



Historic Murray Hill

The Murray Hill Neighborhood Association

October 13, 2016

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To: The New York City Council

As the person who has been primarily responsible for trying to get local businesses to join us at The Murray Hill Neighborhood Association Street Fair over the last several years, I can tell you that if the 1/1 ratio of local/out-of-town vendors becomes NYC Street Fair policy, it will have an enormous detrimental effect on our fair. In fact, I would go so far as to say that our street fair might well cease to exist since it would become cost prohibitive. Our professional event manager would still need to be paid for his services, but the total revenue would be drastically reduced.

For years, I have tried to persuade local restaurants and other businesses to join us and have a presence at our fair. I've stressed the advantages which such a presence affords these local businesses, i.e., almost free advertising, positive community involvement, and attracting new customers who might have been unaware of the vendor beforehand.

As time has passed, I have found it more and more difficult to convince local area businesses to join us at our street fair. I don't know why this is the case, but I know it to be true.

Our yearly street fair is a major source of revenue for the Association. In my opinion, requiring as many local merchants to attend NYC street fairs as non-local merchants would have an immediate and severely detrimental impact on our fair.

I believe the same would be true for many, if not all, neighborhood-sponsored street fairs in NY City.

Respectfully submitted,

Thomas Horan
ms

Thomas Horan
VP MHNA
Chair, Street Fair Committee



The Murray Hill Neighborhood Association

212-886-5867 • PO Box 1897, NY, NY 10156-1897 • www.murrayhillnyc.org

MANHATTAN COMMUNITY BOARD FIVE

Vikki Barbero, Chair

450 Seventh Avenue, Suite 2109
New York, NY 10123-2199
212.465.0907 f-212.465.1628

Wally Rubin, District Manager

TESTIMONY REGARDING THE PROPOSED CECM RULES CHANGES FOR STREET FESTIVALS, OCTOBER 13TH, 2016

Thank you for giving us the opportunity to comment on the proposed changes to the rules for street festivals in our district.

For years, CB5 has been calling for the rules to be revisited. There are currently approximately 60 street fairs in our district annually and, infamously, no matter what the neighborhood or the not-for-profit sponsor, they all look virtually alike, with their ubiquitous tube socks and kabobs. This is because virtually all the festivals are, in fact, produced by two for-profit entities, with no rules for true community engagement or participation.

Wisely, a few years ago, CECM combined some festivals and shortened their length. However, serious problems continue to exist. There are still far too many street festivals in our district. CB5 is, as you know, an extraordinary hub for the close to 60 million tourists who visit our city every year. We are also the city's central business district. On some of our avenues, sidewalks are so often congested that many New Yorkers feel the need to walk in the street to get where they're going. Particularly in the Times Square area, rather than vehicular traffic leveling off on the weekend, it can actually increase.

Therefore, we are extremely gratified and relieved that CECM has proposed to change the rules to allow only 10 street festivals annually per community board district. We are equally pleased that CECM has proposed that at least 50% of the participating vendors at each street festival have a business or local presence in the community district. It is long since time that we put the neighborhood back into these neighborhood street festivals.

CB5 would also like to suggest that CECM seriously review the additional proposals being made by our partners at the Times Square Alliance. Particularly in a district as overburdened as ours often is, a data-driven analysis of the impacts of these street festivals on traffic and area businesses would prove very useful in determining where it is (and isn't) appropriate to locate these festivals.

Finally, we applaud Michael Carey of CECM and Dawn Tolson of SAPO and are grateful to them and this administration for listening to our concerns and proposing these very welcome and important changes. We look forward to having these proposals take effect and hope that CECM will, in addition, adjust the proposed rules to take into account data-driven analytics in further determining where streets festivals are permitted.

Thank you so much for your time.



Coalition for A Livable West Side * PO Box 230078 * New York, New York 10023
Email : livablenewyork@erols.com Phone: 1-212-874-3456 Website: www.livablenewyork.org

October 13, 2016 Hearing on New Street Fair Regulations Testimony of the Coalition for a Livable West Side

The new proposed Street Fair regulations unfairly punish the Street Fairs held in Community Board 7.

Community Board 7 set the GOLD STANDARD for Street Fairs more than 20 years ago. It merged Street Fairs so that two 501c3 organizations share a date. That cut in half the number of Street Fairs held in CB7. It required that non-profits, elected officials, and charities be provided space at no-cost.

It required that in addition to the 20% given to New York City, an additional 20% is donated to non-profit organizations in CB7 that do not have a Street Fair. It offered reduced rates to businesses in CB7.

The proposed regulations will punish Street Fair workers who will lose employment. That is approximately 3,000 jobs. These workers come from throughout the City of New York.

Most local crafts people do not have a NYS Sales Tax certificate and a Consumer Affairs permit and state that as they do the Fairs sporadically that they will not get the necessary permits.

These proposed regulations do great harm to non-profit organizations who depend on Street Fairs. Instead the City should require that all Street Fairs follow the GOLD STANDARD set by CB7 more than 20 years ago.

Respectfully,

Batya Lewton,
Batya Lewton, President



Friends of Dag Hammarskjold Plaza, 224 East 47th Street, Room 339, NYC 10017 ~ 212-826-8980

STATEMENT ON PROPOSED CHANGES TO STREET FAIR LEGISLATION, OCT 13, 2016

The Friends of Dag Hammarskjold Plaza strongly oppose any legislation that would disrupt or decrease the guaranteed income we receive annually as the nonprofit sponsor of a street fair(s) produced by Mardi Gras Productions. There was already a moratorium on additional street fairs in Manhattan when our organization and the promoter appealed to City Hall and were granted a street fair on the grounds that FDHP maintains the municipal park known as Dag Hammarskjold Plaza. In particular, the funds generated by the street fair help offset the cost of cleaning the park's six fountains weekly by a maintenance contractor and twice-daily litter removal by the Doe Fund at a combined cost of \$20,000 annually. The income guaranteed by the promoter amounts to \$10,000 to \$12,000 annually.

Already, we have felt the impact of tampering with the street fair model. Initially, our fair took place on Second Avenue adjacent to the park. Then it was moved to Third Avenue and combined with other nonprofit sponsors, requiring the promoter to combine the income from several street fairs in order to guarantee the income essential to our bottom line.

Further, the proposed reduction in the number of street fairs already in operation would mean that some nonprofits will be denied this crucial source of income altogether. To select some nonprofits for survival and reject others when all have a mission to fulfill would be capricious and unjust.

In a neighborhood where there is no Business Improvement District to underwrite the cost of maintaining public land and given the City's chronically inadequate funding of park maintenance, the income generated by the street fair in its present form provides essential cleaning services for one of the City's most visible and visited parks. Although the concept of showcasing more visual art, artisanal food and craft merchandise is aesthetically appealing, the street fair in its current form does promote entrepreneurial enterprise, and more importantly, it helps to fulfill the mission of many nonprofit organizations which contribute good works to New York City.

In conclusion, the Friends of Dag Hammarskjold Plaza welcome more local vendors along with artisanal food, arts and crafts, but we cannot afford to change the equation which attracts sufficient vendor participation and thus guarantees our income as a street fair sponsor. We strongly oppose proposed new rules demanding both the reduction of events (10 maximum) in each Community Board along with a requirement to have 50% of the vendors be local merchants or residents in the community.

Sherrill Kazan, President

www.hammarskjoldplaza.org

224 East 47th Street
Suite 339
New York, NY 10017
Office: 212-826-8980
Mobile: 917-596-6801
kazantfhp@gmail.com

SHERRILL KAZAN
PRESIDENT



**UNION SQUARE COMMUNITY COALITION [USCC]
P.O. BOX 71, COOPER STATION
NEW YORK, NY 10276**

**MAYOR'S OFFICE OF EVENT COORDINATION AND MANAGEMENT [OCECM]
STREET ACTIVITY PERMIT OFFICE [SAPO]
PUBLIC HEARING**

OCTOBER 13, 2016

GOOD MORNING:

MY NAME IS BILL BOROCK AND I AM SPEAKING ON BEHALF OF THE UNION SQUARE COMMUNITY COALITION [USCC], A NOT-FOR-PROFIT 501[C][3] WITH A SMALL BUDGET OF WHICH I AM THE TREASURER. THE USCC WAS ESTABLISHED IN 1980 TO HELP REVERSE THE DETERIORATION OF UNION SQUARE PARK IN MANHATTAN AND WE HAVE CONTINUED TO SEEK TO IMPROVE THE PARK'S USE FOR THE COMMUNITY, ESPECIALLY FOR CHILDREN THE PAST 36 YEARS.

OUR GROUP HAS BEEN THE SPONSOR OF A CLEARVIEW FESTIVAL MULTI-BLOCK STREET FAIR FOR MANY YEARS

I AM HERE TODAY TO SHARE WITH YOU OUR CONCERNS ABOUT CHANGES TO THE STREET FAIR REGULATIONS BEING PROPOSED BY YOUR OFFICE. THE USCC BELIEVES THAT THERE ARE PROS AND CONS RELATED TO HAVING STREET FAIRS. OUR TESTIMONY TODAY IS TO SHARE WITH YOU THREE CONCERNS THAT WE HAVE.

THE FIRST APPEARS WHAT SEEMS TO US TO BE A VERY GLARING OMISSION. YOUR NOTICE OF THIS PUBLIC HEARING TALKS ABOUT "NEGATIVE EFFECTS", "NOT SERVING THE PUBLIC INTEREST" AND "BURDENS ON THE COMMUNITY" BEING CAUSED BY DISPROPORTIONATE CONCENTRATION [OF STREET FAIRS]. ONE OF OUR CONS IS TRAFFIC CONGESTION, THE DIVERSION OF BUSES AND THE LOSS OF PARKING. THIS HAPPENS WITH ALL STREET FAIRS, NOT JUST WHERE THERE IS A CONCENTRATION OF THEM.

THE GLARING OMISSION I MENTIONED IS THAT NOWHERE IN YOUR 15 PAGE NOTICE OF THIS PUBLIC HEARING DO YOU MENTION WHAT YOU PROPOSE TO DO ABOUT TRAFFIC CONGESTION, THE DIVERSION OF BUSES AND LOSS OF PARKING SPACES ASSOCIATED WITH THE HOLDING OF STREET FAIRS.

WITH REGARD TO THE PROS, THE USCC RECOGNIZES THE BENEFITS TO SMALL BUSINESSES AND VENDORS AND THE INCOME THAT GOES TO THE NOT-FOR-PROFIT COMMUNITY GROUPS THAT SPONSOR STREET FAIRS LIKE OURSELVES.

OUR SECOND CONCERN RELATES TO THE FACT THAT WHILE WE SUPPORT THE PROPOSAL THAT MORE VENDORS HAVE A BUSINESS OR LOCAL PRESENCE IN THE COMMUNITY BOARD DISTRICT WHERE THE STREET FAIR IS BEING HELD, WE ARE CONCERNED THAT THE 50% REQUIREMENT WILL BE TOO HIGH A QUOTA BURDEN FOR THE EVENT PRODUCERS TO MEET. THE RESULT WILL BE THAT THE COMMUNITY NOT-FOR-PROFIT GROUP SPONSORING THE EVENT WILL LOSE ITS SPONSOR INCOME BECAUSE THE EVENT WILL NOT BE HELD PER THE NEW 50% REGULATION.

THE THIRD CONCERN THAT WE HAVE IS THE PROPOSED MAXIMUM OF HAVING ONLY TEN [10] MULTI-BLOCK AND ONLY TEN [10] SINGLE BLOCK FAIRS PER COMMUNITY BOARD DISTRICT. COMMUNITY BOARD DISTRICTS VARY IN ALL KINDS OF WAYS.

WHAT HAPPENS IF THERE ARE MORE THEN TEN [10] SPONSORING GROUPS THAT HAVE BEEN SPONSORING STREET FAIRS IN SPECIFIC COMMUNITY BOARD DISTRICTS FOR MANY YEARS. HOW WOULD THE CHOICE BE MADE AS TO WHICH GROUP[S] WOULD BE CHOSEN AND WHICH ONE[S] WOULD BE TOLD THAT THEY CAN NOT BE A SPONSOR BECAUSE OF THE TEN [10] NUMBER LIMIT. OUR UNION SQUARE COMMUNITY COALITION GROUP WOULD NOT WANT TO BE TOLD. "NO SPONSORSHIP THIS YEAR" WITH THE RESULT OF NOT GETTING NEEDED INCOME THAT WOULD HAVE BEEN USED FOR COMMUNITY WORK.

IN ACTUALITY, THIS COULD HAPPEN TO OUR GROUP AS OUR SPONSORED STREET FAIR, ALTHOUGH NOT IN THE TIMES SQUARE AREA THAT YOUR REPORT STATES IS A PROBLEM AREA, WE ARE STILL IN THE MANHATTAN COMMUNITY BOARD 5 CATCHMENT AREA WHICH HAS WELL OVER TEN [10] STREET FAIRS DURING THE YEAR.

AS A CONSEQUENCE OF WHAT WE HAVE SAID IN THIS STATEMENT, THE UNION SQUARE COMMUNITY COALITION WANTS TO GO ON RECORD AND SAY THAT YOU TAKE INTO CONSIDERATION THE CONCERNS WE HAVE RAISED, AND THAT YOU HOLD OFF AND NOT APPROVE YOUR PROPOSED NEW REGULATIONS UNTIL APPROPRIATE RECOMMENDATIONS ARE MADE WITH REGARD TO MITIGATING THE TRAFFIC RELATED PROBLEMS MENTIONED EARLIER.

SINCERELY,

**BILL BOROCK
FOR THE BOARD OF THE UNION SQUARE COMMUNITY COALITION.**

OCECM/SAPO

My name is Judith Schneider in CB 8 Manhattan and I speaking in opposition to the new rules being proposed by the Office of Citywide Event and Management for the following reasons:

The Mayor and OCEM and are not listening to the local Community Boards with these proposed new rules for conducting street festivals.

I believe Street festivals are one of the items that make the city attractive to the tourists while they are here. It appears to me that the Mayor does not care about how important the tourism is to NYC business, as these rules will clearly reduce street festivals. When I speak with the people not from Manhattan they tell the street festivals are one of the reasons they like coming to the City.

The new rules will make it impossible to get Street vendors to sign up a month in advance instead of a week in advance as they do now, as the weather is a big factor in their decision to participate.

It will make it very difficult for the not-for-profits in our district to raise the funds they have counted on in the past years.

If you start out with these new rules requiring 50% of the vendors be from the district in the coming year, you will do away with all the existing street fairs in our Community District. This rule should be implemented gradually to see how it works.

The Community Boards should be limited to the number of street festivals we have had in 2015 and 2016, thereby not increasing the number of new multi-block or single block street festivals in the various districts.

They say there are 3 Community Boards that are problematic---why penalize the rest of the city for 3 boards.

Judy Schneider

Resident CB8 Manhattan

EAST SIXTIES Neighborhood ASSOCIATION

Michael Carey, Executive Director
Office of Citywide Event Coordination and Management

Good Morning, My name is Theodore M. Renz and I am representing both the Myrtle Avenue Business Improvement District Queens and the Ridgewood Local Development Corporation located in Ridgewood, New York.

Thank you for allowing us to respond to the proposed new rules for street fairs and block parties.

While we commend your agency in taking a fresh look at street fairs and in particular, your recommendation to end the moratorium on new fairs, We do have great concern with a number of the proposed new rules governing street events.

They include the following:

Applicants will have to prove that 50% of vendors for street fairs have a business or local presence within the Community Board where the event is happening.

By requiring 50% of any percentage of vendors to have a local business or presence is impractical. The rules as proposed could disqualify most groups from holding their respective events. Street festivals serve as an economic catalyst for local businesses, new start ups, craft vendors and others.

We recommend that fifty percent of exhibitors have a business or local presence in the Community Board the festival will take place in and/or live in or have a business in the City of New York.

To foster a local participation, rules should require a certain number of exhibitor spaces be provided at little or no cost to local businesses, local artists, an local residents selling handmade (non commercial) products, as well as non for profit organizations and to members of local merchant associations or chambers in the community district.

Signing up 30 days prior to the event-

This is not practical or doable. Most outside vendors and merchants within our BID will not commit to a spot in the Street Fair until the last few days depending on the weather reports. This is due to the fact that there are no rain dates.

New Street Fair Fee Structure-

Raised from 20% of total paid by vendors to \$1375.00 for the first block and \$705.00 for any subsequent blocks

Sponsors shall reserve the right at the close of their event when filing the final income summary to have the option to pay 20% of all rentals fees paid by vendors or pay based on the number of blocks listed on the permit (which is the proposed new fees structure under the rule change).

Thank you again for the opportunity to express our concerns and recommendations.

Sincerely Yours,
Theodore M. Renz

Oct 13, 2016
Testimony for SAPO

My name is Dr. Cynthia Maurer and I serve as the Executive Director of Visiting Neighbors, a nonprofit organization that for the past 44 years has been dedicated to keeping our elderly, frail neighbors independent and able to safely remain in their own cherished homes. Our clients range age in age from 60-105. We also support caregivers and students working with at-risk seniors.

We used to hold a street fair in each of the communities we serve, but several years ago, when the first round of cuts from SAPO happened, we lost four of our fairs. Then, with the next set of cuts, our remaining Manhattan fair in Chelsea was split with other groups. These fairs not only are a source of vital unrestricted funds, but they also enable us to get the word out about our services to the community -- both potential volunteers and seniors who desperately need our services. When we lost these fairs, we were hurt very badly. For us, the 30 percent consolidation of fairs was actually a 72 percent loss of revenue. Our attempts to appeal fell on deaf ears. With this progressive administration, we expected greater consideration.

At the very least, we must safeguard the 1²/₃ fairs we have left. The proposed rules are too drastic and feel punitive. These proposed rules would put us in jeopardy of losing everything. Please reconsider the devastating impact that these rules, if implemented, would have on the crucial services provided by the city's nonprofit sector. While we recognize the need for change, we must protect those most vulnerable, especially in our city that claims to be age friendly.

We need our fairs and the seniors need us! Without our fairs, we lose our ability to engage the community. We have never had a complaint about our fairs, nor an incident of any kind. The communities in which we have the fairs have always strongly supported Visiting Neighbors.

Let's work together to ensure that our mutual goals are met.
Thank you for this opportunity to speak. Hopefully, this time we will be heard.

Dr. Cynthia Maurer
Executive Director
Visiting Neighbors, Inc.
3 Washington Square Village, Suite 1F
New York, NY 10012
cmaurer@visitingneighbors.org
www.visitingneighbors.org

Date: October 11, 2016

To: Street Activity Permit Office (saporules@cityhall.nyc.gov)

Re: Points on Proposed Street Fair Rule Changes

To Whom It May Concern:

Revenue sharing from street fair sponsorships provides a significant source of income for community organizations like Chelsea Reform Democratic Club. We rely on this income to fund activities that benefit our community, such as:

- § Educational programs about public policy and related issues
- § Community and issue advocacy
- § Forums with elected and appointed public officials
- § Petitioning for ballot access on behalf of candidates

We believe that the proposed new street fair permit rules are likely to result in reduced income for CRDC and similar organizations. There is also the danger that, in some years, this income will be eliminated altogether. We worried about three things in particular:

§ The proposed new rules will cap the number of street fairs to ten per community board. In some years, CB4 has hosted as many as 14 multi-street fairs. This will mean that established sponsors may be denied their event.

§ The recommended new fee calculation increases the City's share of street fair revenue without taking into account unpredictable participation by vendors due to inclement weather and other factors beyond control of the organizer and community sponsors. While we understand that the City's expenses need to be recouped, we would hope there is a way to do this that does not shift all of the risk onto the organizers and local sponsors.

§ The proposal to require that 50% of vendors be from the local Community Board area sets a threshold that will be difficult to meet, particularly at the beginning. This will likely result in unanticipated cancellations by the mayor's office with resulting loss of revenue. Rather than implementing this change all at once, we request that you consider phasing it in.

We understand that there is some concern about the resources consumed by street fairs – including rerouted traffic and support from police and sanitation workers, and we applaud SAPO for attempting to deal with these issues proactively. However, we request that SAPO carefully consider the impact any proposed changes to the permit rules might have on community organizations like CRDC.

Sincerely,

David Warren

David Warren, President
Chelsea Reform Democratic Club



Chelsea, Madison Sq., Flatiron, Rosehill

P.O. Box 1120
Old Chelsea Station
New York, NY 10013-1120
Phone: 212-929-9188
Website: www.crdcnyc.org

Home Club Of

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Councilman: Corey Johnson
Former Council Speaker: Christine Quinn
Former State Senator: Tom Duane
Former DNC Member: Esther Smith+

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Mr. Carey and other members of committee thank you for the opportunity to comment on the proposed rules.

My name is John Sharp – I am resident of CB4 and the NY State Democratic Committee Member representing 75th Assembly District (Chelsea & Hell's Kitchen).

I applaud you for revisiting the regulations that address Street Fairs.

I have been approached by many small grass root non-profit organizations in CB4 that since 2007 have become reliant on these street fairs as revenue source. All have asked that SAPO reconsider the implementation of the regulations because it will cause undue hardship and possible total elimination of this income. I have asked them that they send their comments directly to SAPO via email.

I do have an area of concern with some of these proposed rules. I realize that when you asked most people they would want to see that 50% of all vendors come from that community. I also agree but I see where this will cause difficulty for everyone concerned and will need additional time to implement. Each Boro in the City is different and must be treated accordingly. In CB4, store already paid very high rent would not want to pay additional fees to participate in an event even for good causes. I can see difficult for the promoters of the street fairs to find members of that community who would commit to taking a booth on a regular basis thereby give them the ability to be able to plan properly. I also see the loss of revenue for the non-profits trying to fund their good work for the community.

50% Regulation: I ask that SAPO allows for the implementation the 50% rule to be spread over 4 year period – 20% -1st, 30% - 2nd and 40% -3yr finally 50% - 4th year. This gives time for the promotors develop an outreach strategy and to work with the community to find innovated ways to get more commercial groups/stores involved to make the 50% requirement. Also maybe it should be reserved to NYC residents instead of Community specific. This implementation could be evaluated at each milestone to see the feasibility of this rule.

SIEGEL TEITELBAUM & EVANS, LLP

ATTORNEYS AT LAW
260 MADISON AVENUE, 22ND FLOOR
NEW YORK, NEW YORK 10016

TELEPHONE
(212) 455-0300
FACSIMILE
(212) 448-0066

**STATEMENT OF NORMAN SIEGEL
OCTOBER 13, 2016**

Good Morning. I am a civil rights attorney and I am here today representing the interests of vendors and community sponsors who have participated in New York City Street Fairs.

There are serious and substantial concerns and problems, procedurally and substantively, with the proposed changes to the rules that govern New York City Street Fairs.

Procedure Objections

It is my understanding that the proposed rule changes were drafted without adequate input from primary participants in past street fairs. Were the vendors, community sponsors, Community Boards, Neighborhood and Block Associations, Churches, Synagogues, and Community Groups consulted prior to today's hearing? If yes, I request that a list of the dates and times of these consultations be made public. If groups such as the Community Boards, especially Community Board District 1, the Churches and Synagogues, the Police Community Councils, the Sons of Italy, American Diabetes Association, Republican and Democratic Political Clubs, the Congress of Racial Equality, Friends of Dag Hammarskjold, Block and Neighborhood Associations and others were not consulted, then I recommend that you delay any changes to the rules for street fairs until such consultations occur and the participants are heard.

Moreover, I understand that you represent on the bottom of page 2 of the Notice that the Mayor's Office of Citywide Event Coordination and Management (OCECM) "undertook an extensive review of the current state of street fairs and collected substantial information through:

- in-person surveys of street fair participants;
- a general consumer survey open to all;
- surveys of businesses in case study areas; and
- outreach to managers and members of business improvement districts and community boards."

The public is interested and should be able to review those complete surveys and outreach materials before the rule changes are adopted. In fact, we believe that the OCECM and the SAPO erred by not making that material available prior to today's hearing.

Substantive Objections

We object to the overall thrust of the proposed changes on the grounds that you have not and cannot justify that the government interest in making the particular changes is substantial and that the proposed rule changes advance that substantial interest in a manner that is not more extensive and restrictive than is necessary to serve that interest. Nor does there appear to be a rational relationship between the proposed rule changes and a legitimate government purpose.

For example, in the Statement of Basis and Purpose of Proposed Rule you make a major point that the NYPD argues that these streets unfairly “place an excessive burden on police resources and divert uniformed personnel from core crime fighting, public safety and counter-terrorism duties.” Yet, you offer no documentation to substantiate this position. We need to question the validity of such NYPD allegations.

Similarly, we need to question the argument that the street closings significantly add to neighborhood traffic congestion resulting in a detriment to neighborhood concerns. Where is the evidence for this assertion? Which Community Boards, neighborhood associations and community groups make this argument?

You propose “that at least 50% of vendors participating in an event have a business or local presence within the same community board where the street festival or single block street festival occurs.” Yet, this proposed rule change is unfair, potentially discriminatory and not warranted.

It’s unfair because it potentially burdens the right to trade for vendors who do not have a business or local presence within the same Community Board where the street festival or single block street festival occurs. It’s potentially discriminatory because it is my understanding that most street fair vendors are overwhelmingly, racial minorities, immigrants and women. Finally, it’s unwarranted because many local community businesses are actively encouraged to participate in street fairs but have chosen not to participate. There can be other ways to increase participation by local merchants, such as giving local businesses a placement priority. The arbitrary quota proposal is bad policy.

Other Objections are:

*the arbitrary nature of limiting street fairs permits to:

- no more than 200 NYC street festival permits during a calendar year
- no more than 100 Manhattan street festival permits during a calendar year
- no more than 10 street festival permits per Community Board in one calendar year
- no more than 1 street festival permit per calendar day in any Community Board
- no more than 20 permits for single block festivals per Community Board during a calendar year.

*the arbitrary banning of any street fair permit in the area of 42 - 50th Streets from Sixth to Eighth Avenue in Manhattan

*the arbitrary time period of only 5 days for a permit applicant to appeal a denial

*the arbitrary requirement that permit applications for 2017 must be filed between November 1, and December 31, 2016 when the street fairs occur from late April to November 2017.

*the use of vague criteria in considering the approval of a permit application, such as:

- 1) not in the best interest of the community
- 2) lack of good character
- 3) honesty
- 4) integrity

There is much to discuss and either eliminate or substantially modify the proposed rule changes affecting future NYC Street Fairs. I strongly recommend slowing down this rule changing process and allowing for all New Yorkers, especially the Community Boards, vendors, Neighborhood and Block Associations and Community groups who have been an integral part of the NYC Street Fair History a full and fair opportunity to participate. That is essential if we are to have a fair process and outcome.

Thank You.



DEBORAH J. GLICK
Assemblymember 66th District
New York County

The Assembly State of New York

CHAIR
Higher Education Committee
Intern Committee

COMMITTEES
Environmental Conservation
Governmental Operations
Rules
Ways & Means

Testimony of Assemblymember Deborah J. Glick

Street Activity Permit Office of the Office of Citywide Event Coordination and Management

Street Festival Hearing

October 13, 2016

Thank you for the opportunity to testify before you today regarding the proposed changes to the Street Activity Permitting process.

Street festivals can be a wonderful addition to the community. While the Mayor's Office of Citywide Event Coordination and Management contends that the proposed rules are intended to broaden the permitting process and alleviate the strain on NYPD resources, the proposals neglect to take into account the impact these changes would have on community organizations and small businesses which rely on street festivals to engage with the community. Some communities are inundated with a disproportionate number of applications and some amendments might be warranted but the proposed changes will seemingly have a disproportionate impact on smaller, local organizations which will eventually drive them out and result in the exact type of street fair that communities are trying to limit.

The change to a flat rate fee per block from the existing 20% share of profits is particularly burdensome for community organizations that sponsor street festivals to provide a common good for the community. For example, some of these organizations set up stages for free programming on a block and would have to make significantly more money on the other block in order to cover the cost of the permits for both blocks. Many of these organizations already face limited budgets and this amendment would price out many good participants from being able to host a community fair. This is especially true in communities stressed by gentrification, where service providers of long standing are driven into less expensive locations that might cross a Community Board border.

Similarly, the tight restrictions that only allow 10 multi-block events in each community board, and only 20 single-block events per year in a given community board will make it even harder to diversify the quality of street permits. Since these permits would be distributed on a first-come first-serve basis, again smaller organizations and groups would be disadvantaged as they are less likely to be able to afford the time and resources to ensure all paperwork is done immediately.

It is also unclear how these rules impact organizations that might want to host or co-sponsor more than one event. I understand there is a cap of one multi-block fair per group per year, but would a

partner organization also be barred from applying for an additional permit? And lastly, while in many circumstances, the proposal to require half of the participating vendors reside or have a business address in the same community board is a positive thing, many community organizations provide services throughout various community boards and boroughs and could be limited in their ability to allow partners to participate in their fair. This is especially true in communities stressed by gentrification, where service providers of longstanding are driven into less expensive locations that might cross a community Board border.

Addressing the demand that certain communities face is a laudable goal. But these generalized, strict regulations would have detrimental consequences. Furthermore, street fair permits issued through SAPO are far from the most intrusive permit that the City grants. For example, what reviews are being done to limit the number of permits for TV and movie filming in our communities? And what about the permits for public plazas? Has there been any proposed changes to how those permits are issued? Street permits offered through SAPO are one of the few things that the community has input on, and strictly limiting the applications does not change the real demands on communities.

The proposed regulations don't take into account the needs of the whole community. These changes would limit the amount of community participation from community organizations. I would hope that you reevaluate some of the changes that would negatively impact non-profits and community organizations under this new proposal.

Thank you for the opportunity to testify.



The City of New York

Manhattan Community Board 1

Anthony Notaro, Jr. CHAIRPERSON | Noah Pfefferblit DISTRICT MANAGER

Mayor's Office of Citywide Event Coordination and Management

Street Activity Permit Office

Public Hearing on Proposed Rules

100 Church Street, 12th Floor

10:00A.M., October 13, 2016

Thank you for holding this important public hearing today regarding the proposed changes in rules for street fairs. My name is Noah Pfefferblit, and I am the District Manager of Community Board 1 in Lower Manhattan. Community District 1 includes most of Manhattan below Canal Street and south of the Brooklyn Bridge.

At our Community Board 1 (CB1) board meeting on September 27, 2016, CB1 unanimously adopted a resolution strongly urging the Citywide Event Coordination and Management (CECM) to postpone today's public hearing by at least one month to enable Community Boards to provide meaningful input on the proposed rules changes, a request also made by Manhattan Borough President Gale Brewer. We noted in our resolution that the extremely and unusually compressed timeframe precluded meaningful input as community boards require at least 45 days advance notice.

The proposed changes would make very significant changes to the rules for street festivals, setting a maximum of 10 multi-block events in any community district per year and a maximum of 20 one-block events, far fewer than the current number in many Manhattan districts, and a maximum of one festival per organization. This sharp reduction in the number of events would require a lottery to determine which organizations would have the ability to sponsor fairs, making it impossible for CB1 and other organizations that currently sponsor fairs and raise essential funds from them to continue doing so. CECM has not offered any explanation of why it believes that these drastic changes are needed or the reason for the compressed timeframe.

CECM has moved forward with this hearing despite requests to postpone it, and while we therefore cannot address the proposed changes, we have comments regarding how the new rules will affect our internal operations and fundraising.

CB1 has sponsored street fairs in our district for many years. While we review all applications for street fairs and events regardless of the sponsor, we sponsor our own events in order to supplement our budget and conduct work on behalf of our community. In past years CB1 has sponsored as many as six fairs annually, including in the aftermath of 9/11 and post-9/11 reconstruction, when additional funds were needed to provide the services that our members and constituents needed during extraordinarily challenging times. It is inconceivable that we would have been able to meet the challenges of 9/11 and the post-9/11 reconstruction without such funds and other community boards have come to rely on additional funds raised in this way as well to meet unique challenges.

