April 17, 2014

Dear Councilmembers Huizar and Price:

As co-authors of the proposed Street Vending Ordinance, and representatives of the South Park neighborhood in Downtown LA, the South Park Business Improvement District (BID) would like to share with you our concerns regarding a potential effort to legalize street vending. The BID represents 32 square blocks of the south-west portion of downtown Los Angeles, including the Staples Center, LA LIVE, LA Convention Center. The BID security and maintenance officers deal daily with a variety of issues pertaining to illegal street vending (hot dog carts, in particular) – depleting the BID’S resources, which are funded by self-imposed assessments. On behalf of our stakeholders, we want to press the issues of implementation and enforcement regarding the ordinance, and urge you to seek feedback from businesses and residents in the community before moving forward with a plan.

Street vending has been a significant problem in South Park since the opening of the Staples Center in 1999, and we have only seen an increase in it as larger and higher profile events come to L.A. LIVE. In the past 2 months alone, our Safety Team has made contact with 110 illegal vendors. When approached by our Safety Team, vendors often are not willing to communicate, and abandon their wares in lieu of attempting to comply with the laws. As a result, our clean team receives a myriad of calls regarding abandoned materials from street vendors, particularly putrid leftover hotdogs, pools of used oil and water, trash from food wrappings, and broken-down carts.

South Park BID has been working with LAPD on an illegal vending task force, but the issues related to street vending are ever-present, and increasing. We have found that a vast majority of the street vendors in our district are not interested in cooperating with enforcement, and will return to the area with new carts once the original illegal ones have been confiscated.

However, our biggest fear is regarding how the City would actually implement and appropriately enforce a street vending program given the current budgetary restraints. We do not believe simply legalizing vendors will eradicate the above issues, and believe our
stakeholders would end up footing the bill for any shortfalls. Because of that, we urge you to seek the input from businesses and residents in the area before moving forward.

An appropriately funded and regulated program would need to include funding for the following:

- Compulsory trash & cleaning services, paid for by the vendors, NOT assessment payers.
- Control over locations to ensure public safety.
- ADA compliance for adequate sidewalk width.
- And most significantly, effective ongoing enforcement of the regulations.

This is not the first time the City has attempted to legalize street vending. In 1998, McArthur Park was used as a pilot project for sidewalk vending. It was a failure because of a lack of enforcement of illegal vending elsewhere. There was no reason for vendors to obey the rules & locate within the vending district.

The South Park BID is committed to working with the City to ensure economic vitality and mobility for all business types. We are available to meet at your convenience to discuss this further. Please consider the wellbeing of the existing neighborhood institutions when moving forward with these polices.

Sincerely,

Jessica Lall
Executive Director

CC: Felipe Chavez, City of Los Angeles Chief Legislative Analyst (CLA)