cart's late-night sustenance and kindness and the office adjacent breakfast cart bustling early in the morning with hot coffee, baked goods, and a pep talk. Those small exchanges were critical in brightening my professional routines and establishing rapport and a sense of community while coexisting in busy shared metropolitan spaces, especially in the nascent days of a new and overwhelming transition.

Street vendors are interwoven in the culture of New York City - their presence punctuates so many of our favorite films and television shows, literature, and cultural experiences. I love museums - especially art museums - and the dynamics of street vendors that are usually nearby enhance those visits. As this hearing occurred in the pouring rain on the heels (no pun intended) of the Met Gala's opulence, I bet I wasn't the only person looking forward to a sunnier warm day perched on the museum's iconic steps, eating cut mangoes or a soft pretzel from a proximate vendor. Personally, I know I cannot fully process or appreciate the boroughs' collections of Van Gogh, Chagall, Picasso, Magritte, Cassatt, Monet, Jarrell, Lawrence, Basquiat, Chicago, and Warhol without pairing them with at least one cart hot dog.

Street vendors have helped me learn about where I live and how I want to eat and explore the world. Fushka on a corner in Jackson Heights, sizzling tacos in Sunset Park, and a freshly made dosa perched on a bench in Washington Square park aren't just some of the most delicious foods in the New York City - they are portals to heightening cultural curiosity, empathy, and deep respect for differences by witnessing diligence. I have enduring respect for the perseverance the essential workers in the street vendor community demonstrated during the COVID-19 pandemic and, as an Indian immigrant, street vendor rights are especially important to me in the current political climate.

The history of street vending in New York City showcases significance to our urban economy and entrepreneurial spirit; iconic, thriving enterprises synonymous with the city like Russ and Daughters and Moscot originated humbly as pushcarts over a century ago. Vendors play a vital role in our urban growth and vitality, supporting immigrants, people of color, and military veterans to successfully operate microbusinesses while representing our communities and their unparalleled diversity. This package of bills is an opportunity to create fair systems that permit vendors to provide the services and experiences New Yorkers want in a regulated, predictable, enforceable system, offering them clarity and a legitimate chance to build wealth in their neighborhoods.

For decades, critics have tried to connect street vending with disorder and chaos, tweaking the current system at the margins while raining enforcement down on would-be entrepreneurs. New York City

Council has the opportunity to answer those critics once and for all to ensure a functioning regulatory system for street vending by passing Intros 431 and 408 as part of the Street Vendor Reform legislative package.

Intro 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors. By bringing vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses, ensuring a fair system that requires vendors to comply with vending regulations including strict siting and health code rules to maintain their permitting. This will give New York's smallest businesses a real chance to thrive in our local economy.

Currently, while there are more than 5 agencies that do street vendor enforcement, there is no city agency leading on educational resources to vendors. **Intro 408** would create an office of street vendor services within SBS, ensuring that street vendors as our City's smallest businesses have access to training, education, and outreach to support business compliance and growth.

Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

Targeting street vendors, many of whom are immigrants, to be reprimanded and ticketed by NYPD places them at elevated risks for ICE arrests, resulting in immigration detention and deportation. Our city's policies should buoy our economy while uplifting our values, not imitating Trump's cruel and xenophobic agenda. City Council can and must champion policies that protect New Yorkers against the current administration's mass deportation scheme. Enacting these bills will reinforce our commitment to the values that define this city and ensure the well-being of New York families, businesses, and communities.

Thank you for accepting my written testimony. It is the Street Vendor Project's hope that the City Council takes the critical step of passing Intros 431 and 408 as part of the Street Vendor Reform Package.

Mandira Ghai, Street Vendor Project

May 6th, 2025

Good afternoon. My name is Rob Martinez and I am a filmmaker and content creator. I would like to thank Chair Menin and the Committee for the opportunity to testify today in support of Intros 431 and 408.