1 Centre Street, Room 2202 North, New York, NY 10007-1209

Tel. (212) 669-7970 Fax (212) 669-7899

man01@cb.nyc.gov

www.nyc.gov/html/mancb1

The drastic reduction in the number of street fairs would severely limit our ability to raise essential funds. We are also concerned about the tension that would be created when local organizations would be competing for a limited number of permits and some would be able to continue to sponsor events and others would not.

We understand the need to reassess existing rules but we believe that this process should occur in consultation with community boards and not in a way that circumvents us. This would also enable the organizations that sponsor fairs to work with CECM and the Street Activity Permit Office (SAPO) to ensure that any new rules for street fairs are practical. For example, while the requirement to have 50% local merchants is commendable, it is not clear that it will be possible to achieve in a district such as ours that is rapidly growing but still a central business district with large corporations and both regional and national chain stores.

Given the many serious problems that these proposed rules would cause, we urge you to reconsider the proposed changes and to engage community boards and other stakeholders in an inclusive process that would result in equitable and viable solutions.

Thank you for the opportunity to testify today.

Copy of testimony delivered by Ann B. Toback, Executive Director of The Workmen's Circle on Thursday, October 13, 2015 to the members of the Street Activity Permit Office of the Office of Citywide Event Coordination and Management

My name is Ann Toback and I am the Executive Director of the Workmen's Circle, a progressive Jewish culture and social justice organization founded in 1900 that today connects a growing community of Jews of all affiliations with their cultural and social justice heritage. Today, we continue to forward the values and Jewish cultural legacy of our founders in exciting new ways: through festivals, holiday celebrations, educational programs, and social and economic justice campaigns designed to educate and celebrate Jewish culture and build community around our shared heritage.

For over three decades the Workmen's Circle has presented a robust calendar of free outdoor Jewish cultural programs in the five boroughs, starting with our free summer concert series, *Yiddishfest*, founded by Joe Papp in the 1970's. *Yiddishfest* brought world-class entertainers, including Itzhak Perlman, Mandy Patinkin, and the Klezmatics to New York City parks and streets each summer, and for over twenty years, one of *Yiddishfest's* highlight concerts took place at our annual street fair, first on Madison Avenue when our headquarters were on Madison and 33rd Street, and now on 6th Avenue since we moved in 2012 to West 37th Street.

In the last decade we have expanded on our concert offering and have used a block in our 6th Avenue street fair to host our *Workmen's Circle Taste of Jewish Culture Fair*: a celebration of Jewish cultural heritage in a city block. Each year the fair features over twenty-five curated specialty New York City food vendors from all of the five boroughs, offering new takes on traditional Jewish cuisine; world-class music from our stage; social and economic justice campaigns from the street; and crafts and learning for all ages. In the past three years we have seen attendance at our fair grow from 10,000 visitors in 2014 to over 15,000 in 2015 and 2016, when we additionally partnered with the National Yiddish Theatre Folksbiene's KulturfestNYC, a summer-long international Jewish Performing Arts Festival. And we have already started planning to grow and enhance our food and performance offerings for 2017. People from across the city and, in fact, across the globe, have come to experience our *Taste of Jewish Culture* in the heart of Manhattan. And this year, other Jewish communities including Cleveland, Buffalo and Toronto visited our fair with the intention of replicating our program in their cities.

Our one-of-a-kind cultural fair takes place on one city block on 6th Avenue, as part of a larger street fair, featuring city blocks of multicultural vendors who come from all over New York City to sell their products. In fact, over 90% of the vendors at our street fair live in NYC. However, the majority of them cannot afford to live in Manhattan, and instead commute from the outer boroughs. These proposed changes will put most of these hard working, mostly immigrant, minority small business vendors - out of business and will effectively terminate our annual event sponsorship.

While we understand the city's need to oversee the use of street fair permits, and further, to balance cultural programming alongside commercial usage on these blocks, the outcome of the proposed rules will be to all but eliminate outdoor cultural events such as ours. Should the proposed rules take effect, with their new limit on festival permits, our street fair, which has been presented for decades, would immediately fall to the bottom of the list by virtue of our moving our offices five years ago, requiring a change in venue. Further, the mandatory local merchant participation requirement would preclude us from featuring specialty vendors from all over New York City, a featured part of our street fair each year.

THEREFORE:

We strongly oppose the proposed 2017 street fair rule changes. We are sure that an equitable solution to both the issues raised by the Office of Citywide Event Coordination and Management along with those of the vendors and nonprofit organizations wishing to continue to forward cultural programming can be developed. However, in order for a fair and equitable solution to be reached, we respectfully request that the Office of Citywide Event Coordination and Management reconsider these Proposed Rules, which will have the effect of terminating the work of hundreds of small business vendors throughout NYC and eliminate hundreds of free, outdoor cultural festivals like our Taste of Jewish Culture Street Fair, and commit to a new process and timetable that will allow for better community participation in drafting new rules that can take into account the longstanding contributions of the hundreds of nonprofit cultural organizations whose outdoor spring and summer programming are an intrinsic part of New York City's celebration of its multicultural identity and the thousands of small business vendors for whom these fairs represent an an integral part of their commercial revenue.

For more information, please contact Ann Toback at AToback@circle.org or by phone at 646.291.8360

The Workmen's Circle
247 West 37th St, 5th Floor
New York, NY 10018

Tel: 212-889-6800
Fax: 212-532-7518
info@circle.org

www.circle.org



Saint Luke's Lutheran Church

308 West 46 Street, New York, NY 10036

Telephone: (212) 246-3540 Fax: (212) 977-1838

October 13, 2016

Mr. Michael Carey, Executive Director
Office of Citywide Event Coordination and Management
253 Broadway, 6th floor,
New York, NY 10007

Dear Mr. Carey:

I am writing to express my concern about the issues of street fairs as they affect our congregation and houses of worship in general. I am pastor of Saint Luke's Church, located on West 46th Street between 8th and 9th Avenues, and a member of the Times Square Alliance Board.

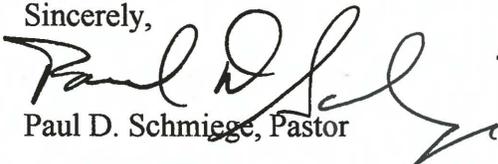
Others have spoken or written of the issues of traffic congestion and sanitation, but I wish particularly to address the issue of Sunday street fairs, or, more broadly, street fairs on religious sacred days that affect any house of worship.

In the past two years we have been seriously impeded by Sunday street fairs. In both years we discovered without prior notice that an Oktoberfest was being set up between 8th and 9th avenues and included booths for the sale of beer and bratwurst directly in front of the church, an established No Parking zone. Suddenly, we discovered that members were unable to get to the church. Access-a-Ride could not drop off handicapped members. Commuters coming by car could find no place to park, and many simply gave up and returned home. Smoke and the odors of cooking penetrated the church during worship. Attendance for the day plummeted dramatically.

I propose to you that the new rules must take into account the existence of active places of worship, and be coordinated to recognize that access to them not be impeded on their days of gathering.

Thank you for the opportunity to respond to the proposed new regulations.

Sincerely,



Paul D. Schmiede, Pastor

The Rev Paul D. Schmiede, Pastor
The Rev. Dr. Martha S. Jacobi, Pastoral Associate
Mr. Pedro d'Aquino, Cantor
Constance Duever, Parish Administrator



114th Civ-OP, Inc.

31-38 29th Street, Bsmt. Astoria, New York 11106
Tel/Fax: (718) 728-8763 Email: bap114@aol.com



October 13, 2016

Michael P. Carey, Executive Director
Mayor's Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Dear Mr. Carey,

It has been brought to our attention that your office is in the process of establishing new rules for Street Festivals. We are very grateful to be allowed this time to express our concerns and opinions regarding this matter today.

114th Civ-OP, Inc. is a unique organization where volunteers serve as extra eyes and ears for the police without getting physically involved. They only observe and report what they see to the authorities. The group's efforts are specifically formulated to:

- a) Decrease crime activity or incidence of crime within the confines of the areas covered.
- b) Create a cleaner and safer quality of life within the community.
- c) Improve relations between our police and the community (to include residents, property and business owners, non-profit organizations and agencies, and religious establishments within our areas covered.)

We are a community sponsor for a smaller multi-block street fair (usually no more than 6 blocks). Proceeds from this event directly support National Night Out Against Crime in the 114th Precinct area. The event attracts over 2,000 people every year.

If the new rules are passed, all Community Boards will only be able to have 10 multi-block Street Fairs per year. This will cause great financial hardship to some non-profit organizations like ours,

should they be denied a permit. Most sponsors in our District have been using proceeds from these street fairs to fund activities that benefit their community for years. Without these funds, the community loses. Based on your current proposal, excessive amounts of street fairs are noted to be held in just a few Manhattan Districts. Is it possible to make exceptions in some Community Boards that may slightly exceed your proposed amount based on individual circumstances in the community? For example, our organization's event is a smaller multi-block festival which requires less Police resources, and the proceeds are used to facilitate activities that foster improving community relations with our Police.

In addition, we feel that requiring a 50 percent presence of local participation is expecting too much. Local businesses are always invited to participate in our street festival for a reduced price. We have noticed that many of the businesses in the area where we hold our festival are closed on Sundays. We also invite local non-profit organizations to participate for free. We would embrace ideas and incentives the City could develop that would encourage more community participation, yet not cause a drastic drop in revenue from our much needed fund raiser event.

Thank you for your time and consideration with this matter.

**Forest Hills Visiting Neighbors Testimony to SAPO
October 13, 2016**

By Laura Scharf, Director of Community Development, Visiting Neighbors, Inc.

Thank you for allowing us to testify on behalf of our community's elderly who rely on Forest Hills Visiting Neighbors' staff and dedicated volunteers so they can remain in their own cherished apartments, part of the Forest Hills and Rego Park communities they cherish. Without Visiting Neighbors' help, many of these seniors would be wrenched from the community they know and love and forced prematurely into nursing homes. Most of our seniors do not have access to the internet to research information about vital services. They rely instead on community events, word of mouth from their friends and neighbors, and help from local legislators to learn about needed services.

Herbert, age 84, recently came to our street fair on 63rd Drive. It was a beautiful day, and he was thrilled to be outside, able to enjoy the sunshine and the company of his neighbors. He stopped by our table and asked how much our services cost. Our coordinator reassured him that there is no charge for Visiting Neighbors' services, and gave him our brochure and some information about seniors' health concerns. "I would love someone to talk to, and it would be even better if they could play chess. Since my wife died last year, I have no one to play chess with. I really miss her. I know I'll never fall in love again, but I guess I can't complain. We had 62 wonderful years together. But I really miss having someone to play chess with." "Thank you so much," he said. "How can I sign up?" She explained the procedure and told him to call our office to set up an appointment for an intake interview. He shook her hand and said, "I'm so glad I came out to the fair today. Otherwise, I would never have known that you could help me. It's so hard being alone."

Forest Hills Visiting Neighbors, like many other community organizations, relies on our street fairs to get word out to the community about our services, to raise urgently needed funds and to attract new volunteers. Community residents look forward to strolling through our street fairs, talking with community groups and sampling the delicious foods.

Our street fairs are well organized and respectful. They provide a valuable opportunity for residents to enjoy everything our community has to offer. They can leave their homes or apartments knowing that they will see long-lost friends and neighbors, learn about new businesses and services, and support local merchants and organizations. Community Board 6 has always told us that we leave the streets cleaner than they were when we got them. They have always been fully supportive of our efforts. Our street fairs help make our city great!

Thank you.

Laura Scharf, Director of Community Development
Visiting Neighbors, Inc., 3 Washington Square Village #1F, New York, NY 10012 (212) 260-6200

Testimony by Fred Arcaro on behalf of Manhattan East Community Association and 17th Precinct Community Council on October 13, 2016.

My name is Fred Arcaro, President of Manhattan East Community Association. Thank you for the opportunity to speak today about the proposed Street Festival regulation.

While SAPO proposed rule to have at least 50% of local small businesses participation is commendable, however, it is next too impossible to achieve for the following reasons:

- The location assigned for our Street Festival have very few small businesses
- The few small businesses are either not interested or they complain that the fees are too costly

Street vendors that do participated in our Street Fair are small mon and pop businesses living in New York City which pay their taxes like everyone else in the City. The proposed rule would reduce their income.

Reducing the number of Street Festival per Community Boards, I fear, is the beginning of the end of well established neighborhood associations such as Manhattan East Community Association which has been in existing since 1994. We have sponsored annual Street Fairs for over 20 years and it should continue. We have used all funds from Street Fairs, our only source of fund, to beautify our neighborhood by painting, cleaning, installing dog hoop and defenders of tree beds. In

addition, to planting in the Waterfront East River Esplanade, when funds are available.

I am also the Treasure of the 17th Precinct Community Council and authorized to speak on its behalf.

Funds from Street Festivals are the only source of income to promote public safety issuers to our residents such as:

- Night Out Against Crime when hundreds of families with their children getting the latest crime prevention tips and police updates while enjoying music entertainment, food and children having fun with Tumble House.
- We sponsor Medal Night where we honor our police precinct officers who were recently awarded for their special service as well as getting latest police updates, all in a dinning setting.
- We have monthly meeting where we have guest speakers to give valuable public safety and other community affairs information.

All these activities would not be possible without Street Festivals revenue.

In closing, both our organizations are apposed to the proposed rules on Street Festivals.

Thanks you

October 13, 2016

Dear OCECM/SAPO Committee:

I am proudly answering the clarion call: The state of NYC street fairs. The Samuel J. Tilden Democratic Club has participated in the Third Avenue Street Fair since 1983 and has donated over \$ 300,000 to projects in the CB Six Manhattan area, on the eastside. The revenues benefit our community and **I am opposed to the 2017 rule changes for street fairs.**

After Super Storm Sandy, in 2012, at Bellevue Hospital, the clothing room was housed in the basement. Everything was destroyed. It was the Tilden Club that replaced new underwear for patients to leave the hospital from street fair funds.

There is also a need to provide meals for homebound seniors within the Board Six area. We did that.

Respite programs at The Friends Seminary and the Brotherhood Synagogue, serving the homeless, have received support from Tilden.

The Gallop autistic children's riding program has benefited. An Environmental overnight retreat was provided to the students at the School of the deaf and hard of hearing.

Funds have also been given to the Public Library.

To deny donations for needy populations from street fair revenues...is wrong.

To deny donations for art and music programs in our community....is wrong.

To deny the ability for seniors to stroll down the avenues free of cars...is wrong.

To deny our families to participate in free activities in the fresh air...is wrong

To deny our residents the right to buy a new chapeau at a street fair...is wrong.

Is this really a war on immigrants, who are the majority of the workers at the fairs? In a line from the *Hamilton* musical, "It's the immigrants getting the job done."

So, I say, enough is enough... leave the street fairs which helps make the city a vibrant place to live!

Vote No! Reject the 2017 rule changes for street fairs! Thank you.

Michelle D. Winfield (Samuel J. Tilden Democratic Club, Donation Committee Member)

320 East 25th Street, 8 DD, New York, NY 10010

212-779-0657

WRITTEN OPPOSITION TO PROPOSED SAPO RULE CHANGE ..

§1-05 Approval or Denial of Applications by the Street Activity Permit Office. – specifically 1-05 (4)(e)

October 11, 2016

**To Michael Carey, Executive Director
NYC Office of Citywide Coordination & Management
253 Broadway, 6th Floor, New York, NY 10007**

3 PAGES FOLLOW ...

Dear Mr. Carey,

I have carefully reviewed the proposed SAPO rule change 1-05 (4)(e) which would drastically impact our organization Bowling Green Association as well as many many other not for profit community groups around New York City.

This new rule change would require that 50% of all vendors participating in NY street fairs to either have a pre-existing business within that community board area or "some other involvement within that community board."

The clear and unambiguous result of such a new rule would be to eliminate every street fair in New York City as this is an impossible requirement as you are well aware. No street fair can possibly meet this proposed requirement regarding "local" involvement." None ever has.

The very nature of street fairs in New York City has always been that the important LOCAL component is the sponsoring not-for-profit group responsible for each street fair. That is the core logic of NYC street fairs and has been for generations.

This proposed rule change would dramatically alter that very useful formula that benefits so many to be over written with a draconian new rule that will destroy the NYC street fair tradition. A tradition that goes all the way back to colonial times and is an integral part of the very fabric of our city and its street life.

NYC street fairs likewise accomplish the important role of providing many immigrants and members of minorities the ability to support themselves and their families by participating in street fairs.

Existing retail businesses with their own store fronts in the district have no need or interest in participating in street fairs. They already have their well appointed retail location where they can display and sell their products and services for maximum effect.

And you have not even supplied the necessary list of local businesses that would relate to this proposed rule change. As in Lower Manhattan and throughout Manhattan and often in the other boros most retail businesses are not local at all but owned and operated by national and international conglomerates.

How are these local businesses ?? Local retail businesses in Lower Manhattan and often elsewhere is confined to the likes of dry cleaners, laundromats, nail salons, barbers, shoe repairers, and few other assorted retail businesses that have absolutely no value in participating in street fairs.

And to make yet another all important point any and all businesses within any and all community board areas are very welcome to participate in NYC street fairs and always have been.

As for others who might have "some existing involvement" in the district that is a useless and vague nebulous term that means nothing at all without a specific precise definition. And even more as above there is no logic as to why these individuals would want to participate in street fairs simply because they have some "involvement" in that district. Again they have always been welcome.

The very nature of street fairs is that thy are inclusive.

SAPO has no legal right to use a devious misleading rule change to accomplish an unstated goal in this case the elimination of all NYC street fairs with an impossible requirement beginning in 2017.

Further to which placing a rigid geographic requirement on the right to do business in specific communities in New York City is blatantly illegal and discriminatory and forbidden by the U.S. Constitution, New York State

Constitution and the New York City Charter. There is not a single other provision of city government in New York City that demands that in order to conduct legitimate business within New York City that one must have a pre-existing business in that community or "some other existing involvement" in that community.

It seems to me and adding to Mayor de Blasio's other ethics problems and investigations underway is that unnamed special interest groups with access and influence in City Hall are being allowed to misuse SAPO to achieve results outside the bounds of law and proper ethical behavior required of government to disenfranchise various New Yorkers and their efforts.

Whether or not an organized conspiracy involving various parties is underway to defraud New Yorkers and others with this proposed rule change is not something for me to determine. That is the purview of others but certainly this proposed rule change addresses such a possibility.

Arthur Piccolo

Bowling Green Association, Inc.

212-809-4615

Testimony from Leslie Brown, President of the Forest Hills Chamber of Commerce
PO Box 751123, Forest Hills, NY 11375
Email fhchamber@aol.com
Phone: 718 268 6565

Date: October 13, 2016

Good Morning, Executive Director Michael Paul Carey, Office of Citywide Coordination and Management

I'm Leslie Brown president of the Forest Hills Chamber of Commerce. It is my pleasure to serve as chamber president, to have owned a business in Forest Hills and to be a life-long resident of Forest Hills. I understand what it is like to run your own small company and I know what the challenges that being self-employed entails. I am here today to speak about what the proposed rule changes for street fairs would do to my not for profit organization, to vendors, startup businesses, and to the community that loves and supports our fairs.

The Forest Hills Chamber of Commerce has held two fairs, in the Spring and the Fall for over 16 years. By reducing our fairs to one puts us in serious jeopardy of closing our doors. I urge you to consider allowing all existing sponsoring organizations such as the Forest Hills Chamber to continue to conduct two (2) street fairs per calendar year as has been our tradition. Families and businesses alike look forward to coming out and being together as one community to enjoy the sights, the sounds and the tastes of a New York street fair.

Requiring as the new proposed rule states that 50% of participating vendors have a business or presence in the community board where the fair is taking place will in all actuality not be possible. I am proud to say that in my fairs I have close to 40% participation of my membership and I have been told that this is one of the highest participation rates. More than half of our members join the street fairs and I do not see how I would be able to meet this requirement.

My 40% will not meet the 50% requirement .I would be happy to see a specified number of exhibitor spaces be made available at little or no cost to some local businesses or artisans and other not for profit organizations at no cost or at a nominal cost to foster additional participation at the fairs.

Many, many of our members sign up at the last minute due to staffing or scheduling issues that small businesses with only 1, 2 or 3 employees have. Some register late because they have not had the time as they work in many cases 7 days a week to get everything in place to exhibit. The current rule of providing the addresses and phone numbers of participating vendors to be submitted 30 days in advance of the event would be quite a hardship for so many. Also the weather plays a factor. The city does not allow a rain date. Participating vendors must exhibit and pay the fee even if the fair will be a washout, and this contributes to signing up closer to the event than 30 days you may now be requiring. Losing even a small amount of money when you are self-employed really can cause a hardship. The more vendors we have the better our fair is.

There is a proposed cap on 10 multi block street festivals and 10 single block street festivals per Community Board district. Please increase this cap so that the number of fairs per community board district meets the needs of each community.

Establishing a flat fee per block rate will discourage offering free or reduced rates for more community participation. Please keep in place the option to allow the sponsoring organization to pay 20% of rental fees from vendors or pay the flat fee structure proposed based on the number of blocks that the fair runs.

I could say in my own words what the street fairs have meant and do mean to everyone involved in making them the great events that they are. But I would like to read some comments from the people that attend, work and support our fairs. The comments come from a petition I started on change.org a few days ago and I have well over 600 signatures in a very short time.

Here are some of the comments (see attached)



October 13, 2016

Written testimony submitted to the Mayor's Office of Citywide Event Coordination and Management

Mr. Michael Paul Carey
Executive Director
Office of Citywide Event Coordination and Management

Good Morning Mr. Carey, staff and guests.

I'm Melissa Chapman, Senior Vice President for Public Affairs at the Brooklyn Chamber of Commerce (BCC). I am delivering testimony on behalf of Carlo A. Scissura, President and CEO of BCC.

BCC is a membership-based, business assistance organization that represents the interests of over 2,100 member businesses as well as other businesses across the borough of Brooklyn. The Brooklyn Alliance is the not-for-profit economic development organization of the Chamber, which works to address the needs of businesses through direct assistance programs and services.

Thank you for convening today's hearing, which seeks to solicit feedback related to updating the rules governing street events. Today, we're respectfully asking for amendments to the proposed rules that would see a more practical implementation of the 50 percent local vendor participation requirement, as well as a shorter lead time to provide a list of anticipated vendor participants, in order for a permit to be issued.

As the voice of the Brooklyn business community, BCC manages a number of 'shop local' initiatives, including *Brooklyn-Made*, a platform for businesses to market and differentiate their products while promoting local business activity and engagement; *Explore Brooklyn*, a dedicated tourism website featuring a complete source for dining, events, shopping and attractions in Brooklyn; and the *Neighborhood Entrepreneurship Project*, which focuses on improving Brooklyn's neighborhood retail districts.

We applaud the end goal of an increase in local vendor representation at street events; however rushed implementation will threaten the very existence of these events. It would be better to have a two to three year period by which community sponsors would be required to be compliant with the new rules governing local participation. In addition, changing the definition of 'local' to include neighboring community boards and zip codes would allow more flexibility in meeting the 50 percent goal, while still ensuring a more robust 'Brooklyn' presence at these street events.

Another well-meaning provision of the proposed rule that will negatively impact community sponsors and local vendors, is the 30-day lead time to provide a list of participants. Very often, small businesses are unable to make commitments that far in advance, since decisions regarding staffing and other resources cannot be confirmed beyond a week in advance. As such, the proposed rules should take into consideration, and change the lead time requirement to one week instead.

Collectively, these amendments will give community sponsors adequate time to be compliant with the proposed rules. They will also help to strike a balance between preserving these events, and a steady increase in local vendor participation.



Thank you for providing us with the opportunity to testify on this issue.

October 13, 2016

CAS/mc

Mr. Michael Paul Carey
Executive Director
Office of Citywide Event Coordination and Management

Good morning Mr. Carey, staff and guests.

I'm Melissa Chennery, Senior Vice President for Public Affairs at the Brooklyn Chamber of Commerce (BCC) and delivering testimony on behalf of Carlo A. Sgarbi, President and CEO of BCC.

BCC is a membership-based, business association organization that represents the interests of over 2,100 non-retail businesses as well as other businesses across the borough of Brooklyn. The Brooklyn Alliance is not a retail economic development organization in the City, which works to address the needs of businesses through direct assistance programs and services.

Thank you for convening today's hearing. When seeking to solicit feedback related to updating the rules governing street events, today, we're respectfully asking for amendments to the proposed rules that would see a more practical implementation of the 50 percent full vendor participation requirement, as well as a shorter lead time to provide a list of approved vendor participants in order for a permit to be issued.

As the voice of the Brooklyn business community, BCC regards a number of such local issues, including Brooklyn's role as a platform for businesses to interact and differentiate their products while promoting local business activity and engagement. Existing BCC is a dedicated business leader, having a complete suite of dining, event, shopping and attraction in Brooklyn, and the Neighborhood District and other projects which focus on improving Brooklyn's neighborhood retail sectors.

We would like to see the goal of a 50 percent full vendor participation in street events, however, rather than implemented, it will increase the very existence of these events. It would be better to have a two to three year period in which community advocates would be required to be compliant with the new rules governing local districts. In addition, changing the definition of "full vendor participation" to include community groups and other codes would allow more flexibility in meeting the 50 percent goal, while still ensuring a more robust Brooklyn presence at these street events.

In other words, the existing provision of the proposed rule that we will receive a 50 percent full vendor participation and a 50 percent full vendor participation is to provide a list of participants. Very often, some of the smaller and smaller businesses that are in an area, since they are not regarding starting and or maintaining, cannot be continued for a week or given to us. As such, the proposed rule should take into consideration, and change the lead time requirement to one week.

Additionally, we understand that the community advocates would like to be compliant with the proposed rule. They will also help to make a 50 percent full vendor participation in street events, and a 50 percent full vendor participation.

~~From June to~~
The new rules are designed to address traffic congestion and NYPD resources. It appears that the distinction between multi-block festivals and single-block festivals addresses those issues. There is, however, an apparently arbitrary cap on the number of single-block "festivals"/"fairs". I help to organize* a single-(weekend-)day / single block street fair on a residential one-way side street with no commercial traffic and relatively little non-commercial traffic. We have organized this street fair for our neighbors as a community builder for more than 20 years. The police provide sawhorse traffic barriers and supervise the goings-on in their routine patrolling. In addition, we provide space for the community affairs officers to answer questions and run their Operation ID. I am concerned the arbitrary cap might cause our street activity permit application to be denied.

despite our minimal impact

In addition, it is less than clear why, as organizers, we need to provide identifying details about our "vendors" and especially information like tax identification numbers or Dept. of Consumer Affairs license numbers. Most of our "vendors" are, in fact, members of our Block Association (residents within our four-block catchment area). How does this detailed personal and business data relieve the minimal traffic congestion or lower the already minimal NYPD burden? As an organizer, I would willingly attest to the 50% "local" nature of our vendors. In fact, we would accept a higher "local" requirement if it ensured that our permit would not be denied arbitrarily.

Finally, we believe that the fee structure, at least for our (and similar) small event(s) is unreasonable. We operate on a shoestring and turning over 20% of our revenue will provide only a small amount of revenue for the City but a substantial drain on our resources. Please consider scaling this fee.

small
*On behalf of the West 102nd - 103rd Streets Block Association, a 501 (c) (4) community service non-profit, representing the residents of the four-block residential area in Manhattan's Upper West Side bounded by Broadway on the east, Riverside Drive on the west including both sides of West 102nd and West 103rd Streets.

Bob Aronson
West 102nd - 103rd

Testimony For October 13, 2016 Hearing regarding the proposed changes for Street Activity Permits

Submitted by: The Graham Avenue BID, 80 Graham Ave., suite 2a, Brooklyn, NY 11206

Representative: Betty M. Cooney, Executive Director

For more than 15 years the Graham Avenue BID has sponsored an 8 block Fiesta on Graham Ave. from Broadway to Boerum St. The event draws more than 20,000 people locally and outside the district. It is one of the largest and most well attended events in this underserved area.

It is not run to make the BID rich...it is to promote this area...bring new tastes, sounds, and fun that are not here already. It provides a community stage with free live all day entertainment for all. Many Hispanic entertainers come year after year to share their talents with the district through this event and new groups promote their talents on stage.

Area merchants are encouraged to participate without any fees to help support the retail district and encourage new shoppers to see what we offer.

Local organizations sign up and give out information and offer free health tests for the community ...all without cost. Woodhull Medical Center, a city owned hospital, the MTA's vintage bus program, and the New York Police Department all do outreach during this event as well as many other local non-profit organizations.

The low cost fees offered to vendors...and sponsorships from businesses who want to reach this community are what support this event plus the volunteer efforts and financial and administrative support of the BID.

The needs of Mid Manhattan... are NOT the same as ours. We rely on these events to build our retail district and provide for an underserved community.

The new proposal would require that our vendors be 50% from this district...this will not work. It is currently open to all who want to participate.

It will restrict some great entertainment, foods and other programs from coming here for the day. It says our community can only enjoy what is here...and they do not deserve to have the opportunity for something special.

We can't take everyone to Manhattan for their large assortment of events and attractions...so we bring our community some wonderful things to enjoy for the day. That said, we also have the expectation that some of these outside groups will recognize the opportunity that exists here and want to become a permanent part of our retail district.

Our businesses NEED this coverage/exposure. The Fiesta brings in more than 20, 000 potential customers for the day.

Many in the area thank me and the BID for providing this wonderful day for the community.

The new proposal wants to require vendors to sign up way before the event... this will not work as they wait to see what the weather WILL BE LIKE. Some of our best events nearly double with last minute signups.

REMEMBER the city doesn't give us RAIN DATES....it is all or nothing...bad for us and bad for business. Why regulate something that is working in our district? Maybe the city should add the option of a raindate to really help make these events profitable.

The money raised by this event is shared with our co-sponsor who makes this event possible for us to run. It is also shared with the costs of running such an event and the 20% that already goes to the city. To request a flat fee per block would give larger, more affluent areas a distinct financial advantage as their vendors pay more for spaces in higher income areas. Raising our fees would only stop vendors from coming to our district. It would stop us from using the small profits we do see from being reinvested in the community. It would threaten future events with burdening costs.

If mid town Manhattan doesn't want these festivals...fine...but don't rob our people from a great free day and one that helps bring **enjoyment and financial support to our area.**

I also noticed there is a new fee being put on farmers market...I thought this was resolved...here good eating habits will be stopped because of the city's need for cash? This is very sad! Again our farmers market...started more than 15 years ago, might have to close its doors with rising costs.

Our BID and others in the borough who hold these events REALLY NEED YOUR HELP AND URGE YOU TO SAY NO TO THE VENDOR RESTRICTIONS, RESTRICTIVE NUMBER OF EVENTS ALLOWED IN EACH DISTRICT AND NEW MULTI BLOCK FEES BEING REQUESTED by today's proposals.

Contact: Grahambid@verizon.net 718 387 6643



Street Fair Testimony Ratified by the NYC BID Association Street Fair Working Group

This testimony is on behalf of The NYC BID Association's Street Fair Working Group, which includes individual BIDs from different boroughs of New York City. The NYC BID Association Street Fair Working Group organized a year and a half ago to look at Citywide Event Coordination and Management practices and provide recommendations to the NYC BID Association. The Street Fair Working Group is pleased that Citywide Event Coordination and Management (CECM) took into consideration many of the recommendations the NYC BID Association provided in the Street Fair Position Statement in June 2015. These recommendations included lifting the moratorium on street fairs for outer-boroughs and upper Manhattan, improving permitting criteria, improving coordination, and giving more weight to local support.

While we are grateful for these efforts and many of the changes that CECM would implement, there are still a number of issues in the new rules that may have unforeseen and negative consequences for NYC's commercial corridors.

