

November 6, 2017

Honorable Members of the City Council
Economic Development Committee
Public Works Committee
Los Angeles City Hall
200 N. Spring Street
Los Angeles, CA 90012

Re: Sidewalk Vending Policy - CF 13-1493

Dear Honorable Members:

The Los Angeles Street Vendor Campaign (LASVC) writes in response to the November 3, 2017 Report of the Chief Legislative Analyst (CLA Report) regarding a Proposed City of Los Angeles Sidewalk Vending Program (program). After more than four years of considering this issue and over a dozen public hearings, the Council is now poised to adopt a comprehensive program to legalize and regulate sidewalk vending in the City of Los Angeles. We appreciate this opportunity to provide input on the specific, important details of such a program. While we urge the Council to adopt a comprehensive Street Vending Program, we believe that certain changes to the proposals in the CLA Report are necessary. We provide the following recommendations to help achieve an effective, equitable and inclusive policy that will uplift and protect *all* entrepreneurs, stakeholders, and consumers in our city.

The LASVC is a broad and diverse coalition of street vendors and 65 organizations from across the city. Individually, our member organizations are leading experts in the fields of community development, immigrant rights, civil rights, public interest law, public health, municipal law, food equity, small business development, safe and vibrant streets, and economic development. Collectively, we work to protect the rights of street vendors and enhance economic opportunities for low-income entrepreneurs. We have worked directly with thousands of vendors in all corners of the city to build leadership and strengthen networks. We have created and implemented a robust vendor-driven policy development process, culminating in a series of thoughtful and pragmatic policy recommendations. We have coordinated legal clinics and provided direct legal services to vendors enduring the unjust impacts of complete criminalization. We have created financial tools and technical assistance programs to promote and sustain vendor business development. All of this supports a broader movement to establish a comprehensive permit system to allow vending on City sidewalks and parks.

This movement to legalize street vending has always been led by those most impacted by the City's criminalization policies: low-income vendors. 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. The LASVC policy platform balances equity, opportunity, fairness, safety and accessibility.

The following response to the CLA Report derives from this platform, and is further shaped by a series of focused feedback sessions with vendors. A short summary of LASVC recommendations is provided first, followed by a more detailed response and set of recommendations for each of the three Attachments that make up the substance of the Proposed Sidewalk Vending Program: (1) *Response to Council Requests*; (2) *Proposed Program Design*; and (3) *Proposed Sidewalk Vending Regulations*. We appreciate your careful consideration, and urge the Council to adopt a Sidewalk Vending Program consistent with the recommendations outlined below.

SUMMARY OF LASVC RECOMMENDATIONS DESCRIBED HEREIN

The following is a short summary of the specific changes that we recommend the Council include when adopting a Sidewalk Vending Program. Each is described in greater detail in this letter.

- Immediately complete the decriminalization of sidewalk vending by removing criminal penalties from LAMC Sections 63.44 and 80.73. This action will protect immigrant entrepreneurs who are unjustly targeted under the Trump administration.
- Advance an amnesty program for vendors with prior convictions and criminal justice debt.
- Do NOT require letters of permission from adjacent businesses – we can uplift all small businesses without giving one type of business veto or extortion power over another.
- Do NOT allow Special Sidewalk Vending Districts to devolve into tools of exclusion. Any prohibition on vending should be strictly limited and based on actual and demonstrable safety concerns, not business discrimination or perceived community animus toward vending.
- Promote safe, shared access to public space. An arbitrary limit of two vendors per block undermines this goal. Instead, commonsense location restrictions can impose appropriate limits on vending, but in a way that is actually tailored to the different street typologies across our city.
- Do NOT attempt to regulate sidewalk vending with Location Restrictions that were developed for news racks– as currently proposed in the CLA Report. Instead, create location restrictions that actually account for vending practices and sidewalk accessibility. Specific recommendations are provided on page 8 of this letter.
- Utilize existing County DPH Route Sheets in the application process to avoid the creation of an added layer of requirements that will add costs to the program.
- Allow vending without a cart, where permitted by the Department of Public Health.
- Implement a first warning for street vending violations, clarify increases in penalties for subsequent offences within a year, reduce base fines, and avoid seizing vendors' property.
- Include additional incentives for Healthy Food Carts.

CLA REPORT ATTACHMENT 1: COUNCIL REQUESTS UPDATE

CLA Report Attachment 1 provides a summary of the January 31, 2017 City Council Action. We offer the following comments regarding this summary.