There are few videos that I've made in my life that have been more beloved than the videos I have made about New York City's street vendors. Whether it was with Cleotilde, whose amazing chalupas made the Ny Times top dishes of 2024. Or with Fidel Cortes, who New York Magazine dubbed the Limon Ice King of Bushwick. Or with the less heralded but equally important tamale makers, who have opened their commissary kitchens to me at 2 in the morning, where they prep until 6 AM to be ready to feed hungry New Yorkers on their commute.

These folks don't take up much space on the street, but they've earned a massive space in the culture of New York City.

I was recently asked to contribute to a popular YouTube food channel with over 10 million subscribers. They were producing a street food competition between the cities of Austin, Portland, Los Angeles, and New York City. In Austin and Portland, the street food scene is a vibrant pop up scene, an incubator for entrepreneurs who can't afford a brick and mortar. In Los Angeles, street vending has been decriminalized, and one of its most famous food trucks inspired the movie Chef.

In New York, we have a broken system, where people win accolades for their food but aren't given the opportunity to sell it legally. New York lost the street food competition. We came in last. The video currently sits at 3.4 million views.

I wish street vendors in New York were given the same opportunity to thrive as they are in these other major cities. This package of bills will let vendors provide the services New Yorkers want - in a regulated, predictable, enforceable system - and give them a real chance to build wealth in their neighborhoods. The City must not criminalize street vendors for trying to provide for their families, but instead cut the red tape and facilitate a healthy regulatory environment for our smallest businesses to thrive.

Intro 431 would ensure business licensing and regulatory compliance of all mobile food and merchandise to maintain an orderly, regulated street vending system while creating economic opportunity for our City's smallest businesses. Currently, 75 percent of mobile food vendors and 37 percent of general vendors operate without business licensing due to arbitrary caps placed on the number of licenses the City issues to vendors. By bringing vendors into the system, these bills will end the unregulated, chaotic status quo that takes advantage of workers, customers, and fellow small businesses, ensuring a fair system that requires vendors to comply with vending regulations including strict siting and health code rules to maintain their permitting. This will give New York's smallest businesses a real chance to thrive in our local economy.

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Street vendors, like all New Yorkers, deserve a shot at success. That includes a fair opportunity to make a living, free from harassment. As small business owners, vendors are the lifeblood of New York City's economy and our communities.

Thank you for accepting our testimony today. It is my hope that the City Council takes the critical step of passing Intros 431 and 408, as part of the Street Vendor Reform Package.

Rob Martinez

Hello my name is Sam Yoo. As a born and bred native New Yorker, and am the owner of three restaurants, Golden Diner, Golden Hof and NY Kimchi. My businesses are located at 123 Madison Street NY, NY 10002 and 16 W 48th St, New York, NY 10036.

I was blessed and privileged with the gift of growing up in this great city. I support the Street Vendor Reform Package and am testifying in support of Intros 431 and 408 today.

Culture & Cuisine / Accessibility

Part of growing up in NY means that I was fortunate enough to grow up with a kaleidoscopic array of food, cuisine, and culture. I went to Stuyvesant High school just a few blocks from where we're standing today and as a young 15 year old, I was exposed to experience Indian, Middle Eastern, Chinese cuisines (to name a few) all at an extremely young age. A large part of why I was able to experience these foods is because I was able to buy them as they were accessible. As we all know, our great city has some of the highest rates of commerce and tourism in the world, and what street vendors allow is making that diversity accessible at affordable pricing.

Street vendors are a huge part of our identity as a cosmopolitan city. Through cuisine, they're able to spread culture and diversity, an integral part of what makes New York special and a coveted place to live and travel to. That's a part of the identity of who we are in New York, and what we represent as New York. We need to be enabling this, not putting up more red tape. To be exposed to these flavors is what has shaped what I do to day as a chef and business owner.

