



December 1, 2014

Helping People,  
Building Community

Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

I am writing on behalf of the Little Tokyo Service Center CDC to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Studies estimate Los Angeles is home to over 10,000 street vendors, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, support public health and activate the vibrancy and safety of our streets.

Over the course of 2 years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. This proposal solves some of the key challenges currently facing the City, and brings forth innovative solutions that pull from the best practices of other large metropolitan cities, while being sensitive to the unique fabric of Los Angeles. The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

- **A Citywide permit process for food and non-food vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city. A cap on the number of permits issued or limiting vending to certain districts will impede the effectiveness of this necessary program.



- **A coordinated process to permit and properly regulate vending in City parks.** The permit process should be coordinated across departments to create a pathway for regulated vending in City parks as well as City sidewalks. The Department of Public Works and the Department of Recreation and Parks should collaborate to ensure efficient permitting procedures and coordinated education, compliance and technical assistance programs.
- **Avoid vending districts and numerical limits on permits.** Recognizing legitimate public safety concerns, we seek to avoid an unsafe concentration of vending operations in any particular area. But limiting the locations where vending is permitted to specific zones and capping the number of permits has been proven to bring about the very ills these policies seek to avoid. The City’s last experiment with legal sidewalk vending was at MacArthur Park in the early 2000s. There, a small vending zone with a de facto cap on the number of carts (less than 50) became a magnet for vendors shut out of the program. As vending activity became over-concentrated, it gave the City’s legal vending program a bad name. In addition to the public safety problems associated with vending district and caps, that failed approach is also administratively burdensome for the City, and works against a basic premise of the program: to expand vending opportunities. We must avoid repeating this failed experiment. Instead, the ordinance should allow vending city-wide, but also articulate reasonable restrictions on obstructions, proximity and accessibility that apply throughout the City. Enforcing these “unlawful obstruction” restrictions would have the effect of limiting the over-concentration of vending operations, without unnecessarily restricting the flexibility of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending “zones” or “districts” would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.
- **Meaningful Incentives for different types of healthy food vending,** including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas, such as schools, in front of hospitals, and within City parks. Many Angelenos lack adequate access to nutritious, culturally-relevant and affordable food. Sidewalk food vendors are a critical part of mitigating this inequity.
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approved. This program must create tools to encourage and support, not exclude, permitted vending.

- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

Rémy De La Peza  
Sr. Planner & Policy Counsel  
Little Tokyo Service Center CDC



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**fax** {323} 780.7608

[www.innercitystruggle.org](http://www.innercitystruggle.org)

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Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,



Maria Brenes  
Executive Director  
InnerCity Struggle



*Los Angeles Community Action Network*

December 1, 2014

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200 North Spring Street, Room 395  
Los Angeles, CA 90012.

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*Los Angeles Community Action Network  
838 E. 6<sup>th</sup> Street, Los Angeles, CA 90021  
Phone # 213-228-0024 [www.cangress.org](http://www.cangress.org)*



December 1, 2014

Page 2

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Sincerely,



Becky Dennison  
Co-Executive Director



## Hunger Action Los Angeles

961 S. Mariposa # 205 Los Angeles CA 90006

Ph (213) 388 8228 Fax (213) 388 8448 www.hungeractionla.org

November 26, 2014  
Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

### RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493

Honorable City Council,

I am writing on behalf of Hunger Action Los Angeles to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

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On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

Frank Tamborello



**Director**

Hunger Action Los Angeles



Richard Williams <richard.williams@lacity.org>

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## Support for Sidewalk Vending Ordinance CF #13-1493

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Will Wright <will@aialosangeles.org>

Mon, Dec 1, 2014 at 10:46 AM

To: richard.williams@lacity.org, felipe.v.chavez@lacity.org

December 1, 2014  
Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

As the Director of Government and Public Affairs for AIA|LA, I am writing to express support for the City of Los Angeles' consideration of a citywide program that would legalize and regulate sidewalk vending in Los Angeles. As a member of the Los Angeles Food Policy Council's stakeholder network of over 280 organizations, we have committed to making Los Angeles a "Good Food" region for everyone—where food is healthy, affordable, sustainable and fair.

Sidewalk vending activates streets with people, which adds to the cultural contribution of a community as well as to the social vibrancy, health and well-being of a place.

Legalized sidewalk vending will support increased availability of healthy food in underserved communities, encourage local economic development, and create safer, more vibrant streets. There are an estimated 10,000 street vendors in Los Angeles, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, and offer incentives to encourage more street vendors to become healthy food entrepreneurs.

**We express our strong support for a sidewalk vending ordinance that creates the following:**

- A Citywide permit process for food and non-food sidewalk vending. This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city.
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As community food advocates, we support street food vendors because we know they play an important role in addressing inequitable access to healthy food, and they are a vibrant part of our local food economy. By legalizing sidewalk vending, the City of LA creates jobs, supports local food entrepreneurs and activates the vibrancy and safety of the streets. On behalf of the thousands of vendors we work with and support, we the City of Los Angeles to pass a sidewalk vending ordinance with expediency.

Very truly yours,

**Will Wright, Hon. AIA|LA**

Director, Government and Public Affairs

**AIA Los Angeles**

3780 Wilshire Blvd., Suite 800  
Los Angeles, CA 90010

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# THE LAW OFFICE OF ADALILA ZELADA-GARCIA

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Sincerely,

*Adalila Zelada-Garcia*

Adalila Zelada-García, Esq.

Stakeholder Network Member, Los Angeles Food Policy Council



200 North Spring Street  
City Hall  
M125  
Los Angeles, CA 90012  
[goodfoodla.org](http://goodfoodla.org)

CC:

Councilmember Gilbert Cedillo  
Councilmember Paul Krekorian  
Councilmember Bob Blumenfield  
Councilmember Tom LaBonge  
Councilmember Paul Koretz  
Councilmember Nury Martinez  
Councilmember Felipe Fuentes  
Councilmember Bernard Parks  
Councilmember Curren D. Price, Jr.  
Councilmember Herb J. Wesson, Jr.  
Councilmember Mike Bonin  
Councilmember Mitchell Englander  
Councilmember Mitch O'Farrell  
Councilmember Jose Huizar  
Councilmember Joe Buscaino



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Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Huerta', written in a cursive style.

