



UNITED FOOD AND COMMERCIAL WORKERS UNION • UFCW770.ORG

John M. Grant, President

Kathy A. Finn, Secretary-Treasurer

MAIN OFFICE

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630 Shatto Place  
Los Angeles, CA 90005  
(213) 487-7070  
(800) UFCW-770

BRANCH OFFICES

HARBOR CITY  
25949 Belle Porte Avenue  
Harbor City, CA 90710  
(310) 784-5340

NEWHALL  
23030 Lyons Avenue, Suite #102  
Newhall, CA. 91321  
(661) 259-9900

CAMARILLO  
816 Camarillo Springs Road, Suite H  
Camarillo, CA 93012  
(805) 383-3300

BAKERSFIELD KAISER MEMBERS  
5000 California Avenue, Suite #211  
Bakersfield, CA 93309  
(661) 323-2866

ARROYO GRANDE  
127 Bridge Street  
Arroyo Grande, CA 93420  
(805) 481-5661

HUNTINGTON PARK –  
RICARDO F. ICAZA  
WORKERS' CENTER  
5400 Pacific Boulevard  
Huntington Park, CA 90255  
(323) 923-1510

SANTA BARBARA  
4213 State Street, Suite 201  
Santa Barbara, CA 93110  
(805) 681-0770

April 16, 2018

Via Email and US Mail

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:

UFCW Local 770 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. This policy has been fully vetted and needs to be completed as soon as possible. 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, Local 770 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>

<sup>1</sup> “Legalize Street Vending.” Editorial. Los Angeles Times, November 25, 2017.

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.

**1. 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.

**2. 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.

Honorable Members of the City Council  
April 16, 2018  
Page 3

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.

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,

UFCW LOCAL 770

A handwritten signature in black ink, appearing to read "John M. Grant", with a large, stylized loop at the beginning and a long horizontal stroke extending to the right.

John M. Grant, President

JMG:le



Michael Espinosa <michael.espinosa@lacity.org>

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

7 messages

**Anna Martinez** <anna.martinez@lacity.org>

Fri, Apr 13, 2018 at 1:04 PM

To: Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Please see email below.

--

**Anna Martinez**  
**Office of the City Clerk**  
200 N. Spring St., Rm. 360  
Los Angeles, CA 90012  
213-978-1025  
213-978-1027 - FAX  
Mail Stop 160-01



----- 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.

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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.**

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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.



**Legacy\_LASVC\_Letter of support.pdf**

325K

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**Michael Espinosa** <michael.espinosa@lacity.org>  
To: Anna Martinez <anna.martinez@lacity.org>

Fri, Apr 13, 2018 at 1:15 PM

Done

[Quoted text hidden]

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**Anna Martinez** <anna.martinez@lacity.org>  
To: Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Fri, Apr 13, 2018 at 4:20 PM

Please see email below.

--

**Anna Martinez**  
**Office of the City Clerk**  
200 N. Spring St., Rm. 360  
Los Angeles, CA 90012  
213-978-1025  
213-978-1027 - FAX  
Mail Stop 160-01



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

From: **David Levitus** <david.levitus@gmail.com>  
Date: Fri, Apr 13, 2018 at 4:15 PM  
Subject: Sidewalk Vending Policy - CF 13-1493  
To: councilmember.cedillo@lacity.org  
Cc: Clerk.CPS@lacity.org, CityClerk@lacity.org

Dear Council Member Cedillo:

Please find attached to this email letters from LA Forward and constituents in CD 1 in support of a fair permitting process for street vending.

Thank you for your consideration.

Best,  
David Levitus, Ph.D.  
Executive Director  
LA Forward

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**2 attachments**

-  **LA Fwd vending letter 4 13 18.pdf**  
153K
-  **CD 1 letter.pdf**  
149K

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**Anna Martinez** <anna.martinez@lacity.org>  
To: Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Fri, Apr 13, 2018 at 4:20 PM

[Quoted text hidden]

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**2 attachments**

-  **LA Fwd vending letter 4 13 18.pdf**  
153K
-  **CD 1 letter.pdf**  
149K

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**Anna Martinez** <anna.martinez@lacity.org>  
To: Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Fri, Apr 13, 2018 at 4:23 PM

Please see email below.