The City Council should complete decriminalization of sidewalk vending.

The Council Requests Update notes the February 15, 2017, Council action to amend LAMC Section 42.00(b) to limit enforcement of violations for street vending to noncriminal Administrative Citation Enforcement (ACE) citations. (CLA Report, Attachment 1, p.1). We applaud the City Council for this crucial action to end years of unjust criminalization and better protect immigrant and worker communities. However, the decriminalization of sidewalk vending is not yet complete.

LAMC Section 80.73 and Section 63.44 both *still allow for vendors to face criminal charges* – a fact that is unacknowledged in the CLA Report Council Requests Update. As outlined extensively in previous correspondence, criminal penalties for sidewalk vending are disproportionate and unjust, and even the mere possibility of criminal charges brings potentially devastating immigration and citizenship consequences. Motions were introduced in October to address these criminalization loopholes, but no hearings have been held and no ordinances have been adopted. We urge the Council to act swiftly to adopt decriminalization ordinances as soon as possible.

The City Council should NOT require that vendors obtain permission from an adjacent business.

The CLA Report references a proposal that vendor applicants be required to obtain a letter of permission from the adjacent business owner. (CLA Report, Attachment 1, p. 2). This requirement should absolutely not be included in the Sidewalk Vending Program. We support policies to uplift *all* small businesses, and believe that vendors and brick and mortar businesses can mutually thrive under a set of commonsense regulations. This does not require conditioning approval of a vending permit on permission from an adjacent business. In addition to being an improper regulatory restraint on competition, such a requirement would be difficult to administer, and would place a disproportionate burden on the vendor-applicant. Moreover, increased instances of extortion of vendors may result from such a requirement.

Rather than favoring one type of small business over another, the appropriate concerns of this policy should be health, safety and accessibility. The CLA Report appropriately underscores the City Attorney's opinion that ***"limiting vending by suggesting that one form of economic activity is favored over another would not be advisable."*** (Attachment 1, p. 2.) We strongly urge the Council to avoid giving one sector of the small business economy veto (or in some cases, extortion) power over another.

We understand the concerns expressed by some brick-and-mortar business operators, and we seek a policy that uplifts all small businesses. Neighboring brick-and-mortar businesses will already be protected by the ordinance's other health and safety restrictions on location, including a prohibition on blocking an entrance or obstructing access. The City should pursue a human relations approach that resolves any conflicts between sidewalk vendors, brick and mortar businesses and other stakeholders without implicating discriminatory bans and unjust enforcement practices. Such an approach has been successfully implemented in other regulatory contexts.

CLA REPORT ATTACHMENT 2: PROGRAM DESIGN

CLA Report Attachment 2 describes key components of a potential Sidewalk Vending Program. We offer the following comments and recommendations regarding these program elements.

The Sidewalk Vendor Coordinator should provide technical assistance and education/outreach.

We support the creation of a Sidewalk Vendor Coordinator position and the establishment of one-stop service centers where plan check and other County-related functions could occur. The Sidewalk Vendor Coordinator should prioritize language access and individualized technical support and coaching, offered to vendors free of charge. The Sidewalk Vendor Coordinator should coordinate closely with community-based organizations as necessary to create and implement an effective outreach and education program.

The Sidewalk Vendor Coordinator should collaborate with the City Attorney and others to establish a meaningful "amnesty" program.

Many individuals have been unjustly cited and prosecuted in the years that the City imposed a complete criminal ban on sidewalk vending. These individuals and their families are vulnerable to the frightening consequences of changing federal immigration policy, as well as all the other collateral consequences of a criminal history. In January, the Council indicated an intent to create an amnesty program. To date, the full range of options available to help support low-income vendors with convictions and/or other criminal justice debt has not been resolved. Many legal options are available (*see, e.g. In re Dapper*, 71 Cal. 2d 184, 188 (1969) (retroactively applying the repeal of a local ordinance to pending cases)). We need bold and creative strategies to support vendors and their families facing the consequences of years of unjust

criminalization. In adopting the Sidewalk Vending Program, the Council should request the City Attorney to continue to evaluate all options for retroactive relief, and direct the Sidewalk Vendor Coordinator to work with the office of the City Attorney and other appropriate government agencies and community organizations to research, develop and implement all available options to support retroactive relief for vendors. This may include, but not be limited to abating prosecutions not yet reduced to final judgment, providing relief to defendants whose convictions have reached final judgment, and establishing an accessible and streamlined process for vendors to apply for relief under these and other “expungement” programs.