Giving hard working people an opportunity

I was raised by immigrant parents that operated restaurants, I've had the privilege to see what hard work and dedication can achieve. They're small business owners and job creators like restaurant owners. I believe that their self-starting spirit of trying to open a business despite having extremely limited resources is something that we should support, so that through their own abilities and hard work, folks can contribute to New York's culture and economy

Now I stand up here after working hard for 15+ years as a restaurant owner who is experiencing success after years of hard work. Street vendors deserve this opportunity and so much more. I am a living breathing example of what it means to come from parents who have lived the American Dream.

Good business practice

Storefronts from across the boroughs so far have come out in support, from restaurant groups like the Marlow Collective, to mom & pop shops like Grand Tea & Imports – and shared the

biggest issues they face are overhead, payroll, outdoor dining – not street vendors. By reforming street vending, our tax dollars will not only be spent smarter (currently being used to police street vendors) and efficiently but it will also increase tax dollars. The City must not criminalize street vendors for trying to provide for their families, but instead cut the red tape and facilitate a healthy regulatory environment for our smallest businesses to thrive. All of these reasons and so many more are why I support the Street Vendor Reform Package and am testifying in support of Intros 431 and 408 today. I call on all restaurants and New Yorkers to do the same.

Buen día, mi nombre es Antonio.

He sido vendedor ambulante en la ciudad de Nueva York desde 2020.

Resido en el barrio de Queens y trabajo en el barrio de Corona Plaza.

Estoy aquí hoy para pedirle al Concejo que apruebe el paquete de reformas para vendedores ambulantes: Propuestas 431, 408, 47, y 24.

Bueno mi testimonio del día de hoy martes 6 de mayo del 2025. Es muy importante para mí le pido licencia y permiso para poder vender en la ciudad de Nueva York. Porque durante la pandemia me he quedado sin trabajo y por eso estoy luchando como sobrevivir con mis pequeñas cosas que vendo. Pero ahora la policía quita todo y ya no se puede vender nada en la calle. Nos ponen tiques de \$250. Por eso estoy aquí presente para luchar por la licencia y permiso.

I am writing to express my strong support for Intro 0431 and Intro 0408, two essential pieces of legislation that will bring long-overdue reform and fairness to the lives and livelihoods of New York City's street vendors.

Intro 0431, which lifts the outdated cap on street vendor permits, is a necessary step toward ending the harmful consequences of the current system. The artificial cap has led to years-long waitlists and a thriving black market where permits are rented at exploitative rates, locking out hard-working individuals who seek a legitimate way to earn a living. By removing the cap while maintaining sensible siting rules—such as leaving space on sidewalks and not blocking doorways—this bill ensures that vending can continue in an orderly and respectful way while finally allowing thousands of entrepreneurs to operate legally and safely.

Intro 0408 is a critical complement to this effort. Creating a division within the Department of Small Business Services specifically dedicated to street vendors will provide much-needed structure, education, and support. The current patchwork of educational materials is confusing and inaccessible. A centralized, organized, and vendor-friendly system will help ensure that all vendors are aware of the rules, rights, and responsibilities of their trade.

Together, these bills will bring street vending into a fully legalized, regulated, and supportive framework. According to the Independent Budget Office, this will not only improve sidewalk organization and public safety, but also boost city revenues through increased sales tax collection. More importantly, it will restore dignity and economic opportunity to thousands of New Yorkers—many of them immigrants and people of color—who contribute to the city's vibrancy and resilience.

I urge you to pass Intro 0431 and Intro 0408 without delay. Legalizing and supporting street vending is not only a matter of economic justice, but a practical step toward a more equitable and prosperous New York City.

Thank you for your time and consideration.

I came to the United States a year ago. I cannot live a normal life here. I have to pay for food and housing, but I don't want to drag my children down. I do not want to be a freeloader and I want desperately to support myself. I hope the government can help the United States better. I will issue a license to me and operate legally. I will definitely be a law-abiding worker and contribute my share to the prosperity of the United States. I want a license, not a penalty.