The following are additional recommendations from the NYC BID Association's Street Fair Working Group:

- A. The BID Association Street Fair Working Group applauds the ban of street fairs on the side streets near Times Square and strongly urges the City to further **limit street fairs in heavily congested commercial business districts in midtown-Manhattan. Closing a street in a heavily congested commercial corridor** creates serious congestion issues for hundreds of thousands of workers coming into Manhattan to their jobs on weekdays. On weekends, street closures in these congested commercial corridors create severe surface mobility issues for those trying to get to a commercial corridor, many of which include major cultural and entertainment attractions, or just travel through the City. With the many street scape changes underway, including the addition of plazas, and sidewalk extensions to improve pedestrian safety, as well as the extension of bike lanes on many of these commercial corridors, street fairs hinder pedestrian, vehicular and bike travel. That said, individual BIDs are expected to offer testimony on their own behalf. Our focus is citywide, not case by case.
- B. The BID Association Street Fair Working Group applauds the lifting of the moratorium on street fairs. However, the following rules as currently proposed would make it very difficult to conduct a street fair for new commercial corridors even if the moratorium is lifted. These new rules would also hinder street fairs that are already in operation in the outer boroughs.

- C. The BID Association Street Fair Working Group urges the City to consider the concerns of the neighborhoods, Community Boards, and Business Improvement Districts with regard to the 50% local vendor requirement as each neighborhood is different. Some need to have more involvement where the 50% works; some look to bring in new businesses from outside their neighborhoods as part of their economic development strategy where the 50% rule can be harmful. While the BID Association agrees that some street fairs have been generic, the 50% local vendor requirement is too onerous to implement for multi-block street fairs in smaller commercial corridors. According to many BIDs which conduct street fairs with local businesses, the 50% requirement is unattainable.
- D. The BID Association Street Fair Working Group opposes the fee structure. Similar to the 50% requirement, the fee structure cannot be a one-size-fits-all solution considering the wildly different circumstances in each neighborhood. Most street fairs produced by Business Improvement Districts have limited profits or break even. The change in the fee structure would reduce revenues and create a situation where a nonprofit is operating a street fair at a net loss. Many Business Improvement Districts would not be able to conduct street fairs under the new fee requirement. This requirement would also prohibit the inclusion of local businesses, since it would increase participation fees and serve as a disincentive to participation, contrary to the intent of CECM.
- E. The BID Association Street Fair Working Group opposes the 30 day notice period. The 30 day notice period also puts an additional burden on nonprofits, since vendors—whether local or not—often wait until a week or two before to sign up due to the weather forecast.
- F. The BID Association Street Fair Working Group requests that CECM review the rule that allows 50% or 100 street fairs from the borough of Manhattan. This proposed rule adversely incentivizes street fairs in Manhattan and takes away from the opportunity to have additional fairs in the outer boroughs.

The NYC BID Association Street Fair Working Group recommends that street fairs be reviewed on an individual basis, as each commercial corridor has unique opportunities and challenges. While the NYC BID Association Street Fair Working Group applauds the many positive changes that were indicated in the new proposed rules, we disagree with the 50% local vendor participation requirement, the new fee structure, the 50% Manhattan street fair allowance and the 30 day requirement, and ask CECM to review such issues on a case by case basis.

Testimony on the Proposed Amendment to NYC Street Fair Rules

Mark Caserta
Executive Director
Park Slope Fifth Avenue BID

My name is Mark Caserta. I am the Executive Director of the Park Slope Fifth Avenue Business Improvement District. Our BID is located along Fifth Avenue from Dean Street, adjacent to the Barclays Center, to 18th Street and is comprised of 30 commercial blocks with more than 500 small businesses.

I am also a board member of the New York City BID Association and the Park Slope Civic Council and a former New York City small business owner. I actually owned a shop on Park Slope's 5th Avenue for 7 years, so I have lots of experience in the community and the small business sector and I'd be happy to work with you and answer any questions you might have.

I want to start by thanking you for tackling this important issue. As a member of the BID Association, I have been a part of the discussions about the problems and challenges that street fairs impose on the city. I think that the focus on reducing the number of street fairs in Manhattan, the kind that have no local flavor and simply offer socks and sausages, is a good thing. We support it! However, some of the rules, as written, would have the opposite effect in cancelling long-standing street fairs that are traditions in outer borough communities. They could lead to a reduction in revenue for small businesses and the loss of funds for community organizations like Business Improvement Districts.

As you know, Park Slope's Fifth Avenue is host to and sponsor of The Fabulous Fifth Avenue Fair, which takes place every year on the Sunday following Mother's Day. The fair is decades old and is attended by between 40,000 and 70,000 people, according to NYPD estimates. We pride ourselves in having a street fair that focuses on local businesses. According to Clearview Festival, which manages our fair, approximately 42 % of our vendors are from within the BID and surrounding community. How do we do it? We sell the fair spots to the merchants who want to be a part of the event at a steep discount (\$50) and we offer spots to local artists for just \$75. The rest of the spots are sold to mostly outside vendors by Clearview at a much higher rate. Through our revenue sharing arrangement, the sale of hundreds of spots to local merchants at a discount means that the BID loses out on a lot of potential revenue. Still, we would rather lose that revenue because we believe it is important to make the fair as locally focused as possible and we strive to improve it every year.

As written, here is how the proposed rules would affect The Fabulous Fifth Avenue Fair. We have also provided some recommended changes to help our fair thrive and grow in the future:

- 50% of participating vendors have a business or local presence in the Community Board where the festival will be taking place.

We believe that this is a good goal for street fairs, however:

- Last year The Fabulous Fifth Avenue Fair sold 578 spaces, of which 241 were occupied by local vendors and non-profits. We would need to sell another 50 spots to meet or exceed this 50% rule. This would lead to a significant loss in revenue that we need to help clean and program our street and it would be very difficult thing to do in just one year. In addition, our BID is located in 2 community districts. As written, vendors from the south end of the BID would not count as "local" vendors because

they are in Community Board 7. Clearly this is not the case! They ARE local! Also, some of our artists and artisans who come from nearby communities would not count as local either. Should we turn away vendors from Brooklyn Heights, Fort Greene and Sunset Park just to make sure that we meet the 50% threshold? We think not. They are just as local!

I might add that two other traditional, much loved street fairs in our community; Seventh Heaven (7th Avenue) and the Brooklyn Pride Festival (5th Avenue) would have a difficult time meeting these thresholds. Brooklyn Pride's event serves Park Slope's large gay and lesbian community, yet the non-profit vendors at the festival are from all over the borough. Should this event be destroyed because of an arbitrary percentage? We think not.

Possible Solutions-

- Increase the definition of local to include surrounding community boards or zip codes or the Borough, as a whole and allow for some discretion in the rule,
- Give sponsoring organizations time to change their street fairs to meet the 50% goal (or whatever percentage is agreed upon through this process). Traditional outer borough fairs cannot change overnight. Sponsors need at least 2-3 years to meet and exceed the 50% goal and change their event. These rule changes should not be about destroying street fairs, but rather making street fairs better. Work with us to make that happen.

-All information pertaining to anticipated Vendors participating in a [street fair] Street festival or Single Block Street festival must be submitted thirty (30) days [one week] prior to the date of the event.

If the goal is to improve our street fairs and make them more local, a rule that requires proof of local vendors in writing 30 days prior to the event is unworkable. Local merchants and artists often make their decisions at the last minute, based on staffing, weather and family concerns. We often get last-minute artists and merchants committing to the fair in the week before the event. The rule should remain at 1 week prior to the date of the event if the goal is to have strong, locally flavored fairs in NYC.

In closing, I want to say that we initially saw this rule changing process as an opportunity to potentially expand our street fair. Currently, The Fabulous Fifth Avenue Fair runs through 18 of the 30 blocks in the BID. Merchants outside of these 18 blocks have been upset for years because they are paying for the BID assessment without receiving the benefits of the fair outside their front doors every May. Instead of expanding, however, we now find ourselves defending what is a very local and well-loved community event. We hope that you will take these comments into account as you draft the final rules.

Thank you for the opportunity to provide comments. If you have any questions, please feel free to reach out to me at (718) 551-5545 or mark@parkslopefifthavenuebid.com.



OFFICE OF THE PRESIDENT
BOROUGH OF MANHATTAN
THE CITY OF NEW YORK

1 Centre Street, 19th floor, New York, NY 10007
(212) 669-8300 p (212) 669-4306 f

431 West 125th Street, New York, NY 10027
(212) 531-1609 p (212) 531-4615 f

www.manhattanbp.nyc.gov

Gale A. Brewer, Borough President

Gale A. Brewer, Manhattan Borough President
Testimony for the Office of Citywide Event Coordination and Management
October 13, 2016

My name is Gale A. Brewer and I am the Manhattan Borough President. I appreciate the leadership of the Office of Citywide Event Coordination and Management (CECM) Executive Director Michael Paul Carey, and CECM Street Activity Permit Office (SAPO) Director Dawn Tolson for giving me the opportunity to testify today and for recently attending the Manhattan Borough Board meeting to explain the proposed rules to the community boards.

I also thank CECM for extending the deadline to comment on this proposal until October 27, 2016. The extension allows most Community Boards (CBs) citywide to engage their communities, discuss the proposal with the general public, and adopt resolutions that serve as their comments in a way that truly reflects the views of the people.

I am one of the few elected officials – I believe – who has had a table with government material at a street festival every weekend since 2002, and even before. In my experience, neighborhood residents attend local block events and the multi-street festivals, and people in wheelchairs, often with family members and friends, attend because they can easily access the goods and services. I know because I sit at the table.

I also want to add that my office has been working with the African community in particular to help members of the community apply for temporary vendor licenses so that they can work at street festivals and at other venues. They need the NYS Certificate of Authority and the NYC Consumer Affairs permit.

In Manhattan, street and single-block festivals are more than community events or tourist attractions. Festivals allow community-based organizations (CBOs) to raise money for additional equipment or programming. Festival proceeds have paid for rain gear for the auxiliary police, walkie-talkies for CERT teams, and free outdoor summer concerts. A festival is often the annual signature event at the metropolitan level in celebration of a particular ethnic or religious community, whose members come from all five boroughs and beyond to vend its specialty wares and partake in its heritage.

Some communities have too many festivals, and Community Board 7 confronted the issue when they faced it twenty years ago. They came up with a good solution. No portion of a street can be used more than twice in any year. Sponsors must combine their festival with another sponsor's festival, and the result was that the total number of festivals was cut by almost 50%. CB7 also required sponsors to donate 20% of their revenues to another non-profit which did not participate in a

festival. This is, of course, in addition to the 20% that the sponsors pay to the City of New York. Had other community boards followed suit, there would not be the glut of fairs citywide.

Street festivals are important in the civic and cultural life of Manhattan, but some avenues are used over and over for fairs, putting an undue burden on the community as a whole. These are some of my concerns based on CECM's proposals:

1. *Cap on the Number of Festivals:* The proposal will limit each CB to 10 street and 20 single-block festivals a year. While I support efforts to reduce festival oversaturation, I find that the hard cap fails to accommodate the needs of some of our communities, such as Manhattan CB 6, home to 26 single-block festivals. Under this proposal, some of these smaller festivals may be put out of existence or forced to merge, with their community sponsors facing revenue loss and a forced reduction in services.
2. *First-Come, First-Served Application:* While I acknowledge the interest in an objective application system, I find the proposed system fails to consider the needs of the community sponsors. Street and single-block festivals can only thrive and bring in proceeds if they are reliably held year after year. It is easy to foresee that "first come-first served" pits community organizations against one another for an arbitrarily limited resource, and can cause a long established, major event to be discontinued. The new system will also lead to unwanted financial volatility for the community sponsors, as festival proceeds, now a major part of their revenue, could be here this year and gone the next. Why not involve the community board - following CB7's lead - and work to merge fairs where appropriate?
3. *50% Local Vendor Requirement:* This is unworkable. For example, a festival celebrating an ethnic or religious community often features vendors coming from all over the region to the anchor neighborhood where the festival is held. Vendors for the Kehila Kedosha Janina festival, the only Romaniote rite synagogue in the Western Hemisphere, could be members of this particular community from all over the city, the region and even beyond. The 50% requirement would foreclose many of these vendors from participating in the annual gathering and celebration of their religious community, as they may not live or work near their spiritual home anymore. Local storefront businesses may or may not be willing to participate in festivals; their top priority is keeping their doors open. And it is my understanding that many local merchants don't want to participate but if they do the festival sponsor could make some spots available for a reduced or no fee. But not 50% of the slots. Most festival vendors are unable to afford storefront rents; their livelihood depends on participating in a large number of festivals all over the city, region and country. And as a city we need to run workshops so more artisans and ethnic vendors get the proper credentials.
4. *Application Fee:* The proposal will fix the application fee for street and single-block festivals at \$1,375 for the first block on the first day, with the fee for each subsequent block or day at \$705. It represents a substantial departure from the current fee, assessed at 20% of the total fees paid by vendors to participate. I am concerned that the fee could be unaffordable to smaller community sponsors. Although the Director of Street Activity Permit Office (SAPO) will have authority to waive or reduce fees, the festival applicant will have to demonstrate that the fee is in excess of 25% of its festival-derived revenue, up from the 20% for which the applicant is currently responsible. In addition, with the increased application fee, community sponsors will be less inclined to provide space for non-profit public service organizations, which are also dependent on street and single-block festivals to engage the community.

Street and single-block festivals celebrate our city and its neighborhoods. A festival is a venue for vendors, non-profits and community residents to interact and intermingle in their joint effort to showcase the community where the festival is held. Over the years, many of our current festivals have thrived despite the constraints and limitations imposed upon them. The proposal before us, however, may not have fully taken into account that these successful festivals, along with their community sponsors, participating vendors and neighborhoods behind them, could be serious jeopardy if the proposal is adopted as is. While I remain fully supportive of the broader goals of the proposal, I would like to ask that CECM consider the above concerns, provide for additional flexibility to the rules, and revise the proposal to build in a mechanism to address the highly varied character and needs of the sponsors and communities, and provide much greater flexibility to adjust fees and other requirements accordingly.

Thank you again for the opportunity to testify.

Testimony on behalf of the Times Square Alliance
Mayor's Office of City Wide Event Coordination and Management
Street Activity Permit Office
October 12, 2016

Thank you for allowing the opportunity to testify on the Street Activity Permit Office (SAPO)'s proposed rules regulating street fairs. My name is Tim Tompkins and I am the President of the Times Square Alliance.

First, let me express my thanks to Michael Paul Carey and the de Blasio Administration for putting forth rules that represent meaningful and thoughtful reforms to street fairs and festivals citywide. This is a complex issue for many communities in New York City and the Alliance is grateful that, after many years of advocacy from a variety of stakeholders, we are finally having a dialogue to create a system that address longstanding concerns about the impact of fairs on neighborhoods, while balancing the benefits to local non-profits and other groups.

We feel two principles should guide the administration in fashioning these rules. One is that every neighborhood and every community is different. The second is that objective data about vehicular and traffic congestion, as well as the distribution of fairs by neighborhood, should be used as a filter for deciding not if a given street fair should occur, but where it occurs.

With respect to the first point, there should not be a "one size fits all" solution to this issue. In some areas of the city, street fairs are important economic drivers, drawing additional foot traffic and activating commercial centers. In other neighborhoods, street fairs exacerbate existing congestion and block access to local businesses and entertainment venues—in some instances, creating a safety hazard. New York City is a collection of diverse, unique communities; the characteristics that define our neighborhoods must be considered when drafting rules that govern the location and frequency of street fairs.

With respect to the second point, data should drive decisions. CECM should use the Department of Transportation, the Taxi and Limousine Commission and land use data to see which streets at which times have the greatest congestion and traffic pressures, even without street fairs. That should be put together with information about the relative number of fairs on those streets, compared to other streets and neighborhoods, to make decisions about whether or not to deny a particular location or time for a particular street fair.

Times Square has its own set of unique facts. **Street fairs in Times Square create an excessive burden on an already overburdened neighborhood.** Near-weekly street closures have caused extreme congestion, hurt local businesses and overwhelmed the area. The part of the City which is the busiest and among the most traffic-congested on weekends has more street fairs than any other.

- **Times Square is already extremely dense and congested.**
 - Times Square represents just 0.1% of New York City's total area, yet it has 21% of the city's hotel rooms, 95% of the Broadway theaters, and a greater concentration of subway stations than any other neighborhood.
 - Theaters and hotels are especially dependent on customers who arrive by car or bus, especially on weekends.
 - An average of 480,000 pedestrians visit Times Square daily—this figure does not drastically fluctuate between weekdays and weekends.
 - On Saturdays alone, over 50,000 people come to the district to attend a theater performance and, on average 27,000 visitors check-in to a hotel within the district.
 - Times Square is also one of the 10 busiest areas for taxi drop-offs in Midtown and Lower Manhattan.

- **Unlike other business districts and much of Manhattan, Times Square is busier, not slower, on weekends.**
 - 54% of weekly Broadway attendance is crammed into the two days street fairs occur -- Saturday and Sunday.
 - 38% of Broadway attendees come by vehicle for a weekend matinee vs. 24% for a regular weeknight show.
 - Weekend vehicular traffic in Times Square often exceeds weekday traffic, unlike other parts of Midtown.

- On weekends, taxi drop-offs are more clustered around Times Square than on weekdays (mostly due to theater and hotel-goers).
 - Times Square's concentration of entertainment options, totaling 64,409 seats (47,635 Broadway seats; 7,851 movie theater seats; and 8,923 comedy club, off-Broadway, music hall and attraction seats) make it much busier on weekends than virtually any other neighborhood, both day and night.
- **Yet despite the intensity of weekend activity, Times Square has a disproportionate number of street fairs.**
 - Community Board 5 has 30% of all Manhattan street fairs.
 - Times Square is 11.8% of Community Board 5, but has 51% of CB5's multi-block street fairs.
 - Times Square represents one-tenth of one percent (.1%) of the city's land area, yet has ten percent (10%) of all street fairs citywide.
 - **Making visitors to the city needlessly exasperated threatens thousands of jobs and millions in net new spending.**
 - The very people inconvenienced by street closures who come to NYC to visit Times Square's hotels, theaters and restaurants on weekends brings net new dollars – and tens of thousands of jobs -- to NYC's economy.
 - Times Square's actors, stagehands, musicians, hotel workers, and restaurant employees all depend on Times Square's thriving tourist economy, which supports 354,000 jobs and \$5.5 billion in state and city tax revenues.
 - If there is a terrorist incident, response times for emergency vehicles will be severely impaired.

Times Square's unique circumstances as I have just articulated leads us to a proposal that, for streets or avenues determined to be "excessively burdened," the City should engage in an additional analysis to determine if such locations are appropriate for street fairs. Streets should be deemed "excessively burdened" if they meet two of the following criteria:

1. Streets have the highest amount of traffic under normal, non-closure conditions, relative to comparable streets
2. Streets which feed directly into at least three streets with a disproportionate number of hotel, entertainment, and transit uses that have significant egress needs
3. Streets in community districts with a disproportionate number of street fairs
4. Streets which the NYPD determines as having specific security and emergency response requirements

It is essential to allow communities that want and welcome specific street fairs to have more of them. Many neighborhoods want street fairs. One way to assist street fair producers and neighborhood non-profits they support is to allow either the 50% local requirement or the cap per community board to be waived or reduced with respect to a proposed street fair if three or more of the following request it:

- The Community Board
- The local Councilmember(s)
- The Borough President
- The BID where the fair would take place

It is also important that we close potential loopholes that could distort the intended impact of the rules. Several provisions are needed to ensure that the rules fulfill their intention:

- Street fairs on a street or avenue that borders two community boards should count towards the total cap for both districts. For example, an 8th Avenue street fair results in significant traffic displacement for both 6th Avenue and 10th Avenue traffic.
- Multi-block street fairs in Manhattan should not be longer than the distance between major two-way thoroughfares (eg 34th, 42nd, 57th Streets). No multi-block street segment between such thoroughfares should be used more than once per year, nor should any single-block be closed for a street fair more than twice a year. If there is a street fair on or next to a block with a 500+ seat theater, it must be cleared by 7 pm.

Make Street Fairs Fair: Times Square and Street Closures – The Facts

Street fairs, which may be desirable in many neighborhoods, completely overwhelm ours

Street fairs in Times Square create an excessive burden on an already overburdened neighborhood. Near-weekly street closures have caused extreme congestion, hurt local businesses and overwhelmed the area. In defiance of common sense, the part of the City which is the busiest and among the most traffic-congested on weekends has more street fairs than any other.

Street fairs can be positive in many instances and are welcomed and wanted in many neighborhoods. They sometimes benefit worthy non-profits. However, **the disproportionately high number of fairs in the Times Square area negatively impacts, rather than benefits, our community.**

We applaud the City for seeking a more equitable distribution of street fairs. We think the rules need to be modified in some important ways to reflect the concerns of other neighborhoods and non-profits, but agree that the current system is too driven by a handful of large, for-profit commercial producers, rather than the needs and concerns of neighborhoods. In addition, the Alliance is willing to work with the legitimate neighborhood non-profits affected by potential rule changes to address their needs.

Times Square and Street Fairs: Far more congestion, and yet far more fairs as well

- **Times Square is already extremely dense and congested.**
 - Times Square is 0.1% of NYC's land area, but contains its highest density of theaters and hotels (95% and 21% of the City's total, respectively), and has a greater concentration of subway stations and ridership than any other neighborhood.
 - Peak pedestrian traffic is 480,000 per day, more than any other neighborhood.
 - Theaters and hotels are especially dependent on customers who arrive by car or bus, especially on weekends.
 - Times Square is one of the 10 busiest areas for taxi drop-offs in Midtown and Lower Manhattan.
- **Unlike other business districts and much of Manhattan, Times Square is busier, not slower, on weekends.**
 - 54% of weekly Broadway attendance is crammed into the two days street fairs occur -- Saturday and Sunday.
 - 38% of Broadway attendees come by vehicle for a weekend matinee vs. 24% for a regular weeknight show.
 - Weekend vehicular traffic in Times Square often exceeds weekday traffic, unlike other parts of Midtown.
 - On weekends, taxi drop-offs are more clustered around Times Square than on weekdays (mostly due to theater and hotel-goers).
 - Times Square's concentration of entertainment options, totaling 64,409 seats (47,635 Broadway seats; 7,851 movie theater seats; and 8,923 comedy club, off-Broadway, music hall and attraction seats) make it much busier on weekends than virtually any other neighborhood, both day and night.
- **Yet despite the intensity of weekend activity, Times Square has a disproportionate number of street fairs.**
 - Community Board 5 has 30% of all Manhattan street fairs.
 - Times Square is 11.8% of Community Board 5, but has 51% of CB5's multi-block street fairs.
 - Times Square represents one-tenth of one percent (.1%) of the city's land area, yet has ten percent (10%) of all street fairs citywide.
- **Making visitors to the city needlessly exasperated threatens thousands of jobs and millions in net new spending.**
 - The very people inconvenienced by street closures who come to NYC to visit Times Square's hotels, theaters and restaurants on weekends brings net new dollars – and tens of thousands of jobs -- to NYC's economy.

- Times Square’s actors, stagehands, musicians, hotel workers, and restaurant employees all depend on Times Square’s thriving tourist economy, which supports 354,000 jobs and \$5.5 billion in state and city tax revenues.
- If there is a terrorist incident, response times for emergency vehicles will be severely impaired.

Proposals for a more equitable, rational and data-driven distribution of street fairs

Adjust the proposed rules to allow for a more data-driven determination of street fair locations and distribution.

Having a common cap on street fairs per community board is an equitable approach, but should be supplemented by additional data-driven analyses of the impacts on traffic and safety, especially at peak times and places. Ultimately the City, rather than event producers, should decide on street fair locations and footprints, based on community and agency input.

For certain categories of streets or avenues determined to be “Excessively Burdened” at certain days of the week or times of day, as indicated below, the City may engage in additional level of analysis which may result in the denial of a street fair application for a particular location at a particular time. Streets or avenues shall be determined to be “Excessively Burdened” if they meet two or more of the criteria below:

- Criteria 1: Streets or Avenues with the worst traffic under normal, non-closure conditions, relative to other comparable streets and avenues.
- Criteria 2: Streets, avenues, or segments of Avenues which feed directly into at least three streets with a disproportionate number of hotel, entertainment and transit uses which are both vehicle dependent and have significant egress/exit needs.
- Criteria 3: Streets or Avenues in Districts with a disproportionate number of Street fairs
- Criteria 4: Streets or avenues which the NYPD determines as having a disproportionate number of venues requiring emergency response access in the event of an incident.

Allow communities that want and welcome specific street fairs to have more of them. Many neighborhoods want street fairs. One way to assist street fair producers and neighborhood non-profits they support is to allow either the 50% local requirement or the cap per community board to be waived with respect to a proposed street fair if three or more of the following request it:

- The Community Board
- The local Councilmember(s)
- The Borough President
- The BID where the fair would take place

Close potential loopholes that could distort the intended impact of the rules. Several provisions are needed to ensure that the rules fulfill their intention:

- Street fairs on a street or avenue that borders two community boards should count towards the total cap for both districts. For example, an 8th Avenue street fair results in significant traffic displacement for both 6th Avenue and 10th Avenue traffic.
- Multi-block street fairs in Manhattan should not be longer than the distance between major two-way thoroughfares (eg 34th, 42nd, 57th Streets). No multi-block street segment between such thoroughfares should be used more than once per year, nor should any single-block be closed for a street fair more than twice a year. If there is a street fair on or next to a block with a 500+ seat theater, it must be cleared by 7 pm.
- Require street fair producers to disclose gross revenues and actual amounts contributed to affiliated non-profits for each street fair.

- Require street fair producers to disclose gross revenues and actual amounts contributed to affiliated non-profits for each street fair.
- Where nighttime street closures create an excessive burden, such closures should end no later than 7 p.m.
- CECM after consultation with the Community (Community Board and BID) determines the footprint and final location of the Street Fair, not the Event Producer and Sponsor.

The Alliance recognizes that street fairs play an important role in the fabric of New York City and we appreciate the support that non-profit organizations often receive from these events. In no way do we seek to prevent such organizations from raising funds through street fairs. However, we must balance the needs of those groups with the need to maintain safe pedestrian and vehicular access to core areas of the city.

Thank you for the opportunity to testify.



.....

**TIMES SQUARE
STREET FAIRS: The Facts**

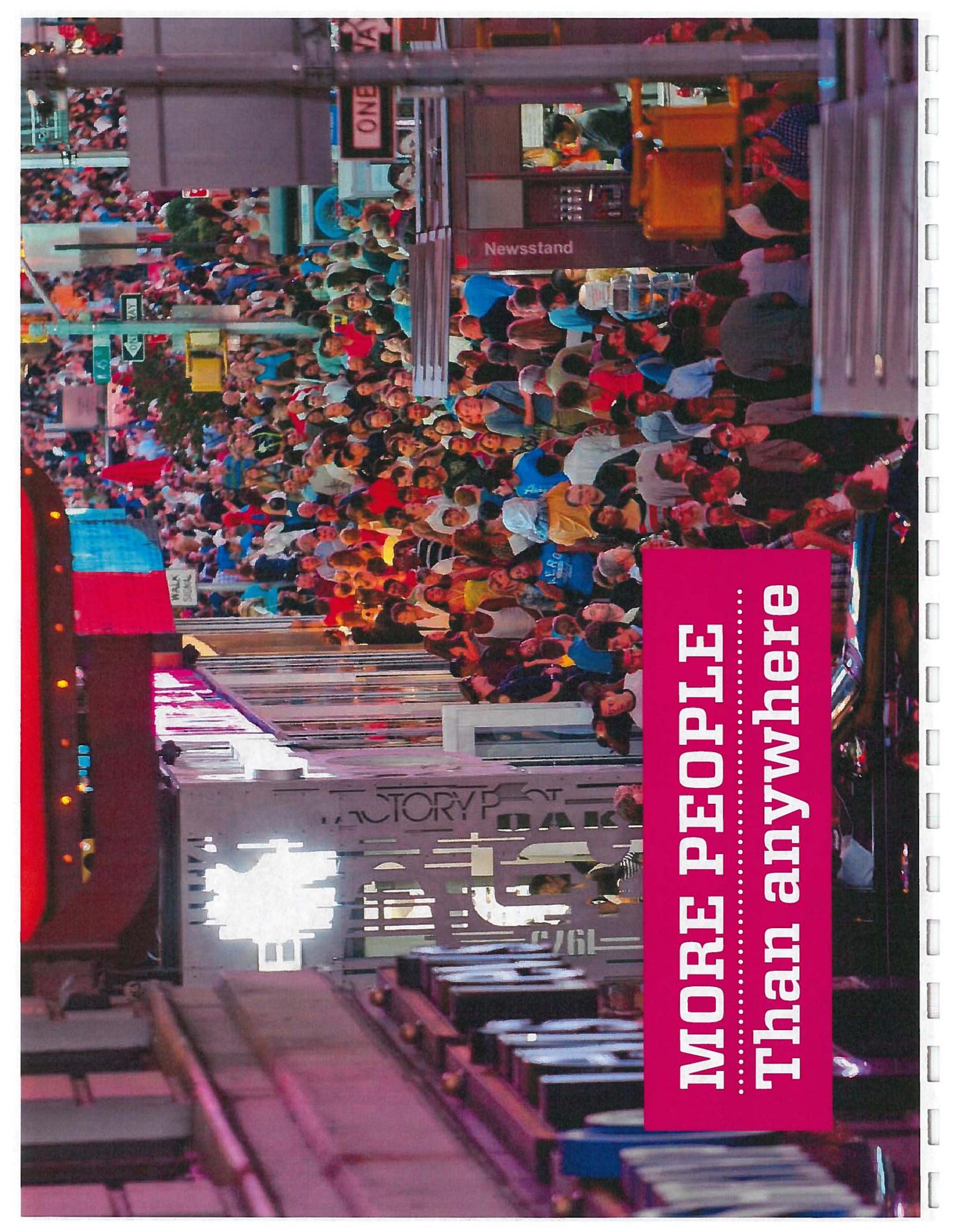
**More people, hotels,
theaters & traffic than
anywhere**

**More street fairs than
anywhere**

.....

BASTA!

MAKE STREET FAIRS FAIR!



