

Item 14  
6/30/2026 BOS  
Meeting

**From:** Lauren Wolfer <lauren@cookalliance.org>  
**Sent:** Friday, June 26, 2026 7:34 AM  
**To:** Clerk/BOS  
**Subject:** Public Comment for June 30 Board Meeting – Item 14 (MEHKO Pilot Program)  
**Attachments:** COOK Alliance Letter to Fresno County Board of Supervisors re\_ MEHKO Program (Item 14).pdf

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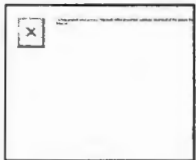
Dear Clerk of the Board,

Attached please find a letter from COOK Alliance regarding Item 14 on the June 30, 2026 Board of Supervisors agenda, the proposed Microenterprise Home Kitchen Operation (MEHKO) pilot program.

We respectfully request that this letter be entered into the public record and provided to the Board in advance of the meeting.

Thank you for your assistance.

Best,  
Lauren



**Lauren Wolfer**  
Policy Director  
[cookalliance.org](http://cookalliance.org)  
760-831-6553  
*she/her*



June 25, 2026

Dear Chair Bredefeld and Members of the Board,

I am writing on behalf of COOK Alliance, a nonprofit organization dedicated to supporting home-based food entrepreneurs, to strongly encourage Fresno County to adopt the proposed Microenterprise Home Kitchen Operation (MEHKO) pilot program.

A MEHKO is a small, permitted home-based food business that allows residents to legally prepare and sell meals directly to consumers from their own home kitchens under Environmental Health oversight. Operators are required to obtain permits, complete food safety training, and comply with inspections and other public health requirements.

Our organization works closely with both MEHKO entrepreneurs and environmental health agencies across California, and we have closely followed the program since it was first authorized in 2019. Comprehensive evidence shows that the MEHKO program is safe and effective, that it is making local food systems safer by providing a regulated alternative to the informal food economy, and that it is helping Californians launch new small businesses and generate needed income.

Many Fresno County residents are looking for practical ways to supplement their income and build greater financial stability. For parents, caregivers, retirees, veterans, people with disabilities, and aspiring entrepreneurs without access to significant capital, opening a traditional food business is often financially out of reach. The MEHKO program creates an affordable pathway into entrepreneurship without subsidies or government assistance. It simply gives residents the opportunity to use their skills to generate income while complying with permits, inspections, business licensing, and food safety requirements.

Importantly, home cooks are already preparing meals for customers throughout Fresno County. However, because the County has not yet authorized a MEHKO program, this activity currently operates without any formal food safety oversight or accountability. By creating a realistic pathway to compliance, the proposed pilot would strengthen food safety while supporting residents who want to operate responsibly.

Research has found strong economic outcomes within the MEHKO program, including that approximately one-third of operators used the permit as a stepping stone into larger food businesses such as catering operations, food trucks, and brick-and-mortar restaurants. In doing

so, they become customers of commissary kitchens, suppliers, and other local businesses, strengthening the broader food economy. The program has also created meaningful entrepreneurial opportunities for women, who represent 70% of MEHKO operators, a substantially higher share than among new entrepreneurs nationally.

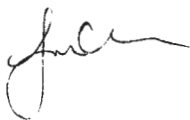
It's also important to note that Fresno County would not be embarking on an experiment. The MEHKO program is neither new nor untested. Research evaluating the program's first five years, conducted in partnership with the University of Washington, found that 97% of permitted MEHKOs received no complaints related to food safety, noise, traffic, parking, or other neighborhood concerns, and identified no confirmed foodborne illness outbreaks. Furthermore, every jurisdiction that initially adopted MEHKOs as a pilot has since voted to make the program permanent. In each case, county staff reported that the concerns raised before implementation simply did not materialize in practice.

Ultimately, this is a question of opportunity, as well as an individual and property rights issue. Why should a Fresno County resident be prohibited from safely preparing and selling meals from their own kitchen when that same activity is legal and regulated in counties across California?

We respectfully encourage the Board to ground its decision in the experiences of jurisdictions that have already implemented the program and the growing body of evidence demonstrating its safety and success. Approving the proposed MEHKO pilot program will strengthen public health while expanding opportunities for entrepreneurship in Fresno County.

Thank you for your time and consideration.

Sincerely,

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

Lauren Wolfer  
Policy Director  
COOK Alliance

Item 14  
6/30/26 BOS Meeting

**From:** Esau Flores <eflores@calrest.org>  
**Sent:** Friday, June 26, 2026 11:05 AM  
**To:** Clerk/BOS  
**Cc:** District 3; District 1; District 2; District 5; District 4  
**Subject:** CA Restaurant Association - MEHKO Comment Letter  
**Attachments:** Agenda Item.pdf; Fresno County MEHKO Letter 06.26.pdf

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Hello,

The California Restaurant Association (CRA) would like to submit this formal comment letter regarding Fresno County's Board of Supervisors' June 30th, 2026, meeting. Specifically, regarding Board Agenda Item 14 - Proposed Amendment to the Ordinance Code of Fresno County, Adding Chapter 8.51 "Microenterprise Home Kitchen Operations."