Applicant, Wan Chunmei

I am an immigrant. I support myself. I don't burden the country. I don't rely on my children. I will make the market active for the country and contribute my Weibo. I want to have legal rights to set up stalls. I hope the leaders will support us vendors. I don't want to worry every day. I am old and can't be scared. Sometimes when the police come, my heart beats. I am really afraid that I will fall to the ground. I don't want to make money in the United States and rely on the government. I have a license and I will respect the leader. Respect the law. You can also charge us a little fee. The license fee is too expensive and we can't pay it because we are very profitable. The license cannot be rented. It is called a license if you do it yourself. Renting a license is not decent. The state takes care of veterans and they need to be self-reliant, so they issue their licenses. Now they sit and rely on this license to make money 180 yuan a day. I hope the government leaders will consider what we did ourselves and want a license. This is called self-reliance.

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Joshua Goodman

Address: Deputy Commissioner, Public Affairs

I represent: Customer Experience

Address: NYC DSNY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Haris Khan

Address: Chief of Staff

I represent: NYC SBS

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Carlos Ortiz

Address: Deputy Commissioner for

I represent: External Affairs

Address: NYC DCWP

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Corinne Schiff

Address: Deputy Commissioner for Environmental Health

I represent: _____

Address: NYC DOHMH

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Salvador Delgado

Address: _____

I represent: Voces Barrios

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Juliana Salas

Address: _____

I represent: Voces Barrios

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

82

I intend to appear and speak on Int. No. 441 402 Res. No. _____

☐ in favor ☐ in opposition

Date: May 6, 2025

(PLEASE PRINT)

Name: Joshua Bloom

Address: [REDACTED] Brooklyn, NY 11137

I represent: Justice for All - Economic Justice

Address: 225 Park Ave Ground Floor New York, NY 10025

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

46

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition ☒ N/A

Date: May 6, 2025

(PLEASE PRINT)

Name: ERIC MOSHER (w/ ALAINA TURNQUIST)

Address: [REDACTED] 10025

I represent: NYC INDEPENDENT BUDGET OFFICE

Address: 110 WILLIAM 10037

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: May 5, 2025

(PLEASE PRINT)

Name: Alaina Turnquist

Address: 110 William Street

I represent: Independent Budget Office

Address: 110 William

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 4318 408 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jackson Chabot

Address: _____

I represent: Open Plans

Address: 377 Broadway

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jennifer Salgado

Address: _____

I represent: Myself

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lucia Maldonado

Address: Queens

I represent: _____

Address: Spanish

Please complete this card and return to the Sergeant-at-Arms

Arabic

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Mounir Ahmed

Address: Brooklyn

I represent: _____

Address: _____

Interpretation
is needed

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Elsa Samaniga

Address: _____

I represent: Voces Ciudadanas

Address: Brooklyn

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 437 Res. No. 408

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lin Han Lin

Address: _____

I represent: st

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

84

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Duane M. Jackson

Address: _____

I represent: myself Vet.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ana Villa

Address: _____ Bronx

I represent: Bronx Street Vendors

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 5/6/2025

(PLEASE PRINT)

Name: Sharon Brown

Address: _____

I represent: Rose of Sharon Enterprises

Address: _____

BRUN NY 11238
Please complete this card and return to the Sergeant-at-Arms

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Melody Fang

Address: _____

I represent: _____

Address: _____

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Melody Fang

Address: _____

I represent: _____

Address: _____

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Shuai Hui Zhen

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

mandarin
**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Shuang

Address: _____

I represent: _____

Address: _____

mandarin
**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ngai Kwan Yan

Address: _____

I represent: _____

Address: _____

mandarin
**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: KU CHAOHANG

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Bangla

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: MD Rahman

Address: _____

I represent: Vendor

Address: _____

mandarin
**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: chen yan yan

Address: _____

I represent: _____

Address: _____

mandarin
**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: AO GUAN

Address: _____

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lili Gonzalez

Address: 100 York St

I represent: Voces Panel

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 4026431 Res. No. _____

☒ in favor ☐ in opposition

Date: 05/06/25

(PLEASE PRINT)