MORE PEOPLE
.....
Than anywhere

Unparalleled Density of Activity

.1%



of NYC land area

21%



of NYC hotel rooms

95%



of Broadway Theaters

124,172,199

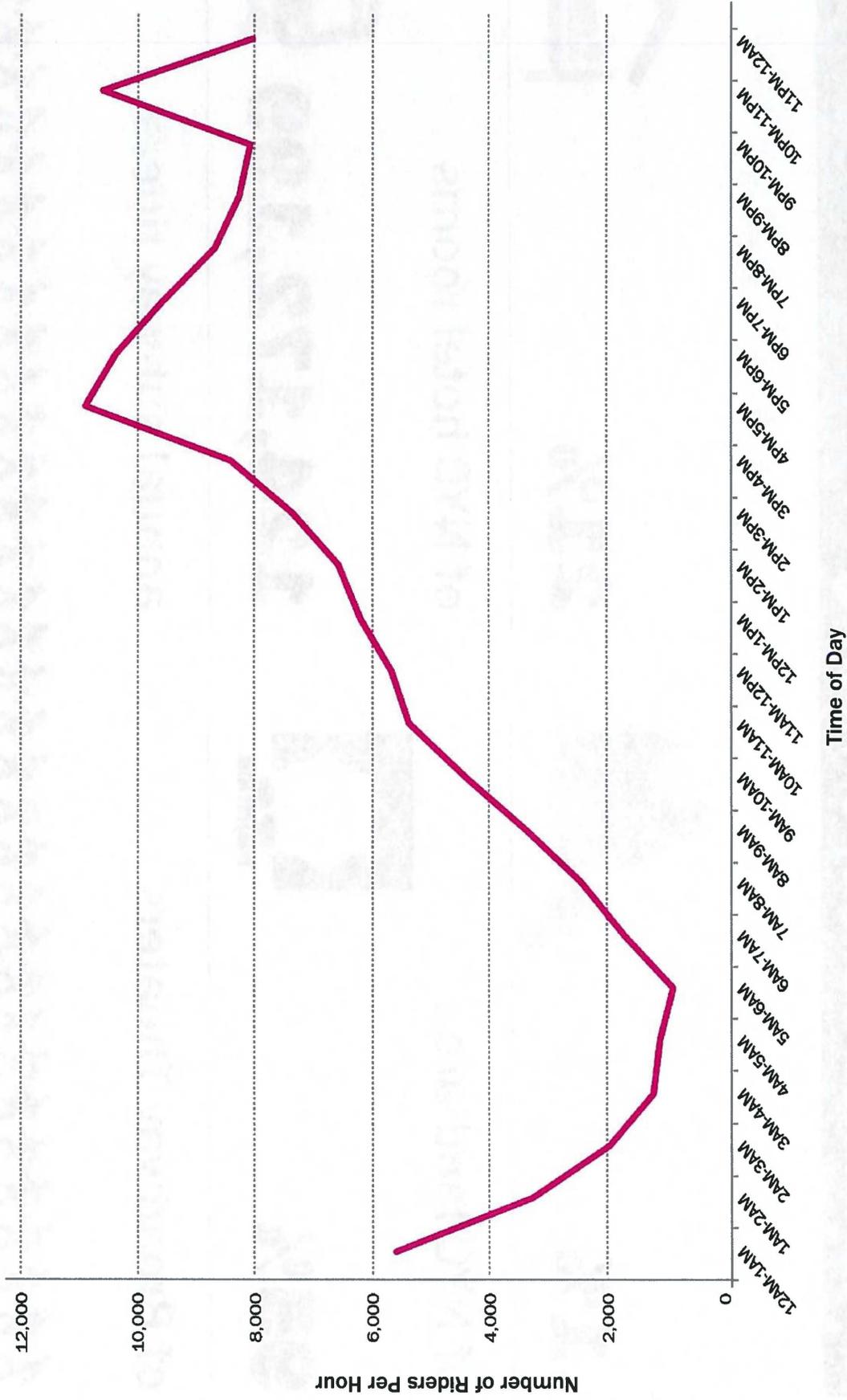


annual subway riders



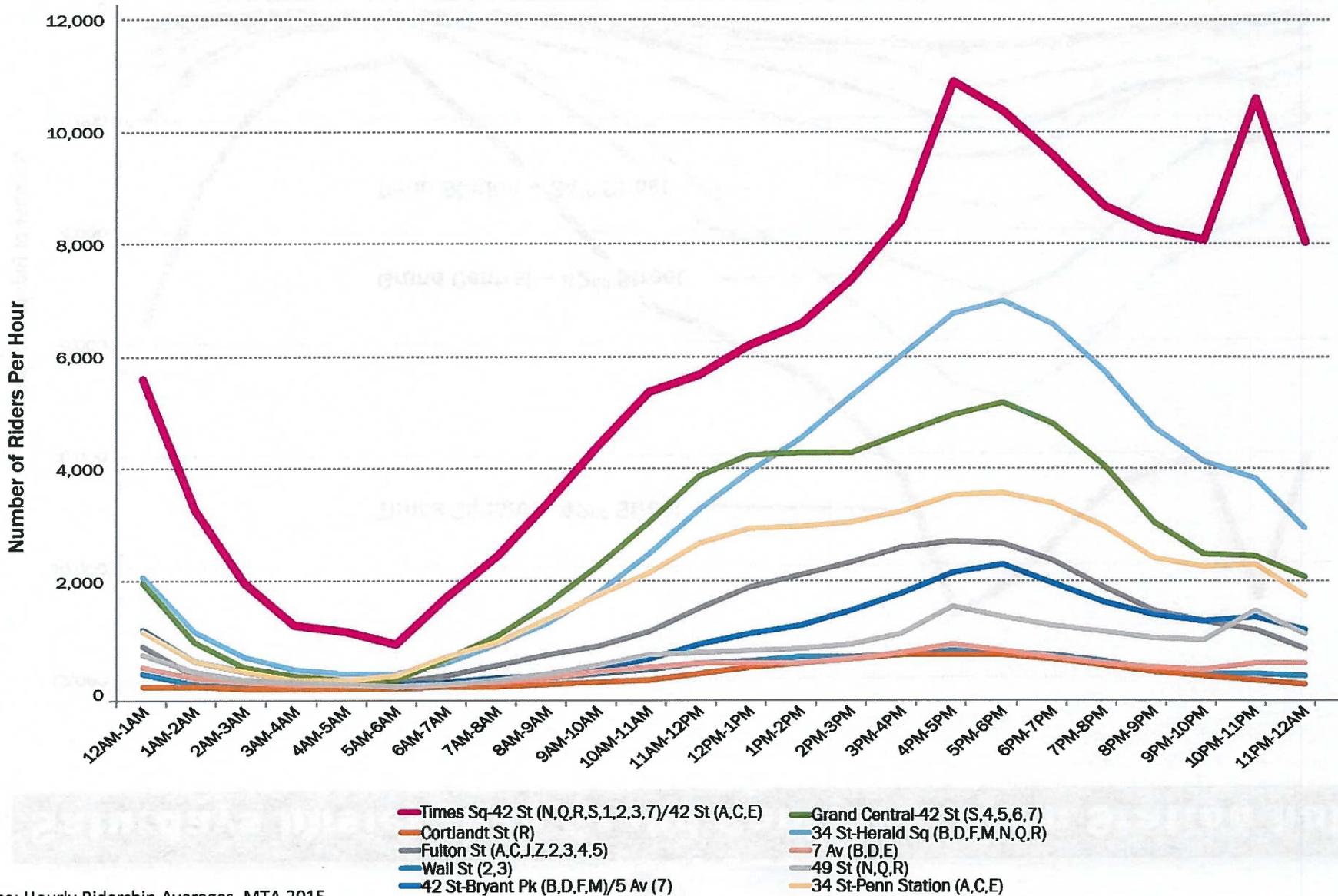
Peak pedestrian traffic **480,000** per day

Highest Saturday Transit Ridership in the City



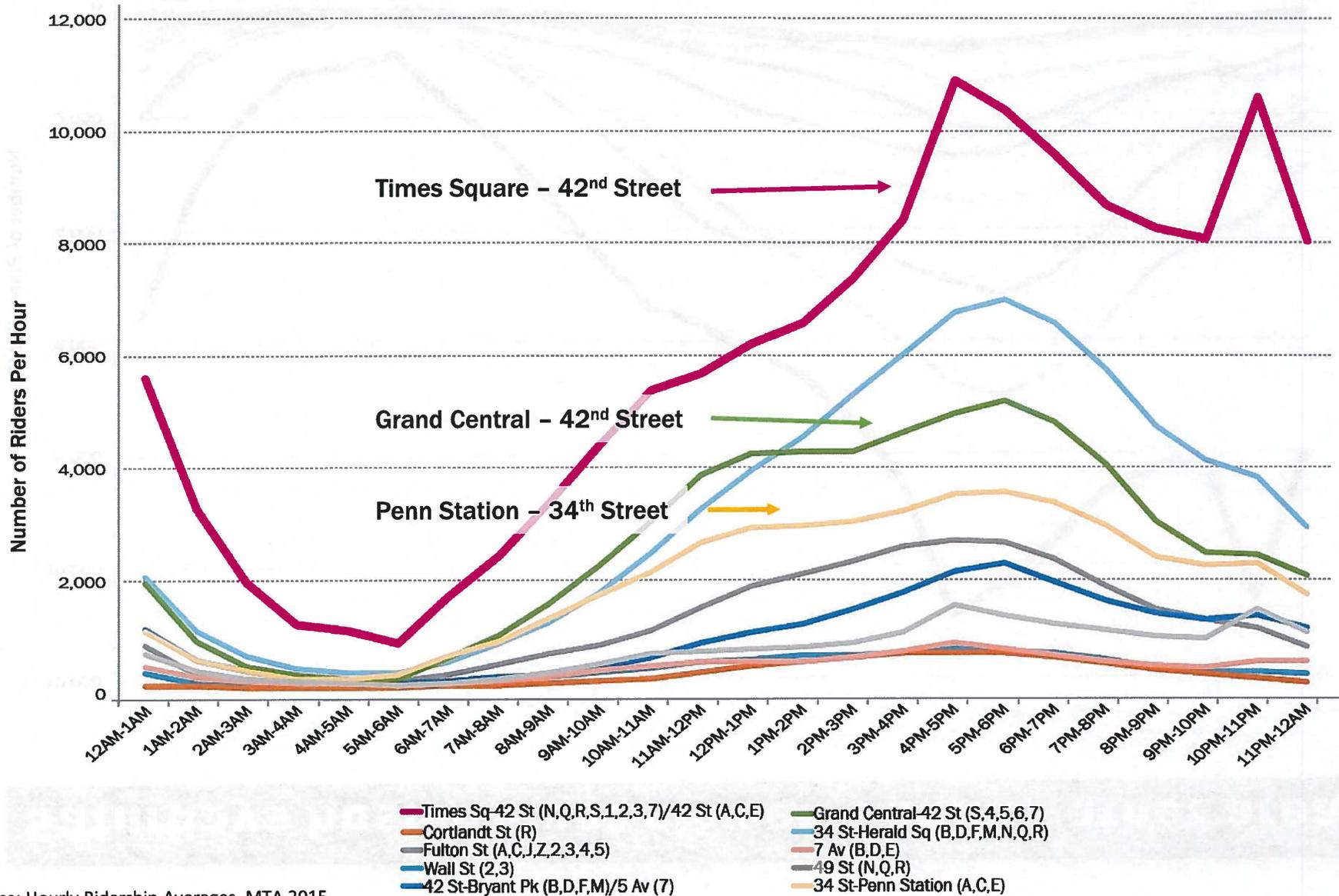
Source: MTA, 2015 Annual Data

Saturdays busier -- not slower -- unlike other areas



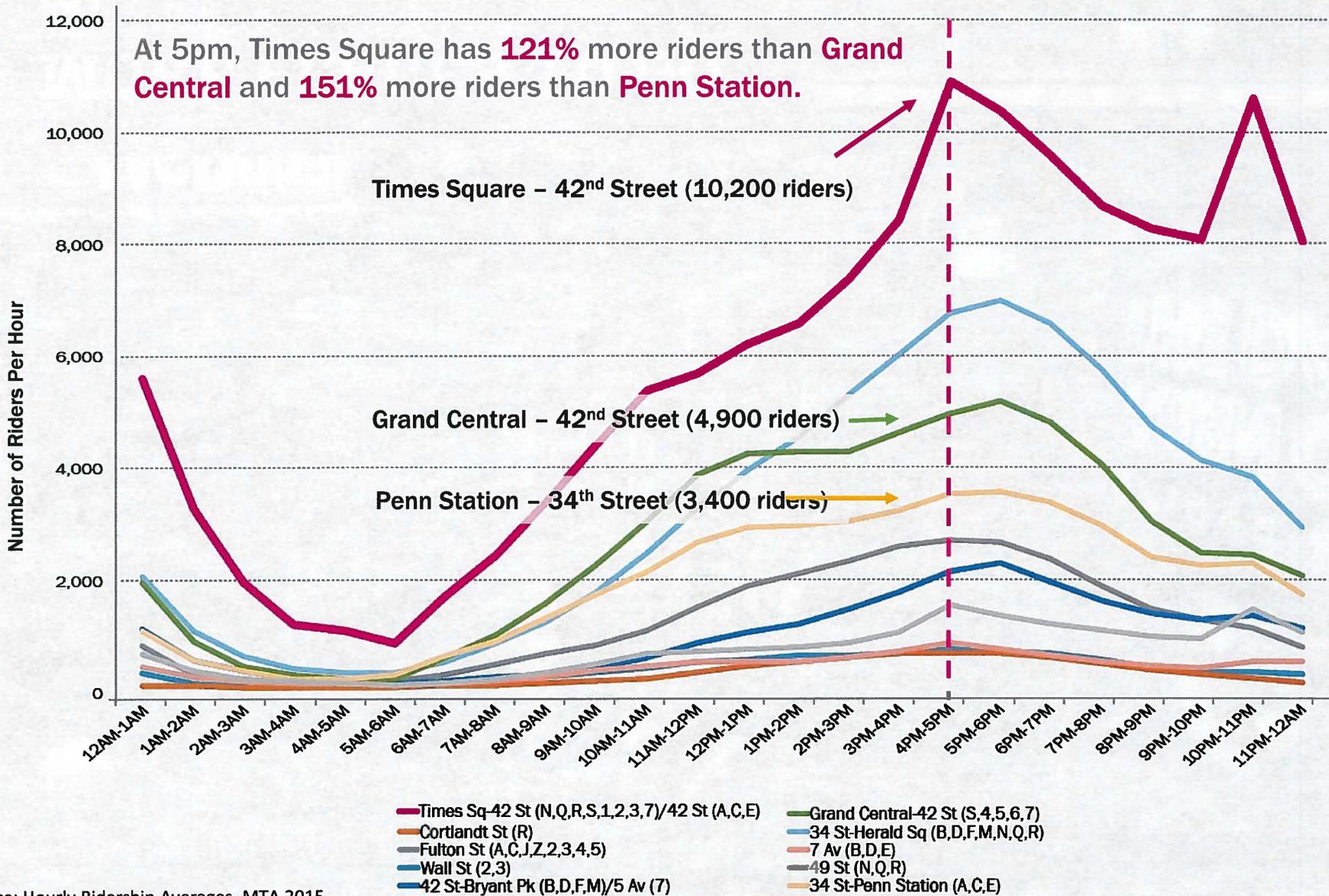
Source: Hourly Ridership Averages, MTA 2015

Saturdays busier than Grand Central & Penn Station hubs

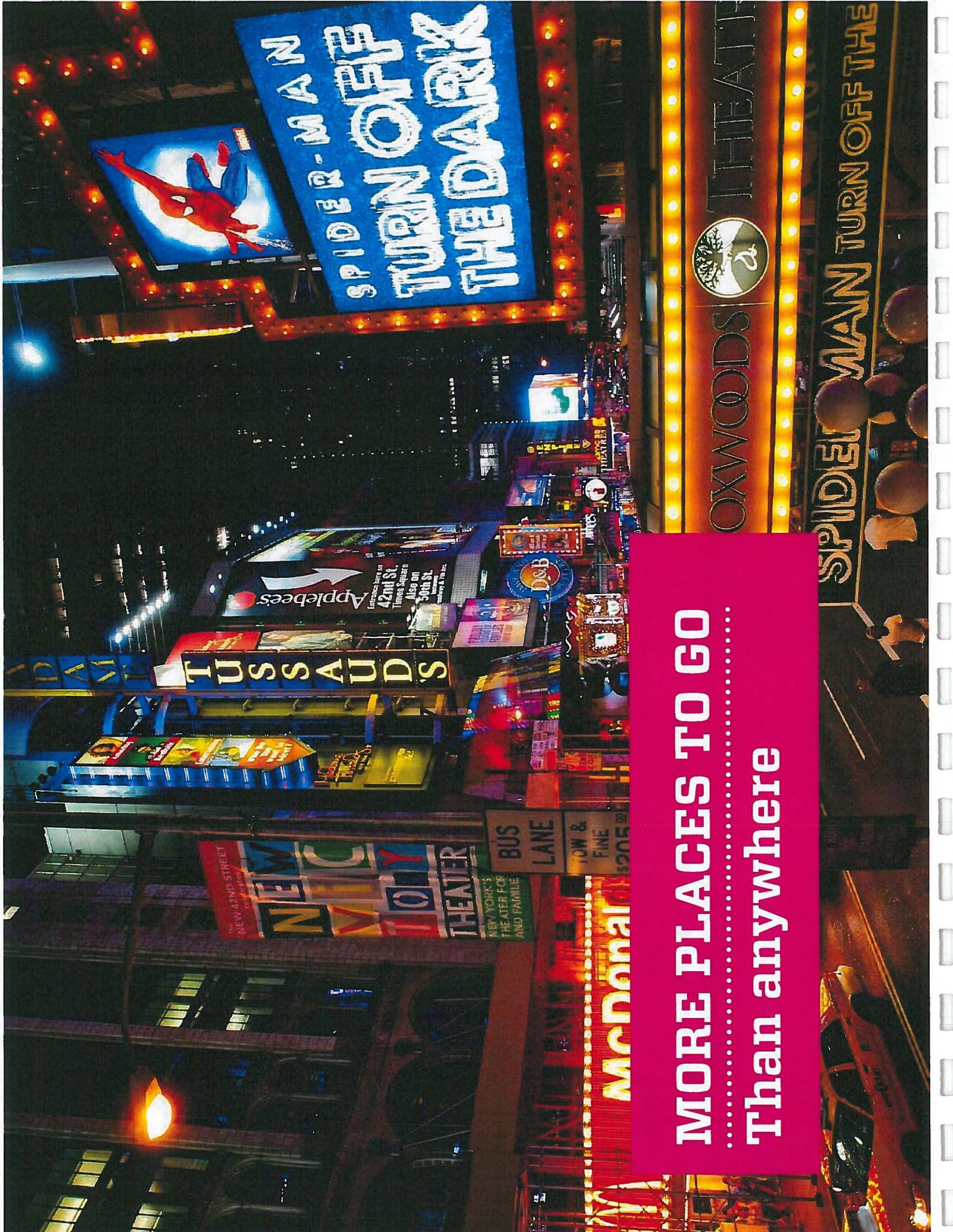


Source: Hourly Ridership Averages, MTA 2015

Times Square 121% to 151% busier on Saturdays



Source: Hourly Ridership Averages, MTA 2015



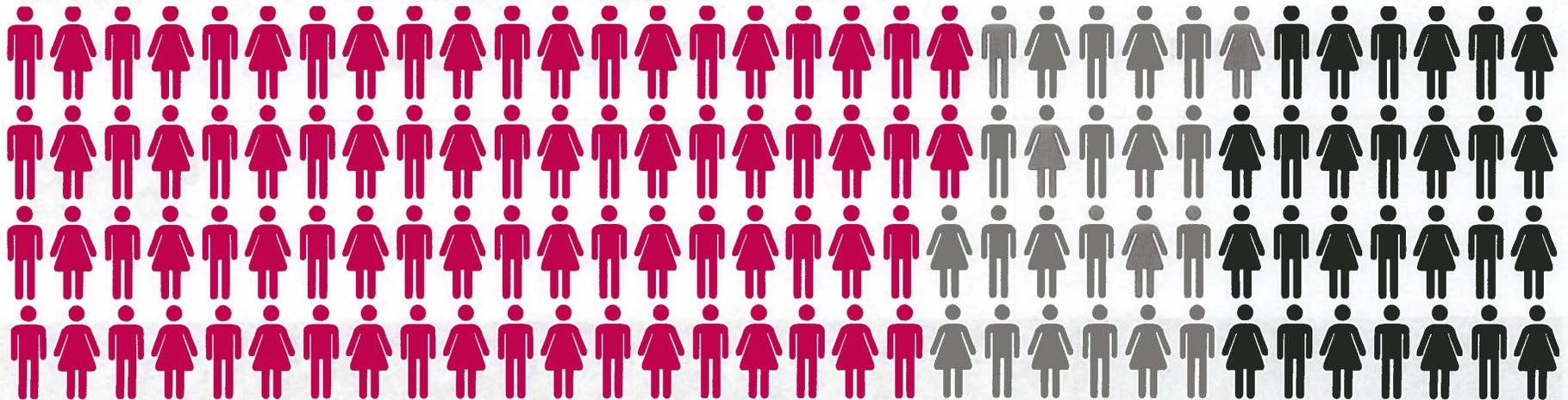
MORE PLACES TO GO
.....
Than anywhere

Extremely High Concentration of Entertainment Venues

64,409

Entertainment seats

- 47,635 Broadway Theater Seats
- 7,851 Movie Theater Seats
- 8,923 Comedy Club, Off-Broadway, Music Hall, & Attraction Seats

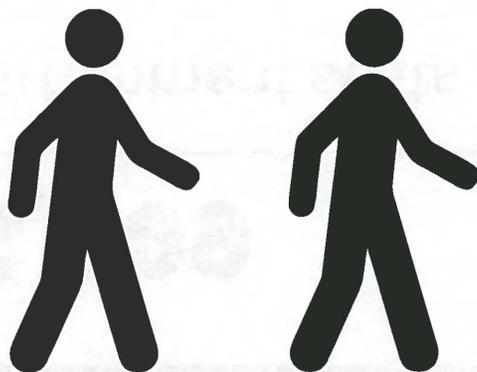


Everything is Busier on Weekends

54%

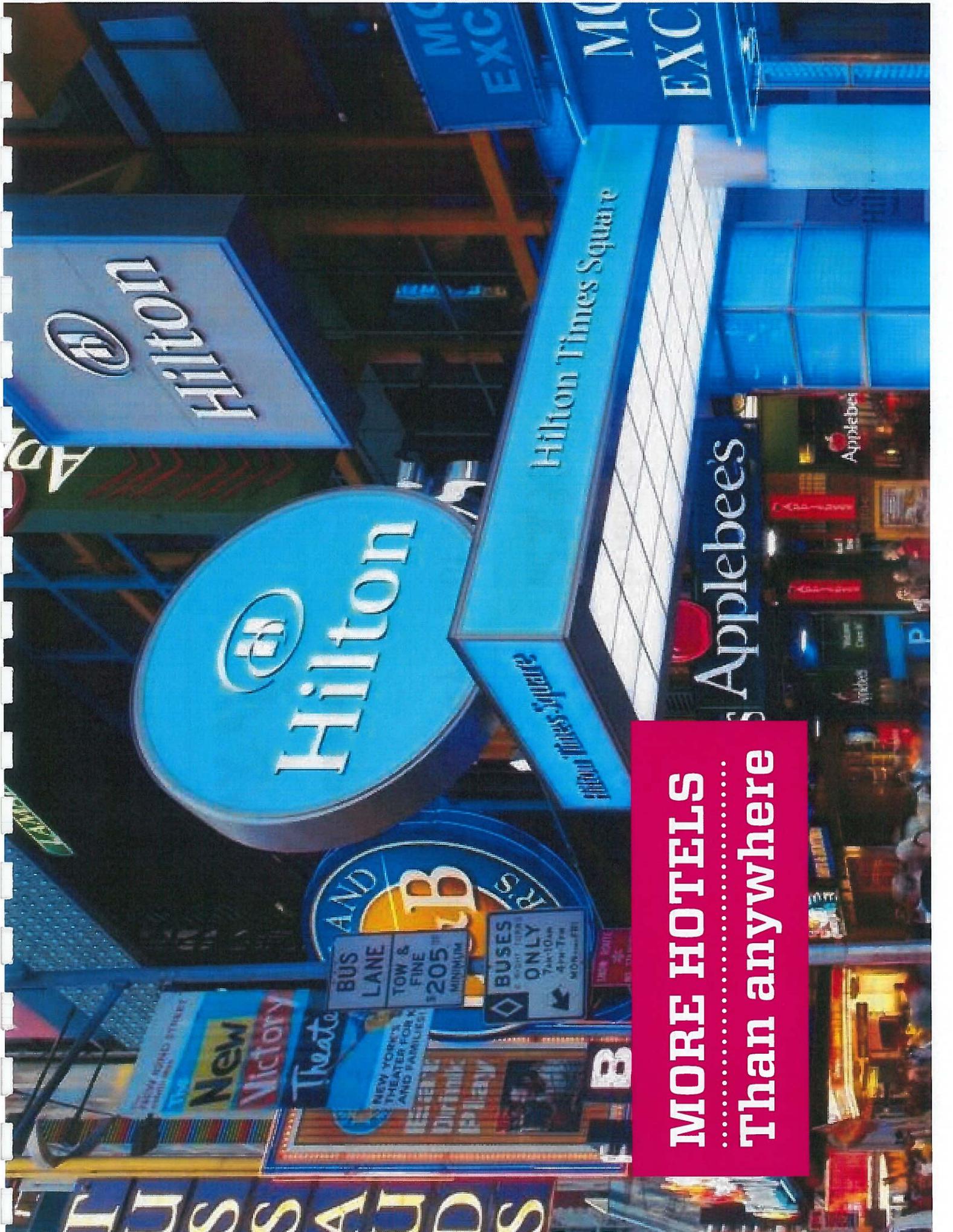
of all weekly Broadway attendees come on weekends (both matinee & evening, Saturday & Sunday)

and **1 of 3** theatergoers...



... arrive by **vehicle mode**

*Vehicle mode includes MTA bus, tour bus, personal car, taxi, car service, long distance bus



MORE HOTELS
.....
Than anywhere

Highest Density of Hotels in New York City

44

hotels

88%

average weekend occupancy

18,141

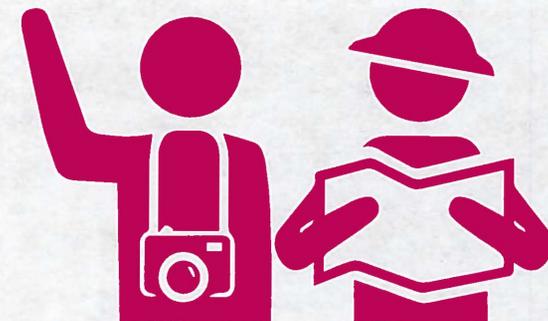
hotel rooms

21%

of NYC hotel rooms in TSq

On an average weekend...

27,000



visitors are staying in Times Square and nearly **100%** of hotel patrons arrive by **cab, car service, or airport shuttle.**

*Based on September 2016 Phone Survey of 12 Times Square hotels.

MORE TRAFFIC
.....
Than anywhere



Weekend & Weekday Traffic Equally Congested

While traffic in most parts of Manhattan decreases on weekends, **traffic in Times Square increases on weekends.**

Manhattan Locations

Madison Avenue between 45th & 46th Streets

 **13%**

56th Street between Fifth & Sixth Avenues

 **21%**

70th Street between Columbus & Broadway

 **12%**

Times Square Locations

Eighth Avenue between 47th & 48th Streets

 **2%**

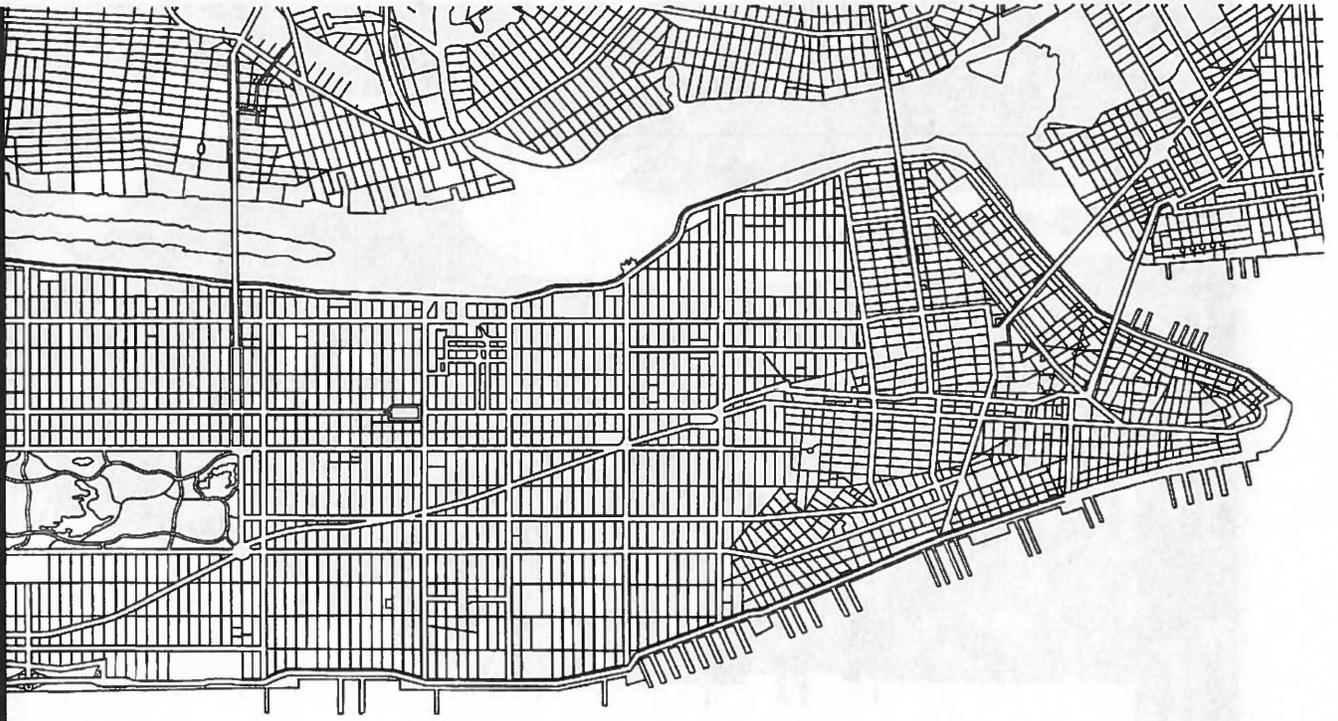
45th Street between Seventh & Eighth

 **6%**

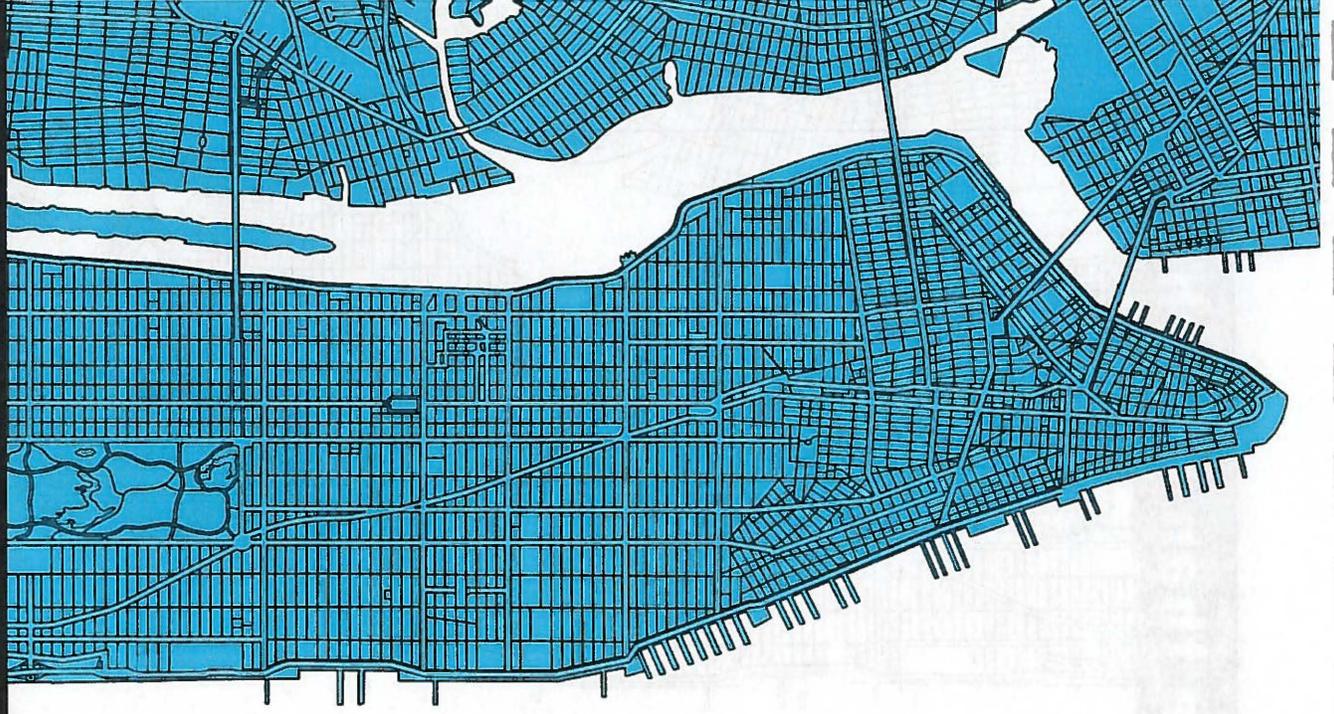
46th Street between Seventh & Eighth

 **6%**

Times Square Street Fairs: More than anywhere

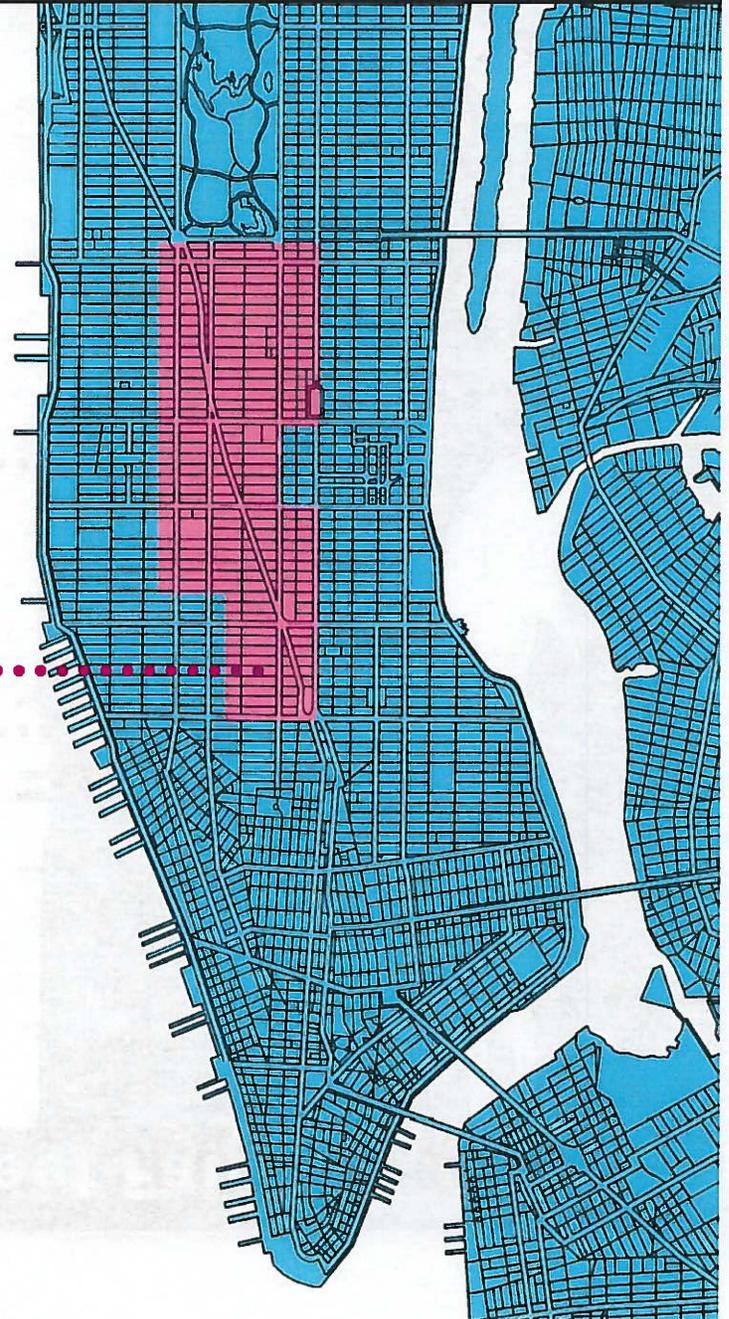


190 Citywide Street Fairs



CITYWIDE STREET FAIRS 190

CB5 = 30% of Manhattan Street Fairs



30%
Of Manhattan Street Fairs
Occur in CB5

CITYWIDE STREET FAIRS 190

CB 5 STREET FAIRS 35

Times Square = 50% of CB5 Street Fairs

CB 2 BROADWAY AVENUE ST
WILLIAM STREET AVENUE (20)