--

**Anna Martinez**  
**Office of the City Clerk**  
200 N. Spring St., Rm. 360  
Los Angeles, CA 90012  
213-978-1025  
213-978-1027 - FAX  
Mail Stop 160-01



----- Forwarded message -----  
From: **David Levitus** <david.levitus@gmail.com>  
Date: Fri, Apr 13, 2018 at 4:20 PM  
Subject: Sidewalk Vending Policy - CF 13-1493  
To: councilmember.buscaino@lacity.org  
Cc: Clerk.CPS@lacity.org, CityClerk@lacity.org

Dear Council Member Buscaino:

Please find attached to this email a letter from LA Forward in support of a fair permitting process for street vending.

Thank you for your consideration.

Best,

David Levitus, Ph.D.  
Executive Director  
LA Forward

---

 **LA Fwd vending letter 4 13 18.pdf**  
153K

---

**Anna Martinez** <anna.martinez@lacity.org>  
To: Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Fri, Apr 13, 2018 at 4:23 PM

Please see email below.

--

**Anna Martinez**  
**Office of the City Clerk**  
200 N. Spring St., Rm. 360  
Los Angeles, CA 90012  
213-978-1025  
213-978-1027 - FAX  
Mail Stop 160-01



----- Forwarded message -----  
From: **David Levitus** <david.levitus@gmail.com>  
Date: Fri, Apr 13, 2018 at 4:20 PM  
Subject: Sidewalk Vending Policy - CF 13-1493  
To: councilmember.krekorian@lacity.org  
Cc: Clerk.CPS@lacity.org, CityClerk@lacity.org



Dear Council Member Krekorian:

Please find attached to this email a letter from LA Forward in support of a fair permitting process for street vending.

Thank you for your consideration.

Best,

David Levitus, Ph.D.  
Executive Director  
LA Forward

---

 **LA Fwd vending letter 4 13 18.pdf**  
153K

---

**Anna Martinez** <anna.martinez@lacity.org>

Mon, Apr 16, 2018 at 7:40 AM

To: Michael Espinosa <michael.espinosa@lacity.org>, Gloria Pinon <gloria.pinon@lacity.org>

Please see email below.

--

**Anna Martinez**  
**Office of the City Clerk**  
200 N. Spring St., Rm. 360  
Los Angeles, CA 90012  
213-978-1025  
213-978-1027 - FAX  
Mail Stop 160-01



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

From: **David Levitus** <david.levitus@gmail.com>

Date: Fri, Apr 13, 2018 at 4:24 PM

Subject: Sidewalk Vending Policy - CF 13-1493

To: [councilmember.englander@lacity.org](mailto:councilmember.englander@lacity.org)

Cc: [Clerk.CPS@lacity.org](mailto:Clerk.CPS@lacity.org), [CityClerk@lacity.org](mailto:CityClerk@lacity.org)

Dear Council Member Englander:

Please find attached to this email a letter from LA Forward in support of a fair permitting process for street vending.

Thank you for your consideration.

Best,

David Levitus, Ph.D.  
Executive Director  
LA Forward

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 **LA Fwd vending letter 4 13 18.pdf**  
153K



April 13, 2018

Councilmember Curren Price, Jr.  
Chair, Economic Development Committee  
Los Angeles City Council  
200 N. Spring Street, Room 420  
Los Angeles, CA 90012

**RE: Sidewalk Vending Ordinance – Protect the Historic Hollywood Walk of Fame/Immediate Enforcement Tools Needed**

Dear Council Member Price:

As a large property owner throughout Hollywood Blvd., I am writing to ask for your help in ensuring that any Citywide Sidewalk Vending Ordinance that is adopted *includes specific protections and robust enforcement for the Hollywood Walk of Fame.*

As you know, Hollywood Boulevard is the most famous street in the world and is home to some of LA's most crowded sidewalks. Not only that, but billions of dollars of tax payments to the City of Los Angeles. With tens-of-thousands of visitors each day, Hollywood is a unique area of the City with very specific public safety concerns surrounding the use of its sidewalks and protection of the Walk of Fame. Similarly, businesses located along Hollywood Blvd. will undoubtedly be impacted by legalized vending in ways that won't necessarily be felt in other areas of Los Angeles. Our tenants are moving out and people are made because they cannot make the payments for the rent.