David Huerta  
President  
SEIU United Service Workers West



# LEGACY LA

December 1, 2014

Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

I am writing on behalf of the Legacy LA to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. Legacy LA represents over 5,000 residents living in the Ramona Gardens community of Boyle Heights and have seen first hand the perils associated with not having sidewalk vending policies in the City. Police have seized equipment that impacts the lives of very low-income residents that are trying to make a living and it also criminalizes these residents that are just trying to survive. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Studies estimate Los Angeles is home to over 10,000 street vendors, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, support public health and activate the vibrancy and safety of our streets.

Over the course of 2 years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. This proposal solves some of the key challenges currently facing the City, and brings forth innovative solutions that pull from the best practices of other large metropolitan cities, while being sensitive to the unique fabric of Los Angeles. The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

- **A Citywide permit process for food and non-food vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city. A cap on the number of permits issued or limiting vending to certain districts will impede the effectiveness of this necessary program.
- **A coordinated process to permit and properly regulate vending in City parks.** The permit process should be coordinated across departments to create a pathway for regulated vending in City parks as well as City sidewalks. The Department of Public Works and the Department of Recreation and Parks should collaborate to ensure efficient permitting procedures and coordinated education, compliance and technical assistance programs.

- **Avoid vending districts and numerical limits on permits.** Recognizing legitimate public safety concerns, we seek to avoid an unsafe concentration of vending operations in any particular area. But limiting the locations where vending is permitted to specific zones and capping the number of permits has been proven to bring about the very ills these policies seek to avoid. The City's last experiment with legal sidewalk vending was at MacArthur Park over a decade ago. There, a small vending zone with a de facto cap on the number of carts (less than 50) became a magnet for vendors shut out of the program. As vending activity became over-concentrated, it gave the City's legal vending program a bad name. In addition to the public safety problems associated with vending district and caps, that failed approach is also administratively burdensome for the City, and works against a basic premise of the program: to expand vending opportunities. We must avoid repeating this failed experiment. Instead, the ordinance should allow vending citywide, but also articulate reasonable restrictions on obstructions, proximity and accessibility that apply throughout the City. Enforcing these "unlawful obstruction" restrictions would have the effect of limiting the over-concentration of vending operations, without unnecessarily restricting the flexibility of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending "zones" or "districts" would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.
- **Meaningful Incentives for different types of healthy food vending,** including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas, such as schools, in front of hospitals, and within City parks. Many Angelenos lack adequate access to nutritious, culturally-relevant and affordable food. Sidewalk food vendors are a critical part of mitigating this inequity.
- **Access to a streamlined permitting process.** The application process for a vendor to participate in a program should be a primary incentive in any system. The process should be affordable, clear, and equitable to the vendor. This should include efforts to identify and overcome any unique barriers to entry, including providing access to technical assistance and education programs. We soundly oppose any public hearing process that gives traditional opponents of vending a stronger weapon to stop a permit from being approved. This program must create tools to encourage and support, not exclude, permitted vending.
- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,



Maria Lou Calanche  
Executive Director  
Legacy LA

December 1, 2014

The Honorable Curren Price  
Chair, Economic Development Committee  
City Hall  
200 North Spring St.  
Los Angeles, CA 90012

**Re: November CLA report on CF# 13-1493**

Dear Councilmember Price,

We received the Chief Legislative Analyst's most recent report on the proposed sidewalk vending ordinance late on the Wednesday before Thanksgiving. Once again, a report to your Committee has been released to the public (and the other Committee members) shortly before the Committee is scheduled to discuss and act on a matter of great importance to many residents in Los Angeles and the local business community.

Despite this report's late release, we have reviewed the report and cannot state strongly enough that there is not enough information about how a program to expand legal sidewalk vending in the City will work, how it will be enforced or what its potential effects will be. In short, this report merely spells out how a potential vendor would be permitted by the City and the County. This report does not lay out even the most rudimentary programs to oversee any type of program to either expand the current street vending ordinance (ordinance #169318) or to create a new program.

In the six months since the Committee last discussed a new sidewalk vending program, CCA has made numerous requests to meet with the working group of City departments that has been tasked with providing information about impacts of a new program and to also help devise that program. Despite being told several times that CCA and representatives from the Downtown Business Improvement Districts would be able to meet with the working group, we were never given the opportunity to share the concerns of the business community. Instead, less than two weeks before the Committee was scheduled to again discuss this matter, we were invited to a hastily arranged meeting attended by a CLA analyst, several city council staff members and representatives from the County Department of Public Health. Other than being shown the "framework" flow chart that is the last page of the November CLA report, we were given little information about how this program will work. Rather, we were informed that few of the departments had provided information that is critical to any program. Furthermore, no notes were taken by the CLA to memorialize our specific concerns with this program.

On numerous occasions the City has gone ahead with ordinances and entire programs without considering, let alone planning for, the effects of those programs. Many times these programs have failed outright due to a lack of budgets, personnel or attention. This new sidewalk vending program has every appearance of going in that direction. In this case however, the chaos that already exists on sidewalks throughout the City will only get worse, because some or all of these vendors will have a City stamp of approval. This "stamp" will further limit the City's ability to deal with illegal and unregulated vending on sidewalks.

A clear set of regulations and a sufficiently budgeted enforcement program are the cornerstones of any program. Why is illegal vending currently a problem – and why did the City’s attempt to create vending zones twenty years ago fail? Because there is – and was – a lack of resources to enforce the regulations that are in place. Any new set of regulations, especially ones that are poorly conceived, is doomed to fail if there is not sufficient enforcement. And saying that the City can figure out those details later is a recipe for disaster.

Therefore, the following set of questions must be answered before the Committee or City undertakes any action:

Has the City done an analysis of why the original street vending ordinance failed or is it just supposition and word of mouth?

If a study has not been done, should not one be done before embarking on a new program?

