

May 5, 2023

Jimmy Kim, General Manager City of Los Angeles Department of Recreation and Parks (email)

Re: Alcohol Beverage Policy Revision, Board Report 23-085

Dear Mr. Kim,

During the April 20th Commission meeting, Commissioners generously granted Friends of Griffith Park's (FoGP) request to postpone the approval of the Alcohol Beverage Policy Revision. Our verbal and written pleas for community outreach and transparency relating to the proposed policy changes are much appreciated. We thank the Commissioners for granting the postponement, a request also made by the Griffith Park Advisory Board.

FoGP has now closely considered the details of the policy revision, taking into account input from our constituency which holds Griffith Park in high esteem and recognizes the Park's value to people from across the City who enjoy it in many different ways.

Most provisions of the proposed Revision are acceptable to us; however, alcohol consumption can be a sensitive and volatile issue since it relates to public safety. This sensitivity is heightened when alcohol sales take place **on public property**. The provisions for security, insurance, containment, and licensing show that RAP considers the sale of alcohol in City parks an extremely significant matter.

We respectfully seek a modification to proposed Section 1, pertaining to the **unlimited** number of public open area event approvals. We believe this provision is too broad to be applied to Griffith Park, despite the high level of scrutiny we'd expect from our Superintendent, the single person who would have complete responsibility for approvals.

Requests for approvals in Griffith Park could become more frequent should word circulate of a more liberal attitude toward open-air gatherings, conventions or celebrations. Why not have a wedding outdoors rather than inside at Friendship Auditorium? Companies might find it exciting to host their regional employee jamboree in a park setting.

Our concern for special events in open areas, particularly picnic grounds, is deep-rooted in FoGP's commitment to prevent existing Park patrons and historic user groups from being displaced, whether temporarily or not. This principle was upheld by the Griffith Park Master Plan Working Group, and distilled into text of *A Vision for Griffith Park*, adopted by the

Commission in January, 2014: "Avoid Evicting or Displacing Established Park Users," where there is particular reference made about picnickers, since they have no advocacy group speaking specifically for them in Griffith Park.

Our Recommendation:

- 1. For Griffith Park, retain the limit on approved "public open area events" at the current level, one approved event per year, rather than having no number limitation.
- 2. No "public open area events" should occur within the "Wilderness Area," as defined by Griffith Park Historic-Cultural Monument #942.

For clarity purposes, the Alcohol Beverage Policy would also be improved: 1) by defining an approved event as only a one-day event, 2) by specifying that open area events are allowed only during official Park visitation hours, and 3) by counting any event that spills over into open areas from a "special event venue" as an open area event.

The changes FoGP recommends are specific to Griffith Park, but may also be well-advised for other regional parks, such as Elysian or Debs. RAP may consider listing other regional parks as exemptions to the revised provision regarding the number of open area events, as well, and retain the current limit of one per year.

As alcohol sales and revenue streams increase with more expanded event venues, a commensurate level of protections must be provided to ensure a safe recreational experience in our parks. Equally important, preventing unintentional displacement to loyal park users should be considered a top priority.

Sincerely,

Gerry Hans President

Cc: Board of Recreation and Park Commissioners, Councilmember Nithya Raman, Matt Rudnick, Brenda Aguirre, Stefanie Smith, Mehmet Berker, Jennifer Hull.

About Friends of Griffith Park:

Friends of Griffith Park (FoGP) is a California non-profit 501(c) (3) dedicated to preserving and protecting Griffith Park's natural habitat, biodiversity, and historic features, for current and future generations. FoGP is committed to ensuring that Griffith Park, a public park and Los Angeles' largest Historic-Cultural Monument, remain open, natural, and free to all citizens of Los Angeles.