Special Sidewalk Vending Districts should not allow for unjust exclusion of vendors.

The Program Design proposes to allow Council Offices to create additional restrictions to “expand, limit or prohibit” sidewalk vending in their district, and calls for such provisions to be submitted and incorporated into NavigateLA within the first 90 days after approval of the program. (CLA Report, Attachment 2, p. 2.) We acknowledge the need for flexibility to respond to unique local dynamics within an overall citywide program. But we also strongly urge the Council to avoid exclusions that will undermine the impact and integrity of the program. Please consider the following recommendations:

Prioritize comprehensive citywide standards. Baseline, citywide standards with commonsense regulations will maximize economic opportunity *and* better address safety and accessibility concerns. We urge the Council to maintain its commitment to citywide program, with built-in flexibility as described below.

Criteria for imposing additional restrictions should be strictly related to health and safety considerations. The CLA Report offers a list of possible criteria for imposing additional restrictions in Special Sidewalk Vending Districts (Attachment 2, p. 2.) We support guidelines to ensure that Special Sidewalk Vending Districts do not function as tools for arbitrary exclusion. However, some of the criteria listed do not appear to be correlated with safety concerns over vending. Specifically, “inadequate parking” and “commercial activity and pedestrian traffic” should not be presumed to be inconsistent with safe and accessible vending. It is also very unclear how “compliance with Community Plans” could be interpreted to require restrictions on vending. Community Plans must not become a tool to exclude vending based on perceived animus toward vending or favoring one sector of the small business economy over another.

Include safeguards to mitigate against unjust and unnecessary exclusion. While individual streets may exhibit unique dynamics that make vending unsafe or unworkable, a Special Vending District should not be a backdoor tool to “opt-out” of the City’s program. Efforts to expand or restrict vending should include the following safeguard provisions:

- No Special Sidewalk Vending District should result in complete exclusion of vending. If vending is deemed unworkable on a certain street, then a District should allow vending on an adjacent or nearby street that does not demonstrate the same constraints.
- There should be a limit on the size and boundaries. The Special Sidewalk Vending District should not become a backdoor for special interests to cause entire communities to “opt-out” of the Program. Appropriate size limitations will ensure that Special Sidewalk Vending Districts are tailored to the specific issues they are intended to address.
- Some neighborhoods have embraced vending as a core element of a thriving cultural and economic hub, and could support expanded vending opportunities. Vendors should have the same ability to initiate and structure a Special Sidewalk Vending District that reflects historical vending practices, provided they can demonstrate that the refined and more permissive rules will not negatively affect health, safety and accessibility.
- The creation of Special Sidewalk Vending Districts should require City Council approval based on findings related to public health, safety and accessibility. We strongly believe that deviation

from the baseline rules should require City Council approval, with duly noticed opportunities for the public to weigh in on the boundaries, rules and processes being proposed. Approval of any Special Sidewalk Vending District should include findings that such restrictions are necessary to promote health, safety and accessibility, or that more permissive vending rules will not negatively affect health, safety, and accessibility.

Do not prohibit vending on certain streets unless necessary due to a demonstrable safety risk. The Program Design suggests that each City Council Office will be able to identify “no vending areas” to be incorporated into the NavigateLA map. (Attachment 2, p. 2.) On sidewalks where vending would otherwise be permitted under the placement requirements, any complete prohibition should be limited in scope and occur only where there are actual and demonstrable safety risks associated with vending. Economic protectionism or perceived community animus should never be a reason to prohibit vending.

Program costs and budget should account for economic impact of vending and should allocate enforcement resources according to need.

A successful Sidewalk Vending Program requires resources for full implementation. As the Council considers various program costs and budgeting strategies, careful attention should be given to the impacts on low-income vendors. Fees should be set at levels that will help offset costs, without discouraging full participation. The Council should consider different fee levels for different types of vending.

While we appreciate the CLA Report’s analysis of cost recovery based on enforcement models, we wish to point out that the revenue analysis is based only on permit fees. (CLA Report, Attachment 2, p. 3-7.) Legalized sidewalk vending will contribute to the City’s coffers in significant other ways, including tax revenue, recirculation of local capital, stimulation of local economies and supply chains, reduction in costs targeting illegal vending, and other economic multipliers (*See*, Economic Roundtable, “Sidewalk Stimulus: Economic and Geographic Impact of Los Angeles Street Vendors.” 2015).

