



Carolina Peters <carolina.peters@lacity.org>

**Fwd: Sidewalk Vending Program for Los Angeles**

1 message

**Melinda Novoa** <melinda.novoa@lacity.org>  
To: Carolina Peters <carolina.peters@lacity.org>  
Cc: Staci Roberts <staci.roberts@lacity.org>

Fri, Apr 13, 2018 at 1:52 PM

Another letter to upload to Council file 1301493. Thanks!

--

Melinda Novoa  
Council and Public Services Division  
Office of the City Clerk  
213-978-0420



----- Forwarded message -----

From: **Nelson Motto** <nmotto@laane.org>  
Date: Fri, Apr 13, 2018 at 1:50 PM  
Subject: Re: Sidewalk Vending Program for Los Angeles  
To: councilmember.cedillo@lacity.org, councilmember.Krekorian@lacity.org, councilmember.blumenfield@lacity.org, david.ryu@lacity.org, paul.koretz@lacity.org, councilmember.martinez@lacity.org, Councilmember.Rodriguez@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.price@lacity.org, councilmember.wesson@lacity.org, councilmember.bonin@lacity.org, councilmember.englander@lacity.org, councilmember.ofarrell@lacity.org, councilmember.huizar@lacity.org, councilmember.buscaino@lacity.org, Clerk.CPS@lacity.org, CityClerk@lacity.org

**Nelson Motto**

Director Shop Well LA

Shop Well LA Project

[https://lh6.googleusercontent.com/R9uZV\\_qNrnRb\\_JA\\_z0-LDxBsvvOITNdTdn3B8kGgcDrobVv1yZLElyHFJ0yKqtjWS-ZcJst3AijxQVYsSJGC2uj-XAgbU3fisoYyPwAx-O4xmOIYZkEFw4FKmb7JQcAiQw](https://lh6.googleusercontent.com/R9uZV_qNrnRb_JA_z0-LDxBsvvOITNdTdn3B8kGgcDrobVv1yZLElyHFJ0yKqtjWS-ZcJst3AijxQVYsSJGC2uj-XAgbU3fisoYyPwAx-O4xmOIYZkEFw4FKmb7JQcAiQw)

E nmotto@laane.org

T 213.977.9400 ext. 121

M 323.243.7565

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464 Lucas Ave. Suite 202

Los Angeles, CA 90017

www.laane.org



Carolina Peters <carolina.peters@lacity.org>

**Fwd: Comment letter - Sidewalk Vending Program CF 13-1493 - Los Angeles Walks**

1 message

Melinda Novoa <melinda.novoa@lacity.org>  
To: Carolina Peters <carolina.peters@lacity.org>  
Cc: Staci Roberts <staci.roberts@lacity.org>

Fri, Apr 13, 2018 at 1:52 PM

Another letter to upload. Thanks!

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Melinda Novoa  
Council and Public Services Division  
Office of the City Clerk  
213-978-0420



----- Forwarded message -----

From: **Emilia Crotty** <emilia@losangeleswalks.org>  
Date: Fri, Apr 13, 2018 at 8:20 AM  
Subject: Comment letter - Sidewalk Vending Program CF 13-1493 - Los Angeles Walks  
To: Clerk.CPS@lacity.org, CityClerk@lacity.org  
Cc: councilmember.cedillo@lacity.org, councilmember.Krekorian@lacity.org, councilmember.blumenfield@lacity.org, david.ryu@lacity.org, paul.koretz@lacity.org, councilmember.martinez@lacity.org, Councilmember.Rodriguez@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.price@lacity.org, councilmember.wesson@lacity.org, Councilmember Bonin <councilmember.bonin@lacity.org>, councilmember.englander@lacity.org, councilmember.ofarrell@lacity.org, councilmember.huizar@lacity.org, councilmember.buscaino@lacity.org

Dear City Councilmembers,

On behalf of Los Angeles Walks, please accept the attached comment letter regarding the proposed Sidewalk Vending Program (CF 13-1493), which will go before the Economic Development Committee on Monday, April 16.

We look forward to this five-year effort resulting in a policy that works for everyone, and appreciate your consideration.