00011 CB2
01 WASHINGTON STREET L982

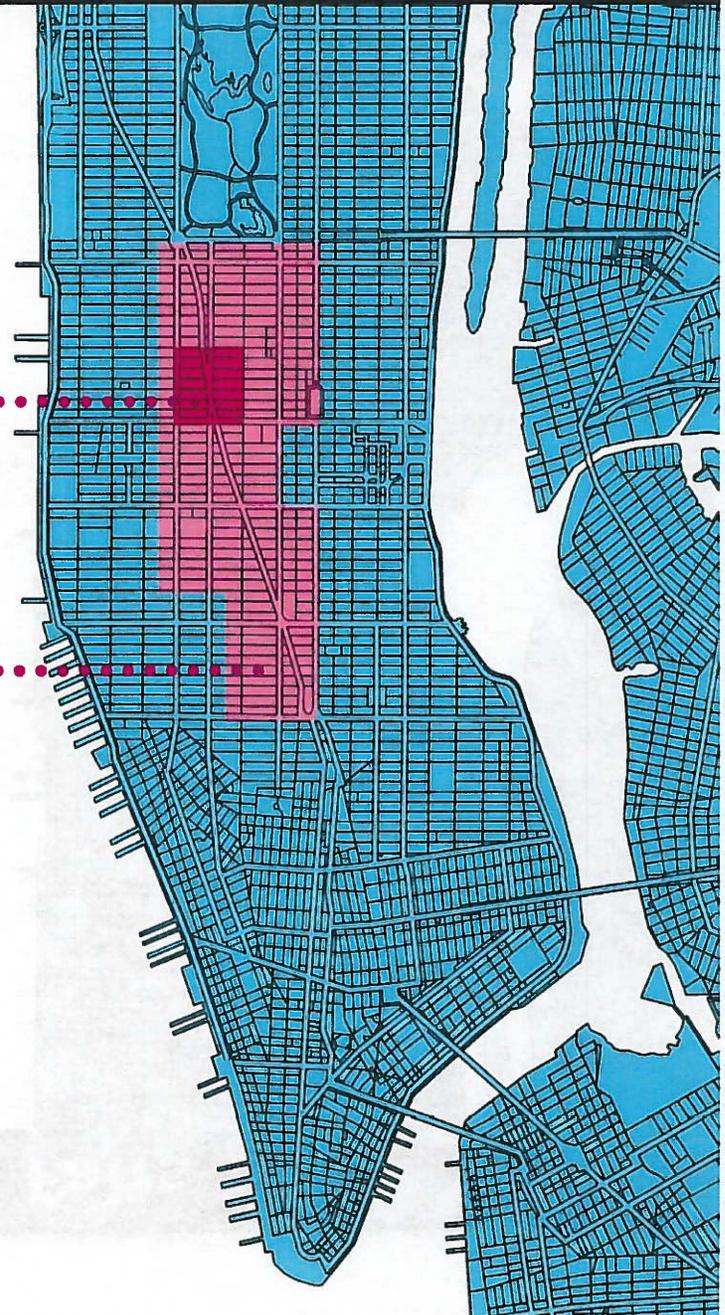
50%
Of CB5 Street Fairs
Occur In Times Square Area

30%
Of Manhattan Street Fairs
Occur in CB5

CITYWIDE STREET FAIRS 190

CB 5 STREET FAIRS 35

TIMES SQUARE STREET FAIRS 18



Times Square = 10% of City Wide = NOT FAIR!

**10% OF ALL STREET FAIRS
IN NEW YORK TAKE PLACE
IN 0.1% OF THE SPACE:
TIMES SQUARE.**

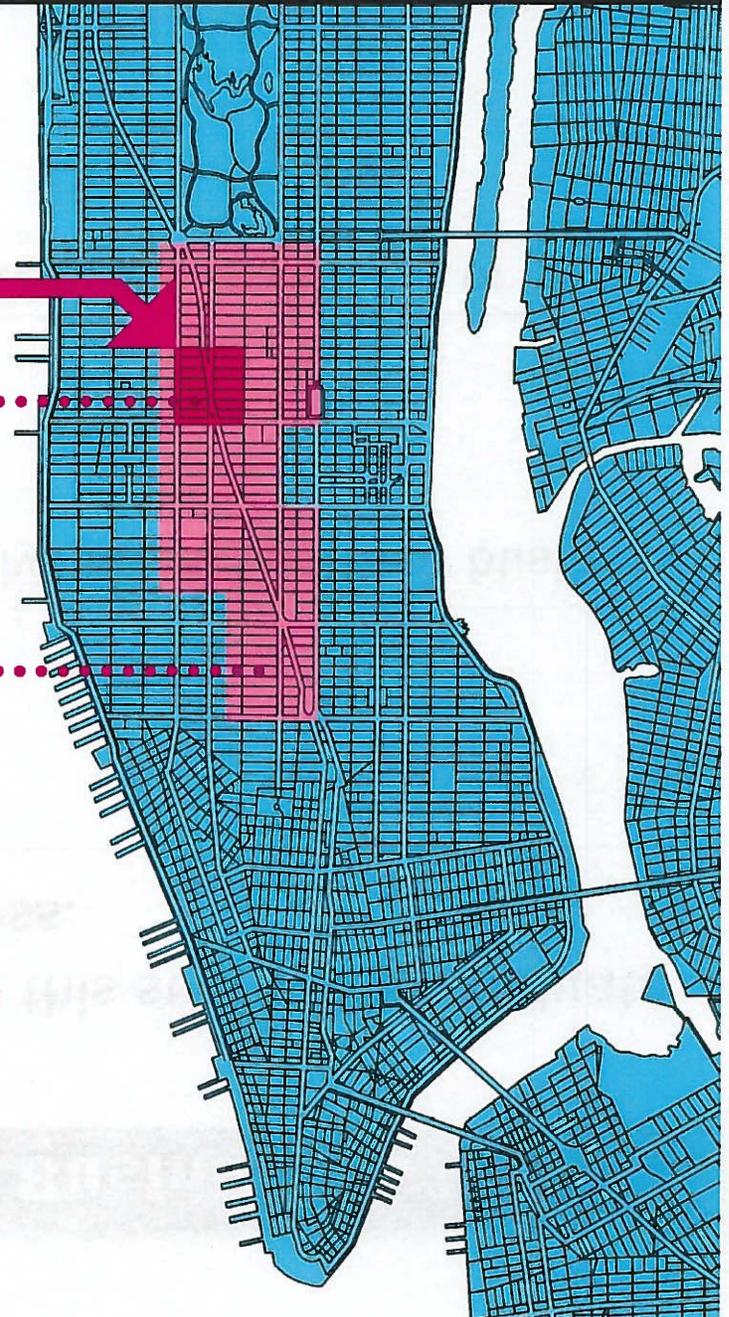
50%
Of CB5 Street Fairs
Occur In Times Square Area

30%
Of Manhattan Street Fairs
Occur in CB5

CITYWIDE STREET FAIRS 190

CB 5 STREET FAIRS 35

TIMES SQUARE STREET FAIRS 18



Street Fairs Hurt Times Square Businesses

Times Square businesses were surveyed this summer to evaluate the impact of street fairs on their business.

77%

Of respondents said street fairs had a negative impact on their business

86%

of respondents said that weekends in Times Square are busier or equally as busy than weekdays

The list of respondents are all businesses in Times Square broken down by: 43% restaurants, 17% hotels, 12% entertainment venues, 17% retail stores, 5% religious organizations, and 2% tour bus companies.

What We Can Do:

The City's Street Activity Permit Office (SAPO) has proposed changes to the way street fairs are permitted and regulated. The new rules are a major improvement. We believe the City should:

- Adjust the proposed rules to allow for a more data-driven determination of street fair locations and distribution.**
- Allow communities that want and welcome specific street fairs to have more of them.**
- Close potential loopholes that could distort the intended impact of the rules.**

From: GO2RIO@aol.com
To: [SAPOrules](#)
Subject: (no subject)
Date: Wednesday, October 12, 2016 12:30:40 PM

Reducing street fairs in Manhattan is a bad idea. I do understand the moratorium that's in place now, and not allowing any new fairs would be understandable. But to end an event that has been around for 32 years would be extremely unfortunate.

For the past 32 years Brazilian American Cultural Center (a non-profit organization) has organized an event in the heart of mid-town called Brazilian Day in New York. It's a celebration of Brazil's independence day, which falls on September 7th. This grand event takes place on 6th Avenue and 46th street, it's an area known as "Little Brazil, which was also created by our organization. This past September they celebrated their 32nd year. BR Day, as they call it for short, is world famous. Our event attracts many people, mostly Brazilians, from across the US and from all over the world. And as you know, tourists bring money to Manhattan, and lots of it. Brazilian tourists are always one of the top five spenders in the city. Tourist from all over the world are in the city during BR Day. They all love Brazilian things and love to come to the event, it's a plus for the city and a fantastic attraction for tourists.

Our last event was on Sunday, September 4th. This year Brazilian Day, was televised live to over 70 countries. This event is very important to Brazilians and the Brazilian community. It's like our 4th of July. To give you an idea, people are already making plans all over the world to go to the 33rd BR Day which would be September 3, 2017.

I wanted to point out that it would be impossible to follow the rule of 50% . 6th Avenue from 42nd to 56th is mostly office buildings, banks and hotels. We will accept any businesses from that area with open arms. I have personally spoken to the people at the midtown NYPD and they will tell you that there have never been any problems during our event. No arrests, no violence, no problems, ever in 32 years! The NYPD considers our street fair to be the best event in community 5. The people who come to our event come to have fun and celebrate Brazil for one special day. It's a day of peace, music, good food and friends gathering. It's a day to hang out with old friends and make new ones. It's a day that you can buy all kinds of Brazilian goods from participating vendors that line the streets in their booths.

The people who attend BR Day are hard working and honest. These are people who respect this country and authority. Taking Brazilian Day away from Manhattan would be a tragedy. It would be like taking New Years at Times Square away, or taking away the Feast of San Gennaro from Little Italy, it would be unheard of! My hope is that

SAPO takes a much closer look at this situation. Please don't end a 32 year tradition.

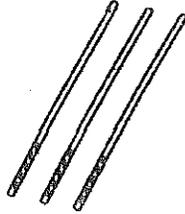
Joao de Matos

President

BACC

Email: go2rio@aol.com

www.brazianday.com



**111th Street Oldtimers
Stickball Organization, Inc.**
413 East 120th Street Suite 303
New York, N.Y. 10035

October 27, 2016

Michael Carey, Executive Director
Office of Citywide Event Coordination and Management

For over 48 years the Old Timers organization has served as the coordinators of the annual festival where past and present community residents have gathered to reunite and celebrate the rich culture and diversity of East Harlem while enjoying good food, dancing to live music bands and participating in recreational activities. They have served the community with programs that preserve the game of stickball and intergenerational mentorships.

The aforementioned event has consistently provided an opportunity to promote the best attributes of the community and continues to draw in new audiences to East Harlem. The "111th Street Oldtimers Day" has become a tradition in East Harlem. Members of the community look forward to "Old Timers Day" because they reunite with old friends and reminisce the "Good old days". Always the 2nd Sunday in July, the two blocks festival 111th Street between Madison Avenue and Fifth Avenue, and Fifth Avenue to Lenox Avenue has no impact on the Avenues' traffic. There is no diversion of Buses or traffic. In our 48 years of the 23rd and 28th police precincts will attest that there have been no problems at our activities.

Our headquarters is in Community Board 11 (Madison and Fifth Avenue) the block where the music and stickball game is in Community Board 10, is not within the same community board. (Fifth and Lenox Avenue)

The one size fits all approach is unfair to our organization and the community we serve. East Harlem is not down town or midtown Manhattan. If there are 3 Community boards that have issues, the remedy should be with the 3 boards and not restrict and penalized the rest of the city.

The 50% rule is too high requiring small vendor to have a business or local presence within the same community board, will make it more difficult for groups to attack small vendors. The weather always being a large factor, vendors may be reluctant to apply 30 days prior to the event.

Respectfully submitted,



Wilfred Renta
Treasurer

From: [Jeanne Kazel Wilcke](#)
To: [SAPORules](#)
Subject: 2 Recommendations on SAPO Proposed Rules
Date: Thursday, October 20, 2016 4:08:04 PM

1. 50% local vendor participation in street fairs is commendable, but not realistic and shuts out desirable & interesting vendors. A recommendation is to instead consider giving a priority to include in this order:

- 1) Local Vendors;
- 2) Artisans & Craftspeople;
- 3) Local Farmers.

Local vendors & small business owners get highest priority.

Next are artisans, a group that needs to reach a wide range of consumers and may not have a fixed retail address. Selling only at street fairs in districts where they live or manufacture will drastically limit their sales.

Fresh-farm products are a healthy and popular contribution to street fairs. A plus is the support communities can give to our NY State farm and dairy industries, which range from Upstate NY to Long Island.

2. Limiting the number of street fairs is well intended and would be a relief to many communities and lower gridlock and traffic congestion. But the risk is that local organizations that most directly benefit the community are excluded from sponsoring a street fair.

A recommendation for sponsorship of street fairs is to give priority in the following order:

- 1) Organizations located in the district;
- 2) Organizations that may not be headquartered in the district, but do significant work within that community.

Grassroots, volunteer non-profit & civic organizations have few sources of funds. Street fairs become very important to their survival. Plus their work directly benefits the community they reside in.

Other sponsoring groups may not be headquartered in the district, but they do significant work in the area.

The criteria must be based on the work in the area being truly 'significant' (the key word). The organization must have strong ties within the borders of the community.

Thank you for your consideration of these recommendations.

Sincerely,

Jeanne Wilcke
rednyc@mac.com
(917) 348-4859

From: [Gary Fagin](#)
To: [SAPOrules](#)
Cc: [anthony.notaro@gmail.com](#); [Noah Pfefferblitt](#); [Marco Pasanella](#); [Paul Hovitz](#); [Switaj, Diana](#); [Levine, Michael](#)
Subject: 2017 Proposed SAPO Rule Changes; October 13, 2016 Hearing
Date: Sunday, October 02, 2016 3:28:44 PM
Attachments: [GSF signature.png](#)
[SCC logo.png](#)
[SCC address.png](#)

TO: Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

RE: 2017 SAPO Proposed Rule Changes; October 13, 2016 Hearing

Dear Mr. Carey:

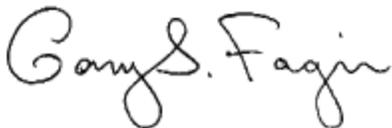
I am writing on behalf of the Seaport Community Coalition (SCC), a 501(c)(3) neighborhood organization located in the South Street Seaport Historic District (Community Board No. 1, Manhattan). The SCC advocates for quality-of-life issues in the sensitive South Street Seaport Historic District, and manages FishBridge Park community garden and dog run, also located in the South Street Seaport Historic District.

The SCC has been a sponsor of an annual street fair produced by Mardi Gras Festival Productions, Ltd. The funds the SCC receives from this sponsorship have been critical to the maintenance and renovation of FishBridge Park. We are concerned that The Office of Citywide Event Coordination and Management Street Activity Permit Office's proposed rule changes that cut back on the number of street fairs, and restrict the make-up of the street fairs, will eliminate or substantially reduce SCC's sponsorship funding.

We hope OCECM/SAPO will take in consideration the effect any proposed rule changes will have on small Manhattan 501(c)(3) neighborhood organizations like the SCC before implementing any changes.

Thank you.

Cordially,



Gary S. Fagin
Treasurer
Seaport Community Coalition
917-592-0796
garyfagin@earthlink.net



**Seaport
Community
Coalition**

P.O. BOX 435 • PECK SLIP STATION • NEW YORK, NY 10272

From: [Arlene Harrison](#)
To: [SAPORules](#)
Cc: [Joe Giovanni](#)
Subject: 2017 SAPO Rule Changes
Date: Monday, October 03, 2016 2:12:29 PM



To Whom It May Concern:

The Gramercy Park Block Association is opposed to any SAPO rules changes.

The GPBA is dedicated to public safety, crime prevention, historic preservation, and quality-of-life issues of the greater Gramercy Park neighborhood.

We have have sponsored the event for over two decades, and the street fair helps support our organization & it's various community causes.

Sincerely,

Arlene S. Harrison
President, The Gramercy Park Block Association
Trustee of Gramercy Park
34 Gramercy Park East
New York, NY 10003

212-260-3875

www.gramercyparkblockassociation.org

THE SECRET TO REAL ESTATE. LLC

ADVISORY SERVICES

October 10, 2016

Mr. Michael Carey
C/O Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

I live in Midwood, own a small business in Midwood, and am on the Board of Directors of Midwood Development Corporation. In all these roles, I can see the immense impact that MDC has on the community. One of its key events – for fundraising, revenue of neighborhood businesses, local morale, and family-friendly entertainment – may soon come to an end.

For the past 38 years, MDC has been hosting the annual Mardis Gras street fair. I had the privilege to attend my first one earlier this year, and was shocked to see the number of people attending – the streets were packed. Additionally, the diversity of residents - all religions, races, and ages were represented – displays exactly the type of diversity the City strives to attain at community events, and is *exactly* the type of diversity New York City needs right now. By all measures, Mardis Gras is a resounding success and the City should be proud to have such an event within its borders.

Therefore, it was with great dismay when I heard that the proposed rules would require “at least fifty percent of vendors participating in a street fair would have to be businesses with locations inside the same community board where the event is being held,” effectively ending this staple event. If the requirement has to be met, and documented, in order to secure a permit, it would pose a severe hardship on MDC. It would be extremely labor intensive for MDC to reach out to all the business in Community Board 14 Brooklyn. Staff time would be spent without knowing that we would get a permit.

Our agency provides a variety of needed services to the young, old, new Americans, and individuals with developmental disabilities. We rely on the Mardi Gras to raise supplemental funds to cover our operating costs not covered by our City and State contracts. Eliminating this event would affect MDC and the community tremendously.

We strongly urge that this burden not be placed on us, and the regulations not be approved.

Sincerely yours,



Adam R. Katz

Neighborhood Resident, Local Business-Owner, and Member of the Board

From: [Milenkovic Kanami](#)
To: [SAPORules](#)
Subject: against your proposal new street rules It is my only income to live in this life. Do not take a way.
Date: Sunday, October 02, 2016 9:42:03 AM

I have to say, you should not do many changes for street festival rules.
It is my only income to live in this life.
Do not take a way.

Kanami Milenkovic



GRAMERCY NEIGHBORHOOD ASSOCIATES | 2016

Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Sir:

It has come to my attention that The Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management is establishing new rules for Street Festivals. As the President of Gramercy Neighborhood Associates (GNA) a 501(c)(3) non-profit organization in the Gramercy neighborhood I feel it is my duty to explain how some of these new rules might directly impact the organizations our events directly benefit but also the overall city of New York.

GNA has always worked closely with our community coordinating local events for decades. For the last 4 years we have held Taste of Gramercy Neighborhood with proceeds directly benefitting local schools and any leftover food feeding our local homeless population. As an organization, we feel it's important to give back to our community and bring people together. Neighborhoods are not what they once were. People are constantly looking for the next big food craze or cultural experience and are not getting to know what is directly in front of them. The very idea of having a local restaurant or bar that they consider "home" is quickly fleeting and you may live next door to someone for over a decade without ever knowing his or her name. Our organization and this particular event bring a community together that begs for more engagement and opportunities to volunteer and meet one another.

Many of the amendments you are proposing go against this sense of community we are working to promote. By limiting the number of events per community board in a calendar year, charitable organizations that normally assist with the promotion of one another's events will now be in direct competition. This will not only waste the energy of those organizations who will be fighting one another but it also takes time away from completing their overall mission.

If we have a simple goal of fostering community and giving back, why should this be limited? Asking an organization who is engrained in their neighborhood to stop and never grow hurts the community. It also impacts any organization that directly benefits from the proceeds of the events. It pushes people out of their neighborhoods which will cause them to spend money elsewhere and it stops the work of community volunteers who just want to give back. After the success of Taste of Gramercy Neighborhood, we have decided that it is time to expand our event to an additional street. Many of the amendments you are proposing could hurt the growth of the event, which in turn would hurt the neighborhood we champion for.

We do our best to bring restaurants and other vendors from the neighborhood but with so many large corporations moving in and small businesses, being pushed out it is hard to guarantee 50% of the vendors will be community based. Obviously, that is the goal but having sponsors participate who are local gets harder with each passing year. Perhaps ensuring the large corporations who move into a community board be required to give a percentage back to that area instead of spending money on outreach to other communities, cities, and states would be beneficial to the city and it would ensure that communities are able to meet this 50% number. I doubt there is a single event put on by any neighborhood organization that has a goal of less than this but unfortunately it is a hard number to reach.

GRAMERCY NEIGHBORHOOD ASSOCIATES P.O. Box 678 Madison Square Station New York, NY 10159

www.gnaonline.org

Stay connected:   

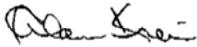
events@gnaonline.org

+1 917 603 1128

As far as the NYPD, we understand there can be a burden on them for street festivals and we make sure to include our local precinct into our plans every year. In our experience by working closely together with the NYPD when choosing dates, streets and getting their overall feedback is important to our event's success. Our relationship with the NYPD is a major initiative of our organization and we continue to work with them throughout the year.

We appreciate this opportunity to provide feedback on your proposed amendments. Please do not hesitate to reach out to continue this dialogue and please remember the ultimate goal here is to create community while helping those around us.

Sincerely,



Alan Krevis, Board of Directors President
Gramercy Neighborhood Associates

Gramercy Neighborhood Associates (GNA) is a 501(c)(3) non-profit organization committed to serving the Gramercy Park neighborhood. Since 1912 our mission has been to make Gramercy one of the city's best neighborhoods to both live and work by preserving its historic character and significance while helping to foster its future growth.



Comments on Proposed Amendment to Street Fair Permit Rules

Street Activity Permit Office, New York City

October 24, 2016

Etsy operates marketplaces where millions of people around the world connect, both online and offline, to make, sell and buy unique goods. Etsy also offers a wide range of seller services and tools that help creative entrepreneurs start, grow and manage their businesses. Etsy began in a Brooklyn apartment in 2005, and has evolved into a sophisticated technology platform that, as of June 30, 2016, connects 1.7 million Etsy sellers and 26.1 million buyers across the globe. Fully 86% of Etsy sellers are women, and most of them operate businesses of one out of their homes.

At Etsy, we use advocacy and public policy as tools to advance our mission, advocating for the interests of our seller community. Our work is member-powered and mission-driven. We seek to reduce the barriers our sellers face to starting and growing their businesses, with the goal of strengthening and growing the creative economy.

Recently, members of the [Etsy New York Team](#), a volunteer-led group of over 250 Etsy sellers based in the New York area, reached out to us about the proposed amendment to the Street Fair Permit Rules, and the danger that the 50% local business requirement would impose. Several Etsy NY members have submitted public comments via the SAPO website, and delivered public testimony at the hearing. Today, we write to your office to provide further evidence that this proposal would unduly harm the local artisans and business owners that it is meant to protect.

The proposed rule, which mandates that 50% of participating vendors must “have a business or local presence within the same community board where the [street festival] is to occur,”¹ is meant to curb the redundancies of the mass produced items and food options we see today. The sentiment of the proposed rule is to encourage local vendors, but the execution of this rule would have an inverse effect. This rule would substantially limit the opportunity to browse the unique and handcrafted items created by local micro-entrepreneurs and artisans just a community board away.

Etsy sellers personify the new face of entrepreneurship—for 30% of our sellers, their creative business is their sole occupation. For the rest, their creative business provides an important source of supplemental income, contributing 17% to total household income on average. Instead of seeking a traditional storefront, 95% of Etsy sellers operate their business alone from their homes, which means street fairs and other markets are an important venue to find and cultivate new customers.² These micro-entrepreneurs value local opportunities to display their wares and talk about their creative process with interested local community members and new customers. Street fairs can be a major source of income for these local entrepreneurs, and help to bolster our local economy by connecting local buyers and sellers.

In light of the distinct differences between a micro-entrepreneur and the vendors this proposed rule seeks to limit, we recommend exploring alternative approaches to ensuring that street fairs promote and encourage local businesses. Mandating that 50% of vendors have a business or local presence in the same community board where the street festival is to occur would disproportionately affect artisans and creative micro-entrepreneurs living outside of the central business districts, further hindering efforts to diversify the types of wares available at street fairs around the city and support the local economy.

As you continue the rulemaking process, we encourage you to consider the nuances of the creative economy, and the local micro-entrepreneurs that help it thrive. If you have any follow up questions, please contact our Senior Director of Global Policy, Althea Erickson (althea@etsy.com).

¹ §1-05(C)(4)(e)

² etsy.me/sellercensus



NEW YORK STATE ASSEMBLY

ARAVELLA SIMOTAS
Assemblymember 36th District
Queens County

CHAIR
Task Force on Women's Issues
Subcommittee on Child Product Safety

DISTRICT OFFICE:
31-19 Newtown Avenue, Suite 401, Astoria, NY 11102
(718) 545-3889 • FAX: (718) 545-3607

ALBANY OFFICE:
Legislative Office Building, Room 652, Albany, NY 12248
(518) 455-5014 • FAX: (518) 455-4044

VICE-CHAIR
Majority Conference

COMMITTEES
Banks
Consumer Affairs and Protection
Corporations, Authorities and
Commissions
Energy

October 13, 2016

Mr. Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Dear Mr. Carey:

I write to express my concerns about the new rules proposed by the Street Permit Activity Office of the Mayor's Office of Citywide Event Coordination and Management regarding street fairs. Although well-intentioned and designed to address legitimate concerns in midtown Manhattan, these rules will have significant impacts on other portions of the city, including the neighborhoods that I represent.

The proposed rules impose a cap of ten multi-block festivals in any community board annually, twenty single-block fairs in any community board annually, and no more than one festival in a single community board daily. I believe that it makes sense to raise the annual cap on multi-block festivals and to establish a procedure where a community board can waive the other caps. Within Queens Community Board 1, for example, we already have twelve (12) such longstanding festivals that would be forced to compete for the 10 permits. The rules are not clear on which ones, if any, would be grandfathered in, nor is there a clear process for making that determination. Creating a scenario where the city must choose who wins and who loses between festivals that have equal claim to being integral parts of a community's fabric is ill-advised, and I strongly recommend that you make greater allowance for these longstanding community festivals.

In addition, while an annual cap on multi-block festivals is clearly designed to address legitimate concerns about large numbers of festivals on major thoroughfares, it makes sense to add language clarifying that the cap does not apply to festivals on smaller streets. Festivals as part of legitimate religious observances should also be excluded.

While I appreciate the goal of requiring local merchant participation, many street fairs reflect the diversity of the county or the city, not only the neighborhood and the regulations should account for that. I also have concerns about the proposal to limit sponsoring organizations to one festival per year. There are many worthwhile organizations sponsoring local events that enjoy strong local support. In fact, Queens Community Board 1 has at least one organizer who sponsors two

popular street fairs. The local community board should be empowered to waive that cap in those circumstances.

I urge you to revise the proposed rules to reflect the concerns set forth above. In my district, a number of local groups host annual street fairs that provide sorely needed financial support to the sponsoring organizations. These community groups are long-standing institutions in the community and greatly contribute to the vibrancy of the neighborhood. Any regulation that would hinder their ability to financially support their activities would be detrimental to my community and the city at large. I urge you to recognize those facts when crafting final regulations. The city is a collection of neighborhoods, and no two are alike. The final adopted rules should reflect that diversity.

Sincerely,



Assemblymember Aravella Simotas
New York State
36th District - Queens

cc: Mayor Bill De Blasio

RECEIVED

OCT 18 2016

STREET Fairs

WRITTEN OPPOSITION TO PROPOSED SAPO RULE CHANGE ..

§1-05 Approval or Denial of Applications by the Street Activity Permit Office. – specifically 1-05 (4)(e)

October 11, 2016

**To Michael Carey, Executive Director
NYC Office of Citywide Coordination & Management
253 Broadway, 6th Floor, New York, NY 10007**

3 PAGES FOLLOW ...

Dear Mr. Carey,

I have carefully reviewed the proposed SAPO rule change 1-05 (4)(e) which would drastically impact our organization Bowling Green Association as well as many many other not for profit community groups around New York City.