We recommend the City Council direct the Sidewalk Vending Coordinator to concentrate on streamlining the permit program by making the application process more affordable and providing effective outreach and education efforts for vendors during the first year of the program. Creating a working system for lawful vending will significantly decrease the amount of illegal vending, which will in turn reduce the enforcement burden. We recommend the City maintain current enforcement levels for the first year and subsequently decide on the appropriate enforcement model based on number of permits issued, and lessons learned during the first year of implementation.

The City should prioritize cost reduction strategies for vendors.

We applaud the CLA and Council for investigating strategies to reduce the high costs to vendors, which could serve as barriers to full compliance. We support changes to State and County regulations to be more narrowly tailored to mobile food facilities, thereby reducing food vending startup costs. We also strongly support the recommendation to explore options relating to cooperatives and incubators. The City should also support micro-lending and other programs to improve access to capital for low-income vendors who are excluded from mainstream capital. We urge the City to coordinate closely with community-based lenders and other organizations focused on building opportunities for low-income entrepreneurs. The Council should direct the Sidewalk Vending Coordinator to immediately convene a cost reduction task force - consisting of street vendors, City, County and State agencies, and community-based organizations working with street vendors - to develop and implement additional recommendations to remove barriers to entry for vendor participation.

CLA REPORT ATTACHMENT 3: PROPOSED SIDEWALK VENDING REGULATIONS

CLA Report, Attachment 3 provides proposed regulations for a Sidewalk Vending Program. We offer the following comments and recommendations regarding these core regulations.

The General Program Provisions should prohibit special vending districts from excluding vendors, allow flexibility and choice in vending location, and promote healthy food vending.

Prohibit complete exclusion of vending from Special Sidewalk Vending Districts. The General Program Provisions state, “the City Council may wish to establish a process to designate expanded, restricted, or no-vending areas. Such areas shall be called ‘Special Sidewalk Vending Districts.’” (CLA Report, Attachment 3, p. 2.) As described above, this process should include safeguards to prevent unjust exclusions, and allow only those restrictions necessary to address actual, demonstrable safety concerns.

Allow flexibility and choice in vending location. The General Program Provisions state that the Sidewalk Vending Coordinator “shall develop a lottery system to allocate sidewalk vending permits based on the availability of locations, and with a percentage of permits reserved for low income individuals.” (CLA Report, Attachment 3, p. 2.) We support prioritizing low income vendors in the permitting process, but it is unclear how a lottery would work. Several questions need to be resolved, including:

- Is a lottery triggered only if multiple applicants propose to vend in the same location?
- Will a lottery system acknowledge an applicant’s history of vending in a certain area?
- Will unique locations be allocated to multiple vendors if proposed days and times do not overlap (e.g., one vendor proposes to work at an intersection on the weekend only, while another vendor proposes to work that the same location during the weekdays only)?

Assigning a single fixed location is counter to the standard practice of many stationary vendors who choose to operate at different locations on different days/times depending on their schedules and consumer demands (e.g. selling in one location on the weekend, and another location on certain weekday mornings). And when an assigned space sits vacant, there will be missed opportunities for trade. Requiring such a deviation from standard practices may improperly inhibit the natural flexibility of vending to the detriment of vendors and customers, and may ultimately discourage some vendors from participating in the program. We believe vendors should be able to select a route or series of locations/times, provided they adhere to the commonsense location rules. For food vendors, the County Route Sheet (described below) offers an instructive model.

Incentivize Healthy Food Carts. We strongly support the inclusion of healthy food incentives, as proposed in the General Program Provisions. The LASVC, under the leadership of the LA Food Policy Council, has long championed a healthy food cart program and has performed significant research and analysis regarding such a program. In addition to the permit fee waivers and renewal extensions outlined in the General Program Provisions, we recommend that incentives include special authorization to vend near schools, at designated “Healthy Food Corners,” and a right of first refusal for vending opportunities at City-sponsored events. We also recommend the City distinguish and support healthy food carts with signage and marketing support. We hope to collaborate closely with the Sidewalk Vending Coordinator as this important program is implemented.

The Application Requirements should be inclusive and aligned with existing requirements.