Name: Leeanne G-Bailey

Address: [REDACTED] NY 11373

I represent: Elmhurst/Corona Community

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jimmy Hernandez

Address: _____

I represent: Voces Panel

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Erin Discapink

Address: _____

I represent: NYC BID Association

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Angel Hart

Address: [REDACTED] Plaza North

I represent: Long Island City BID

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Barbara Blair

Address: _____

I represent: Garment District BID

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Lisa Soren

Address: _____

I represent: Bronx Chamber

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Evan Sweet

Address: _____

I represent: Meatpacking BID

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Dan Scorse

Address: _____

I represent: Hudson Yards / Hell's Kitchen BID

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Angel Hart

Address: _____

I represent: LIC Partnership

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 108 431 1164 1251 Res. No. _____

☐ in favor ☒ in opposition

Date: 5/4/25

(PLEASE PRINT)

Name: Brian McGinn

Address: 5 Bryant Park

I represent: Bryant Park Co-p / 34th St Park-shp

Address: 5 Bryant Park

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Nancy Sheroff

Address: _____

I represent: Bayside BID

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Brian McGinn

Address: _____

I represent: Bryant Park / 34th St

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Betsy Mark

Address: _____

I represent: Queens Community Board 7

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☐ in favor ☒ in opposition

Date: 05/06/25

(PLEASE PRINT)

Name: Lisa Sorin

Address: _____

I represent: Bronx Chamber of Commerce

Address: 1202 Waters Pl, Bronx, NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Pamela Franco Lora

Address: _____

I represent: Chinese American Planning Council

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: Christopher Canton

Address: _____

I represent: Self

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Luz Ordoñez

Address: _____

I represent: Brooklyn NY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 408⁴⁷ 24 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Scott Foletta

Address: 317 Lenox Ave 10th Fl New York NY 10018

I represent: Neighborhood Defender Service

Address: 317 Lenox Ave 10th Fl New York, NY 10018

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 06/05/25

(PLEASE PRINT)

Name: Vladimir Tladi

Address: 555 Eastern Parkway Brooklyn

I represent: New York Immigration Coalition

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Julliana Sales

Address: [REDACTED] NY 11232

I represent: Voces Ciudadanas

Address: 475 41st Brooklyn NY 11232

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☐ in favor ☒ in opposition

Date: 5-6-2025

(PLEASE PRINT)

Name: Nelson Eusebio

Address: _____

I represent: National Supermarket Assoc.

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: DANIEL COATES

Address: _____

I represent: Aphe Elm Road NY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 + 408 Res. No. _____

☒ in favor ☐ in opposition

Date: 5-6-25

(PLEASE PRINT)

Name: ANDREW GUSTAFSON

Address: BROOKLYN 11218

I represent: Myself

Address: _____

Please complete this card and return to the Sergeant-at-Arms



THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Mohamed Attia

Address: _____

I represent: Street Vendor Project

Address: _____



THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Calvin Baker

Address: _____

I represent: Street Vendor Project

Address: _____



THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Carina Kaufman Gutierrez

Address: 40 Recluse

I represent: Street Vendor Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 5/16/2025

(PLEASE PRINT)

Name: Guadalupe Sosa

Address: East Harlem

I represent: SVP

Address: 40 Reister St NY NY

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Matthew Sympson

Address: 40 Reister St

I represent: Street Vendor Project

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Brenda Irizarry

Address: [REDACTED]

I represent: Northwest Bx Community clergy

Address: Coalition 103 E 196 St

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Edessa G. Johnson

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Regina B. Bono

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lila J. Jones

Address: Sunset Park

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 408 Res. No. 431

☒ in favor ☐ in opposition

Date: 05/06/25

(PLEASE PRINT)