This new rule change would require that 50% of all vendors participating in NY street fairs to either have a pre-existing business within that community board area or "some other involvement within that community board."

The clear and unambiguous result of such a new rule would be to eliminate every street fair in New York City as this is an impossible requirement as you are well aware. No street fair can possibly meet this proposed requirement regarding "local" involvement." None ever has.

The very nature of street fairs in New York City has always been that the important LOCAL component is the sponsoring not-for-profit group responsible for each street fair. That is the core logic of NYC street fairs and has been for generations.

This proposed rule change would dramatically alter that very useful formula that benefits so many to be over written with a draconian new rule that will destroy the NYC street fair tradition. A tradition that goes all the way back to colonial times and is an integral part of the very fabric of our city and its street life.

NYC street fairs likewise accomplish the important role of providing many immigrants and members of minorities to support themselves and their families by participating in street fairs.

Existing retail businesses with their own store fronts in the district have no need or interest in participating in street fairs. They already have their well appointed retail location where they can display and sell their products and services for maximum effect.

And you have not even supplied the necessary list of local businesses that would relate to this proposed rule change. As in Lower Manhattan and throughout Manhattan and often in the other boros most retail businesses are not local at all but owned and operated by national and international conglomerates.

How are these local businesses ?? Local retail businesses in Lower Manhattan and often elsewhere is confined to the likes of dry cleaners, laundromats, nail salons, barbers, shoe repairers, and few other assorted retail businesses that have absolutely no value in participating in street fairs.

And to make yet another all important point any and all businesses within any and all community board areas are very welcome to participate in NYC street fairs and always have been.

As for others who might have "some existing involvement" in the district that is a useless and vague nebulous term that means nothing at all without a specific precise definition. And even more as above there is no logic as to why these individuals would want to participate in street fairs simply because they have some "involvement" in that district. Again they have always been welcome.

The very nature of street fairs is that thy are inclusive.

SAPD has no legal right to use a devious misleading rule change to accomplish an unstated goal in this case the elimination of all NYC street fairs with an impossible requirement beginning in 2017.

Further to which placing a rigid geographic requirement on the right to do business in specific communities in New York City is blatantly illegal and discriminatory and forbidden by the U.S. Constitution, New York State

Constitution and the New York City Charter. There is not a single other provision of city government in New York City that demands that in order to conduct legitimate business within New York City that one must have a pre-existing business in that community or "some other existing involvement" in that community.

It seems to me and adding to Mayor de Blasio's other ethics problems and investigations underway is that unnamed special interest groups with access and influence in City Hall are being allowed to misuse SAPO to achieve results outside the bounds of law and proper ethical behavior required of government to disenfranchise various New Yorkers and their efforts.

Whether or not an organized conspiracy involving various parties is underway to defraud New Yorkers and others with this proposed rule change is not something for me to determine. That is the purview of others but certainly this proposed rule change addresses such a possibility.

Arthur Piccolo

Bowling Green Association, Inc.

212-809-1700

From: [Mardigras Production](#)
To: [SAPORules](#)
Subject: Attention Michael Carey
Date: Thursday, October 06, 2016 1:52:29 PM

Dear Director Carey;

My name is Arthur J Tisi. I have worked at Mardi Gras Festival Productions for 37 years.

I am extremely proud of the many Festivals we have been called upon to manage over the years. These street fairs provide family entertainment to both New Yorkers and tourists alike.

These New York City street fairs, especially those in Manhattan, provide an exciting (free) day out for a family of five who can't afford to see "The Lion King" and then go to dinner. These families come from each of the 5 boroughs and feel welcome. There are items they can afford to buy and inexpensive food they can enjoy.

I am against the new rules being proposed by CECM and I will give you my reasons.

- 1) I lived in lower Manhattan and was a street fair vendor and my wife lived in El Barrio. We met at a NYC street festival where she worked and on October 8th we will celebrate our 49th wedding Anniversary. As the new rules are written I would have to stay where I lived & she would have to stay where she lived, preventing us from being the loving grandparents we now are.
- 2) When then Mayor Edward I. Koch created S.A.P.O. the purpose was to help "not-for-profit groups and the like" to make some funds and stay afloat, it was not to torture them. I am proud that I was able to play a part in this effort so that these groups had the funds to exercise their First Amendment rights. We are sure that our now great Mayor Bill de Blasio will not allow this injustice to take place.
- 3) How many young people of color, who are first timers to retail, will you tell there is no place for them to display their merchandise or art. These new entrepreneurs can develop and perfect their trade for as little as one hundred dollars a day. We all know how expensive it would be to rent a retail space in NYC. Along with our Mayor let us continue to encourage those who are new to the business world.
- 4) Do these new vendors have to apologize to those who think they are not chic or high end enough? People, who live in the real world, know they must sell that which other people want to buy and not whatever someone, who never worked at retail, thinks they should sell.
- 5) Director Carey, part of the rules that prohibit street festivals between 42nd & 50th Street between 6th & 8th Avenue were in the rules for the 2016 festival season. You then knew this was an attempt for the B.I.D. to control the city streets and you wisely allowed festivals in these areas. Please don't allow a few to control, manage and destroy the lives of so many. Besides the new entrepreneurs who honorably make a living to feed and shelter their families, festivals in these areas assisted, for many years, in the recruitment of Minorities to the Police and Fire Departments.

All the best,

Arthur Tisi



Bailey House, Inc.
The Rand Harlan Center
for Housing, Wellness
and Community

1751 Park Ave
New York, NY 10035
Tel: (212) 633-2500 x455
Fax: (212) 633-2932
www.baileyhouse.org

 @baileyhouse
 facebook.com/baileyhouse

October 7, 2016

Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

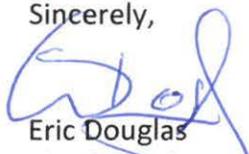
On behalf of all of us at Bailey House, and most importantly the residents of Bailey Holt-House located at 180 Christopher Street in the West Village, we respectfully submit this request to consider the amendments to the proposed rule changes for street fairs.

Bailey House has been the community sponsor for street fairs dating back more than 25 years and currently sponsors two street fairs each year. The income from these fairs helps the organization provide much needed services at Bailey-Holt House, a residential facility for formerly homeless people living with HIV/AIDS we have operated since 1986. The 46 residents of this facility are typically the most medically frail of the clients we serve, and the building is staffed 24/7 to help meet resident needs.

We are in strong favor of the proposed amendment to allow existing sponsoring organizations to continue to conduct two festivals this year. In addition, we support the amendment related to requiring 50% of participating vendors to have a business or local presence in the Community Board where the festival takes place to ensure that businesses that live or have a presence in New York be considered, coupled with the rule that a set number of exhibitor spaces be provided to local businesses or artists.

Street fairs are a lively part of New York City. While we understand the need to address issues arising from street fairs, particularly those in already congested areas, we are hopeful the amendments will be adopted. The livelihood of our clients is directly and favorably impacted by the income we receive as a community sponsor, and they are grateful for that. Thank you for considering our request.

Sincerely,



Eric Douglas
Chief Development Officer

October 21, 2016

Mr. Michael Paul Carey

Executive Director

Office of Citywide Coordination and Management

253 B'way., 6th floor,

New York, NY 10007

Dear Mr. Carey:

As the president of Or Olam Synagogue, a non-profit sponsor of a street fair on Lexington Avenue on the first Sunday in August for more than 20 years, I can attest to the importance of this fair to our organization and to the vendors who participate.

Our synagogue hosts an Alcoholics Anonymous meeting every Wednesday evening, at no cost to this non-denominational group. We also provide space for mentally disabled adults on Thursday evenings. Every December, we collect clothing and toys for tots for the indigent in homeless shelters. The proceeds from the street fair provide us with \$8-9 thousand dollars, much less than the initial amount we received before the economic recession of 2008.

Rents have risen so much in the immediate area of this fair. An art-framing store that had been around the corner from my residence, located on Third Avenue, between 55th and 56th Streets, was forced to move when the rent went from \$10,000 to \$18,000 per month. Very few small businesses can survive once their lease is up for renewal. They cannot afford to pay additional fees for the fairs.

A requirement to have an increase in local businesses as vendors, to justify the street fair, would be tantamount to eliminating the fair.

The vendors, most of whom are either artisans, immigrants trying to make a living, or jobbers selling discounted merchandise, are mostly New York City residents, dependent on tourists and other Manhattan residents willing to pay for their merchandise.

Even local businesses that are not participating directly in the street fairs benefit from the increased traffic on the streets during the fairs. A merchant who sells Indian-styled blouses and jewelry on Lexington Avenue, off of 56th Street, is always open during the street fair on Sunday because the owner benefits from the increase in potential customers.

Tourists and local residents enjoy the diversity of foods and other products offered at the fairs. Not every vendor is selling tube socks. However, some people must be buying those if the vendors are returning to the fair.

I have been not only staffed the sponsor table, but have also been a consumer. I've bought sun hats, sun glasses, spices, costume jewelry, and children's clothing from an artisan. Yet, I'm a frequent customer at Bloomingdale's, my neighborhood department store.

I hope that you will review this matter with the various community boards and not make a decision that is based on the experience of a few.

Thank you very much.

Sincerely,

Barbara Gerber-Krasner, Ph.D., President



114th Civ-OP, Inc.

31-38 29th Street, Bsmt. Astoria, New York 11106
Tel/Fax: (718) 728-8763 Email: bap114@aol.com



October 13, 2016

Michael P. Carey, Executive Director
Mayor's Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Dear Mr. Carey,

It has been brought to our attention that your office is in the process of establishing new rules for Street Festivals. We are very grateful to be allowed this time to express our concerns and opinions regarding this matter today.

114th Civ-OP, Inc. is a unique organization where volunteers serve as extra eyes and ears for the police without getting physically involved. They only observe and report what they see to the authorities. The group's efforts are specifically formulated to:

- a) Decrease crime activity or incidence of crime within the confines of the areas covered.
- b) Create a cleaner and safer quality of life within the community.
- c) Improve relations between our police and the community (to include residents, property and business owners, non-profit organizations and agencies, and religious establishments within our areas covered.)

We are a community sponsor for a smaller multi-block street fair (usually no more than 6 blocks). Proceeds from this event directly support National Night Out Against Crime in the 114th Precinct in our area. Every year National Night Out Against Crime is celebrated in neighborhoods across the city to highlight the importance of community groups and business associations working closely together with the New York City Police Department to help demonstrate their intolerance to crime. Participants include residents, property and business owners, non-profit organizations and agencies, and religious establishments. They give handouts, demonstrations, samples and presentations to attendees. Police Officers cook hot dogs, play games with children, and spectators get to learn about some of the wonderful resources available right in their own neighborhood. It is also a great venue for participants to network and learn more about each other. The event attracts over 2,000 people every year.

If the new rules are passed, all Community Boards will only be able to have 10 multi-block Street Fairs per year. This will cause great financial hardship to some non-profit organizations like ours, should they be denied a permit. Most sponsors in our District have been using proceeds from these street fairs to fund activities that improve their communities for years. Without these funds, the community loses. Based on your current proposal, excessive amounts of street fairs are noted to be held in just a few Manhattan Districts. Is it possible to make exceptions in some Community Boards that may slightly exceed your proposed amount based on individual circumstances in the community? For example, our organization's event is a smaller multi-block festival which requires less Police resources, and the proceeds are used to facilitate activities that foster improving community relations with our Police.

In addition, we feel that requiring a 50 percent presence of local participation is expecting too much. Local businesses are always invited to participate in our street festival for a reduced price. We have noticed that many of the businesses in the area where we hold our festival are closed on Sundays. We also invite local non-profit organizations to participate for free. We would embrace ideas and incentives the City could develop that would encourage more community participation, yet not cause a drastic drop in revenue from our much needed fund raiser event.

Thank you for your time and consideration with this matter.

Barbara A. Pollock

Barbara A. Pollock, Vice President

RECEIVED
OCT 18 2016



NEDERLANDER

October 18, 2016

To Whom It May Concern, The City of New York:

We support the rule revisions as proposed by The Office of Citywide Event Coordination and Management and the Street Activity Permit Office. Nederlander operates nine very busy Broadway theatres in the Times Square area, from 41st street to 52nd street. While we appreciate the value of street festivals to the culture of New York City, and encourage communities that would like to have them, it is incredibly difficult and counterproductive for our neighborhood, Community 5, Times Square, the smallest yet busiest in the city to host more than 10% of the festivals. We are continually concerned for our security and the security of our patrons, worry about our elderly and disabled patron's ability to access our theatres, and always have to remain diligent about potential damage to the historic and landmarked theatres we operate.

We continue to live in an active shooter environment with ongoing threats of terror on our democracy and way of life. With the amount of people already coming to the Times Square area for theatre, shopping and dining, the addition of closed streets and crowded festivals amplifies this incredible security concern. The New York City Police Department is heavily taxed and it is difficult for our theatre community to supplement the needed and necessary security to maintain a level of safety for our patrons. On a given Saturday we have 26,000 patrons making their way to our theatres. On the day of a street festival, many of them arrive late and will sometimes miss the show entirely due to traffic and parking. However, the large festival crowds appearing soft in target, are ideal for the active shooter and terrorist.

Closed and congested streets make it incredibly difficult for our elderly and disabled patrons. A guest that uses a walker or wheelchair would prefer to turn around and go home rather than fight the re-routed traffic to try to get close to the theatre. As you can imagine, walking extra blocks or using power for an electric wheelchair is also too taxing for these guests to cross festivals or circumnavigate them to get to the theatre. We value these guests and count their lost revenues when they cannot attend the theatres because of blocked or compromised access.

We continually worry, when festivals are near the historic theatres, about damage to the buildings. For example, the 46th Street festival last year placed a barbeque pit within 10 feet of the wooden front doors of the Lunt-Fontanne. Thankfully the Time Square Alliance was able to get it relocated, but a few floating embers could have been a disaster to the Lunt-Fontanne theatre, the Broadway theatre community, and the City of New York. Those setting up and striking the festival tents and equipment must do so quickly, and could easily, albeit accidentally, cause damage to one of our buildings.

Nearly each week of every summer, security, access, and the potential for damage to our buildings are just some of the problems we face during street festivals, which is why we support the new changes to Section 1043 of the New York City Charter. It will be important to limit the number of permits given in our neighborhood, while still allowing those communities who wish to have festivals participate. Nederlander is thankful for the consideration in this matter.

Bill Register
Vice President Operations
CC Tim Tompkins, President, Times Square Alliance



Ruben Diaz, Jr.
Borough President

BRONX COMMUNITY BOARD No. 10

3165 East Tremont Avenue • Bronx, New York 10461
Tel: (718) 892-1161 • Fax: (718) 863-6860
E-mail: bx10@cb.nyc.gov
[Facebook.com/BronxCommunityBoard10](https://www.facebook.com/BronxCommunityBoard10)
Website: www.nyc.gov/bronxcb10



Martin A. Prince
Chairperson

October 24, 2016

Via E-MAIL

Michael Paul Carey, Executive Director
Office of Citywide Coordination
And Management
253 Broadway, 6th Floor
New York, New York 10007

RE: Mayor’s Office of Citywide Event Coordination and Management
Street Activity Permit Office
Public Hearing to Comment on Proposed Rules

Dear Mr. Carey:

Bronx Community Board 10 submits the following comments for consideration at the above referenced Public Hearing offered in the form of a resolution which was unanimously approved at the October 20, 2016 meeting of Bronx Community Board 10:

“Resolved...That the Board submit written or oral testimony to the MAYOR’S OFFICE OF CITYWIDE EVENT COORDINATION AND MANAGEMENT’S STREET ACTIVITY PERMIT OFFICE regarding their proposed rules changes on or before October 24, 2016, the extended date for submission of written comments. Specifically, the Committee urges SAPO to remove the wording of “citywide” and replace it with “at the discretion of the Community Board”, and to replace the month of “November” with the month of “October” for the application time frame due to the holiday season. To define “block parties” as distinct events from “street festivals” (which have a commercial focus) and to give community boards discretion over approving “block parties”.

Thank you for your kind consideration of our comments.

Sincerely,

Martin Prince, Chairman
Bronx Community Board 10

C/101



BROOKLYN COMMUNITY BOARD 13
1201 Surf Avenue – 3rd Fl., Brooklyn, NY 11224
(718) 266-3001 FAX (718) 266-3920
<http://www.nyc.gov/html/bkncb13>

ERIC ADAMS
Borough President
JOANN WEISS
Chairperson
EDDIE MARK
District Manager

STATEMENT TO BE INCLUDED IN PUBLIC HEARING
RECORD ON PROPOSED RULES
MAYOR'S OFFICE OF CITYWIDE EVENT COORDINATION
AND MANAGEMENT
October 13, 2016

Brooklyn Community Board 13 was unable to attend this important Public Hearing due to a scheduling conflict. However, we would like to go on record as opposing the proposed changes.

Due to unusually short timeframe which did not allow meaningful input as the community boards require at least 45 days advance notice, we were unable to bring this matter before our complete community board membership.

On October 6, 2016, Brooklyn Community Board 13's Street Closing Committee met in emergency session and after lengthy discussion it was decided that SAPO's proposed rule changes for Street Fairs would definitely have negative effects on our community.

1. If the moratorium on new street fairs are lifted, our community board will be inundated with requests by outside promoters, who prior to the moratorium found that our area to be a very lucrative site for their events. We are also concerned with the tension that would be created when CBOs would be competing for a limited number of permits, some would be able to continue to sponsor events and some would not.
2. Due to the nature of our seaside communities (boardwalk, amusements and beach venues), Coney Island and Brighton Beach have become home to many "citywide events". If these events are counted in our permitted number, community based organizations will find themselves being prevented from having events, which they have used, in the past, to generate funds for their organizations.
3. The increase in the fees associated with permits will definitely put a strain on the already financially taxed community based organizations that wish to have events, thus opening up for private promoters to bring out of the area vendors into our community and thus take away much needed funds.
4. Finally, the definitions of the types of street fairs are not clear and will complicate the process by perhaps having applicants apply for the wrong permit and thereby lengthening the permit process.

We understand the need to reassess existing rules but we believe that this reassessment should occur in consultation with individual community boards, not without our input. We would like the rules for street fairs to be practical and to benefit our community. This cannot be done without community board input.

Please consider our statements and concerns and before you approve the proposed changes, you reconsider the changes and include the community boards in the process which will go a long way to obtain viable solutions.

Thank you for the opportunity to submit this statement.



BROOKLYN COMMUNITY BOARD 14
FLATBUSH–MIDWOOD COMMUNITY DISTRICT
810 East 16th Street
Brooklyn, New York 11230

ERIC ADAMS
Borough President

ALVIN M. BERK
Chairman

SHAWN CAMPBELL
District Manager

To: Michael Carey, Director, Mayor's Office of Citywide Event Coordination and Management
Dawn Tolson, Director, Street Activity Permit Office

From: Alvin M. Berk, Chairman, Brooklyn Community Board 14
Shawn Campbell, District Manager, Brooklyn Community Board 14

Date: October 13, 2016

Re: Comments on The Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management (OCECM) proposed rules for Street Festivals.

Currently Community Board 14 hosts four multi-block street events, and one Single Block Festival per year (which had also been a multi-block event for 20 years prior to 2013. Testimony from the 2015 moratorium hearing is attached as explanation). In addition, we consider approximately 70 applications for block parties, farmers markets, religious events, sidewalk sales, and containers, to name some. Community Board 14 has typically approved over 95% of all applications submitted for our consideration. There are additional events and street uses that do not come before the Community Board for recommendation including demonstrations, street openings for construction and utility repair, and so far in 2016 nearly 150 film crews.

Up until this year SAPO has always upheld our recommendations. However, in 2016 our recommendation to deny was overturned three times. Given the careful consideration of all activities and group dynamics in our community, our close consultation with the 70th Police Precinct, and the growing number of applications, this emerging trend is alarming.

- Therefore, there must be more specificity in the role of the Community Board and the local Police Precincts in the application process, which underscores our important on the ground perspective. (§1-04 Submitting and Processing of Applications, (b), (c) and (3)(g));
- Include Community Boards and Police Precincts in all site visits (§1-01 (h));
- Include Community Boards and Police Precincts in all denial conferences (§1-06 of Title 50 a,b);
- Require applicants to acknowledge conditions, to ensure receipt and understanding and intention to comply;
- Require SAPO to notify the Community Board upon receipt of any comments submitted by an application in response to a denial or conditions;

Accountability and Transparency

- Add steps that SAPO/CECM shall take when their approval or denial of a permit application does not align with Community Board and/or Police Precinct recommendations. The proposed rules should require SAPO to enumerate reasons for overruling a Community Board and/or Police Precinct recommendation. Community Boards and local Precincts must have an opportunity to appeal in these cases;
- Add a requirement that in cases where SAPO/CECEM makes significant exceptions to any rules governing street activities applications, the reasons for the exceptions shall be provided in writing to the relevant community board and police precinct.

We appreciate the efforts of the Citywide Event Coordination and Management and the Street Activity Permit Offices to strike the right balance between community interest in broadening access to street festivals and the government's role to consider the wishes of the community and balance those wishes with the need to prioritize and balance resource distribution.

For the past several years CECM has maintained a moratorium on multi-block festivals based on the assertion that there was a need to curb New York City Police Department overtime.

However, this argument coincides with a parallel decision by the City to enable applications from Department of Transportation for multi-block events called Weekend Walks. Like street fairs, Weekend Walks typically require extensive police presence.

- Therefore, the rules must be explicit about where DOT events such as Weekend Walks and Plaza events, fit into all aspects of the rules;
- ((§1-01 (e)) Provide clarity on the number of **all** street activities SAPO includes in determining limits per community sponsor and limits per community district. Totals must take into consideration all events in a community for which streets are closed including: DOT weekend walks, block parties, religious events, film permits, major capital projects, etc. These limits should be considered with maximum Community Board and NYPD input. The local perspective is very important here since some districts host more street festivals, others have more commercial corridors that lend themselves to Weekend Walks and some districts more film shoots, or religious events, etc.

Given the disproportionate occurrence of street activities in the City, it seems that any amendment to the current rules might not address the need to balance community events and city resources fairly across boroughs and communities. Rather, a paradigm shift that reorganizes permitting approval responsibilities to respective Boroughs, rather than a centralized permitting system might do better to assure that events are more closely tied to the communities which host them.

- Rules changes, short of such a shift, should allow each Community Board in consultation with local Police Precincts where appropriate, to set further limits on the number of events in each Community District;
- It is imperative that there be limits on the number of times particular streets can be closed for all activities. Closing major thoroughfares causes greater traffic impacts, and should be limited with maximum input from Community Boards and local Police Precincts.

Ensuring maximum Community Board and Police Precinct input on all aspects of the street activity permit process as well as numeric and location limits will assist CECM in addressing a broadly expressed concern by myriad groups that the proposed rules seem too “cookie-cutter” and do not address local community concerns in many, if not most, of the outer borough neighborhoods.

Additional details within the proposal that CECM has put forth are in need of clarification and thoughtful change. They are noted below:

THE PROPOSED RULE

The requirement that at least 50% of vendors have a local business/presence within the community board might have the unintended consequence of stifling creative events such as arts walks. In addition, this proposal does not recognize that the commercial mix of some blocks (those that include dry cleaners, accounting offices, law firms, etc.) might not lend well to street events.

§1-01 Applicability and Definitions

“Community Sponsor” - the documentation required to prove status should be denoted in this section. The terms are “headquartered” and have an “indigenous relationship” are both used in the text. Are these interchangeable definitions? The Community Board must have a role in determining the authenticity of the organization’s relationship to the community.

§1-03 Application Requirements and Deadlines

- (c) (5) – clarify plans – is the requirement for schematic plans? What level of detail is required?
- (d) (5) – Farmer’s market ...must be submitted 60 days prior to the first day of the event dates.
- (f) ...must allow for a 15 foot wide emergency vehicle lane.
- (g) Applicants may obtain paper copies at SAPO offices or at Community Board offices.

§1-04 Submitting and Processing of Applications

- (2) When two competing applications are being considered, the application that is submitted with all required documentation shall be eligible for approval.

Page 9

- (k) How is the 90% cost to process the application calculated? What costs are included? Ensure that the formula is transparent.

Thank you for taking our comments, which put the needs of our community first, into your careful consideration.

Respectfully Submitted,

Alvin M. Berk



Chairman

Shawn Campbell



District Manager



BROOKLYN COMMUNITY BOARD 14
FLATBUSH–MIDWOOD COMMUNITY DISTRICT
810 East 16th Street
Brooklyn, New York 11230

ERIC ADAMS
Borough President

ALVIN M. BERK
Chairman

SHAWN CAMPBELL
District Manager

November 19, 2015

Emil Lissauer
Deputy Executive Director
Office of Citywide Event Coordination & Management
100 Gold Street, 2nd Floor
New York, NY 10038

Dear Mr. Lissauer,

Please accept this testimony on behalf of Brooklyn Community Board 14, in opposition to the proposed amendment by the Street Activity Permit Office (SAPO) and the Citywide Event Coordination and Management (OCECM) that would extend through Calendar Year 2015 an existing moratorium on applications for new or expanded street fairs.

The existing moratorium is rationalized by asserting a need to curb the use of New York City Police Department overtime. Our objection to this argument is that the decision to impose a blanket moratorium on street fair applications coincides with a parallel decision by the City, through its Department of Transportation (DOT), to enable applications for comparable multi-block events under the rubric of a DOT program called Weekend Walks. Like street fairs, Weekend Walks typically require extensive (and expensive) police presence and sanitation services, as well as, frequently, the rerouting of buses. We assert that the costs of street fairs and Weekend Walks may be similar in many instances, depending on the details of a specific event. These costs can be estimated through the application process, enabling each event to be evaluated individually.

Unlike street fairs, Weekend Walks prohibit participation by local vendors who do not have storefronts within the event boundaries, or by visiting vendors who may wish to offer goods and services not otherwise locally available, e.g., ethnic food, artisanal crafts, or art works. In some ethnic communities, such as the South Asian community in Brooklyn Community District 14, Weekend Walks are inconsistent with their needs. A moratorium on street fair applications can constitute a barrier to efforts by such minority groups to celebrate their cultures of origin.

It is difficult to rationalize a blanket rule denying one group the right to submit a street fair application while enabling submission of a Weekend Walk application by another group, particularly when the tools exist to evaluate each application on its individual merits.

In addition the current moratorium has been applied inappropriately in CD 14. For the past three years the street fair moratorium was applied to the only ethnic-themed event in the community. That event, the annual Pakistani American Merchants Association's festival, had been approved for over 20 years as a multi-block event, but had been re-classified as a single block party in 2013 due to the applicant's failure to meet a paperwork submission deadline. When the applicant sought to restore the event to its historic format, the application was rejected under the street fair moratorium.

Without such a blanket moratorium, the Community Board could still recommend denial of applications in consultation with the local Police Precinct on the basis of focused, local needs and concerns, rather than because of a wholesale, citywide, blanket moratorium. Such a blanket moratorium is anathema to the tenets of community board input. Without a moratorium, SAPO would still retain the ability to deny applications.

We therefore request that the moratorium on street fairs be allowed to sunset on December 31, 2015.

Thank you for your consideration.

Sincerely,



Shawn Alyse Campbell
District Manager



Alvin M. Berk
Chairman

cc: Hon. Eric Adams
Hon. Mathieu Eugene
Hon. Jumaane Williams
Hon. Chaim Deutsch
Hon. David Greenfield

From: [Carol Schachter](#)
To: [SAPORules](#)
Subject: Testimony for October 13 hearing
Date: Monday, October 10, 2016 5:57:40 PM
Attachments: [Testimony October 12, 2016.odt](#)

Attached is testimony from me on behalf of the 13th Precinct Community Council and Gramercy Neighborhood Associates.

My contact information is as follows:

Carol Schachter, 201 East 17 Street, Apt. 3B, New York, N.Y. 10003 cell: 917 622-5601 e-mail: cschachter@hotmail.com

I will be attending the hearing to render this testimony in person. Thank you.

Carol Schachter

Testimony at SAPO Hearing Thursday, October 13, 2016 100 Church Street, NYC 10:00 A.M.

Given by: Carol Schachter

On Behalf of: 13th Precinct Community Council and Gramercy Neighborhood Associates, Inc.

Good morning and thank you for the opportunity to speak today about the proposed Street Fair regulations.

For decades, I have worked with and for community organizations which obtain revenues from local street fairs. I am a past president of the Stuyvesant Park Neighborhood Association and am currently with the two organizations above. I have been members of other neighborhood organizations for many years as well. For example, I am one of the five founders of 1000 Plus Friends of Parks.

To suggest that 50% of vendors be part of the proposed structure is highly unrealistic. A simple walk down the avenues in question would provide you with knowledge of who is there now in the absence of mom and pop stores. I'm thinking Duane Reade, CVS, Starbucks and TD Bank as a few examples. Why would TD Bank, which is headquartered in Canada, wish to participate in a local venue? I have tried and failed. And I am sure our promoter has also tried local business people over all these years to no avail.

The vendors come from New York City by and large. This has been the case from the beginning. Decades ago there were participating restaurants. I remember Mariella's huge pizza which was given away to charity at the day's end. Mariella's is out of business. My own stretch of Third Avenue is like a ghost town now and even the medical center doesn't accept my health insurance!

For the 13th Precinct Community Council, we depend upon street fair revenues for our Night Out Against Crime. When the school gates open at five p.m., tons of families pour in to get our annual giveaways and enjoy face painters, clowns, food and a Tumble House. All of this would not be possible without street fair revenue.

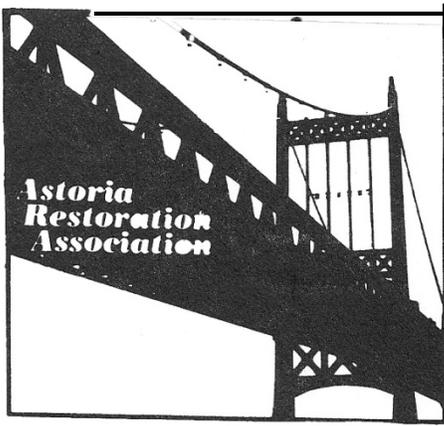
For GNA, as an example, we do an annual Clean and Green at a local park and provide free books about our community. Again, street fair revenues provide a path where we can be not only present but contribute to our neighborhood.

Street fairs are lovely in that neighbors come out and visit our tables to sign up for membership and catch up with events....or just say hello. Our organizations have a presence there which evokes the days of conversations. Today we live in a virtual world where one on one conversations are becoming obsolete. These fairs go against that grain and provide our neighbors with information. As an example, the 13th Precinct got massive feedback about the WiFi stations and their effect on the community. This would not have happened without an open discussion at our street fair which was timely and vital. And which produced results.

I am proud to represent my community affiliations, and I know that many other organizations will speak as I do. I was chair of Community Board Six from 2004 to 2006, and was also chair of its Business Affairs and Street Activities Committee for years. In that regard, the board monitored the organizations having their fairs. In fact, many CB6 members are active in their organizations, and a few of them are even founders!

We must remember too that some of these organizations were highly responsible for putting our present politicians in office! And so I hope that 2017 brings no change to the proposed regulations so that all community organizations can continue to do what they do best with revenues obtained as a result of their street fairs which bring excitement, color, fun and knowledge to and for our neighborhoods.

Thank you.



**31- 28 Ditmars Boulevard
Astoria, New York 11105
718-726-0034**

Response to Change in SAPO rules for Street Festivals

October 14, 2016
Michael Carey
C/O Citywide Event Coordination and Management
253 Broadway, 6th floor
New York, NY 10007

Dear Mr. Carey,

The Astoria Restoration Association is a non-profit community group located in Northwest, Queens. We had our first Street Festival on September 16, 1979 on 31Street. We have sponsored street festivals ever since. They are fun and highlight the neighborhood and the commercial street.