- Has an economic analysis been done on this proposed program?
  - Can we tell for sure that the benefits of allowing food and products to be sold on sidewalks outweigh the costs (and potential costs) to existing, permanent businesses and restaurants?
  - Will this program cost the City money through lower sales tax revenue as existing brick and mortar businesses lose sales (as well as enforcement and management costs)?
- Will vendors be allowed to sell only items they apply for or for any type of food or product?
- How will the City determine how many permits to issue across the City and within a specific area?
  - Will the public be able to have input about whether vending will be allowed in their neighborhood and what locations would be available and off limits to vendors?
  - How will the City determine how many vendors are allowed on a block, what spacing will be between them and will a food vendor will be allowed in front of a restaurant?
  - Will there be set hours and set locations for vendors and will a vendor only be allowed / required to sell in one location (if not, why not)?
  - Will vending be allowed in residential neighborhoods and in front of houses?
  - The City is considering issuing permits for vending in parks – will the park at City Hall be included? Will the dog park and plaza at LAPD headquarters be included?
    - If not, what is the justification for forcing vending in front of businesses and homes, but not City Hall?
  - Will the business improvement districts be given a portion of the permit fee in order to mitigate the additional costs created by vendors, such as additional garbage that the BIDs must haul away at their members’ expense?
- How will the program be paid for?
  - Will it come from vendor fees? If so, what will the permit fee be set at?
  - If it does not come from fees, will the program have dedicated funding to make sure that enforcement does not get cut in the future?
  - The CLA report notes that there could be as many as 40,000 non-food vendors and 10,000 food vendors – how many inspectors will be needed to enforce this program and how will they be paid for?

- How will this program be enforced?
  - Do Street Services and Recreation and Parks have the manpower and the training to enforce these rules?
    - Street Services currently has two inspectors for the entire City. How many will it need to add to monitor and inspect 50,000 potential vendors?
    - Will park rangers be expected to inspect vendors or will recreation staff members be expected to enforce these regulations?
      - What about at pocket parks and parks such as Pershing Square?
  - What is LAPD's role in this program?
  - The County already cannot inspect all of the food trucks it needs to. How can we expect them to add hundreds or thousands of food carts to their compliance lists?
    - The LA Times reported that only 40 percent of food trucks have been inspected by the County. The Department of Public Health currently has 16 inspectors for 6,000 registered food trucks. Four inspectors are responsible for trucks inside the basic area of the City of Los Angeles.
      - How can the County expect to add up to 10,000 food vendors to its inspection roles and still claim that these carts and the trucks are "safe" for consumers?
    - Will the City need to reimburse the County for these inspections?
    - Will food vendors have letter grades like restaurants? If not, why should they be treated any differently?
    - The County inspects brick and mortar restaurants four times per year. Will the County and potentially the City susceptible to lawsuits for violations of equal protection laws by failing to inspect push carts (and food trucks) an equal number of times? Would not they be guilty of discriminating against restaurants?
  - Will the City need to pay overtime to staff for evening and weekend inspections?
  - What will be the penalties be for vendors who do not have a permit? For vendors who sell out of their area or location? For vendors who are in non-compliance? For food vendors who make people sick? For vendors who sell counterfeit goods?
  - What will be the insurance requirements on vendors?
- How will vendors deal with restrooms? Are restaurants and stores required to make restrooms available to vendor customers?
- Filming is important in Los Angeles. If a crew wants to film on a street and a vendor is permitted to be there, how would this be resolved?
- The City has a numerous issues with sidewalk damage and impassable sidewalks. Many areas have narrow sidewalks. How will this affect permits?
  - How does this program comply with Americans with Disabilities Act requirements?
  - Will there be minimum space requirements that vendors must give to passersby?
- How will this program affect the various civil cases against the City over sleeping on sidewalks, storing property on sidewalks and other cases about how the City is dealing with its homelessness crisis?

- Who will be responsible for trash? For damage to City property? Damage to private property?
- Will there be standards about how the carts must look?
  - About whether they can use amplification or bells, horns, etc. to attract customers?
  - How about signs and banners?
  - Will vendors be allowed from behind their carts to solicit business?
  - Will vendors be allowed to approach customers who are in line for a restaurant or store in order to steal sales from that business?
- The City has had trouble with the Venice Boardwalk vending process. It also has numerous issues with “characters” on Hollywood Blvd. How will this be different?
- Will the City indemnify a property owner, tenant, etc. for any injuries or illnesses that are caused by a vendor or his / her products in front of that property owner’s building or lot?
- How will we collect sales tax revenue from vendors?
- Why are other cities able to ban direct competition by food vendors in front of restaurants or merchandise sellers in front of stores?

There are numerous other issues that must also be addressed before the City can move forward. We urge you to refrain from taking any action until these and other questions are answered. Moving forward in any way will only cause the current chaotic situation with illegal vending in the City considerably worse. It will also move the City in a direction that, as history shows, will be unable to mitigate without spending years and hundreds of thousands. Work with the business community and local communities to develop a fully fleshed out plan and give those same communities the ability to opt out of any program.

Sincerely,



Carol E. Schatz  
President & CEO



December 1, 2014

Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

I am writing on behalf of T.R.U.S.T. South LA to express our strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Studies estimate Los Angeles is home to over 10,000 street vendors, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, support public health and activate the vibrancy and safety of our streets.

Over the course of 2 years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. This proposal solves some of the key challenges currently facing the City, and brings forth innovative solutions that pull from the best practices of other large metropolitan cities, while being sensitive to the unique fabric of Los Angeles. The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

- **A Citywide permit process for food and non-food vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city. A cap on the number of permits issued or limiting vending to certain districts will impede the effectiveness of this necessary program.
- **A coordinated process to permit and properly regulate vending in City parks.** The permit process should be coordinated across departments to create a pathway for regulated vending in City parks as well as City sidewalks. The Department of Public Works and the Department of Recreation and Parks should collaborate to ensure efficient permitting procedures and coordinated education, compliance and technical assistance programs.