Having witnessed first-hand what inadequate enforcement of existing vendors already means for my business and others along Hollywood Blvd, I implore the City Council to ensure that robust funding for enforcement be a top priority in the ordinance that is adopted. *The enforcement model adopted should provide adequate resources for both complaint-driven and proactive enforcement throughout Hollywood. Staffing levels for enforcement of the ordinance MUST go above and beyond what is currently provided through the Bureau of Street Services.*

The Hollywood Business Community, along with CD-13, LAPD, and local stakeholders has been working tirelessly to regain control of Hollywood's public sidewalks. For years, the business community has complained about the proliferation of "characters", tour bus solicitors, and illegal sidewalk vendors due to inadequate enforcement. In recent months, the situation has deteriorated to the point where it creates public safety issues and reflects very poorly on Hollywood and this City.

We are all aware of the importance of the tourism industry in Hollywood and want to be sure that each and every individual leaves our City having had a pleasant and entertaining experience. It has become very apparent that aggressive solicitation on Hollywood Boulevard leaves a bad impression on the tourists that my business depends on. Unfortunately, for business owners and



tourists alike, the situation on Hollywood Blvd. has already become a very real public safety concern that can no longer wait to be addressed until the City passes its Sidewalk Vending ordinance. *While I understand that the implementation of the final vending ordinance may inevitably take a while longer, I beseech this Committee and the full City Council to find a way to bring immediate enforcement relief to Hollywood Boulevard.*

Thank you for your time and consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. Bolour", is written above a horizontal line.

Mehdi Bolour

Denley Investment and Management Co.  
1710 N. McCadden Place  
Los Angeles, CA 90028  
(323) 463-4100

CC: Councilmember Joe Buscaino  
Councilmember Jose Huizar  
Councilmember Mitch O'Farrell



April 11, 2018

Councilmember Curren Price, Jr.  
Chair, Economic Development Committee  
Los Angeles City Council  
200 N. Spring Street, Room 420  
Los Angeles, CA 90012

**RE: Sidewalk Vending Ordinance – Protect the Historic Hollywood Walk of Fame/Immediate Enforcement Tools Needed**

Dear Council Member Price:

As a member of the Hollywood Business Community I am writing to ask for your help in ensuring that any Citywide Sidewalk Vending Ordinance that is adopted *includes specific protections and robust enforcement for the Hollywood Walk of Fame.*

As you know, Hollywood Boulevard is the most famous street in the world and is home to some of LA's most crowded sidewalks. With tens-of-thousands of visitors each day, Hollywood is a unique area of the City with very specific public safety concerns surrounding the use of its sidewalks and protection of the Walk of Fame. Similarly, businesses located along Hollywood Blvd. will undoubtedly be impacted by legalized vending in ways that won't necessarily be felt in other areas of Los Angeles.

Having witnessed first-hand what inadequate enforcement of existing vendors already means for my business and others along Hollywood Blvd, I implore the City Council to ensure that robust funding for enforcement be a top priority in the ordinance that is adopted. *The enforcement model adopted should provide adequate resources for both complaint-driven and proactive enforcement throughout Hollywood. Staffing levels for enforcement of the ordinance MUST go above and beyond what is currently provided through the Bureau of Street Services.*

The Hollywood Business Community, along with CD-13, LAPD, and local stakeholders have been working tirelessly to regain control of Hollywood's public sidewalks. For years, the business community has complained about the proliferation of "characters", tour bus solicitors, and illegal sidewalk vendors due to inadequate enforcement. In recent months, the situation has deteriorated to the point where it creates public safety issues and reflects very poorly on Hollywood and this City.