Sincerely,  
Emilia

--



**Emilia Crotty**  
Executive Director  
508-916-7863 | losangeleswalks.org

20180413 Sidewalk Vending Policy 13-1493\_Los Angeles Walks.pdf  
328K



Carolina Peters <carolina.peters@lacity.org>

## Fwd: Comment letter: Council File 13-1493 Sidewalk Vending Program

2 messages

Melinda Novoa <melinda.novoa@lacity.org>  
To: Carolina Peters <carolina.peters@lacity.org>

Fri, Apr 13, 2018 at 2:28 PM

Another letter for public comment on the file. Thanks!

--

Melinda Novoa  
Council and Public Services Division  
Office of the City Clerk  
213-978-0420



----- Forwarded message -----

From: **Rosana Franco** <rfranco@goodfoodla.org>  
Date: Fri, Apr 13, 2018 at 2:13 PM  
Subject: Comment letter: Council File 13-1493 Sidewalk Vending Program  
To: Clerk.CPS@lacity.org, councilmember.price@lacity.org, councilmember.buscaino@lacity.org,  
Councilmember.Huizar@lacity.org  
Cc: commi.postigo@gmail.com, caroline.toren@lacity.org, francisco.ortega@lacity.org, amanda.daflos@lacity.org

Dear all,

Attached is a comment letter regarding the proposed City Sidewalk Vending Program, CF 13-1493, which I am submitting on behalf of various women's rights organizations and allies.

Please let me know if you have any questions. Thank you.

Best,  
Rosana

--

Rosana C. Franco  
Policy Associate  
Los Angeles Food Policy Council  
305 E. 1st Street, Los Angeles, CA 90012  
rfranco@goodfoodla.org | 213.473.3546 (office)

Letter of Support from Women's Organizations\_LASVC\_04-13-18.pdf  
3833K

Melinda Novoa <melinda.novoa@lacity.org>  
To: Carolina Peters <carolina.peters@lacity.org>  
Cc: Staci Roberts <staci.roberts@lacity.org>

Fri, Apr 13, 2018 at 2:28 PM

Including Staci so she know what I forwarded to you.



Carolina Peters <carolina.peters@lacity.org>

## Fwd: Sidewalk Vending Policy - CF 13-1493

2 messages

Melinda Novoa <melinda.novoa@lacity.org>  
To: Carolina Peters <carolina.peters@lacity.org>

Fri, Apr 13, 2018 at 12:59 PM

Please upload the attached letter.

Thanks,  
Melinda

--

Melinda Novoa  
Council and Public Services Division  
Office of the City Clerk  
213-978-0420



----- Forwarded message -----

From: **Ruby Rivera** <ruby@legacyla.org>

Date: Fri, Apr 13, 2018 at 12:55 PM

Subject: Sidewalk Vending Policy - CF 13-1493

To: councilmember.cedillo@lacity.org, councilmember.Krekorian@lacity.org, councilmember.blumenfield@lacity.org, david.ryu@lacity.org, paul.koretz@lacity.org, councilmember.martinez@lacity.org, Councilmember.Rodriguez@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.price@lacity.org, councilmember.wesson@lacity.org, councilmember.bonin@lacity.org, councilmember.englander@lacity.org, councilmember.ofarrell@lacity.org, councilmember.huizar@lacity.org, councilmember.buscaino@lacity.org

Cc: Clerk.CPS@lacity.org, CityClerk@lacity.org, Carla DePaz <CDePaz@elacc.org>

Dear Honorable Members:

Please see attached our letter urging the City Council to consider and adopt the recommendations of the LA Street Vendor Campaign, as outlined in the coalition's January 11, 2018 letter.

Thank you,  
Ruby Rivera, MSW  
Director of Programs and Policy  
Legacy LA

April 13, 2018

Honorable Members of the City Council

Los Angeles City Hall

200 N. Spring Street  
Los Angeles, CA 90012

**Re: Sidewalk Vending Policy - CF 13-1493**

Dear Honorable Members:

Legacy LA writes in support of a comprehensive and inclusive Sidewalk Vending Program (Program) for Los Angeles. This Program should create opportunities for vendors to formalize their business and work without fear of criminalization, while promoting safety and accessibility in our public space. Unfortunately, the current proposal includes several policy elements that, if adopted, could prevent legal vending in wide swaths of the city in such a way that could cripple the entire Program. We urge the Council to consider and adopt the recommendations of the LA Street Vendor Campaign, as outlined in the coalition's January 11, 2018 letter. In particular, Legacy LA urges the Council to consider the following:

**1. Do not give private property owners authority to disallow (veto) vending on the public right-of-way near their property.**

We strongly oppose giving private property owners veto power over a vendor's ability to work on the public sidewalk. Protecting certain favored businesses from perceived competition clearly exceeds the appropriate scope of this Program. As the LA Times Editorial Board notes, giving business owners veto power over what happens on the sidewalk would be "an unprecedented giveaway, allowing a private business to govern a public space. Doing so would invite extortion, as property owners could demand 'rent' from vendors for their permission to sell on the sidewalk."<sup>[1]</sup>

This policy would also reinforce a hierarchy that values street vending less than other types of small businesses. It would elevate property ownership over micro-entrepreneurship and delegitimize street vending as something not deserving of the same protections and opportunities afforded other businesses. This is not the message our public policy should send.

There is no need to pit one type of small business directly against another. Reasonable rules for vending location will already prevent vendors from obstructing the entrance to a brick and mortar business, and will require vendors to help keep the sidewalks clean. The Council could consider other procedures to resolve conflicts between businesses without discriminatory bans and unjust exclusions.

Giving certain private property owners absolute power to prohibit vending opportunities is a potentially fatal blow to this Program. We urge you to avoid including such a provision.

**2. Do not allow Special Sidewalk Vending Districts to result in unjust exclusion of vendors.**

Certain individual areas may exhibit unique dynamics that make the standard rules for vending unworkable. In these circumstances, it is appropriate to build in flexibility to adjust rules. But this should not create a backdoor tool to "opt-out" of the City's program altogether, or impose onerous restrictions based on anti-vending sentiment. Instead, the creation of Special Sidewalk vending Districts should: (A) never result in the complete prohibition of vending in a community; (B) include appropriate size limitations for districts; (C) enable vendors and other stakeholders to initiate districts to expand vending opportunities; and (D) require City Council approval based on health and safety findings.

### 3. Promote public safety without arbitrary restrictions on opportunity.

The Sidewalk Vending Program should include reasonable rules on where and when vending may occur, in order to ensure accessible public sidewalks and safe business operations. However, the current proposal goes too far, and instead threatens to eliminate vending from wide swaths of the city that could safely accommodate it.

The Sidewalk Vending Program should not impose a limit of two stationary vendors per block face. Such an arbitrary restriction – applied uniformly to the City’s largest and smallest blocks alike - ignores the diversity of our built environment. Instead, the Council should allow more vending on the City’s larger boulevards and should allow vendor applicants to petition for additional locations on blocks where it will not negatively impact public safety.

The Sidewalk Vending Program should include reasonable rules on sidewalk placement to ensure safe passage and protect customers from unsafe proximity to vehicle travel. However, these rules should be thoughtfully crafted according to the realities of vending and pedestrian activity -- not copied directly from an old ordinance regulating news racks (LAMC section 42.00(f)(6)), as currently proposed.

The Sidewalk Vending Program should also relax the hours of operation in non-residential areas. Many vendors work outside the hours of 7:00am to 9:00pm to accommodate other pressures on their schedules, such as childcare and supplemental employment, and to cater to consumer preferences. Stationary vendors operating away from residential neighborhoods should have same limitations on hours of operation as brick and mortar businesses in that area.

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We appreciate the Council’s thoughtful consideration of all the important elements of a fair and workable Sidewalk Vending Program. However, we are very concerned with the number of onerous restrictions that are currently proposed. The cumulative effective of imposing a property owner veto, special district “opt-out,” two-per-block cap, and restrictive hours of operation will be a massive eroding of opportunities for vendors to come into compliance. The success of this Program depends on it being accessible to low-income vendors. To achieve that success, we ask the Council to remove these unnecessary barriers.

Sincerely,

Ruby Rivera

Director of Programs and Policy

Legacy LA

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[1] “Legalize Street Vending.” Editorial. Los Angeles Times, November 25, 2017.

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 Legacy\_LASVC\_Letter of support.pdf  
325K

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Melinda Novoa <melinda.novoa@lacity.org>  
To: Carolina Peters <carolina.peters@lacity.org>  
Cc: Staci Roberts <staci.roberts@lacity.org>

Fri, Apr 13, 2018 at 2:29 PM

Including Staci so she know what has been forwarded.

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Carolina Peters &lt;carolina.peters@lacity.org&gt;

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