- **Avoid vending districts and numerical limits on permits.** Recognizing legitimate public safety concerns, we seek to avoid an unsafe concentration of vending operations in any particular area. But limiting the locations where vending is permitted to specific zones and capping the number of permits has been proven to bring about the very ills these policies seek to avoid. The City's last experiment with legal sidewalk vending was at MacArthur Park in the early 2000s. There, a small vending zone with a de facto cap on the number of carts (less than 50) became a magnet for vendors shut out of the program. As vending activity became over-concentrated, it gave the City's legal vending program a bad name. In addition to the public safety problems associated with vending district and caps, that failed approach is also administratively burdensome for the City, and works against a basic premise of the program: to expand vending opportunities. We must avoid repeating this failed experiment. Instead, the ordinance should allow vending city-wide, but also articulate reasonable restrictions on obstructions, proximity and accessibility that apply throughout the City. Enforcing these "unlawful obstruction" restrictions would have the effect of limiting the over-concentration of vending operations, without unnecessarily restricting the flexibility of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending "zones" or "districts" would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.
- **Meaningful Incentives for different types of healthy food vending,** including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas, such as schools, in front of hospitals, and within City parks. Many Angelenos lack adequate access to nutritious, culturally-relevant and affordable food. Sidewalk food vendors are a critical part of mitigating this inequity.
- **Access to a streamlined permitting process.** The application process for a vendor to participate in a program should be a primary incentive in any system. The process should be affordable, clear, and equitable to the vendor. This should include efforts to identify and overcome any unique barriers to entry, including providing access to technical assistance and education programs. We soundly oppose any public hearing process that gives traditional opponents of vending a stronger weapon to stop a permit from being approved. This program must create tools to encourage and support, not exclude, permitted vending.
- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me at 323-233-4118 or [sandra@trustsouthla.org](mailto:sandra@trustsouthla.org). On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,



Sandra McNeill  
Executive Director



Richard Williams <[richard.williams@lacity.org](mailto:richard.williams@lacity.org)>

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## Public Comment CF#13-1493 for Tuesday's EDC meeting.

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**K Sabo** <[ksabo@wildwildwest.org](mailto:ksabo@wildwildwest.org)>

Mon, Dec 1, 2014 at 2:41 PM

To: Krekorian Paul <[paul.krekorian@lacity.org](mailto:paul.krekorian@lacity.org)>, curren.price@lacity.org, jose.huizar@lacity.org, councilmember.wesson@lacity.org, councilmember.cedillo@lacity.org, nury.martinez@lacity.org  
Cc: Richard.Williams@lacity.org, O'Farrell Mitch <[councilmember.ofarrell@lacity.org](mailto:councilmember.ofarrell@lacity.org)>, Shull Mike <[michael.a.shull@lacity.org](mailto:michael.a.shull@lacity.org)>

December 1st, 2014

Honorable committee members of the Economic Development Committee,

One size does not fit all! In this case in particular, one plan does not fit all.

The Department of Recreation and Parks is a semi-proprletary department governed by their commission per the City Charter. They should be making their own decisions with regards to managing their properties, and this includes how they manage every concessionaire, including food vendors.

Remove Recreation and Parks from this action and allow the department to manage their individual properties as the People of Los Angeles by way of the City Charter intended.

Thank you,

Kristin C. Sabo (Lake View Terrace, CA 91342)

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**Kristin C. Sabo**

[ksabo@wildwildwest.org](mailto:ksabo@wildwildwest.org)

Dear Councilman Huizar,

I am the Principal of a 20 person Architecture firm, Omgivning Inc., in the Historic Core. I have also been a resident, in the Historic Core and Financial District from 2008 thru 2014. My Architecture firm specializes in revitalizing historic buildings in DTLA.

I am a huge proponent of sidewalk vitality and the energy that it draws to create a vibrant community. Although I want to support the street vending ordinance, I must strongly oppose it. I use, live, walk and engage on our downtown sidewalks and I do not think this ordinance is thought through. There does not seem to be many limitations to the ordinance and based on our current BID's load of trash and clean up, I cannot fathom at this current time, how they could accommodate the extra load.

As an Architect for small restaurants and retail in DTLA I must also remind the city how incredibly difficult, time consuming and most of all extremely expensive, it is to open a brick and mortar establishment downtown. Is it fair to allow vendors to set up anywhere at anytime for almost no cost and with almost no regulation? This will significantly affect the already struggling brick and mortar establishments.

I hope the Council will not pass this ordinance, but will spend more time on establishing resources for cleanup and regulation for street vendors so that it will be a highly successful venture in the future.

Thank you so much.



Karin Liljegren, Principal.  
Omgivning Inc.

# MÁS

**DATE**

December 1, 2014

**TO**

The Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and  
Felipe Chavez  
200 North Spring Street,  
Room 395  
Los Angeles, CA 90012.

**RE**

Support for proposed Sidewalk  
Vending Program, Los Angeles  
City Council File #13-1493

xxxxxxxxxxxxxxxxxxxxxxxxxxxx



**OFFICE**

3051 N. Coolidge Avenue  
Los Angeles, CA 90039

**PHONE**

+1 323 382 4762

**EMAIL**

elizabeth@mas.la

**WEBSITE**

www.mas.la

To the Honorable City Council:

I am writing on behalf of LA Más to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign - a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Our work leading the Futuro de Frogtown project - a community oriented visioning process tied to zoning changes along the LA River - has further cemented the need for these changes. The informal economy is vibrant and essential in many of our communities.

Over the course of two years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

- A Citywide permit process for food and non-food vending.
- A coordinated process to permit and properly regulate vending in City parks.
- Avoid vending districts and numerical limits on permits.
- Meaningful Incentives for different types of healthy food vending, including but not limited to, fresh fruit, produce, water and healthy snacks.
- Access to a streamlined permitting process.
- Responsible and humane enforcement focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Timme', with a long horizontal flourish extending to the right.

Elizabeth Timme  
Co-Director



December 1, 2014  
Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493

Honorable City Council,

I am writing on behalf of the Strategic Actions for a Just Economy (SAJE) to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Studies estimate Los Angeles is home to over 10,000 street vendors, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, support public health and activate the vibrancy and safety of our streets.

Over the course of 2 years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. This proposal solves some of the key challenges currently facing the City, and brings forth innovative solutions that pull from the best practices of other large metropolitan cities, while being sensitive to the unique fabric of Los Angeles. The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

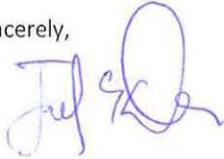
- **A Citywide permit process for food and non-food vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city. A cap on the number of permits issued or limiting vending to certain districts will impede the effectiveness of this necessary program.
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of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending "zones" or "districts" would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.