We are all aware of the importance of the tourism industry in Hollywood and want to be sure that each and every individual leaves our City having had a pleasant and entertaining experience. It has become very apparent that aggressive solicitation on Hollywood Boulevard leaves a bad impression on the tourists that my business depends on. Unfortunately, for business owners and tourists alike, the situation on Hollywood Blvd. has already become a very real public safety concern that can no longer wait to be addressed until the City passes its Sidewalk Vending ordinance. ***While I understand that the implementation of the final vending ordinance may inevitably take a while longer, I beseech this Committee and the full City Council to find a way to bring immediate enforcement relief to Hollywood Boulevard.***

Thank you for your time and consideration.

Sincerely,

Alwyn Hight Kushner

President & COO

TCL Chinese Theatres

6925 Hollywood Blvd, Los Angeles, CA 90028

E-mail: [Alwyn@chinesetheatres.com](mailto:Alwyn@chinesetheatres.com)

Phone: 323-465-4847

CC: Councilmember Joe Buscaino  
Councilmember Jose Huizar  
Councilmember Mitch O'Farrell



**MUSICIANS INSTITUTE**  
**COLLEGE OF CONTEMPORARY MUSIC**

6752 Hollywood Boulevard, Hollywood, CA 90028

April 13, 2018

The Honorable Curren Price, Jr.  
Chair, Economic Development Committee  
City of Los Angeles  
200 N. Spring Street, Room 420  
Los Angeles, CA 90012

Subject: Sidewalk Vending Ordinance – Need for an Immediate Solution in Hollywood

Dear Councilmember Price,

As a business owner on Hollywood Boulevard, I respectfully ask that the city council accelerate a solution to confusion and congestion that has gripped the Walk of Fame ever since the city loosened regulations governing sidewalk vending. We have waited patiently for a new ordinance, but our community is suffering. Public safety is at stake and our businesses cannot survive another summer of chaos.

Our 1,000 music college students and 350 staff members suffer the consequences of navigating the dangerously overcrowded, very chaotic and volatile environment on Hollywood Blvd. on a daily (and nightly) basis (Musicians Institute is open 24/7). We are concerned for the safety of our entire college community; as well as the reputation of our business having to operate in these conditions.

**IN CONCLUSION**

We understand that there is still much work to be done to complete the creation of a regulatory framework for sidewalk vending. Hollywood cannot go another year waiting for the ordinance to be completed. While that process is being worked out, we seek your help in identifying an interim solution, that could go into effect immediately, to restore order to this historic walk. The safety of those who visit, work and live here is at stake.

Sincerely,

Beth Marlis  
VICE PRESIDENT, MUSICIANS INSTITUTE

Cc: Councilmember Joe Buscaino  
Councilmember Jose Huizar  
Councilmember Mitch O'Farrell

Tel 323.860-1161 | Email [bethm@mi.edu](mailto:bethm@mi.edu) | Web [mi.edu](http://mi.edu)

# Hollywood & Highland

April 12, 2018

Councilmember Curren Price, Jr.  
Chair, Economic Development Committee  
Los Angeles City Council  
200 N. Spring Street, Room 420  
Los Angeles, CA 90012

RE: Sidewalk Vending Ordinance  
Protect the Historic Hollywood Walk of Fame/Immediate Enforcement Needed

Dear Councilmember Price:

As a representative of CIM Group, a long-time owner and operator of properties throughout Hollywood, I am writing to ask for your help in ensuring that any Citywide Sidewalk Vending Ordinance that is adopted **includes specific protections and robust enforcement for the Hollywood Walk of Fame.**

As you know, Hollywood Boulevard is the most famous street in the world and is home to some of LA's most crowded sidewalks. With tens-of-thousands of visitors each day, Hollywood is a unique area of the City with very specific public safety concerns surrounding the use of its sidewalks and protection of the historic Walk of Fame. Additionally, businesses located along Hollywood Boulevard will undoubtedly be impacted by legalized vending in ways that are not applicable to other areas of Los Angeles.