Inclusive Application Process. We support inclusive identification options for a Sidewalk Vending Operator License and Sidewalk Vending Certificate of Operation. The list of acceptable identification included in the CLA Report (CLA Report, Attachment 3, p. 5) should be expanded to be consistent with

the Proof of Identify provisions in AB 60. The Regulations should also clearly prohibit any inquiry into immigration or citizenship status within any part of the permitting or enforcement process.

Align location selection with County Process. The Proposed Regulations would require applications for stationary vending in commercial and industrial areas to indicate the proposed “location or area marked by major cross streets, and either north, south, east or west side of the street.” (CLA Report, Attachment 3, p. 5.) To obtain a County Health Permit, food vendors are already required to submit a Route Sheet as part of their application to the County, which outlined the proposed vending location by day and time. Rather than imposing an unnecessary duplicative layer of requirements, the City should accept the County Route Sheet as adequate indication of proposed location in an application.

Operating Requirements should promote safe sidewalks without arbitrary restrictions.

Do NOT include an across-the-board maximum of two vendors per block face. The Proposed Operating Requirements would limit vending to “two carts per block face” regardless of the size of the block. (CLA Report, Attachment 3, p. 6.) Two vendors per block may be appropriate for *some* streets. In fact, some streets might only safely accommodate one vendor, or even none. However, our major boulevards can safely accommodate more than two vendors per block face. An arbitrary limit fails to account for these variations. Instead, the program should rely on location restrictions that more accurately reflect safety priorities. Spatial regulations will create a de-facto cap on the number of vendors that may legally operate on each street, but in a way that is driven by the unique safety and accessibility dynamics of that street. This program should boost the entrepreneurship that drives our city forward. A two-vendor-per-block face limit achieves the opposite. It is arbitrary, unnecessary, and an unduly burdensome restraint on entrepreneurship.

Do not create additional restrictions for food vending not imposed by the County. The proposed Operating Requirements would allow stationary and mobile vending of food products only from “Public Health Department approved **mobile pushcarts**...” (Attachment 3, p. 6, Operating Requirements (A) and (C), emphasis added). However, in some limited cases, the California Retail Food Code and County regulations do not actually require a mobile pushcart. For example, LA County Code Section 8.04.230 allows for a “personal hawker” to vend packaged, non-hazardous food “on his person or in a container such as a pack, bag, box, or basket.” This is the least expensive public health permit available, and does not require expensive equipment. By requiring all food sales to occur from “approved pushcarts,” the Operating Requirements could be interpreted to prohibit this type of vending in the city, thereby eliminating an accessible start-up opportunity for low-income vendors to operate in compliance with County health regulations. These Operating Requirements should be revised to require sales from approved pushcarts, *to the extent such pushcarts are required by the Department of Public Health.*

Clarify where stationary vending is permitted. The proposed Operating Requirements would allow stationary vending in “commercial and industrial areas of the city.” (CLA Report, Attachment 3, p. 6.) For clarity, we recommend that the program allow permitted stationary vending in “non-exclusively-residential zones,” so as to ensure that vending is permitted on sidewalks in mixed-use areas, areas zoned Public Facilities, as well as Commercial and Industrial zones.

Expand Hours of operation in non-residential areas. The proposed Operating Requirements would limit all forms of vending in all locations to the hours of 7:00am to 9:00pm. (CLA Report, Attachment 3, p. 6.) Many vendors work before 7:00am and after 9:00pm in order to accommodate other pressures on their schedules, such as childcare and supplemental employment, and to cater to consumer preferences. In order for this program to be successful, hours of operation need to take into account where vending

already occurs and avoid excluding vendors from the permit process. On non-residential zoned streets, vendors should have the same legal hours of operation as brick and mortar businesses in that area.

Establish Placement Requirements that are tailored to vending practices and safety considerations.

We recommend commonsense sidewalk placement restrictions, applied citywide and without further limitation by arbitrary caps. Appropriately crafted, these restrictions can promote opportunities for vendors while protecting public safety and avoiding congestion.

Unfortunately, the CLA Report's Proposed Placement Requirements (Attachment 3, p. 8-9) appear to be lifted directly from LAMC 42.00(f)(6) governing the placement of *news racks*. Needless to say, sidewalk vending has regulatory considerations distinct from news racks. Several of these restrictions, if applied to vending, would have counterproductive results. For example, Proposed Requirement no. 21 could effectively prohibit vending on streets with parking meters. Proposed Requirement no. 4 would prohibit vending within a full 45 feet to the rear of any sign marking a bus stop. Surely these restrictions could be better tailored to vending operations.