- **Meaningful Incentives for different types of healthy food vending**, including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas, such as schools, in front of hospitals, and within City parks. Many Angelenos lack adequate access to nutritious, culturally-relevant and affordable food. Sidewalk food vendors are a critical part of mitigating this inequity.
- **Access to a streamlined permitting process**. The application process for a vendor to participate in a program should be a primary incentive in any system. The process should be affordable, clear, and equitable to the vendor. This should include efforts to identify and overcome any unique barriers to entry, including providing access to technical assistance and education programs. We soundly oppose any public hearing process that gives traditional opponents of vending a stronger weapon to stop a permit from being approved. This program must create tools to encourage and support, not exclude, permitted vending.
- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,



Joe Donlin  
Associate Director  
Strategic Actions for a Just Economy

December 1, 2014  
Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

I am writing to express support for the City of Los Angeles' consideration of a citywide program that would legalize and regulate sidewalk vending in Los Angeles. As a member of the Los Angeles Food Policy Council's stakeholder network of over 280 organizations, we have committed to making Los Angeles a "Good Food" region for everyone—where food is healthy, affordable, sustainable and fair.

Legalized sidewalk vending will support increased availability of healthy food in underserved communities, encourage local economic development, and create safer, more vibrant streets. There are an estimated 10,000 street vendors in Los Angeles, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, and offer incentives to encourage more street vendors to become healthy food entrepreneurs.

We express our strong support for a sidewalk vending ordinance that creates the following:

- **A Citywide permit process for food and non-food sidewalk vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city.
- **Incentives for different types of healthy food vending,** including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas such as around schools and in front of hospitals.
- **Responsible and humane enforcement** focused on education and training first, that avoids arrests or excessive criminalization of vendors.

As community food advocates, we support street food vendors because we know they play an important role in addressing inequitable access to healthy food, and they are a vibrant part of our local food economy. By legalizing sidewalk vending, the City of LA creates jobs, supports local food entrepreneurs and activates the vibrancy and safety of the streets. On behalf of the thousands of vendors we work with and support, we the City of Los Angeles to pass a sidewalk vending ordinance with expediency.

Sincerely,  
Andrew Douglas



200 North Spring Street  
City Hall  
M125  
Los Angeles, CA 90012  
[goodfoodla.org](http://goodfoodla.org)

Environmental & Social Justice Advocate, Urban Farmer  
Member, Urban Agriculture Working Group, Los Angeles Food Policy Council

cc:

Councilmember Gilbert Cedillo  
Councilmember Paul Krekorian  
Councilmember Bob Blumenfield  
Councilmember Tom LaBonge  
Councilmember Paul Koretz  
Councilmember Nury Martinez  
Councilmember Felipe Fuentes  
Councilmember Bernard Parks  
Councilmember Curren D. Price, Jr.  
Councilmember Herb J. Wesson, Jr.  
Councilmember Mike Bonin  
Councilmember Mitchell Englander  
Councilmember Mitch O'Farrell  
Councilmember Jose Huizar  
Councilmember Joe Buscaino

December 1, 2014

Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

Los Angeles, CA  
(213) 375-4518  
endsheriffviolence  
@gmail.com  
dignityandpowernow  
.org

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

I am writing on behalf of Dignity and Power Now and the Coalition to End Sheriff Violence to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Studies estimate Los Angeles is home to over 10,000 street vendors, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, support public health and activate the vibrancy and safety of our streets.

Over the course of 2 years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. This proposal solves some of the key challenges currently facing the City, and brings forth innovative solutions that pull from the best practices of other large metropolitan cities, while being sensitive to the unique fabric of Los Angeles. The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

- **A Citywide permit process for food and non-food vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city. A cap on the number of permits issued or limiting vending to certain districts will impede the effectiveness of this necessary program.
- **A coordinated process to permit and properly regulate vending in City parks.** The permit process should be coordinated across departments to create a pathway for regulated vending in City parks as well as City sidewalks. The Department of Public Works and the Department of Recreation and Parks should collaborate to ensure efficient permitting procedures and coordinated education, compliance and technical assistance programs.

- **Avoid vending districts and numerical limits on permits.** Recognizing legitimate public safety concerns, we seek to avoid an unsafe concentration of vending operations in any particular area. But limiting the locations where vending is permitted to specific zones and capping the number of permits has been proven to bring about the very ills these policies seek to avoid. The City's last experiment with legal sidewalk vending was at MacArthur Park in the early 2000s. There, a small vending zone with a de facto cap on the number of carts (less than 50) became a magnet for vendors shut out of the program. As vending activity became over-concentrated, it gave the City's legal vending program a bad name. In addition to the public safety problems associated with vending district and caps, that failed approach is also administratively burdensome for the City, and works against a basic premise of the program: to expand vending opportunities. We must avoid repeating this failed experiment. Instead, the ordinance should allow vending city-wide, but also articulate reasonable restrictions on obstructions, proximity and accessibility that apply throughout the City. Enforcing these "unlawful obstruction" restrictions would have the effect of limiting the over-concentration of vending operations, without unnecessarily restricting the flexibility of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending "zones" or "districts" would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.
- **Meaningful Incentives for different types of healthy food vending**, including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas, such as schools, in front of hospitals, and within City parks. Many Angelenos lack adequate access to nutritious, culturally-relevant and affordable food. Sidewalk food vendors are a critical part of mitigating this inequity.
- **Access to a streamlined permitting process.** The application process for a vendor to participate in a program should be a primary incentive in any system. The process should be affordable, clear, and equitable to the vendor. This should include efforts to identify and overcome any unique barriers to entry, including providing access to technical assistance and education programs. We soundly oppose any public hearing process that gives traditional opponents of vending a stronger weapon to stop a permit from being approved. This program must create tools to encourage and support, not exclude, permitted vending.
- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

Patrisse Cullors  
Executive Director, Dignity and Power Now



# Building Healthy Communities

## Boyle Heights

December 1, 2014  
Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012.

**RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493**

Honorable City Council,

I am writing on behalf of the Building Healthy Communities – Boyle Heights to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

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restrictions would have the effect of limiting the over-concentration of vending operations, without unnecessarily restricting the flexibility of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending “zones” or “districts” would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.

