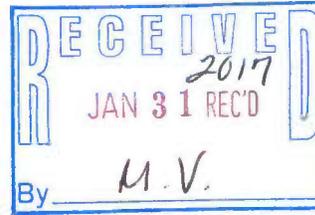


c/o Hollywood Property Owners Alliance

6562 Hollywood Boulevard
Hollywood, CA 90028
323.463.6767

www.hollywoodbid.org



#30

January 30, 2017

Members of the Los Angeles City Council:

Herb J. Wesson
Mitchell Englander
Nury Martinez
Gilbert Cedillo
Paul Krekorian
Bob Blumenfield
David Ryu

Marqueece Harris-Dawson
Curren Price
Mike Bonin
Mitch O'Farrell
Jose Huizar
Joe Buscaino
Paul Koretz

200 N. Spring Street
Los Angeles, CA 90012

Subject: CF 13-1493: Proposed Street Vending Policy

Dear Councilmembers,

I am writing on behalf of the Hollywood Entertainment District, a BID managed by the Hollywood Property Owners Alliance. We have been following with interest the city's proposal since it first surfaced in 2014, and have made our comments known at each public hearing.

Thank you for hearing many of our concerns. We are grateful to read in the November 22, 2016 policy recommendation that a "one size fits all" approach would not be appropriate for a city as large and diverse as Los Angeles – a city of many unique neighborhoods. The Hollywood Entertainment District is a neighborhood with special circumstances. We already experience the crush of sidewalk activity which can make the pedestrian experience unwieldy and intimidating at times. Visitors and businesses complain of the unwanted advances by street characters, CD vendors and aggressive tour hawkers that line the Walk of Fame. Street vendors, sidewalk artists and performers already compete for crowded sidewalk space, especially near our busy transit stops. We also experience all-day parking of food truck vendors, directly competing with adjacent stores. In these cases, the daily cost of a parking ticket is a small price to pay compared to the considerable expenses shouldered by the brick and mortar food businesses.

To that end, we would exercise the option to "opt-out" of the street vending framework and will be interested to see the procedure that would be outlined to do so.

Additionally, we remain concerned about enforcement, as this has historically proved to be an area of challenge to this city. There has been little mention during the course of this policy development process as to the fees that would be levied on vendors, both in terms of initial application, annual renewal and fines/penalties. Cost recovery is essential: This system must generate enough revenue to adequately staff an enforcement unit that can roam the city 24/7. In fact, more illegal food

Hollywood
Property Owners
Alliance

Mark Echeverria
President
Musso & Frank Grill

Michael Gargano
Vice President
Argent Ventures,
LLC

Evan Kaizer
Secretary
The Sieroty
Company

Brian D. Johnson
Treasurer
Loews Hollywood
Hotel

Leslie Blumberg
The Fonda

Joseph D'Amore
Hollywood
Commercial Realty

Darcy Derler-Judd
Robertson
Properties
Group

David Green
Nederlander
West Coast

Julie Hudman
Saban Community
Clinic

Chad Lewis
Klein Financial

Galo Medina
Comprehensive
Financial Services

Frank Stephan
Clarett West
Development

Mark Stephenson
Hollywood United
Methodist Church

John Tronson
Whitley Court
Partners LLC

Monica Yamada
CIM Group

Katie Zandona
Ullman Investments

Tony Zimbardi
AMDA

Kerry Morrison
Executive Director

vending occurs in Hollywood after dark and into the wee hours of the morning. This cannot be a "9 to 5" operation.

The 11/22/16 memo recommends hours of operation of 7 a.m. to 9 p.m. The enforcement strategy should anticipate that the city will need officers to patrol, in particular, into the late hours, to ensure compliance with these hours. Further, it is not clear what role the County Health Department will play in this program, as their participation to ensure food safety, access to restrooms and hot water, and adherence to public health rules is critical.

We appreciate that there are parts of the city where this will be viewed as a net benefit to the neighborhood experience and that the framers of this ordinance are looking to create opportunities for adaptability. We thank you for listening and considering the various points of view from throughout all of Los Angeles. In Hollywood, our position has been to opt-out of this framework in the interests of public safety and improving the pedestrian experience for the millions of people who visit Hollywood each year.

Sincerely,

A handwritten signature in black ink, appearing to read "Kerry Morrison". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kerry Morrison
Executive Director

cc: Members of the board of directors, Hollywood Property Owners Alliance

Central Hollywood
Coalition
Board of Directors

★★★

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Maxwell
Emerson College

★★★

Joseph Mariani
Executive Director

c/o Central Hollywood Coalition
6562 Hollywood Boulevard
Hollywood, CA 90028
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www.sunsetandvinebid.org

January 30, 2017

Members of the Los Angeles City Council:

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Mike Bonin
Mitch O'Farrell
Jose Huizar
Joe Buscaino
Paul Koretz

200 N. Spring Street
Los Angeles, CA 90012

Subject: Proposed Street Vending Policy

Dear Councilmembers,

I am writing on behalf of the Sunset & Vine Business Improvement District, a BID managed by the Central Hollywood Coalition.