Name: Balanda Spachim

Address: 50 broad st

I represent: AWHD Ass. for Neighborhood Housing and

Address: development

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 408, 431 Res. No. 6

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: Nick Aquino

Address: 40 Worth Street Suite 229, NY NY

I represent: Volunteers of Legal Service

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Karim Aly

Address: _____

I represent: Street Vendor

Address: _____

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lia Yun Min

Address: _____

I represent: SVP

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Barbara Blair

Address: [redacted] NY

I represent: Garment District Alliance

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Shimou Zaed

Address: _____

I represent: Good Wonder

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Tom Sanchez

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: YU LIN

Address: [REDACTED] college point

I represent: NY 11356

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Dylan Dellisanti

Address: [REDACTED] Wash DC. 20002

I represent: Institute for Justice

Address: 901 N. Glebe Rd, Suite 900 Arlington, VA

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____
☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Richard A. ...

Address: [REDACTED]

I represent: ...

Address: ...

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431/408 Res. No. _____
☒ in favor ☐ in opposition

Date: 05.06.2025

(PLEASE PRINT)

Name: Julie Torres Moskovitz, AIA

Address: [REDACTED] BKXNY 11211

I represent: Citizen, Small Business Owner

Address: 140 Jackson St

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Jimmy Joel Hernandez

Address: [REDACTED] Street

I represent: Street Vendor Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: May 6, 2025

(PLEASE PRINT)

Name: Eliana

Address: _____

I represent: Make the Road NY

Address: 14-19 Roosevelt Ave Queens NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: May 6, 2025

(PLEASE PRINT)

Name: Angel

Address: _____

I represent: Make the Road NY

Address: 14-19 Roosevelt Ave Queens NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: Betsy Blake

Address: [Redacted] Flushing

I represent: Community Board 7 NY 1134

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. 408

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Juan Lopez

Address: [Redacted] Bronx, NY 10466

I represent: North West Bronx Community and class

Address: coalition 603 E 196th St Bronx, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 25/06 Res. No. 2025

☐ in favor ☐ in opposition

Date: 247 839 3484

(PLEASE PRINT)

Name: Antonio

Address: [Redacted]

I represent: Asfay Yachin to per lisonia

Address: y premises

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 408 Res. No. 431

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Adrian Cepeda

Address: [Redacted]

I represent: The World's Borough Bookshop / SUP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: Shamir Settle

Address: 1893 7th Ave

I represent: Immigration Research Initiative

Address: NY, NY

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 400 Res. No. 431

☒ in favor ☐ in opposition

Date: 05/06/2025

(PLEASE PRINT)

Name: Maryam Shuaib

Address: _____

I represent: CHR-MY

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 408 Res. No. 431

☒ in favor ☐ in opposition

Date: 05/06/25

(PLEASE PRINT)

Name: Robert Martinez

Address: [REDACTED] RTD-Corwood NY 11385

I represent: Myself

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 481 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Magdy Elabbky

Address: _____

I represent: Street Vendor

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: James Gonzalez

Address: _____

I represent: in favor

Address: La Fina Restaurant

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Victor Chacha

Address: [REDACTED] N.Y. 11727

I represent: Corona Plaza N.Y.A

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 55 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Brahma Sheketa

Address: _____

I represent: Street Vendor

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Ariel Mintz

Address: _____

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/2025

(PLEASE PRINT)

Name: Elhadji Dieng

Address: _____

I represent: SVP

Address: 440 Rector St

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: IBRA SEY

Address: _____

I represent: SVP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 5/9/25

(PLEASE PRINT)

Name: Pedro GARCIA

Address: [REDACTED] LITTLE ROCK NY 11362

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: ELSA SAMANIEGO

Address: [REDACTED]

I represent: VOCES CIUDADANAS

Address: BROOKLYN

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Y. K. N. KHERKEANYE

Address: [REDACTED] NYC 10009

I represent: SELF

Address: [REDACTED]

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Manuel Rodriguez

Address: [REDACTED]

I represent: myself SUP

Address: Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: JESSICA WALKER

Address: _____

I represent: Manhattan Chamber of Commerce

Address: 575 Fifth Ave NY, NY

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 4/31

(PLEASE PRINT)