We sincerely hope the Council will consider placement requirements that respond to the unique characteristics of the vending trade, rather than recycling regulations from an entirely different issue. We propose the following Placement Requirements for sidewalk vending:

No vending shall occur:

- (1) In such a way that would restrict or interfere with the ingress or egress of the abutting owner or tenant or to create or become a nuisance, or constitute a hazard to traffic, life or property, or an obstruction to adequate access to fire, police, or sanitation vehicles.
- (2) Where placement impedes the flow of pedestrian traffic by reducing the clear space to less than 5 feet or, impedes access to or the use of abutting property, including, but not limited to, residences and places of business.
- (3) Immediately in front of buildings, houses, structures, or public stairs such that it causes a violation of ADA guidelines for pedestrian passage.
- (4) On any part of the public right-of-way that is improved with lawn, flowers, shrubs, trees, other plants or decorative landscaping.
- (5) On the roadway portion of any street, except that vending shall be permitted within a People St. Plaza or other areas reserved exclusively for pedestrian use.
- (6) On medians of divided highways, unless such median is intended as a pedestrian walkway.
- (7) Within ten feet of a fire hydrant.
- (8) Within twenty feet of any hospital or emergency room entrance.
- (9) Where exigent circumstances exist and a police officer or other authorized officer or employee of the city gives notice to a vendor to temporarily move from a location such vendor shall not vend from such location. For the purpose of this subsection, exigent circumstances shall include but not be limited to, unusually heavy pedestrian or vehicular traffic, existence of any obstructions in the public space at or near such location, an accident, fire or other emergency situation at or near such location, or a parade, demonstration, or other such event or occurrence at or near such location.

Ensure humane strategies for monitoring and compliance.

The City's long-standing practice of allowing criminal prosecutions for street vending violations carried devastating consequences for low-income workers and their families, and heightened the risk of detention and deportation proceedings for immigrant vendors. We wholeheartedly support the elimination of criminal penalties as part of the enforcement regime in the new Sidewalk Vending Program. While we are

pleased to see this commitment to decriminalization, we also recommend the following important changes to the proposed compliance program:

Include a warning for a first violation in each enforcement tier. The proposed two-tier penalty system does not include a warning. (Attachment 3, p. 10.) Vendors should be given a first warning and an opportunity to correct violations as a matter of course. This will enable education and invite vendors into the program more effectively than issuing fines and penalties right out of the gate.

Clarify the timeframe for increased penalties for subsequent violations. The current proposed ACE fines do not have a time limit for subsequent offenses. (Attachment 3, p. 10.) Standard practice is to increase penalties for subsequent violations occurring within one year. (*See, e.g.* LAMC Section 11.2.04(a)(1), Government Code Section 36900(b)). Accordingly, the Regulations should clarify that escalating fines should only be applied to subsequent violations occurring **within one year** of the first violation.

Align the penalties for vending without a Certificate of Operation with existing law. We support a policy that allows vendors to cure citations for vending without a Certificate of Operation by obtaining a permit and having previous citations significantly reduced or eliminated. However, the proposed base fines will cause undue financial hardship for low-income vendors. ACE fines for violations of the Sidewalk Vending Program without a Certificate of Operation should be \$100 for a first violation (after a warning), \$200 for a second violation within one year, and \$500 for a third or subsequent violation within one year. This range is consistent with fines relating to infractions (*see, e.g.*, LAMC Section 11.2.04(a)(1) and Government Code Section 36900(b)).

Avoid property seizure. Confiscation of vendors' property - which has proven to be a procedural and legal morass - is an ineffective and inappropriate deterrent. The City is already facing lawsuits from civil rights groups about the unlawful seizure of property from street vendors. It is antithetical to the values of justice and economic mobility, and is inconsistent with an otherwise balanced and humane enforcement program.

This week marks four years since the City began considering the legalization of street vending in LA. As we enter the fifth year of this effort, our city and our country are now facing challenges many of us could never have predicted at the outset. Finally adopting a thoughtful, citywide street vending program is an important moment for Los Angeles – an opportunity to show that Angelenos are committed to inclusion, racial equity, and economic opportunity for everyone, especially low-income families. We urge the Council to consider the above recommendations, incorporate them into the Sidewalk Vending Program, and expeditiously approve the drafting and adoption of an ordinance to legalize sidewalk vending.

Sincerely,

The Los Angeles Street Vendor Campaign