



June 13, 2013

City Council Public Safety Committee
Honorable Mitchell Englander, Chair
Los Angeles City Hall
200 N. Spring Street
Los Angeles CA 90012

Re: Valet Parking Draft Ordinance (CF# 09-0206)

Dear Councilman Englander and Committee Members,

On behalf of the Hotel Association of Los Angeles, I would like to express some concerns with the draft ordinance being considered for valet parking operators and attendants in the City of Los Angeles.

The Hotel Association of Los Angeles – representing premier hotels and lodging accommodations across the Greater Los Angeles area – commends the steps the City is taking to protect our visitors and residents from rogue valet operators and the nearly four years of research and work by the Los Angeles City Attorney's Office on these proposed regulations.

But while we believe this is a well-intended effort, we are significantly concerned with the potential financial impact and regulatory burdens that all of our *reputable* parking operators- currently contracted by our hotels- would face under this ordinance, as written. In addition, we are gravely concerned that the draft ordinance does not appear to address a significant issue some of our operators face: The minimal need to cross public right-of-way to access the parking facilities.

The proposed regulatory paperwork and costs - an additional annual permit, as well as per-attendant fees and the costs of attendant background checks, may seem reasonable but can easily amount to thousands of additive dollars to the current significant costs and administrative processes we already bear in today's fragile economy. In addition, many of our hotels *must* use public right of ways to access their overflow facilities - which would put them in violation of this ordinance and in line for *additional* penalties.

We strongly urge you to consider regulatory exemptions for hotel parking operators. We also ask for further discussion on the ordinance's public right-of-away definitions to include exemptions to allow reasonable variance to access primary parking facilities as well as overflow.

Our Association stands ready to work with you and City leaders to ensure this ordinance rightly protects our visitors and residents from fly-by-night valet operators without penalizing our long-upstanding, compliant operators.

Sincerely,

A handwritten signature in black ink, appearing to read "Bob Amano", is written over the word "Sincerely".

Bob Amano
Executive Director

Cc: Councilwoman Jan Perry
Councilman Joe Buscaino
Councilman Paul Krekorian
Councilman Dennis Zine