July 31, 2015

Councilmember Curren Price
Council District 9
Los Angeles City Hall
200 N. Spring Street, Rm. 420
Los Angeles, CA 90012

Re: Opposition to sidewalk vending program (C.F. 13-1493)

The Figueroa Corridor Business Improvement District (BID) submits this letter in opposition to the sidewalk vending program being proposed in the City of Los Angeles. A caveat to this opposition is that if a sidewalk vending program is approved it be in the form of a pilot program only.

In addition, the Figueroa Corridor BID will continue to oppose the sidewalk vending program until concerns/questions posed by the BID at the community input meeting and to Council District 9 are answered. See attachment for the list of concerns/questions.

Sincerely,

Steve Gibson
Executive Director
Figueroa Corridor BID

Enclosures: Concerns/Questions document

cc: Councilmember Gil Cedillo
Councilmember Marqueece Harris Dawson
Councilmember Paul Krekorian
Councilmember Nury Martinez
Richard Williams
June 25, 2015

Felipe Valladolid Chavez
Legislative Analyst
Office of the Chief Legislative Analyst

Re: Figueroa Corridor BID- Sidewalk Vending Ordinance concerns/questions:

General Concerns
- Why does the City think this ordinance is a good idea and what’s the benefit?
- If the ordinance is approved and it goes horribly wrong is there a way to revert it?
- Could a pilot program be implemented first? For example, a pilot program with a hard sunset at 3 years to fully evaluate the effectiveness.

Regulation/Enforcement Concerns
- How do you enforce whatever rules are put into place, when the current vendors can’t be enforced?
- What’s the enforcement plan? Will an additional 17 investigators be enough to enforce the entire City?
- Will ADA regulations be enforced?
- Funding source for enforcement and inspection? Will these be funded through business licenses and vendor permits?
- On violations, could the cost be high enough to discourage vendors from repeating the offense?
- Can any item be sold? What about counterfeit goods?
- Regarding entertainment venues (LA Coliseum for example), who will monitor the 100+ food and merchandise vendors that will set-up? What if they block the sidewalk? Who is going to enforce that at late at night?

Health/Safety Concerns
- Will vendor food items and commissaries be inspected by the County Health Department?
- Will vending carts be inspected?
- Plan for trash removal for vendors? For example, where do vendors collect/dispose of trash generated?
- How can a food vendor set up without water and a restroom available?

Brick and Mortar Establishment Concerns
- Will vending be permitted in commercial areas with existing brick and mortar establishments?
- Will vendors be taxed and pay taxes like existing brick and mortar establishments? If so, how will the taxes be collected?
- How is the question of unfair competition between street vendors, and brick and mortar establishments addressed (high taxes, rent, etc.)? For example, if a taco cart sets up in front of a brick and mortar Mexican Food Restaurant, and sells to the customers entering the establishment, is that fair and will being 10’ away from a business entry really matter?
- Can vendor’s set-up in residential neighborhoods?
- Can vendor’s set-up in front of schools?