The imposition of having at least 50% participating vendors having a business in the same community board will decimate my Street Festival. The Ditmars-31 Street commercial area has changed a lot over the years. Now it is mostly made up of restaurants, beauty and nail parlors, real estate agents and banks. Over the 35 years I have been doing these festivals I have learned that local participation is haphazard at best. Those on the block(s) of the festival do not need to be vendors on the street. They are already there. Surrounding restaurants do not need to or want to come on to the street. They get the benefits of the crowd, without the logistical problems in food preparation and service. Nail and beauty salons do not care. Real estate agents are showing properties on Sundays, and the banks have gone from being major sponsors in my area, to only wanting to know if I will open an account. This proposal will not stimulate business; just curtail our pool of potential vendors. Festivals were and are, I hope, known for bringing in something new and different *for a day*; different kinds of merchandise and food items. Local merchants can participate, but why should local non-profits have to insure their participation. The street festival is for the community. All businesses in the area benefit by the event, because the residents, potential customers and the tax-payers of our neighborhood do come out to enjoy this event. It reinforces the vibrancy of our commercial area and brings in new potential shoppers.

The flat fee will kill all the festivals and make them not worth doing. \$1375 for one block! Some years I have barely made \$2000 after expenses. What happens if the forecast is bad, without rain dates, most vendors now wait until the last minute. We still owe you \$1375?

Street Festivals are community events and in my case a modest fundraiser. Your rules changes will make it impossible for us. Please do not enact these changes.

Sincerely,

Catherine Picora

Catherine Picora
Executive Director



CHILDREN'S LEUKEMIA RESEARCH ASSOCIATION, INC.

585 STEWART AVENUE • SUITE LL18 • GARDEN CITY, NY 11530 • (516) 222-1944



RESEARCH GRANTS

University of Arizona
Baltimore Cancer Research Center, MD
Boston University Medical Center, MA
Brookhaven National Laboratory
University of California, Irvine, CA
Cancer and Leukemia Group B
Case Western Reserve
University of Chicago, IL
Children's Hospital, Ohio
Dana Farber Cancer Institute, MA
Dartmouth Medical School, NH
Sidney Farber Cancer Institute, Boston, MA
Medical College of Georgia, Augusta, GA
Donald Guthrie Foundation for Medical Research, Sayre, PA
Emory University, GA
Harbor General Hospital, UCLA Medical School, CA
Fred Hutchinson Cancer Research Center, Seattle, WA
Jewish Hospital of St. Louis, MO
Long Island Jewish-Hillside Medical Center, NY
Mt. Sinai Hospital, NY
Maimonides Hospital
University of Maryland, Baltimore Cancer Research Center
The Medical College of Wisconsin, Milwaukee
Mercy Hospital
University of Michigan, Ann Arbor
University of Minnesota, St. Paul
University of Minnesota, Minneapolis
Montefiore Hospital
National Institute of Health, Bethesda, MD
New England Medical Center Hospital, Boston, MA
University of New Mexico
New York Medical College
New York University Medical Center, NY
University of Oregon Health Sciences Center, OR
Palo Alto Medical Research Foundation
University of Pennsylvania, PA
Queens Hospital Center
University of Pittsburgh, PA
Rockefeller University, NY
Rutgers University
The Salk Institute, San Diego, CA
Scripps Clinic & Research Foundation, La Jolla, CA
Sloan Kettering Cancer Center, NY
Stanford University Hospital, CA
Stanford University Medical Center, CA
Tufts University, New England Medical Center, MA
University of Texas Medical Branch, Galveston, TX
University of Utah, UT
University of Virginia, VA
Washington University, St. Louis, MO
Yale University

FELLOWSHIPS

Medical College of Georgia, Augusta, GA
The Rockefeller University, NY
Memorial Sloan Kettering Cancer Center, NY
Fred Hutchinson Cancer Research Center, Seattle, WA
Sloan Kettering Cancer Center, NY
Sidney Farber Cancer Institute, Boston, MA
Stanford University Medical Center, CA
Stanford University Hospital, CA
Baltimore Cancer Research Center, MD
New England Medical Center Hospital, Boston, MA
University of Maryland, Baltimore Cancer Research Center
New England Medical Center Hospital, Boston, MA
The Salk Institute, San Diego, CA
University of Pennsylvania, PA
New England Medical Center Hospital, MA

SPECIAL PROJECTS

Baltimore Cancer Research Program, Univ. of Maryland, MD
National Institute of Health, Bethesda, MD

October 7, 2016

Michael Paul Carey, Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

I would like to express my concern regarding OCECM/SAPO public hearing on October 13, 2016 regarding changes to the proposed NYC Street Fair Rules.

Mardi Gras Festival Productions, Ltd. has been sponsoring this annual event for CLRA for over twenty years. We are a small non-profit organization that provides yearly Research Grants to Doctors working towards finding a cure for Leukemia. We awarded a Research Grant to Dr. Hans Guido Wendell at Memorial Sloan Kettering, NYC in 2016. We also provide financial patient aid to families for their medical bills and prescription medication copays. Many of these families live in NYC.

I do not feel that the proposed changes will be beneficial to organizations such as Children's Leukemia Research Association nor the NYC Community as a whole.

Thank you for your time.

Sincerely,

Anthony R. Pasqua
President

Fifty Years of Dedication to Scientific Research and Patient Aid For Families In Need.

The latest Annual Report of the Association is available at the above address, or by writing to Dept. of State, Charities Registration, Albany, NY 12231

www.info@childrensleukemia.org



Heritage of Pride, Inc.



Heritage of Pride, Inc., 154 Christopher St., #1D, New York, NY 10014 •
Telephone: 212.80.PRIDE • Fax: 212.807.7436 • Web: <http://www.nycpride.org>

Michael Carey
Executive Director of the Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

October 19, 2016

Dear Mr. Carey,

As a small 501c3 volunteer managed non-profit that works tirelessly to increase the visibility for small non-profits around the country, NYC Pride's PrideFest has become one of the longest running LGBT street festivals in the world. Each year our community comes together to commemorate the Stonewall Riots that took place on Christopher Street in June of 1969. This moment in time led to the modern LGBT rights movement around the world and further accelerated our path to equality.

PrideFest, located in Council Member Corey Johnson's district and Community Board 2, has grown to become one of the largest LGBT events in the country with vendors from all over the world. NYC Pride has grown its roster of events from 5 to 13 and include events such as OutCinema, Family Movie Night, the legendary March, and many more. A study done by the Empire State Development Corporation, found that NYC Pride Week as a whole brought in roughly 11.8 million to New York City taxes and over \$277 million in economic activity for New York City in 2016. Also, PrideFest continues to be one of the few opportunities for LGBT non-profits from all over the country to come together to raise awareness about their organization and help raise needed funds to keep their doors open.

Additionally, we have vendors from all over New York State that look forward to vending at PrideFest because it remains as the only LGBT centric street festival in Manhattan. Small businesses that have LGBT centric products have a limited means to sell their products to a mass LGBT audience and PrideFest has continued to be the best opportunity to help these small businesses raise crucial revenue.

The proposed rules by the city will further strain necessary revenue for various national LGBT non-profits, small businesses, and non-profits outside of the New York City area by putting a limitation on how many vendors outside of our Community Board can be present at our events. There could be a drastic reduction in non-profits permitted to raise the needed funds for their operations. Whether it's community organizations that are helping to raise awareness about teen suicide, non-profits that are working to expand LGBT rights in the workplace, or organizations that are helping to take LGBT teens off the street, mandatory caps on vendors outside of our Community Board will cripple their ability to speak about the important matters that face our community.

Additionally, there would be an additional hardship imposed on NYC Pride by the registration submission deadline increased from 1 week to 30 days. Over 35% of our submissions are last minute and would or could hurt our revenue moving forward. This revenue is crucial in helping us to continue to grow our community grant program. A program that provides working grants to small needy LGBT non-profits in the local New York City area. Over \$1 million in grants has been awarded to other community organizations since NYC Pride started the program. The overall changes to these street fair rules drastically would reduce our ability to grow or sustain the program in future years.

Organizer & Producer of New York City's Lesbian, Gay, Bisexual, Transgender Pride
Rally, March, PrideFest & Dance



NYC Pride / Heritage of Pride is opposed to further restraints put on the number of vendors outside of our Community Board and continue to believe that our organization produces a well-balanced well-produced event that brings vendors from all over the world for this worldwide event. We look forward to working with the city on how to continue to make PrideFest bigger and better as we approach the 50th anniversary of the Stonewall Riots as we also host WorldPride in 2019.

Best,

Chris Frederick
Managing Director
Chrisf@nycpride.org
212-989-2145

Lori Fine
PrideFest Director, Executive Board
Lori@nycpride.org

CC: Matt Johnson - Folsom Street East, Councilwoman - Rosie Mendez, Councilman - Jimmy Van Bramer, Councilman- Daniel Dromm, Councilman - Corey Johnson, Councilman - Ritchie Torres, Councilman – Carlos Menchaca, Scott Melvin – New York State Department of Labor, Glendda Testone – Executive Director of the New York LGBT Center, Dave Studinski – Co-Chair NYC Pride, Maryanne Roberto – Co-Chair NYC Pride

DISTRICT OFFICE:
165 PARK ROW, SUITE 11
NEW YORK, NY 10038
212-587-3159
FAX: (212) 587-3158

CITY HALL OFFICE:
250 BROADWAY, SUITE 1882
NEW YORK, NY 10007
(212) 788-7259
chin@council.nyc.gov



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THE CITY OF NEW YORK
MARGARET S. CHIN
COUNCIL MEMBER, 1ST DISTRICT, MANHATTAN

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YOUTH SERVICES

**Testimony Regarding Proposed Changes to Street Festival Rules by the Mayor's Office of
Citywide Event Coordination and Management**
Council Member Margaret S. Chin
October 27, 2016

I am Council Member Margaret S. Chin. I have the privilege to represent a Council district that includes Manhattan's Community Boards 1, 2, and 3. I want to thank the Executive Director of the Office of Citywide Event Coordination and Management (CECM), Michael Paul Carey, and the Director of the Street Activity Permit Office (SAPO), Dawn Tolson, for the opportunity to provide testimony in regards to this crucial rule change. Furthermore, I appreciate CECM's acknowledgement of the timing needs of our Community Boards by extending the deadline to October 27th.

I commend CECM's intent behind the proposed changes to the street festival rules. I represent Community Board 2, which is one of the most popular community districts for street activities. While I understand the need to strike a delicate balance between the quality of life concerns of residents and the benefits that street fairs offer to nonprofit and community groups, I echo the concerns of multiple community boards, including Community Board 2, about the proposed rule changes.

The proposed change caps the number of permits available to each community board to 10 permits, while only granting a total of 100 permits for the entire borough of Manhattan. Community Board 1 itself hosts up to six annual street festivals to raise essential funds for staff members and other community needs. These street festivals do not include the ones that local nonprofits sponsor. Community Board 2 experienced 22 street festivals last year – 12 more than what the new rules will allow. These two community boards alone would make up over a quarter of the permits allocated to Manhattan. Furthermore, with 12 community boards in Manhattan, each community board would not be able to take full advantage of the 10 street festivals that each community district is allowed, if the cap is put in place.

The structure of community boards require at least one month for the board to review and to approve or disapprove an application for a street fair. For many event types, such as health fairs, Level B plaza events, and medium street events, the deadline to apply is 30 days or less. The proposed changes to street festival rules would preclude a community board's ability to provide comment on street festivals, which is antithetical to a neighborhood-oriented permitting process. I hope that CECM can ensure that all street permits, except for 1st Amendment protected activities, will have at least a 45-day deadline ensure meaningful community input.

Nonprofit organizations also reached out to me with concerns about the 50 percent local vendor requirement, the fee structure, and the requirement to have vendor information 30 days before

the event. In regards to the local requirement, the Kehila Kedosha Janina synagogue hosts the Greek Jewish festival every year in the Lower East Side. Even though most of the Greek Jewish residents moved out of this neighborhood years ago, vendors and residents come back every year for this festival. Unfortunately, the 50 percent local vendor rule would block congregations like Kehila Kedosha Janina with geographically disperse congregations from holding these important events.

Furthermore, the proposed fee structure creates far too many hurdles for small nonprofits that depend on the revenue street fairs provide. Smaller nonprofits continue to tell me that the \$1,375 per day, per block fee for the first day and \$705 per day per block for any subsequent days would be too much to pay. Even though there is a waiver provision, the waiver only refunds the fee that is already paid, and does nothing to prevent the chilling effect such steep fees would no doubt engender in the community of smaller nonprofits.

Lastly, the proposed rule requires the host of a street festival to provide vendor information within 30 days. Vendors are generally unable to confirm its participation due to a number of factors, including weather, staff schedules, and conflicting events. In addition to the 50 percent local vendor requirement, this rule will be an undue burden for any street festival host.

While I will acknowledge that too many street festivals within one community district can be overly burdensome for residents, community approved street festivals can provide vibrancy to the neighborhood and ensure financial stability for community groups and local nonprofits. This rule will overburden the organizations that need street festivals the most.

Once again, I want to thank Executive Director Carey and Director Tolson for the opportunity to testify. I hope to continue working with CECM to ensure rules that are fair to residents and local organizations alike.

Thank you.

COREY JOHNSON
COUNCIL MEMBER, DISTRICT 3

DISTRICT OFFICE
224 WEST 30TH STREET – SUITE 1206
NEW YORK, NY 10001
TEL: (212) 564-7757
FAX: (212) 564-7347

CITY HALL OFFICE
250 BROADWAY - SUITE 1804
NEW YORK, NY 10007
(212) 788-6979



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October 27, 2016

Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

I am writing to share my feedback on the rule changes proposed by the Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management (OCECM) regarding the issuance of permits on city streets.

I support changes to the current rules, which are flawed in many respects. For example, the current rules do not sufficiently encourage participation by local vendors or variety between events. Also, currently, not-for-profit organizations that sponsor and benefit from our street fairs often lack an indigenous relationship with local communities.

However, after hearing from many constituents, community boards and local not-for-profit organizations about this issue, I have a number of concerns.

My comments on the proposed rule change are as follows:

1. 50% Local Vendor Participation Requirement

While I believe that a goal of 50% local vendor participation is laudable, it has been expressed by many that that this requirement would be onerous and unrealistic for many street fairs. If SAPO and OCECM implement a local vendor requirement, I urge you to consider the feedback of community boards and show flexibility in cases when this requirement cannot be met.

2. Permit Fee Increase

While I understand that a revised fee structure is needed to support certain events, a flat fee of \$1,375 would be cost prohibitive for many smaller organizations and smaller festivals that occur on narrow streets. The current structure, based on a percentage of proceeds, is fairer to smaller organizations and festivals. If this new fee structure is implemented, I ask that you make exceptions not-for-profit organizations that cannot afford to pay the new, higher fees.

3. Cap on Street Festivals

For decades, local not-for-profits such as block associations have benefited from street fair proceeds. The money raised is critical in helping them perform activities like enhancing our neighborhoods, promoting civic engagement and giving residents an avenue to organize around important community issues. Significantly reducing the number of street fairs could force even more not-for-profits to accept mergers of their events, resulting in a reduction in revenue for important local community groups. I urge SAPO and OCECM to work closely with not-for-profit organizations to ensure that any rules changes work for them, not against them.

4. Flea Markets

Weekly flea markets such as the Hell's Kitchen Flea Market should be exempt from the 50% local vendor requirement. A weekly operating schedule and a focus on antiques and artisans from the five boroughs and beyond makes this requirement unreachable for Hell's Kitchen Flea Market. The proposed 12 hour time limit would also be problematic for the Hell's Kitchen Flea Market, as its vendors need time to carefully load and unload large antiques.

5. Community Board Review

Community board review of street permit applications involves a committee hearing that is publicized on a board's public calendar, followed by a resolution that must be adopted at a full board meeting. In order for this to happen, a minimum 45-day time frame is necessary.

I greatly appreciate your attention to the issues I've have outlined in this letter and look forward to working with SAPO and OCECM on these rules changes. I hope the proposed rules will foster greater community-based activity on our streets.

Sincerely,



Corey Johnson
Council Member, District 3

CC: Community Board 2, District Manager, Bob Gormley
Community Board 4, District Manager, Jesse Bodine
Community Board 5, District Manager, Wally Rubin
Community Board 7, District Manager, Penny Ryan

- On weekends, taxi drop-offs are more clustered around Times Square than on weekdays (mostly due to theater and hotel-goers).
- Times Square’s concentration of entertainment options, totaling 64,409 seats (47,635 Broadway seats; 7,851 movie theater seats; and 8,923 comedy club, off-Broadway, music hall and attraction seats) make it much busier on weekends than virtually any other neighborhood, both day and night.
- **Yet despite the intensity of weekend activity, Times Square has a disproportionate number of street fairs.**
 - Community Board 5 has 30% of all Manhattan street fairs.
 - Times Square is 11.8% of Community Board 5, but has 51% of CB5’s multi-block street fairs.
 - Times Square represents one-tenth of one percent (.1%) of the city’s land area, yet has ten percent (10%) of all street fairs citywide.
- **Making visitors to the city needlessly exasperated threatens thousands of jobs and millions in net new spending.**
 - The very people inconvenienced by street closures who come to NYC to visit Times Square’s hotels, theaters and restaurants on weekends brings net new dollars – and tens of thousands of jobs -- to NYC’s economy.
 - Times Square’s actors, stagehands, musicians, hotel workers, and restaurant employees all depend on Times Square’s thriving tourist economy, which supports 354,000 jobs and \$5.5 billion in state and city tax revenues.
 - If there is a terrorist incident, response times for emergency vehicles will be severely impaired.

Times Square’s unique circumstances as I have just articulated leads us to a proposal that, for streets or avenues determined to be “excessively burdened,” the City should engage in an additional analysis to determine if such locations are appropriate for street fairs. Streets should be deemed “excessively burdened” if they meet two of the following criteria:

1. Streets have the highest amount of traffic under normal, non-closure conditions, relative to comparable streets
2. Streets which feed directly into at least three streets with a disproportionate number of hotel, entertainment, and transit uses that have significant egress needs
3. Streets in community districts with a disproportionate number of street fairs
4. Streets which the NYPD determines as having specific security and emergency response requirements

It is essential to allow communities that want and welcome specific street fairs to have more of them. Many neighborhoods want street fairs. One way to assist street fair producers and neighborhood non-profits they support is to allow either the 50% local requirement or the cap per community board to be waived or reduced with respect to a proposed street fair if three or more of the following request it:

- The Community Board
- The local Councilmember(s)
- The Borough President
- The BID where the fair would take place

It is also important that we close potential loopholes that could distort the intended impact of the rules. Several provisions are needed to ensure that the rules fulfill their intention:

- Street fairs on a street or avenue that borders two community boards should count towards the total cap for both districts. For example, an 8th Avenue street fair results in significant traffic displacement for both 6th Avenue and 10th Avenue traffic.
- Multi-block street fairs in Manhattan should not be longer than the distance between major two-way thoroughfares (eg 34th, 42nd, 57th Streets). No multi-block street segment between such thoroughfares should be used more than once per year, nor should any single-block be closed for a street fair more than twice a year. If there is a street fair on or next to a block with a 500+ seat theater, it must be cleared by 7 pm.

- Require street fair producers to disclose gross revenues and actual amounts contributed to affiliated non-profits for each street fair.
- Where nighttime street closures create an excessive burden, such closures should end no later than 7 p.m.
- CECM after consultation with the Community (Community Board and BID) determines the footprint and final location of the Street Fair, not the Event Producer and Sponsor.

The Alliance recognizes that street fairs play an important role in the fabric of New York City and we appreciate the support that non-profit organizations often receive from these events. In no way do we seek to prevent such organizations from raising funds through street fairs. However, we must balance the needs of those groups with the need to maintain safe pedestrian and vehicular access to core areas of the city.

Thank you for the opportunity to testify.

Make Street Fairs Fair: Times Square and Street Closures – The Facts

Street fairs, which may be desirable in many neighborhoods, completely overwhelm ours

Street fairs in Times Square create an excessive burden on an already overburdened neighborhood. Near-weekly street closures have caused extreme congestion, hurt local businesses and overwhelmed the area. In defiance of common sense, the part of the City which is the busiest and among the most traffic-congested on weekends has more street fairs than any other.

Street fairs can be positive in many instances and are welcomed and wanted in many neighborhoods. They sometimes benefit worthy non-profits. However, **the disproportionately high number of fairs in the Times Square area negatively impacts, rather than benefits, our community.**

We applaud the City for seeking a more equitable distribution of street fairs. We think the rules need to be modified in some important ways to reflect the concerns of other neighborhoods and non-profits, but agree that the current system is too driven by a handful of large, for-profit commercial producers, rather than the needs and concerns of neighborhoods. In addition, the Alliance is willing to work with the legitimate neighborhood non-profits affected by potential rule changes to address their needs.

Times Square and Street Fairs: Far more congestion, and yet far more fairs as well

- **Times Square is already extremely dense and congested.**
 - Times Square is 0.1% of NYC's land area, but contains its highest density of theaters and hotels (95% and 21% of the city's total, respectively), and has a greater concentration of subway stations and ridership than any other neighborhood.
 - Peak pedestrian traffic is 480,000 per day, more than any other neighborhood.
 - Theaters and hotels are especially dependent on customers who arrive by car or bus, especially on weekends.
 - Times Square is one of the 10 busiest areas for taxi drop-offs in Midtown and Lower Manhattan.

- **Unlike other business districts and much of Manhattan, Times Square is busier, not slower, on weekends.**
 - 54% of weekly Broadway attendance is crammed into the two days street fairs occur -- Saturday and Sunday.
 - 38% of Broadway attendees come by vehicle for a weekend matinee vs. 24% for a regular weeknight show.
 - Weekend vehicular traffic in Times Square often exceeds weekday traffic, unlike other parts of Midtown.
 - On weekends, taxi drop-offs are more clustered around Times Square than on weekdays (mostly due to theater and hotel-goers).
 - Times Square's concentration of entertainment options, totaling 64,409 seats (47,635 Broadway seats; 7,851 movie theater seats; and 8,923 comedy club, off-Broadway, music hall and attraction seats) make it much busier on weekends than virtually any other neighborhood, both day and night.

- **Yet despite the intensity of weekend activity, Times Square has a disproportionate number of street fairs.**
 - Community Board 5 has 30% of all Manhattan street fairs.
 - Times Square is 11.8% of Community Board 5, but has 51% of CB5's multi-block street fairs.
 - Times Square represents one-tenth of one percent (.1%) of the city's land area, yet has ten percent (10%) of all street fairs citywide.

- **Making visitors to the city needlessly exasperated threatens thousands of jobs and millions in net new spending.**
 - The very people inconvenienced by street closures who come to NYC to visit Times Square's hotels, theaters and restaurants on weekends brings net new dollars – and tens of thousands of jobs -- to NYC's economy.

- Times Square’s actors, stagehands, musicians, hotel workers, and restaurant employees all depend on Times Square’s thriving tourist economy, which supports 354,000 jobs and \$5.5 billion in state and city tax revenues.
- If there is a terrorist incident, response times for emergency vehicles will be severely impaired.

Proposals for a more equitable, rational and data-driven distribution of street fairs

Adjust the proposed rules to allow for a more data-driven determination of street fair locations and distribution.

Having a common cap on street fairs per community board is an equitable approach, but should be supplemented by additional data-driven analyses of the impacts on traffic and safety, especially at peak times and places. Ultimately the City, rather than event producers, should decide on street fair locations and footprints, based on community and agency input.

For certain categories of streets or avenues determined to be “Excessively Burdened” at certain days of the week or times of day, as indicated below, the City may engage in additional level of analysis which may result in the denial of a street fair application for a particular location at a particular time. In no event shall a street determined to be “Excessively Burdened” at those times be subject to more street fairs than a comparable street or avenue which is not “Excessively Burdened.” Streets or avenues shall be determined to be “Excessively Burdened” if they meet two or more of the criteria below:

Criteria 1: Streets or Avenues with the worst traffic under normal, non-closure conditions, relative to other comparable streets and avenues.

Use historical DOT Traffic Data (“Level of Service” Data), TLC Taxi Travel time data, or Google Maps data to determine which proposed street fair locations over time already have, relative to other city streets or avenues, disproportionately poor traffic **without** being subject to a street closure. (Such analysis can be done by the City or by a third party, subject to City review for appropriate methodology, and shall be limited to an analysis of the times of day or week when a street fair is proposed). Those locations which already have the worst traffic cannot have proportionally more street fairs than any other city street or avenue.

Criteria 2: Streets, avenues, or segments of Avenues which feed directly into at least three streets with a disproportionate number of hotel, entertainment and transit uses which are both vehicle dependent and have significant egress/exit needs.

To be classified as having a disproportionate number of such uses, a street must meet two or more of the following criteria:

- Two or more hotels with 150+ rooms within any block
- Two or more theaters or entertainment venues with 500+ capacity within any block
- One 500+ capacity theater and one 150+ room hotel within any blocks
- It is within a 5 block radius of:
 - A bus terminal servicing multiple bus lines
 - A major commuter train station

Criteria 3: Streets or Avenues in Districts with a disproportionate number of street fairs

Any street or Avenue which is in a Community Board that has more than 10% of the total number of street fairs citywide.

Criteria 4: Streets or avenues which the NYPD determines as having a disproportionate number of venues requiring emergency response access in the event of an incident.

Allow communities that want and welcome specific street fairs to have more of them. Many neighborhoods want street fairs. One way to assist street fair producers and neighborhood non-profits they support is to allow either the 50% local requirement or the cap per community board to be waived with respect to a proposed street fair if three or more of the following request it:

- The Community Board
- The local Councilmember(s)
- The Borough President
- The BID where the fair would take place

If the 50% local participation requirement is eliminated, another way to encourage local involvement could be to require the benefiting non-profit or community organization sponsor to be located within 500 feet of the block that is closed or, in the case of a multi-block street festival, require it to be 500 feet to the street that is being closed for the event. The Alliance is open to this distance being narrower.

Close potential loopholes that could distort the intended impact of the rules. Several provisions are needed to ensure that the rules fulfill their intention:

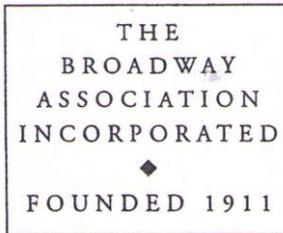
- Street fairs on a street or avenue that borders two community boards should count towards the total cap for both districts. For example, an 8th Avenue street fair results in significant traffic displacement for both 6th Avenue and 10th Avenue traffic.
- Multi-block street fairs in Manhattan should not be longer than the distance between major two-way thoroughfares (eg 34th, 42nd, 57th Streets). No multi-block street segment between such thoroughfares should be used more than once per year, nor should any single-block be closed for a street fair more than twice a year. If there is a street fair on or next to a block with a 500+ seat theater, it must be cleared by 7 pm.
- Require street fair producers to disclose gross revenues and actual amounts contributed to affiliated non-profits for each street fair.



The following organizations have endorsed the Times Square Alliance's plan to make street fairs fair:

The New 42nd Street	Rendezvous restaurant
Roundabout Theatre Company	Auntie Anne's Pretzels
Barbetta Restaurant	Hilton Times Square
Jujamcyn Theaters	Broadway Association
Sherwood Equities, Inc.	TBD Theatricals LLC
Saint Luke's Lutheran Church	The Broadway League
D3 LED LLC	W Hotel Times Square
DoubleTree Suites by Hilton-Times Square	Hyatt Centric Times Square NY
Broadway Cares/Equity Fights AIDS	OPEN LOOP NY
Spectacular Cities	New York Marriott Marquis
The Katz Company	The Lambs Club restaurant
Donna Bell's Bake Shop	Martinique Jewelers
Meson Sevilla Ltd.	Grand Slam New York LLC
Invicta	Starbucks
Hellenic Holidays, Inc.	Jamestown LP
Glass House Tavern	Havana Central Restaurant
Nederlander Producing Company of America Inc.	Project FIND
Carolines on Broadway	810 Deli Inc.
The New 42nd Street, Inc.	Stuart Thompson
Richards/Climan, Inc.	Charlotte Wilcox Company
Junkyard Dog Productions	Le Bernardin
Dodger Properties LLC	Playhouse Square Center





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October 13, 2016

Mr. Michael Paul Carey

Executive Director

Office of Citywide Coordination and Management

253 Broadway, 6th Floor

New York, New York 10007

Dear Mr. Carey:

On behalf of the Broadway Association, I am writing in support of the proposed Amendment to SAPO's Street Fair Permit rules.

The Broadway Association is a 105-year-old business association devoted to the cultural and economic betterment of Midtown West in Manhattan. Our membership includes property owners, major corporations, hotels, advertisers, unions, civic associations, theater companies, developers, banks, law firms, airlines, non-profits and publishers. Working together with city and state entities, the Broadway Association strives to preserve and protect our district through community engagement.

As you are aware, the Theater District is extremely congested. According to the Times Square Alliance, peak pedestrian traffic is 480,000 people per day in Times Square, and the vehicular numbers often exceed the daily pedestrian counts. The ongoing construction in the area is also exacerbating an already overcrowded space which is extremely difficult to navigate for both New Yorkers and the millions of tourists visiting Times Square each year.

Currently, 10% of all street fairs in the City take place in Times Square and the area has more street fairs than anywhere else in the City. This is an overburden for a district which cannot manage the traffic flow without the added congestion of a street fair. New Yorkers and visitors are increasingly avoiding the area due to congestion.

We support the proposed amended rules and thank you for your consideration on this important matter.

Sincerely,

Cristyne L. Nicholas

Chairman

STATEMENT OF THE BROADWAY LEAGUE
IN SUPPORT OF THE PROPOSED RULES ON STREET FESTIVALS

October 21, 2016

The Broadway League has been the principal trade association for the commercial theatre industry in New York State and across North America for over 80 years. It represents more than 750 theatre owners, producers and road presenters nationwide – with over 400 of its members maintaining offices in New York City. The League cannot overstate its appreciation to New York City’s Street Activity Permitting Office for proposing rules aimed at addressing a massive and escalating problem.

The League has always encouraged legislation and regulation aimed at enhancing the flow of vehicular and pedestrian traffic, improving access to the Theatre District, and enhancing the quality of life for residents, visitors and businesses in the Times Square area. In the past, we have endorsed sensible restrictions that support economic activity on the streets of New York City, including licensing pedicabs, improving oversight of street vendors, implementing location restrictions for tip-seeking performers and delineating pickup/drop-off locations for tour buses.

The League wishes to express its support and endorsement for this proposal to provide additional oversight of the city’s many street festivals to ensure that these events are more evenly distributed among New York. This much needed reform will help reduce the intense overtaking of Times Square on weekends, as well as ensure that more neighborhoods profit from the patronage and economic benefits such events often provide.

With respect to SAPO’s proposal, we wholly concur with the statement of the Times Square Alliance and incorporate by reference the declarations set forth in The Alliance’s submission.

Times Square is already one of New York’s most costly and traffic-infused neighborhoods, boasting a population that, unlike most areas of New York, increases on Saturdays and Sundays with peak pedestrian traffic exceeding 480,000 people. Navigating midtown is a significant burden and a seemingly unending array of outdoor events regularly

drive foot-traffic into the streets, as well as divert attention from local store-fronts. 54% of weekly Broadway attendees come on the weekend and 1 out of 3 arrive by motor-vehicle. However, these frequent events mandate significant alterations to traffic patterns which frustrate motorists, lead to increased vehicular congestion and create a significant barrier to accessing Broadway's theatres.

Approximately 13.3 million theatre tickets were purchased during the 12-month Broadway theatre season ending in May 2016. During that period, Broadway had a direct economic impact of \$12.6 billion on New York City. Over 80% of those tickets were sold to patrons residing outside New York City and nearly 60% of tourists reported that attending a Broadway show was a principal reason for visiting New York. Broadway spending generates over \$500 million in local tax revenue and directly supports approximately 89,000 jobs. Therefore, it is essential that lawmakers ensure every effort is taken to cultivate and maintain a welcoming environment that includes unobstructed access to the Theatre District for our patrons, actors, stage hands, musicians and other personnel this industry employs (directly and indirectly).