In reviewing the 11-22-16 memo prepared by Councilmembers Buscaino and Price, it is evident that many of the concerns raised on behalf of the business community have been heard. We appreciate the new details regarding limits placed on number and location of vendors, enforcement policies and special neighborhood considerations.

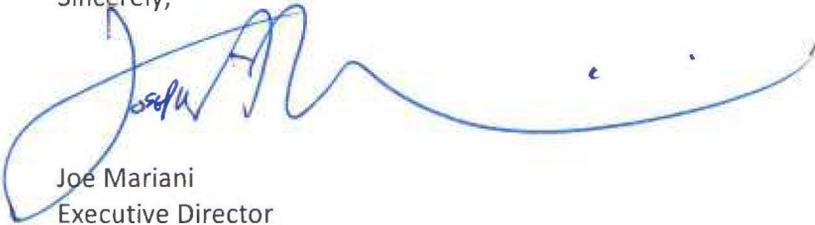
Thank you for the consideration given to "special vending districts." It is very important that you acknowledge that a "one size fits all" approach does not work in Los Angeles, which is a city of many diverse neighborhoods. The ordinance should have an option for special zones, including specific guidelines on how a neighborhood could opt out of a vending district. For example, the framework suggests that a vendor (limited to two per block face) should have the permission of the adjacent property owner. Similarly, the ordinance should identify a signature threshold for a neighborhood who elects to opt-out of the vending district opportunity altogether.

Enforcement of this ordinance is a key factor of success, and we look forward to how the city anticipates to find the right balance of application and annual fees, along with penalties, in order to assure cost-recovery. A visible example of where annual fees have not kept pace with true cost of enforcement is the city's newsrack ordinance. In this case, fees established in 2009 (\$21.69 per rack) have not been adjusted since that time. This coupled with a decline in the number of newsracks in the city has resulted in an ordinance for which there are few city staff to enforce. Learning from this, the city should establish, up front, an adequate fee system, with annual review, to ensure

optimal staffing and enforcement. Further, enforcement needs to happen into the evening and late night hours. This is when we see the greatest preponderance of food vending in Hollywood.

Thank you for consideration of these comments. We look forward to reviewing the draft ordinance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joe Mariani", with a large, sweeping flourish extending to the right.

Joe Mariani
Executive Director
Sunset & Vine BID

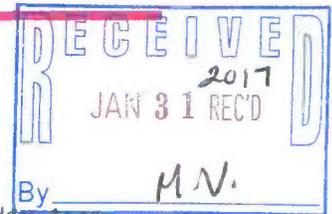
cc: Members of the Central Hollywood Coalition Board of Directors

@COOLHAUS
EATCOOLHAUS.COM
8586 WASHINGTON BLVD
CULVER CITY, CA 90232



January 30th, 2017

Dear City Council,



I'm writing to express my support for the City's efforts to create a permit system for sidewalk vendors. As an entrepreneur who has expanded my business from a mobile vending operation to one that has its own brick and mortar business as well as products in grocery stores over Los Angeles, a legal permit system would be a tremendous lift to our local economy.

I am the CEO of Coolhaus, an ice cream company whose products can be found at our brick and mortar storefront here in the Los Angeles area, and in grocery stores like Whole Foods, Smart & Final, Lassens and in many communities across Southern California. The success of Coolhaus is due to not only our hard work, but also our ability to begin our business by selling our products on the street. We used small food trucks and carts to reach our customers who enjoyed the accessibility of purchasing our products in places that were convenient to them. We always tried our best to build our business in a lawful way, but we also saw how the current policies restricted the potential of our business at the onset.

Our business has now grown to generate more than \$10MM a year.

We believe a legal permit system for entrepreneurs who sell products on the sidewalk can be a tremendous benefit, not only for them, but also the City of Los Angeles. Street vendors can be important contributors to the tax base of our City, and I know many of the impacted entrepreneurs are eager to participate fully in the mainstream economy.

While some may raise the concern about competition with brick and mortar businesses, we've found that many street vendors have a good relationship with adjacent businesses. We have often worked hard to build relationships with adjacent businesses to make sure they we were all benefiting from an economy that can take care of all of us.

For this reason, I am concerned about the proposal to require an adjacent business owner to provide permission to a street vendor because they can sell. While I do believe we should build out a system where everyone can benefit, I am concerned about giving one part of our business community too much power over another.

I appreciate your attention to my letter and to this important matter in our City. Los Angeles should no longer remain as the only major city without a permit system for the street vendors that I consider my colleagues.

Sincerely,

Natasha Case
CEO, Coolhaus