



April 17th, 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:

On behalf of Leadership for Urban Renewal Network (LURN) 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. 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, LURN 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.

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

**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,



Rudy Espinoza

Executive Director



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

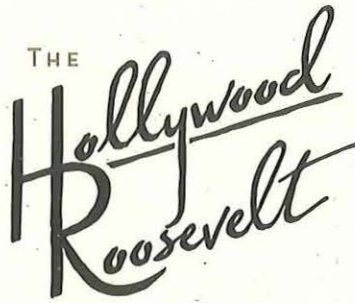
Subject: Sidewalk Vending Ordinance – Need for an Immediate Solution in Hollywood

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.

I represent the Hollywood Roosevelt Hotel. We have about a quarter of a million overnight guests staying at the hotel each year and many more guests attending banquet events or dining with us. Those guests, along with members of our staff, have expressed concerns about the street vendors on Hollywood Boulevard. You cannot walk a block without being accosted by someone wanting to sell you something. There is additional trash from these vendors that makes our neighborhood look less attractive. For guests from other countries, the sidewalk chaos is confusing, and they prefer to avoid it all together. Not the impression we want them taking back home.

The hotel contributes \$4million dollars annually in transient occupancy taxes and tourism assessment fees. We contribute another \$100k to the Hollywood BID to supplement city services and improve the guest experience for those staying at our hotel. The BID's initiatives are to create a clean, safe neighborhood. It is impossible to keep the walk of fame clean when it is cluttered with street vendors. When the sidewalks are cleaned, the shine is short lived. The vendors are out again in force daily with trash, and clutter. It is also not safe to have people walk into the street to get past the vendors.



**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,

A handwritten signature in blue ink, appearing to be 'Colleen Jimenez', is located below the word 'Sincerely,'.

Colleen Jimenez, Hotel Asset Manager

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



Michael Espinosa <michael.espinosa@lacity.org>

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**Fwd: 04/14-Hi Mr Giron**

1 message

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**David Giron** <david.giron@lacity.org>  
To: Cty Clerk - Michael Espinosa <Michael.Espinosa@lacity.org>

Mon, Apr 16, 2018 at 2:32 PM

for the file.



David Giron  
Legislative Director  
**Councilmember Mitch O'Farrell**  
200 N. Spring Street, Room 480, Los Angeles, CA 90012  
(213) 473-7013 tel | (213) 473-7734 fax | [www.cd13.org](http://www.cd13.org)

**Find the Councilmember on:**    

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

From: **Corinne Rogan** <[missrogan@yahoo.com](mailto:missrogan@yahoo.com)>  
Date: Sat, Apr 14, 2018 at 8:49 PM  
Subject: 04/14-Hi Mr Giron  
To: [david.giron@lacity.org](mailto:david.giron@lacity.org)

I'm not a shop owner on Hollywood Blvd but am a member of the HollywoodChamber.

When I walk Hollywood Blvd, even in the daytime, it seems a little dangerous,. At all times, there R too many people/street vendors trying to get anyone & everyones attention.

I'm very grateful & aware of the importance of the tourism industry in Hollywood. I love that each and every individual leaves Hollywood having been fully entertained and having their face hurt from smiling too much.

But, It has become very apparent that aggressive solicitation on Hollywood Boulevard leaves a bad impression of our community. It seems dangerous.

The situation on Hollywood Blvd. has already become a very real public safety concern that can no longer wait to be addressed. We need the city to pass its Sidewalk Vending ordinance.

I urge the city council & this Committee to find a way to immediately find & enforce relief to Hollywood Boulevard. Thank U!

I'm Corinne Rogan w/MissRogansEnterprises



## CHURCH of SCIEN TOLOGY INTERNATIONAL

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 Tools Needed**

Dear Council Member Price:

As a property owner and member of the Hollywood 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 one of the most famous streets 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 our church facilities 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. 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,

*Luis Gonzalez*

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Luis A. Gonzalez  
Humanitarian Programs Director  
Church of Scientology International

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:

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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.*

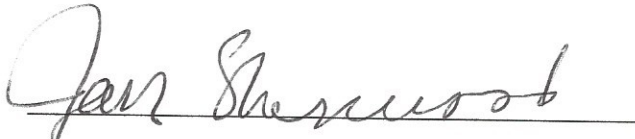
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We are all aware of the importance of the tourism industry in Hollywood and want to be sure that each and every individual leaves our City having had a pleasant and entertaining experience. It has become very apparent that aggressive solicitation on 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,

  
(signature)

Name: Jan Sherwood

Business Name: LA City Tours

Business Address: 6806 Hollywood Blvd, LA, CA 90028

E-mail: jan@lacitytours.com

Phone: 323-356-3846

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

# UNITE HERE! Local 11

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464 Lucas Ave., Suite 201 • Los Angeles, California 90017 • (213) 481-8530 • FAX (213) 481-0352

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Monday, April 16, 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:

On behalf of over 28,000 workers represented by UNITE HERE Local 11, we write in support of a comprehensive and inclusive Sidewalk Vending Program for Los Angeles. UNITE HERE Local 11 is a member of the Los Angeles Street Vendor Campaign, a citywide coalition of street vendors and 65 organizations from across the city.

LA is the only urban area out of the nation's 10 largest cities that does not have a legal permit system for street vending. With 50,000 street vendors investing in our city, a permit system would lead to thousands of jobs, create safer streets, and increase access to healthy foods in underserved communities. We support a permit program that legalizes sidewalk vending and establishes conditions that protect the rights and dignity of our city's low income entrepreneurs.

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. Over the course of several years, hundreds of vendor leaders have collectively developed a policy platform that is rooted in the experiential knowledge of the vending community and further informed by legal and policy analysis and robust stakeholder input. UNITE HERE Local 11 stands in solidarity with the street vendors of Los Angeles as they fight for dignity and respect through the passage of a fair and comprehensive legal vending permit program.

Sincerely,

Natalie Schuman