Please let us know if you have any questions.

Thank you,

**Esau Flores**  
**Legislative Coordinator**

**California Restaurant Association**  
621 Capitol Mall, Suite 2000  
Sacramento, CA 95814

T: 916.431.2774  
[eflores@calrest.org](mailto:eflores@calrest.org)



**While all information released by the California Restaurant Association (CRA) is intended to provide accurate information on the subject covered, the CRA does not provide legal advice and any information provided by the CRA shall not constitute legal advice. You are encouraged to consult your attorney, accountant, or other appropriate professional, as needed.**

Confidentiality note:

This electronic message transmission contains information from the California Restaurant Association which may be confidential or privileged. The information is intended to be for the use of the individual or entity named above. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited.

If you have received this electronic transmission in error, please immediately notify us by telephone at 800.765.4842.



June 26, 2026

Bernice Seidel  
Clerk of the Board of Supervisors  
2281 Tulare St, Room 301  
Fresno, CA 93721

**RE: Opposition – Microenterprise Home Kitchen Operation Implementation**

The California Restaurant Association (CRA) is the definitive voice of the state's food service community, representing nearly 22,000 eating establishments. The Fresno Chapter of the CRA is a robust and very active group of restaurants representing a wide variety of restaurant concept types, cuisines, and cultures throughout our local region.

In this letter, we would like to express feedback regarding Fresno County's proposal to establish a two-year pilot program that would grant up to 66 permits, allowing individuals to prepare and sell meals directly from their homes – otherwise known as Microenterprise Home Kitchen Operations (MEHKOs).

We appreciate your time and hope this letter helps advance the shared goal of maintaining high health and safety standards for all food preparation, ensuring environmental stewardship, nurturing law-abiding brick-and-mortar restaurants, and ensuring that the impacts of such proposals on local communities are adequately considered.

**I. Public Health, Food Safety, and Accessibility**

While the state legislature passed AB 626 (2017), the County should effectively evaluate and consider the health and safety issues that such a program poses. The CRA is committed to enhancing safety and reducing any risk that can lead to foodborne illness. Similarly, brick-and-mortar restaurants are purpose-built environments, designed with strict health and safety standards in mind.

These purpose-built environments include proper temperature controls for cold storage and hot foods, strict sanitation practices, including but not limited to specified food prep and storage areas that have separate sinks for food and non-food uses. Commercial kitchens also have built-in fire mitigation systems and response requirements – this includes commercial hoods, fire suppression systems with specialized wet chemical agents, along with sprinkler systems, and proper employee training.

The reality is that MEHKOs are in homes, and residential kitchens rarely have this type of equipment or systems. This not only increases the risk of cross-contamination but also poses serious safety issues. For example, often, the same areas used for hand-washing are also utilized for food preparation, and food preparation areas will often be in the same general areas as household animals – such realities are unavoidable in people's homes that were never intended for commercial food preparation.

Restaurants are fiercely regulated, and rightfully so – food preparation is a massive responsibility, and we regulate as such in commercial settings. Accessibility also remains an issue as restaurants are required to adhere to the Americans with Disabilities Act (ADA) requirements. Ultimately, the CRA urges the County not to set a double standard for kitchens that would forgo the health and safety of our communities by allowing a MEHKO program to exist without addressing key issues. As part of this, we urge the County to increase the frequency of inspections and make them unscheduled, as they are for other food establishments like restaurants.

## **II. Infrastructure and Environmental Stewardship**

Today, restaurants are mandated to install and maintain grease trap interceptors within each food facility, preventing excess fats, oils, and grease from entering the municipal sewer systems and existing plumbing lines – ultimately avoiding sewage spills and harmful impacts to the environment. Should a large quantity of MEHKOs be approved within one residential area, the impacts could be severe, including irreparable harm to the surrounding environment from resulting sewage backups, should disposal of certain products happen improperly. Ultimately, our sewer systems were not designed with MEHKOs in mind.

Additionally, under state legislation such as SB 1383 (2016), restaurants are required to partner with food recovery organizations to donate any excess food – subject to restrictions. Additionally, under SB 1383, certain restaurants also follow organic waste recycling practices to reduce emissions. The CRA questions whether these MEHKOs would be required to follow the same standards that many restaurants are subject to. If not, this is a clear policy decision to enable a two-tier enforcement model that puts restaurants at a significant disadvantage and undermines the state’s environmental goals.

## **III. Traffic and Parking**

If individuals begin operating a micro-enterprise kitchen out of their home, it could lead to significant traffic, circulation, and parking impacts within surrounding neighborhoods. This could pose particular issues in a multi-unit residential community. Properly zoned restaurants have minimum parking space requirements, with zoning restrictions that take into account traffic volume, as well as flow, as designed by city planners.