As the Assistant General Manager of Hollywood & Highland Center® and responsible for the oversight of all operations at the Center, for more than 10 years I have seen the proliferation of "characters", tour bus solicitors, and illegal sidewalk vendors due to inadequate enforcement, and the resulting negative impacts of harassment to our visitors and employees, and our tenants' businesses that suffer from unenforced and unregulated vending. We receive continuous complaints and have witnessed aggressive vendors prey on tourists on a daily basis. Often tourists think that the businesses on Hollywood Boulevard and/or the City promotes these vendors and accepts this type of behavior.

# Hollywood & Highland

The Hollywood business community, CD-13, LAPD, and local stakeholders have been working tirelessly to regain control of Hollywood's public sidewalks. For years, the business community members together and individually have complained about this situation that has deteriorated to the point where public safety issues are prevalent and reflects very poorly on our businesses, Hollywood, and this City.

We implore the City Council to ensure that substantial funding for enforcement be a top priority in the Ordinance that is adopted with adequate resources for both complaint-driven and proactive enforcement throughout Hollywood. Staffing levels for enforcement of the Ordinance must go above and beyond what is currently provided through the Bureau of Street Services (IS THERE ANYTHING AT THIS TIME?).

The tourism industry in Hollywood is important and we want to be sure that each and every individual leaves our City having had a safe and entertaining experience. It has become very apparent that aggressive solicitation on Hollywood Boulevard leaves a bad impression on tourists, negatively affects our businesses, but moreover is just unacceptable. Locals, employees, and their clients also suffer from this situation, which unfortunately has already become a very real and known public safety concern that can no longer wait to be addressed until the City makes a decision on its Sidewalk Vending Ordinance. **While we understand that the implementation of the final Vending Ordinance may inevitably take a while longer, we strongly request this Committee and the full City Council to find a way to bring immediate enforcement relief to Hollywood Boulevard.**

Thank you for your consideration.

Sincerely,



Mike Harkins  
CIM Group  
Assistant General Manager  
Hollywood & Highland Center  
[mharkins@cimgroup.com](mailto:mharkins@cimgroup.com)  
(323) 817-0230

CC: Councilmember Joe Buscaino  
Councilmember Jose Huizar  
Councilmember Mitch O'Farrell





April 13, 2018

The Honorable Curren Price, Jr.  
Chair, Economic Development Committee  
City of Los Angeles  
200 N. Spring Street, Room 420  
Los Angeles, CA 90012

Re: Sidewalk Vending Ordinance

Dear Councilmember Price,

As operator of the historic El Capitan Theatre, the Walt Disney Studio's flagship movie theater on Hollywood Blvd., and frequently the number one top grossing single screen theater in America, I am writing you to ask for your help in drafting and enforcing a sidewalk vending ordinance that provides for the highest levels of pedestrian safety on the heavily travelled sidewalks in our community.

El Capitan Theatre draws hundreds of thousands of guests each year to the premieres, special events, and first run commercial engagements that take place here with the expectation that the theater is reached safely and without obstruction or the need to step into a curb lane to pass a vendor occupying the narrow sidewalks that lead to our front doors.

We recognize that street vending provides economic opportunity for some, but ask that you balance that goal with strong protections for the safety of all who use our sidewalks to reach their homes and businesses. The need for this ordinance is immediate. I applaud and support your efforts to finding a sensible solution that can be implemented quickly.

Sincerely,

A handwritten signature in blue ink that reads "Edward Collins". The signature is written in a cursive style.

Edward Collins  
General Manager  
El Capitan Theatre

Cc: Councilmember Joe Buscaino  
Councilmember Jose Huizar  
Councilmember Mitch O'Farrell

Mailing Address: 350 South Buena Vista Street • Burbank, California 91521-9054  
6834 Hollywood Boulevard • Hollywood, California 90028 • 323/468-8268

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:

**Promesa Boyle Heights** 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, **Promesa Boyle Heights** 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

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<sup>1</sup> “Legalize Street Vending.” Editorial. Los Angeles Times, November 25, 2017.