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- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

**Joel Perez**

Joel Perez  
Communications and Project Coordinator  
Building Healthy Communities – Boyle Heights



December 1, 2014

Honorable Members of the Los Angeles City Council  
c/o Office of the City Clerk  
Attention: Richard Williams and Felipe Chavez  
200 N. Spring Street, Room 395  
Los Angeles, CA 90012

RE: Support for Proposed Sidewalk Vending Program, LA City Council File # 13-1493

Honorable Members of the City Council:

On behalf of PolicyLink, I am delighted to provide a letter in support of the passage of the measure that would legalize and regulate sidewalk vending in Los Angeles. PolicyLink is a national research and action institute advancing racial, economic and social equity. In the course of our work, we collaborate with community organizations, government agencies, policymakers and other stakeholders to reverse longstanding policies and systems that have compromised the health and economic status of people of color and residents of low income communities.

Innovative strategies that remediate these historic barriers to opportunity are now yielding promising results. Among them are strategies that create pathways to small business opportunities, particularly for people who have previously been denied entry into these endeavors. Passage of the street vending measure currently under consideration will allow many new entrepreneurs to emerge in Los Angeles. Among them are people not currently in the workforce, those who face a variety of obstacles to employment, such as limited education, language barriers, lack of childcare and more.

The measure will also spur economic development in neighborhoods that are often overlooked and underserved by existing retail outlets. This is particularly the case with respect to access to healthy food. Unfortunately, many Los Angeles neighborhoods must contend with significant disparities in the food retail environment, disparities which in turn have been linked to severe health challenges. Full service grocery stores selling fresh, affordable produce and healthy food options are scarce, yet these same communities are overrun with fast food outlets and liquor stores selling salty, fatty, processed foods. Allowing sidewalk vending and providing incentives for the sale of healthy food will provide new options and increase access for residents without grocery stores nearby, residents who typically lack transportation to take them to stores in other areas.

Moreover, this is an opportune time for Los Angeles to move forward on permitting sidewalk sales. Jurisdictions across the country already allow sidewalk vending – Boston, New York, Austin and Portland for example – and are deriving the benefit of the excitement and vitality these businesses generate. The explosion of interest specifically in food vending is remarkable – driving foot traffic to shopping areas, entertainment venues and bricks and mortar stores, and in the process contributing to the local tax base. Los Angeles is already building a reputation as a “food city”, and should take full advantage of this trend. But it is essential that people of color and residents of low income communities are fully integrated into these emerging ventures. The entrepreneurial spirit within these populations is strong; small business pathways such as food vending can provide an opportunity to build upon cultural

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—  
213 620-9479 t

traditions, express creativity and build community, while making it possible for vendors to earn an honest living.

We hope you will consider the enormous potential of this measure to expand access to healthy food, foster small business development and re-energize the city's retail environment. We urge you to take prompt action to adopt the sidewalk vending measure.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary M. Lee". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mary M. Lee  
Deputy Director  
PolicyLink



December 1, 2014  
Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012

RE: Support for proposed Sidewalk Vending Program, Los Angeles City Council File #13-1493

Honorable City Council,

I am writing on behalf of the Los Angeles Neighborhood Land Trust, to express support for the City of Los Angeles' consideration of a citywide program that would legalize and regulate sidewalk vending in Los Angeles. As a member of the Los Angeles Food Policy Council's stakeholder network of over 280 organizations, we have committed to making Los Angeles a "Good Food" region for everyone—where food is healthy, affordable, sustainable and fair.

Legalized sidewalk vending will support increased availability of healthy food in underserved communities, encourage local economic development, create safer, more vibrant streets, and has the potential to positively impact the safety and livelihood of our city's park system. There are an estimated 10,000 street vendors in Los Angeles, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, and offer incentives to encourage more street vendors to become healthy food entrepreneurs.

We express our strong support for a sidewalk vending ordinance that creates the following:

- A Citywide permit process for food and non-food sidewalk vending. This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city.
- Incentives for different types of healthy food vending, including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas such as around schools and in front of hospitals.
- Responsible and humane enforcement focused on education and training first, that avoids arrests or excessive criminalization of vendors.

As community food advocates, we support street food vendors because we know they play an important role in addressing inequitable access to healthy food, and they are a vibrant part of our



local food economy. By legalizing sidewalk vending, the City of LA creates jobs, supports local food entrepreneurs, and activates the vibrancy and safety of the streets and parks. On behalf of the thousands of vendors we support, we ask the City of Los Angeles to pass a sidewalk vending ordinance with expediency.

Sincerely,

A handwritten signature in blue ink that reads "Alina Bokde".

Alina Bokde  
Executive Director  
Los Angeles Neighborhood Land Trust  
Network Member, Los Angeles Food Policy Council

CC:

Councilmember Gilbert Cedillo  
Councilmember Paul Krekorian  
Councilmember Bob Blumenfield  
Councilmember Tom LaBonge  
Councilmember Paul Koretz  
Councilmember Nury Martinez  
Councilmember Felipe Fuentes  
Councilmember Bernard Parks  
Councilmember Curren D. Price, Jr.  
Councilmember Herb J. Wesson, Jr.  
Councilmember Mike Bonin  
Councilmember Mitchell Englander  
Councilmember Mitch O'Farrell  
Councilmember Jose Huizar  
Councilmember Joe Buscaino

Councilman Jose Huizar  
200 N. Spring Street, Room 465  
Los Angeles, CA 90012

Dec 1, 2014

Dear Councilman Huizar,

I am writing in regards of the proposed City of Los Angeles Sidewalk Vending ordinance.

As a Downtown Los Angeles resident since 1996, I have enjoyed a firsthand view of all the exciting cultural and economic growth in our neighborhood. I believe a lot of this positive change is due to those visionary investors who first chose to take financial risks in this area. Unfortunately, I believe the current ordinance may serve to deter our neighborhood's continued improvement in the following regards.

As much as the streetscape has improved in our neighborhood, there are still a lot of empty storefronts. Accordingly, I am concerned that permitting sidewalk vending will only act as a further disincentive for small and medium sized businesses because it (1) allows direct competition with established retail and dining establishments attempting to operate in the area and (2) economically favors sidewalk vendors who deal with significantly lower investment and operational costs. In short, as a downtown, do we want to attract more small and medium sized businesses or transitory vendors?