## **IV. Strained Resources & End of Local Assistance**

AB 178 – Budget Act of 2022, established a grant program that is currently administered by the California Conference of Directors of Environmental Health (CCDEH). However, this grant program is set to end in the fall of this year, with CCDEH stating that an extension of the grant program is unlikely. Given this, if the County establishes a pilot MEHKO program, it will be unable to utilize grants that other jurisdictions received to offset the cost of establishing such a program.

This raises serious concerns for the CRA, especially as the County faces a \$300 million deficit for the next fiscal year and looming departmental cuts. The CRA is concerned that any additional resources required to regulate a pilot MEHKO program could result in raised environmental

health fees for existing brick-and-mortar restaurants – forcing them to subsidize the cost of MEHKOs. This, of course, would be wholly inappropriate. While we acknowledge that the MEHKO program is intended to be self-funded, we want to caution that this intention may not be realistic.

## **V. Enforcement and Implementation Concerns**

While there are restrictions outlined in statute regarding what and how much a MEHKO can sell, along with other limitations, the CRA has serious concerns regarding the enforcement of such restrictions. How would the County ensure that these limitations are not exceeded? While there are record-keeping requirements, there are various ways to circumnavigate these mandates for MEHKOs. This is particularly concerning given that the ordinance provides for only one routine, scheduled, annual inspection.

There are further considerations regarding the operation of a MEHKO, including alcohol service, food delivery, and a laundry list of other factors and restrictions that MEHKOs face. Without adequate resources, the County will be unable to carry out adequate and fair enforcement. Who will ensure that alcohol is not unlawfully served or sold and that delivery restrictions are followed? Furthermore, how will the cap on sales be enforced if compliance relies upon operator-reported records, with no way to cross-reference transactions?

A majority of counties have not opted in for many of the reasons and questions raised in this letter. In response to this, Assembly Bill 2315 (AB 2315) would have mandated every local jurisdiction to create a MEHKO program, irrespective of the limitations that we've outlined in our letter thus far. AB 2315 died in the state legislature, and the CRA urges the County to consider lessons learned from other jurisdictions and consider the fact that the vast majority of the state's 58 counties have not opted into this program.

## **VI. Labor protections**

California has some of the most robust labor laws in the nation, with oversight provided by both the state and local bodies. However, if MEHKOs are allowed to operate, how will Fresno County ensure that the same labor protections and standards that restaurants are held to will also be followed by MEHKOs? The reality is that while "household members" do not need to be paid, who will ensure proper and timely payment of wages for the one full-time employee, for whom MEHKOs are allowed under this pilot? How will overtime pay be enforced? Mandatory meal and rest breaks are required by California law. How will those laws be enforced behind closed, private doors? These are just a few of the questions that are imperative for the County to address.

## **VII. Struggles of the Industry**

CRA's members have stressed that current pressures have made operating brick-and-mortar restaurants borderline untenable. A survey of our members noted that over 40 percent were not profitable. Over the past years, restaurants have struggled with 40-year high inflation rates, escalating wage pressures, excessive rents, tariffs, reduced foot traffic, and increased layers of regulation at both the state and local levels.

Brick-and-mortar restaurants operate as one of the top sales tax generators for local jurisdictions – tax generators that help fund first responders, libraries, and other local resources. Efforts should be made by the County to nurture the brick-and-mortar restaurant community, not efforts that would effectively compromise public food safety and create an avenue for restaurant-like operations, but without all the responsibilities, costs, and restrictions.

Given the challenges raised – and questions not yet answered, we would welcome the County to consider ways to help the existing restaurant community, one of the most diverse employer communities around. More than 80% of restaurant chefs, a senior role, are people of color; nearly 70% of managers and supervisors are people of color; and 60% are owned by people of color.

### **VIII. Conclusion**

The CRA urges the County to consider these challenges as it deliberates whether to move forward with establishing a pilot MEHKO program. Restaurants follow strict health, safety, environmental, and accessibility requirements. By establishing a program that does not hold MEHKOs to comparable standards, the County would forgo decades of best practices for food service businesses and undermine a community that remains a highly productive partner and leader in local sales tax generation.

Given the critical nature of these questions, we must respectfully ask that the County not move forward with the proposal to establish a MEHKO pilot program until these crucial questions are adequately answered. We also encourage the County to explore alternative methods, such as commissary kitchens, which provide lower barriers to entry, make enforcement more practical, and remove the challenges and secrecy that come with operating behind closed, private doors with extremely limited oversight from local public health officials.

Sincerely,



Matt Sutton  
Senior Vice President, Government Affairs & Public Policy  
California Restaurant Association

Cc: Supervisor Pacheco – District 1  
Supervisor Bredefeld – District 2  
Supervisor Chavez – District 3  
Supervisor Mendes – District 4  
Supervisor Magsig – District 5