

Starline TOURS

February 18, 2020

The Honorable Joe Buscaino, Chair
Trade, Travel, and Tourism Committee
Los Angeles City Council
200 N. Spring Street, Room 410
Los Angeles, CA 90012

Date: 2-18-20
Submitted in TTT Committee
Council File No: 17-1115
Item No.: 1
Deputy: Public

RE: TOUR BUS ROUTE RESTRICTIONS (COUNCIL FILE 17-1115) & LAMC § 80.36.1 et seq.

Dear Council President Pro Tempore Buscaino;

Thank you for the opportunity to address the Trade, Travel, and Tourism Committee with respect to proposed amendments to Los Angeles Municipal Code (LAMC) § 80.36.1, et seq.

Please allow this letter to serve as a request:

- 1. to temporarily delay passage of the proposed amendments pending consideration of critical revisions requested by various parties (including the Hollywood Chamber of Commerce);***
- 2. for an opportunity for representatives of Starline Tours of Hollywood, Inc. (Starline) to briefly meet with individual committee members to discuss the relevant amendments;***
- 3. for Starline to voice its agreement with the points raised in the public comments made by the Hollywood Chamber of Commerce.***

Starline has provided sightseeing tours in Los Angeles for over 85 years, longer than any other tour company in California. Starline employs hundreds of Los Angeles residents and strives hard to provide excellent service to domestic and international tourists.

Further, Starline is committed to obeying all federal, state and local laws / rules / ordinances and is in favor of increased tour bus industry regulation, as increased regulation will not only clarify Starline's duties under the law, but will also provide much needed restrictions on rogue, law-breaking tour bus operators who cause a myriad of problems for local residents and for many law-abiding businesses, including Starline.

Starline joins the Hollywood Chamber of Commerce (the Chamber) in supporting the proposed amendments to the LAMC. However, Starline has many of the same or similar concerns that the Chamber expressed in its correspondence with this Committee.

So as to not belabor the points articulated by the Chamber, Starline's concerns that directly align with the Chamber's concerns are as follows:

1. the lack of clarity with respect to whether individual persons or business entities would be criminally liable for fourth and subsequent violations of the amended ordinance;
2. Starline opposes "priorable" violations of the statute when they are accumulated based on a cumulative number of violations from an operator's entire fleet of vehicles and are not accumulated based on a cumulative number of violations by that operator's **individual** drivers. As communicated by the Chamber, this provision places companies with many vehicles and drivers in a negatively disparate position when compared to companies with one or very few vehicles and drivers;
3. the lack of any provision within the proposed amendments requiring notice to be given to tour bus operators of newly restricted streets; ¹
4. the lack of a provision for oversight, a hearing, a vote, public comment, or appellate procedure concerning the decision to restrict a given street or streets.

In conclusion, Starline urges a short delay in the passage of the proposed amendments to the LAMC so that committee members can meet with stakeholders and consider the suggested

¹ *Starline and other local tour bus operators met with Los Angeles Department of Transportation (DOT) officials on January 28, 2020 and discussed proposed technical revisions, such as providing sufficient notice to operators of newly restricted streets. While Starline agrees technical revisions are critically necessary, it believes the process must be accessible to all interested parties. In a February 13, 2020 letter to this Committee, Transportation Committee Legislative Assistant John White suggested that DOT be permitted to make such revisions internally. Starline strongly favors a formal revision process that is subject to some form of legislative approval. Starline opposes any entity having unilateral authority to internally make revisions without any oversight and outside public view.*

changes in order to better serve residents, law-abiding businesses and their employees residing in Los Angeles, and visitors to Los Angeles.

Thank you in advance for your time and consideration with respect to the points raised in this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Noonosh Sapir".

Noonosh Sapir,
Chief Operating Officer
Starline Tours of Hollywood, Inc.

Please allow this correspondence to be posted to Council File 17-1115