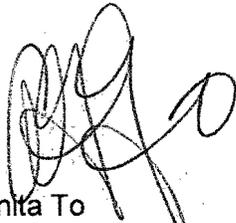
Next, there is the issue of noise and cleanliness. As a resident of Downtown LA, I have firsthand experience with noise and cleanliness issues caused by sidewalk (as well as other mobile) vendors, at events such as Artwalk every 2<sup>nd</sup> Thursday of every month. There is little to no regulation in this regard. I personally have walked down the street outside my building and requested police officers ask food truck owners and other vendors to lower the sound of their music and pick up after their trash, only to be told by these officers it was not their order of the night. As a result, I have had to confront many of these vendors myself with minimal success. How much worse will this situation become if street vendors invade the downtown area every day and not just once a month? If the issue of noise and cleanliness cannot be controlled once a month, why should I believe it will be better managed once it is allowed to run 24/7 in downtown.

Further to the above, as a resident of Downtown LA, I am required to pay special assessments to BID (Business Improvement District) to help clean and patrol my neighborhood. If the city requires assessments because it doesn't have the resources to take full care of its own residents and neighborhood, what will it do once cleanliness and patrol issues are multiplied due to this ordinance? Will it simply multiply the special assessments as well? How does that benefit those who already live in this neighborhood?

Finally, in addition to noise, traffic, sanitation and a foreseeable increase in special assessments, I am also concerned about the locations where these permits will be

issued and the proposed times of operation. The proposed ordinance sets forth regulations but fails to identify consequences for violations thereof. What authority will enforce the ordinance? Is there a single point of communication between residents and whatever authority is monitoring the vendors? Will building owners and residents be notified when permits are issued? Will there be public hearings when permit applications are filed, such as those required for liquor license applicants? Given the level of impact this ordinance will have on our neighborhood, too many issues remain unanswered or unexplored.

I urge the city council to consider long-term impacts and the future direction of the city more carefully before approving this proposed ordinance. I have read the draft ordinance. I agree that there are some safety issues that should be addressed regarding street vendors. However, I feel that the permit zones, budget and enforcement issues should be thoroughly spelled out and addressed first.



Anita To  
257 S. Spring Street  
PH-F  
Los Angeles, Ca. 90012



Richard Williams <richard.williams@lacity.org>

---

**CF 13-1493 Street Vending Motion - Economic Development Committee  
tomorrow, Tuesday 12/2 - 1 PM**

---

**Brian Folb** <Brian@hollywoodoffices.com>  
To: "richard.williams@lacity.org" <richard.williams@lacity.org>  
Cc: Daniel Halden <daniel.halden@lacity.org>

Mon, Dec 1, 2014 at 6:20 PM

Hi Richard,

Dan Halden from Councilmember O'Farrell's office suggested I send my comments on this matter to you for the record, as I will be unable to attend the hearing tomorrow.

My concerns on this are the obvious unique issues we have with street vendors in Hollywood (e.g. aggressive CD vendors & street characters, performers, etc.). There cannot be a carte blanc street vending allowance without looking at the nuances of these kinds of unique issues. It would be completely irresponsible and a disregard for public safety to not address street vending on a case by case basis, accompanied by required permitting and a specified set of rules and regulations applicable for each type of vendor.

We just passed an ordinance to disallow the sale of bus tours on the street. It would seem the passage of the street vendor ordinance would create a conflict of this ordinance that has already been approved.

Thanks,

Brian.

**Brian Folb**

- - - -

**PARAMOUNT CONTRACTORS & DEVELOPERS, INC.**

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p. 323.462.6727

f. 323.462.0863

[www.hollywoodoffices.com](http://www.hollywoodoffices.com)





December 1, 2014

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

RE: Hollywood Chamber concerns with proposal to legalize sidewalk vending in Los Angeles

Dear Council Member Price:

On behalf of the Hollywood Chamber of Commerce and its nearly 900 members in the greater Hollywood area, I am writing to share our concerns with the proposal for city-wide legalization of sidewalk vending in Los Angeles. ***Specifically, the Chamber asks that the Council stay away from “a one-size fits all policy” for street vending in the City, and that at a minimum the City allow for an opt-out clause for Business Improvement Districts within the City- where property owners pay an additional assessment to keep their streets clean and safe.***

The Hollywood Chamber is disappointed that once again, a report to your Committee has been released to the public with little time for the business community to digest the report and make any sort of thoughtful and deliberative comments before the Committee is scheduled to consider the item. This is a regrettable way to establish policy on a matter of such great importance to many businesses and residents throughout Los Angeles.

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. Hollywood Boulevard is already struggling with an overabundance of CD-vendors, street characters, and tour bus solicitors and cannot afford the increase in the number of street vendors that legalization of sidewalk vending would undoubtedly bring.

The Hollywood Chamber, along with CD-13, LAPD, the Hollywood BID 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” and CD vendors in the area around the Chinese Theatre and Hollywood & Highland. At the Chamber, we receive complaints from tourists and other visitors who have been harassed. 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 we are trying to attract.

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Promoting and enhancing the business, cultural and  
civic well-being of the greater Hollywood community.

Currently, the CD vendors, characters and tour bus hawkers are only allowed on the sidewalk due to First Amendment issues and cannot legally sell. If the City passes this ordinance, it will inevitable open a “can of worms”, allowing CD vendors and characters to “charge” rather than to ask for “donations.” Additionally legalization of street-vending would reopen the issue of Hollywood Blvd. tour operators selling on the public sidewalks - taking payment and setting up curbside sales operations from the public parking spaces that they commandeer. The City, LAPD, and County departments that oversee vending do not have enough staff resources as is, to properly enforce existing vendors. Legalization of street vending will only serve to exacerbate an already out of hand problem in Hollywood and on the Walk of Fame.

In addition to the public safety concerns with the legalization of street vending, the Chamber is also concerned about the impacts of a city wide ordinance on Hollywood’s brick and mortar establishments. Nearly all of Hollywood and East Hollywood lie within City approved Business Improvement Districts (BIDs). Similar to the existing problems that many Hollywood restaurants have with food trucks parking adjacent to their buildings and pilfering restaurant clientele, the Chamber is extremely concerned that established Hollywood businesses will now be faced with trying to remain competitive in the face of a slew of retail and food carts.