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,



Deycy Hernandez  
Director - Promesa Boyle Heights



April 13, 2018

The Honorable Curren Price  
Chair, Economic Development Committee  
City of Los Angeles  
200 N. Spring Street, Room 420  
Los Angeles, CA 90012

**SUBJECT: Council File 13-1493 – Sidewalk Vending**

Dear Councilmember Price,

The Valley Industry and Commerce Association (VICA) commends your hard work on developing a comprehensive sidewalk vending policy proposal and shaping a framework for a successful sidewalk vending program. Over the years, VICA has worked with the Los Angeles City Council to create sensible solutions for street vending that do not interfere with traditional brick-and-mortar businesses. Our vision for a street vending policy includes limiting the number of vending permits issued; designating zones for sidewalk vending; requiring the consent of brick-and-mortar businesses; and ensuring sidewalk vendors pay their fair share in taxes and fees.

Requiring vendors to receive consent from brick-and-mortar businesses along with creating designated vending locations will appropriately limit the number of vendors and prevent a disproportionate concentration of street vendors in certain communities. Limiting the number of licenses will allow cities to ensure public safety, preserve neighborhood character, and protect access to businesses. A cap on the number of vendors will also help regulate street vendors more efficiently.

An appropriate method of enforcement is necessary for street vending licensing programs. It is important the city allocate additional staff to oversee the regulation and enforcement of sidewalk vending. Proper enforcement is needed to carry out the vision you have modeled for a comprehensive sidewalk vending policy.

Small businesses in the San Fernando Valley and across the city have competed with vendors for years. We want to ensure that businesses are able to operate with as little disruption or impact as possible. Although we support many of the components that have been added to this proposal, we want to ensure that the City Council crafts a strong and comprehensive program that will be impartial to both brick-and-mortar businesses and sidewalk vendors.

We thank you for your consideration.

Sincerely,

Lisa Gritzner  
VICA Chair

Stuart Waldman  
VICA President



## Hunger Action Los Angeles

961 S. Mariposa # 205 Los Angeles CA 90006

Ph (213) 388 8228 Fax (213) 388 8448 [www.hungeractionla.org](http://www.hungeractionla.org)

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:

Hunger Action Los Angeles (HALA) 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 components that could sabotage and undermine the intent of the Sidewalk Vending 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, HALA 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.**

The LA Times Editorial Board notes correctly that 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 in fact is already happening.

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. 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.**

The creation of Special Sidewalk Vending Districts could be weaponized to keep vendors out of areas without just cause. 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

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<sup>1</sup> “Legalize Street Vending.” Editorial. Los Angeles Times, November 25, 2017.

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 also relax the hours of operation in non-residential areas. In those parts of the city they should have just the same restrictions as brick and mortar businesses.

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We appreciate the Council’s thoughtful consideration of all the important elements of a fair and workable Sidewalk Vending Program. But property owner vetoes, separate “vending districts” and restricted hours are essentially unfair, unnecessary, and in some cases unconstitutional. 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,

A handwritten signature in cursive script that reads "Frank Tamborello". The signature is written in black ink and is positioned above the typed name and title.

Frank Tamborello  
Executive Director



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:

**Women Organizing Resources, Knowledge and Services (WORKS)** 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, **WORKS** 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.

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<sup>1</sup> "Legalize Street Vending." Editorial. Los Angeles Times, November 25, 2017.

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,

A handwritten signature in black ink, appearing to read "Francesca de la Rosa", with a long horizontal flourish extending to the right.

Francesca de la Rosa

Director of Policy and Strategic Alliances



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:

LAANE 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, LAANE 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>

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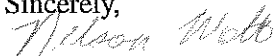
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Sincerely,



Nelson Motto

Director of Shop Well Campaign