Name: Isabel Rosania

Address: Brooklyn

I represent: SVP myself

Address: Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: 431 S. Ave. 109/1100

Address: Arms

I represent: SVP

Address: Spanish

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: WALFED SALAMA

Address: AMMER ALWAD

I represent: SVP

Address: SVP

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Stephanie Brown

Address: [REDACTED] Brooklyn NY 11237

I represent: The City Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: Tiffany Heras

Address: [REDACTED] Central Islip NY 11722

I represent: ALGUN DIA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 481 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: AHMED MARIAD

Address: _____

I represent: SVP

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6/25

(PLEASE PRINT)

Name: CALVIN HARRISON

Address: [REDACTED] 11031

I represent: STREET VENDOR PROJECT

Address: 40 RECTOR ST 10006

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Cleo

Address: _____

I represent: Street Vendor Project

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: MARION WARRICK JR

Address: [REDACTED]

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Marlene Escalco

Address: Bron

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: Al the way

Address: [REDACTED] NY 11264

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☒ in opposition

Date: _____

(PLEASE PRINT)

Name: 142-19 Barclay Ave 6 Hushing

Address: [REDACTED]

I represent: Chin me' ge

Address: _____

Please complete this card and return to the Sergeant-at-Arms

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: May 6, 2025

(PLEASE PRINT)

Name: Erin Piscopink

Address: _____

I represent: NYC BID Association

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Mohamed Awad

Address: _____

I represent: Fire Vendor Project

Address: _____

THE COUNCIL
THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: 5/6

(PLEASE PRINT)

Name: MOHAMED AWAD

Address: _____

I represent: SVP

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 408,431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Nick Czubatka

Address: Jackson Heights, Queens

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. Venderpark Res. No. 1

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Abram Morris

Address: Manhattan District 5

I represent: Individual

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Nicholas Tabares on behalf of Daniel Cook

Address: _____

I represent: Make the Good NY

Address: _____

Please complete this card and return to the Sergeant-at-Arms

manhattan

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Zhang Jie

Address: _____

I represent: _____

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: May/06/2025

(PLEASE PRINT)

Name: Vicente Venutimilla

Address: [Redacted] Bronx

I represent: Bronx Street Vendors

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Spanish

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☐ in favor ☐ in opposition

Date: 05/06/2025

(PLEASE PRINT)

Name: Xiomara Reyes

Address: [Redacted]

I represent: Bronx Street Vendors

Address: _____

Please complete this card and return to the Sergeant-at-Arms

*Interpreter
needed*

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Laidys Bueno

Address: _____

I represent: Voces Ciudadanas

Address: [Redacted] Brooklyn

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

Español ☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Evelia Capotzi

Address: _____

I represent: _____

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Español.

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Teresita Cargio

Address: _____

I represent: _____

Address: _____

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: zhu xing lai

Address: _____

I represent: _____

Address: _____

#

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. 431 Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Lola Siguencia

Address: Queens

I represent: Myself

Address: Spanish

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Linda Yang

Address: _____

I represent: _____

Address: _____



Please complete this card and return to the Sergeant-at-Arms



SPANISH

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: SPANISH

(PLEASE PRINT)

Name: Rosalia Alvarez

Address: [REDACTED] Bronx NY 10451

I represent: _____

Address: _____

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Margaret Chin

Address: _____

I represent: _____

Address: _____

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: SPANISH

(PLEASE PRINT)

Name: Margarita Armenta

Address: [REDACTED]

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

mandarin

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: A-long

Address: _____

I represent: _____

Address: 110 5th Ave

◆ Please complete this card and return to the Sergeant-at-Arms ◆

Wolof

THE COUNCIL THE CITY OF NEW YORK

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

☒ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Wolof

Address: _____

I represent: SVP

Address: _____

◆ Please complete this card and return to the Sergeant-at-Arms ◆