Despite the arguments of good-intentioned proponents that a regulated system of registration and taxation, would bring vendors out of the shadows and allow them to contribute to the local economy- these carts are a serious threat to the Hollywood community. These carts take cash only, are hard to inspect for the health department because they are mobile, don’t contribute to the City’s tax base, don’t pay rent, don’t pay BID assessments, all while using our maintained streets and sidewalks, trash cans, parking spots, restrooms, and more. Because they do not have the same overhead costs, these mobile carts can under-cut the city’s existing restaurants and retails establishments. They literally roll in, take the business (and tax dollars) and leave. Meanwhile, many of the tenants who are already struggling to stay in Hollywood will see their revenue decline, from yet another City policy that overlooks what is in the best interest of Los Angeles’s small business community.

Given the many potential consequences for Hollywood if street vending is legalized, the Chamber asks that this council stay away from “a one-size fits all policy” for street vending in the city. At a minimum the City should allow for an opt-out clause for Business Improvement Districts within the City- where property owners pay an additional assessment to keep their streets clean and safe.

Thank you for taking into consideration the concerns of the Hollywood Business Community as you consider the effects of legalized sidewalk vending in Los Angeles. Please feel free to call on the Chamber if we can be of any assistance on this issue.

Sincerely,



Leron Gubler  
President & CEO

CC: Members of the LA City Council



# UFCW LOCAL 770

UNITED FOOD AND COMMERCIAL WORKERS UNION • [www.ufcw770.org](http://www.ufcw770.org)

Ricardo F. Icaza, President

John M. Grant, Secretary-Treasurer

December 1, 2014

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



Honorable City Council  
c/o: Office of the City Clerk  
Attn: Richard Williams and Felipe Chavez  
200 North Spring Street, Room 395  
Los Angeles, CA 90012

**RE: Support for proposed Sidewalk Vending Program  
Los Angeles City Council File #13-1493**

Honorable City Council:

On behalf of UFCW Local 770, I'd like to express strong support for the City of Los Angeles' consideration of a citywide program that would legalize and establish a sidewalk vending system in Los Angeles. As a member of the LA Street Vendor Campaign – a coalition of 55 community-based, policy, labor, and academic organizations - we stand with the tens of thousands of food and merchandise vendors who make our streets active and vibrant every day.

Studies estimate Los Angeles is home to over 10,000 street vendors, many of whom provide fresh fruits and vegetables and other healthy culturally-relevant food in neighborhoods with limited healthy food options. These street vendors operate outside of the formal economy, because the City currently lacks a process to recognize and support these entrepreneurs. By developing a permit process with a humane enforcement strategy, the City could give these small business owners an opportunity to make an honest living, support public health and activate the vibrancy and safety of our streets.

Over the course of 2 years, the LA Street Vendor Campaign interviewed hundreds of street vendors and community advocates to develop out a citywide proposal that has strong support from vendors, small businesses, and community stakeholders. This proposal solves some of the key challenges currently facing the City, and brings forth innovative solutions that pull from the best practices of other large metropolitan cities, while being sensitive to the unique fabric of Los Angeles.

The Campaign has included the following key recommendations to the Los Angeles City Council and City Departments in support of a permit system that works for everyone:

- **A Citywide permit process for food and non-food vending.** This process should consider the cost of the program for the City and the financial capacity of low-income vendors. In order for vendors across the City to have a real incentive to participate, any policy that is put forth must apply to all areas of the city. A cap on the number of permits issued or limiting vending to certain districts will impede the effectiveness of this necessary program.
- **A coordinated process to permit and properly regulate vending in City parks.** The permit process should be coordinated across departments to create a pathway for regulated vending in City parks as well as City sidewalks. The Department of Public Works and the Department of Recreation and Parks should collaborate to ensure efficient permitting procedures and coordinated education, compliance and technical assistance programs.
- **Avoid vending districts and numerical limits on permits.** Recognizing legitimate public safety concerns, we seek to avoid an unsafe concentration of vending operations in any particular area. But limiting the locations where vending is permitted to specific zones and capping the number of permits has been proven to bring about the very ills these policies seek to avoid. The City's last experiment with legal sidewalk vending was at MacArthur Park in the early 2000s. There, a small vending zone with a de facto cap on the number of carts (less than 50) became a magnet for vendors shut out of the program. As vending activity became over-concentrated, it gave the City's legal vending program a bad name. In addition to the public safety problems associated with vending district and caps, that failed approach is also administratively burdensome for the City, and works against a basic premise of the program: to expand vending opportunities. We must avoid repeating this failed experiment. Instead, the ordinance should allow vending city-wide, but also articulate reasonable restrictions on obstructions, proximity and accessibility that apply throughout the City. Enforcing these "unlawful obstruction" restrictions would have the effect of limiting the over-concentration of vending operations, without unnecessarily restricting the flexibility of vendors to respond to changing markets or undermining the inherent mobile characteristics of the trade. With these reasonable restrictions in place, we believe that any additional geographic restriction or circumscribed vending "zones" or "districts" would only serve to limit economic opportunities for vendors, limit the economic growth potential for the City, and could create an improper tool for exclusion.

Richard Williams and Felipe Chavez

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- **Meaningful Incentives for different types of healthy food vending**, including but not limited to, fresh fruit, produce, water and healthy snacks. Examples of incentives offered to healthy food vendors should include reduced permit fees, special access to events sponsored by the City and exclusive vending areas, such as schools, in front of hospitals, and within City parks. Many Angelenos lack adequate access to nutritious, culturally-relevant and affordable food. Sidewalk food vendors are a critical part of mitigating this inequity.
- **Access to a streamlined permitting process.** The application process for a vendor to participate in a program should be a primary incentive in any system. The process should be affordable, clear, and equitable to the vendor. This should include efforts to identify and overcome any unique barriers to entry, including providing access to technical assistance and education programs. We soundly oppose any public hearing process that gives traditional opponents of vending a stronger weapon to stop a permit from being approved. This program must create tools to encourage and support, not exclude, permitted vending.
- **Responsible and humane enforcement** focused on education and training first, that avoids arrests, confiscation of property and criminalization of vendors.

Should you desire more expanded detailed from the aforementioned recommendations, please do not hesitate to contact me. On behalf of the thousands of vendors we work with and support, we urge the City of Los Angeles to pass an ordinance for permitted sidewalk vending with expediency.

Sincerely,

UFCW LOCAL 770



Ricardo F. Icaza, President



John M. Grant, Secretary-Treasurer

RFI:JMG:le