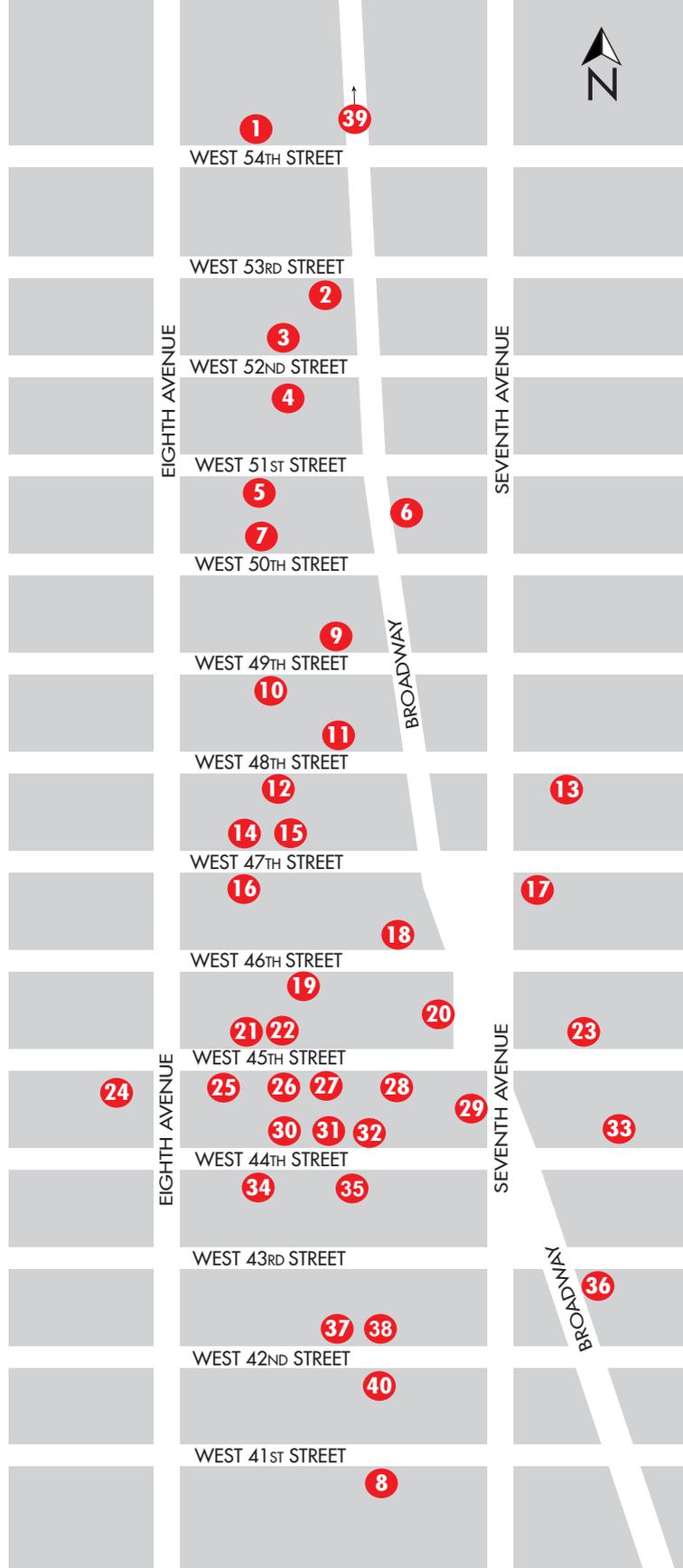
Midtown has simply become chaotic. The designation of Broadway (between 42nd and 47th Streets) as an outdoor plaza has increased vehicular and pedestrian congestion as construction and revised traffic patterns overlapped with a proliferation of outdoor events. Accordingly, it is imperative that the City take measures to more effectively regulate the public activity in and around Times Square.

The Broadway League feels this proposal is a positive step in addressing several challenging issues facing Times Square. We wish to note that we are available to work with SAPO and The City Council towards our shared goal of continuing to provide residents and visitors with a unique and safe experience. On behalf of the Broadway theatre community, the League applauds SAPO's dedication to addressing this problem in a fair and balanced manner.

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Bernard B. Jacobs	26
Booth	28
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For more information on Broadway's 40 historic theatres, visit SpotlightOnBroadway.com

BROADWAY THEATRE MAP



**STATEMENT OF THE SHUBERT ORGANIZATION
IN SUPPORT OF AMENDMENTS OF STREET FAIR PERMIT RULES**

October 24, 2016 -- The Shubert Organization (“Shubert”) supports the proposed amendments to the rules governing street fairs. The proposed rule amendments would help reduce the traffic and congestion that currently plague the Time Square area, while continuing to allow for street festivals that contribute to the vibrancy and diversity of City life. The proposed rules represent an intelligent and thoughtful approach to re-distribute the City’s street fairs so as not to over-tax any given area. We applaud the Office of Citywide Event Coordination and Management (OCECM) in its efforts to establish a better process for the permitting and placement of street fairs.

According to the OCECM, approximately 200 street fairs will take place in calendar year 2016, with the majority located in the borough of Manhattan and concentrated in Community Boards 2, 5 and 7. It specifically notes the following: The high number of street fairs in Manhattan increases traffic congestion and burdens on local communities, particularly within Community Board 5 in the vicinity of Time Square.

We couldn’t agree more. Time Square is the City’s tourist and entertainment hub. Maintaining its vibrancy while not overwhelming its capacity and resources takes careful oversight. Putting street fairs in this nerve center of the City simply doesn’t make sense. Traffic and congestion in Time Square are at historic highs and threaten the very fabric of the area. Over 300,000 pedestrians walk through the center or bowtie of the Time Square (7th and Broadway between 42nd and 47th streets) each day, making the Time Square area one of busiest pedestrian areas in the world. Over 20 bus carriers transport over 200,000 people every day from the Port Authority terminal located at 42nd and 8th Avenue. And then there are the tour buses, taxi cabs and other vehicles that snake through and around the main arteries of Broadway and Seventh and Eighth Avenues, and the congested side streets in order to reach their destinations.

Shubert has been operating legitimate theatres in the Time Square area for over 100 years. We have witnessed the cycles of growth, decay and revitalization that have transformed the area over the past decades. As the operator of seventeen Broadway theatres, our health is tied

to the health of the City and the Time Square area. We know the importance of maintaining the area as one that is safe and welcoming to all who come its way.

Tourism has played a central role in the revitalization of the City as a whole and the Time Square area in particular. 2016 is expected to see a record number of tourists to New York City (over 59 million visitors) and Broadway is a major reason why tourists come to the City. During the 2014-2015 season, Broadway as an industry contributed \$12.57 billion to the economy of New York City. During the same season, over 4.3 million “Broadway Tourists” (defined as people who did not live in NYC who said that Broadway was a very important reason in their coming to the City) came to the Time Square area and saw an average of almost two shows each. These Broadway Tourists are vital to the economic well-being of both Broadway and the City of New York.

Not so long ago Times Square and tourism where both looking much worse. In the 1960s and 1970s, the Time Square area was in desperate straits. By the late 1970s, the Time Square area was overrun by crime, drugs and urban decay. Tourism had plummeted. Only through tremendous time, money and effort, has the area seen significant revitalization and transformation into its current form.

We want to make sure that the Time Square area retains its status as a tourist mecca with world class attractions. This will not be possible if it becomes overrun with activity making it impossible to navigate its streets, and taxing our police and private security forces to the breaking point. We have already significantly increased the security presence in the Time Square area to address the threat of terrorist attacks and ensure the public’s safety. Adding more street fairs into the mix makes the job that much more difficult.

Street fairs create a particular burden on the Time Square area. Unlike other areas of the City, traffic in Time Square increases on the weekends, when most street fairs are held. Moreover, over 50% all Broadway attendees come on the weekends, and 1 in 3 arrive by vehicle. In addition, Time Square has the highest density of hotels in the City, with 27,000 people staying at Time Square area hotels on an average weekend. It is no wonder that 77% of businesses surveyed in the Time Square area said that street fairs had a negative impact on their businesses.

We are not opposed to street fairs, we just don’t think it makes sense to place them in the Time Square area. We believe that the OCECM’s proposed rules strike a sensible balance of allowing street fairs to continue to prosper while not choking its central thoroughfares and

unduly straining the resources of any given area within the City. The proposed rules would continue to allow for 200 Street fairs throughout New York City. However, it would restrict the total number in Manhattan to 100 and the number within each community Board to 10. This makes perfect sense. New York City has an amazing array of diverse and vital neighborhoods in all five boroughs. Street fairs should continue to thrive throughout the City and to contribute to the vitality and diversity of the City. But sensible urban planning means that placing the street fairs on what are already some of the most travelled streets in the world simply doesn't make sense. We can do better. The proposed rule amendments reflect a thoughtful reexamination of where and when we hold street fairs. We support the proposed rule amendments.



NEDERLANDER

October 18, 2016

To Whom It May Concern, The City of New York:

We support the rule revisions as proposed by The Office of Citywide Event Coordination and Management and the Street Activity Permit Office. Nederlander operates nine very busy Broadway theatres in the Times Square area, from 41st street to 52nd street. While we appreciate the value of street festivals to the culture of New York City, and encourage communities that would like to have them, it is incredibly difficult and counterproductive for our neighborhood, Community 5, Times Square, the smallest yet busiest in the city to host more than 10% of the festivals. We are continually concerned for our security and the security of our patrons, worry about our elderly and disabled patron's ability to access our theatres, and always have to remain diligent about potential damage to the historic and landmarked theatres we operate.

We continue to live in an active shooter environment with ongoing threats of terror on our democracy and way of life. With the amount of people already coming to the Times Square area for theatre, shopping and dining, the addition of closed streets and crowded festivals amplifies this incredible security concern. The New York City Police Department is heavily taxed and it is difficult for our theatre community to supplement the needed and necessary security to maintain a level of safety for our patrons. On a given Saturday we have 26,000 patrons making their way to our theatres. On the day of a street festival, many of them arrive late and will sometimes miss the show entirely due to traffic and parking. However, the large festival crowds appearing soft in target, are ideal for the active shooter and terrorist.

Closed and congested streets make it incredibly difficult for our elderly and disabled patrons. A guest that uses a walker or wheelchair would prefer to turn around and go home rather than fight the re-routed traffic to try to get close to the theatre. As you can imagine, walking extra blocks or using power for an electric wheelchair is also too taxing for these guests to cross festivals or circumnavigate them to get to the theatre. We value these guests and count their lost revenues when they cannot attend the theatres because of blocked or compromised access.

We continually worry, when festivals are near the historic theatres, about damage to the buildings. For example, the 46th Street festival last year placed a barbeque pit within 10 feet of the wooden front doors of the Lunt-Fontanne. Thankfully the Time Square Alliance was able to get it relocated, but a few floating embers could have been a disaster to the Lunt-Fontanne theatre, the Broadway theatre community, and the City of New York. Those setting up and striking the festival tents and equipment must do so quickly, and could easily, albeit accidentally, cause damage to one of our buildings.

Nearly each week of every summer, security, access, and the potential for damage to our buildings are just some of the problems we face during street festivals, which is why we support the new changes to Section 1043 of the New York City Charter. It will be important to limit the number of permits given in our neighborhood, while still allowing those communities who wish to have festivals participate. Nederlander is thankful for the consideration in this matter.

Bill Register
Vice President Operations
CC Tim Tompkins, President, Times Square Alliance



Street Fair Testimony Ratified by the NYC BID Association Street Fair Working Group

This testimony is on behalf of The NYC BID Association's Street Fair Working Group, which includes individual BIDs from different boroughs of New York City. The NYC BID Association Street Fair Working Group organized a year and a half ago to look at Citywide Event Coordination and Management practices and provide recommendations to the NYC BID Association. The Street Fair Working Group is pleased that Citywide Event Coordination and Management (CECM) took into consideration many of the recommendations the NYC BID Association provided in the Street Fair Position Statement in June 2015. These recommendations included lifting the moratorium on street fairs for outer-boroughs and upper Manhattan, improving permitting criteria, improving coordination, and giving more weight to local support.

While we are grateful for these efforts and many of the changes that CECM would implement, there are still a number of issues in the new rules that may have unforeseen and negative consequences for NYC's commercial corridors.

The following are additional recommendations from the NYC BID Association's Street Fair Working Group:

- A. The BID Association Street Fair Working Group applauds the ban of street fairs on the side streets near Times Square and strongly urges the City to further **limit street fairs in heavily congested commercial business districts in midtown-Manhattan. Closing a street in a heavily congested commercial corridor** creates serious congestion issues for hundreds of thousands of workers coming into Manhattan to their jobs on weekdays. On weekends, street closures in these congested commercial corridors create severe surface mobility issues for those trying to get to a commercial corridor, many of which include major cultural and entertainment attractions, or just travel through the City. With the many street scape changes underway, including the addition of plazas, and sidewalk extensions to improve pedestrian safety, as well as the extension of bike lanes on many of these commercial corridors, street fairs hinder pedestrian, vehicular and bike travel. That said, individual BIDs are expected to offer testimony on their own behalf. Our focus is citywide, not case by case.
- B. The BID Association Street Fair Working Group applauds the lifting of the moratorium on street fairs. However, the following rules as currently proposed would make it very difficult to conduct a street fair for new commercial corridors even if the moratorium is lifted. These new rules would also hinder street fairs that are already in operation in the outer boroughs.

- C. The BID Association Street Fair Working Group urges the City to consider the concerns of the neighborhoods, Community Boards, and Business Improvement Districts with regard to the 50% local vendor requirement as each neighborhood is different. Some need to have more involvement where the 50% works; some look to bring in new businesses from outside their neighborhoods as part of their economic development strategy where the 50% rule can be harmful. While the BID Association agrees that some street fairs have been generic, the 50% local vendor requirement is too onerous to implement for multi-block street fairs in smaller commercial corridors. According to many BIDs which conduct street fairs with local businesses, the 50% requirement is unattainable.
- D. The BID Association Street Fair Working Group opposes the fee structure. Similar to the 50% requirement, the fee structure cannot be a one-size-fits-all solution considering the wildly different circumstances in each neighborhood. Most street fairs produced by Business Improvement Districts have limited profits or break even. The change in the fee structure would reduce revenues and create a situation where a nonprofit is operating a street fair at a net loss. Many Business Improvement Districts would not be able to conduct street fairs under the new fee requirement. This requirement would also prohibit the inclusion of local businesses, since it would increase participation fees and serve as a disincentive to participation, contrary to the intent of CECM.
- E. The BID Association Street Fair Working Group opposes the 30 day notice period. The 30 day notice period also puts an additional burden on nonprofits, since vendors—whether local or not—often wait until a week or two before to sign up due to the weather forecast.
- F. The BID Association Street Fair Working Group requests that CECM review the rule that allows 50% or 100 street fairs from the borough of Manhattan. This proposed rule adversely incentivizes street fairs in Manhattan and takes away from the opportunity to have additional fairs in the outer boroughs.

The NYC BID Association Street Fair Working Group recommends that street fairs be reviewed on an individual basis, as each commercial corridor has unique opportunities and challenges. While the NYC BID Association Street Fair Working Group applauds the many positive changes that were indicated in the new proposed rules, we disagree with the 50% local vendor participation requirement, the new fee structure, the 50% Manhattan street fair allowance and the 30 day requirement, and ask CECM to review such issues on a case by case basis.

DISTRICT OFFICE
563 COLUMBUS AVENUE
NEW YORK, NY 10024
(212) 873-0282

CITY HALL OFFICE
250 BROADWAY, SUITE 1744
NEW YORK, NY 10007
(212) 788-6975

HRosenthal@council.nyc.gov
www.council.nyc.gov



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CO-CHAIR WOMEN'S CAUCUS

October 27, 2016

Re: The Street Activity Permit Office Proposed Rules for Street Festivals

I applaud the Mayor's Office of Citywide Events Coordination and Management (OCECM) and the Street Activity Permit Office (SAPO) for their efforts to improve the quality of street fairs across New York City. The initiatives to increase participation by local businesses in street fairs and to diversify the locations of street events are well intentioned and attempt to address a very real concern. Unfortunately, as currently written, these proposed rules would have unintended negative consequences for the neighborhood I represent in the City Council, District 6 on the Upper WestSide of Manhattan.

Negative Consequences of Proposed Fee Structure

By moving from a percentage of receipts fee structure to a flat fee per block, the proposed rules would negatively impact the quality of street fairs in my district. Under the current system, our local street fair organizers are generous in their donation or discounting of table space to local non-profit organizations, elected officials, and other community institutions. This inclusion strengthens the connection between a street fair and the community it is set in. Requiring organizers to pay a set fee per block would make this donation of space financially infeasible, reducing a key means of local engagement made possible by street fairs.

Negative Consequences of Proposed Local Business Requirements

While increasing local business participation in street fairs is a laudable goal, the proposed rules do not seem to be an effective instrument for achieving it. Mandating a 50% local participation rate simply does not seem feasible. Our local street fair organizers consistently make extensive outreach efforts to increase local participation, but even in the best of circumstances, reaching the 50% threshold seems out of reach. The truth is that participating in a street fair may not be cost effective for all small businesses, often requiring extra staffing that some businesses simply do not have. Creating a mandate that will be very difficult to meet does not seem to be the appropriate means of incentivizing increased local participation in areas with a strong tradition of street fairs, and especially in areas that historically have not participated.

Community Board Input

The effect of street fairs on a given community is exactly the type of issue that local Community Boards are exceptionally well-equipped to deal with. Any rules approved should create a mechanism that allows Community Boards to grant waivers to certain requirements, should the Community Board deem such a waiver to be in the best interest of the community. Empowering the Community Board to permit a second street fair for a local organizer or to restructure the local business requirements, for example, could be an appropriate relief mechanism to the new requirements and would ensure that an individual community's best interests are taken into account.

Street Fairs as a Fundraising Mechanism for Non-Profits

One example of a benefit of local oversight of street fairs was the development in Manhattan Community Board 7 of a mechanism by which 20% of the proceeds of street fairs are required to be

donated to an affiliated non-profit organization. Such a requirement strengthens the connection between street fairs and the local community, and should be explored at a citywide level.

I support the goals laid out by the Street Activities Permitting Office to improve the quality and expand access to street fairs throughout the city. As delineated, however, I do have serious concerns over whether the rules as proposed would achieve these goals. It is my hope that, through further engagement with local communities, this proposal can be reworked to strengthen the quality and equity of street fairs.

Sincerely,

Helen Rosenthal

From: [Richard Schurkamp](#)
To: [SAPORules](#)
Subject: Comment on proposed street fair rules
Date: Sunday, September 25, 2016 11:21:32 AM

The proposals to limit the number of street fairs in each community, and--especially--to require that at least half the vendors come from the local neighborhoods, are the best ideas I've heard in quite a while.

I walked the full length of the Sept. 18th Columbus Avenue street fair, and was very surprised at how sparsely attended it was, by both vendors and pedestrians. But, by the end of my walk, I understood why. With few exceptions, the same generic vendors had outposts every couple of blocks. . . same products, same signage, same owners. So there was really no reason for anyone to walk through the fair; if you wanted grilled corn on the cob or an iphone case, you could just buy it and leave, knowing that you continued down the avenue, you would just find it again.

One of the few busy and interesting booths was a used-book stall set up (probably illegally) on a side street, to benefit that street's block association. At least there was a friendly neighborhood feel to it, and I walked away with a couple of new books. The live music organized by a local bar attracted a good crowd, and a few of the local restaurants that set up tables and chairs in front of their establishments seemed to be doing well. The overall impression was that people were far more interested in experiencing an expansion of what the neighborhood had to offer than in an endlessly repeated parade of generic street fair merchandise.

And, of course, when I happened to head a few blocks uptown on Amsterdam later that day. . . there were the exact same vendors at an identical street fair.

These fairs have ceased to be a source of pleasure or promotion to the neighborhoods they take place in. Unfortunately, they're only serving the operators. And, who knows, if the focus of the fairs is returned to the neighborhoods, more local vendors might be interested in participating, and more people--from local neighborhoods, and different parts of town--might come out to enjoy them.

Best regards,

Richard Schurkamp
51 West 81 St., #2K
NYC, NY 10024

From: [david](#)
To: [SAPOrules](#)
Subject: comments on new regulations
Date: Monday, October 24, 2016 2:26:29 PM

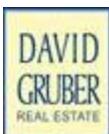
Please consider these comments to the proposed new regulations

- Good idea to reset to 10 Street Fairs both multiple block or single max in any Community Board .
- If some board in manhattan have over 20 fairs a two year faze is appropriate to give people an opportunity to link with others to form jount street fairs
- The first come first serve by time stamp may not be the way to go as its far too chaotic ... maybe other criteria or filters need to apply like longevity or complaint free fairs etc
- Good enforcement especially for organizations that simply have an address in the district should be rigorous . Organization all want to have their fairs in Board 2 and 5 in Manhattan as there are so many tourist on summer weekendsnational and City wide organizations are a particular problem as opposed to real local groups
- Caps by community boards should be made for commercial street events as well
- Finally non profits should collect all fees and pay the fairs producers a flat fee established by SAPO . Over the years there have been many complaints about how money is distributed back to the community by the thesis professional fair producers which often do not have full disclosure of revenues Non profits just sit back and collect the checks and if they complain that they live or are supported by these fairs they must be proactive in the process . I also feel that that the community at large should have endure so many steet fairs if a non profit does not want to make an effort to raise some of their funding elsewhere and just depend on fairs

I think your proposals are excellent but need some tweaking

Excuse typos etc

DAVID GRUBER
5 CARMINE STREET
NEW YORK , NEW YORK 10014
646 752 4954



From: [Andrew Marcus](#)
To: [SAPOrules](#)
Subject: Comments on new SAPO Rules
Date: Friday, September 23, 2016 11:24:26 AM

Hello,

My name is Andrew Marcus and I am the Director of the Greek Jewish Festival, an annual community street festival hosted by Kehila Kedosha Janina, the 90-year-old landmark Greek Jewish synagogue located on the Lower East Side. After reading the proposed changes to the SAPO Rules, I have the following comments:

1. In the past, our Greek Jewish Festival has made every effort to include as many local community partners and vendors as possible in our festival. You can see from our website the results of this community partnership: [GreekJewishFestival.com](#). However, I must note that too often local business owners or vendors who we were very interested in including in our festival simply did not want to participate because of the additional staff/labor/supply costs they would incur to set up a booth at our festival. In addition, as a Synagogue, we cannot include food vendors that do not serve Kosher food, which severely limits our options for local vendors. As a result of these two factors, it would be a very high burden for our festival to be required to have 50% of our vendors be local. While we support local businesses and applaud the intent of this new rule, we would strongly recommend an alternative to incentive local vendors, including possible fee discounts rather than complete denial of a festival permit.

2. The newly proposed fee structures for multi-block street festivals would present a very high burden on our synagogue/community. The rules propose "\$1375 per day/per block fee for first day/block and \$705 per day/per block fee for any subsequent days or blocks." As an historic synagogue and community landmark completely dependent on small individual donations, these new large fees would impose a huge burden on our annual Greek Jewish Festival and may jeopardize the financial feasibility of our festival. We strongly suggest SAPO reconsiders these high fees.

3. As the only Greek Jewish synagogue in the Western Hemisphere, we are proud to be a part of the truly incredible and diverse community of the Lower East Side. However, the new proposed rules that would institute a cap on the number of festivals permitted within a single community district would arbitrarily limit the number of community events that our neighbors could host and hinder the celebration of diversity that has gone on for years on the Lower East Side. We are located in Community District 3 and would strongly request that SAPO consider alternatives to fixed caps on the number of permitted events allowed each year. One reasonable alternative could be a cap on the number of events that hire a producer separate from the number of events hosted purely by local organizations.

4. With respect to the above 3 comments and other changes, we would very strongly request that SAPO modify the street festival rules to reduce the burden on community sponsors who DO NOT use festival producers. We believe that SAPO should treat larger, produced festivals as one category with more stringent requirements, and SAPO should treat smaller 100% community-produced events (with no hired producer) as a different category with less burdensome requirements and fees. Our Greek Jewish Festival is hosted, planned, and run by an all-volunteer

staff and we do not believe that it is equitable to charge our festival the same fees and hold us to the same local-vendor requirements as larger corporate-produced events.

Kehila Kedosha Janina Synagogue and Museum is proud to be a community landmark on the Lower East Side and welcomes visitors from all over the world throughout the year. Our Greek Jewish Festival means so much to us and to our local partners and we kindly request that SAPO not implement the rule changes noted above that would result in a very large burden on our community.

Thank you very much,
Andrew Marcus
Trustee, Kehila Kedosha Janina Synagogue and Museum
Director, Greek Jewish Festival
amarcusnyc@gmail.com
347-204-9461
kkjsm.org
GreekJewishFestival.com

From: westsidedef@aol.com
To: [SAPORules](#)
Subject: Comments on Street Fair Rule Changes
Date: Wednesday, October 26, 2016 12:05:47 PM

I am the President of the West Side Federation of Neighborhood & Block Associations an umbrella organization representing block associations, neighborhood associations, tenants associations and other community oriented groups on the Upper West Side an area covering 59th to 110th Street, Central Park West to Riverside Drive. For over 40 years the Federation has been working to improve and maintain the quality of life on the West Side.

The street fairs are a vibrant and important part of New York City life. It gives community organizations such as ours, an opportunity to once a year be out in the street interacting with our community and having the opportunity to listen to their questions and input on the issues that affect their neighborhoods. This input is very important to us because it gives us the information we need to address the problems that affect our community.

We believe that the proposed 50% local community participation rule change will make street festivals totally not feasible. This is not the spirit of the proposed rules. This proposed rule may divide New York City into at least two cities, Manhattan and non-Manhattan. The non-Manhattan New Yorkers will not have equal access to opportunities in Manhattan. We are all New Yorkers and one New York and there should be access for all New Yorkers to the street fairs in Manhattan. Local community businesses have always been welcome to participate in street festivals. In fact, they have been given special priority by street festival promoters, including but limited to not having street vendors blocking their entrances or store fronts. Only very few local community businesses participate in street festivals. One important factor that seems to be overlooked by everyone is that the current owners of businesses are not the same kind that we had 15 to 20 years ago who were more willing to participate in street fairs.

In terms of traffic congestion, sanitation and policing, these street fairs as a rule are held on weekends. These are days with lesser traffic and congestion. We also have to take into consideration that New York City has constructed pedestrian plazas and closed streets in midtown Manhattan that really causes more of a horrendous traffic congestion than these street fairs do. The City does this for people to enjoy their streets.

The Federation looks forward to working with the Mayor's Office to foster and make street fairs a more attractive alternative to the community residents and tourists, but can not support this proposed Rule Change for 2017.

Sincerely,

Miriam Febus
President
West Side Federation of Neighborhood & Block Associations
212-969-8047

From: [Harris Schrank](#)
To: [SAPORules](#)
Subject: Comments Regarding Rule Change
Date: Monday, October 03, 2016 4:18:24 PM

I'd suggest that the amplified music at these fairs be eliminated. In my experience only a few people pay attention to this music - it's generally quite mediocre - and in any event it's hard to understand its purpose. It does not notify people that the fair is occurring; they'll know because of the street closing. But it does cause a hardship to neighbors since the music is invariably played quite loud (probably at illegal levels). I live at Broadway and 96th Street, and for some reason all the music at these fairs is played at this corner, whether the fair is going uptown or downtown on Broadway.

Thanks for considering this proposal - Harris Schrank (212 662 1234)

From: [Gerald Lederman](#)
To: [SAPORules](#)
Subject: Comments Regarding Rule Change
Date: Friday, September 30, 2016 2:16:22 PM

Apart from the concerns mentioned in other responses to the proposed rule changes, that of the small neighborhood not for profit has not been mentioned. A number of charitable, civic and neighborhood service organizations rely on the proceeds generated from street fairs to sustain their activities.

If there is a requirement that 50% of the vendors at a street fair be local in origin, a number of street fairs will be unable to meet this demand and result in their cancellation. The resulting loss of revenue would not be able to be made up by many small not for profits.

We understand the negative reaction of local merchants to street fairs, however, it is our understanding that in most instances outside of Manhattan, they are offered the opportunity to participate in the street fair without cost. I would urge the Mayor's office to consider the impact that outer borough cancellations will have on these organizations.

Jerry L.

From: [James Higgins](#)
To: [SAPORules](#)
Subject: Comments Regarding Rule Change
Date: Tuesday, September 27, 2016 3:29:37 PM

I am writing to comment on the proposed "Street Fair" Rules.

"Street Fairs" in Manhattan are a substantial public nuisance, and the City should do everything in its power to relocate them to less densely populated areas of New York City (such as some parts of Staten Island) or, to the extent possible, eradicate this blight altogether.

The principal effects of "Street Fairs" are (1) to enrich vendors of undistinguished food and goods that are readily available throughout Manhattan, and (2) to exacerbate severely the overload of cars in and resultant choking traffic jams in Manhattan.

I hope you will be successful in eradicating this blight. In the mean time, moderate intermediate steps to limit the public nuisance damage should be taken:

- (1) "Street fairs" on one-way cross streets only – NOT on major thoroughfares.
- (2) No "street fairs" on days, even weekends when there are parades or other events (awards ceremonies, etc.) that mean the traffic burden in Manhattan is already worsened.

Thank you for your help in ridding Manhattan of this public nuisance.

James Higgins
35-37 North Moore Street
#2A
New York, NY 10013
+1-201-793-0522 (direct)
+1-646-284-5476 (mobile)
jhiggins@new-vernon.com

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From: ken@kettlecornnyc.com
To: [SAPORules](#)
Subject: Comments Regarding Rule Change
Date: Wednesday, October 12, 2016 11:09:27 AM

Hi Michael,

My name is Ken Nercessian. I own a small business called Kettle Corn NYC. We have been donating popcorn to city organizations for years including NYC Dads, Harlem Parks and a few others as well.

Please see attached picture.

I have been a street vendor since 2004. This is where I was able to start my company that currently supports 2 employees and myself.

I would not have been able to start my business if it hadn't been for the street fairs. Limiting and potentially eliminating the street fairs would take away my livelihood and the livelihood of my employees.

Street fairs are important to the community as well as the vendors. In my experience, families that visit the street fairs are very happy when they visit. Children are always smiling, parents are relaxed and enjoy the experience. We post our street fair locations on our social media platforms. We get a lot of positive comments from people who visit the street fairs regularly. Street fairs also create work for the vendors and their staff and improve the economy as a result.

Please do not limit or eliminate the street fairs.
Without the street fairs, my small business and my staff will suffer.

Thank you,

Ken Nercessian
Principal

Nercessian Kettle Corn NYC, LLC.
Nercessian Kettle Corn NYC Operations, LLC.
Phone: (646)765-3210



From: [bruce bromley](#)
To: [SAPORules](#)
Subject: Comments Regarding Rule Change
Date: Monday, September 26, 2016 2:52:48 PM

I don't want street festivals in my neighborhood. They block streets to traffic, they create litter, and they harm local businesses. And who are these people running the fairs?

Sent from my iPhone

From: [John DiBiase](#)
To: [SAPOrules](#)
Subject: Comments Regarding Rule Change
Date: Thursday, October 20, 2016 12:41:52 PM

Statement from the Washington Square Outdoor Art Exhibit regarding the proposed SAPO Street Activity Changes

The Washington Square Outdoor Art Exhibit Inc, has been an iconic institution in Greenwich Village for 86 years. We are a non-profit organization that only sponsors 2 shows a year for artists and crafts people to exhibit their work.

Alfred H. Barr, Jr., first director of MOMA and Gertrude Vanderbilt Whitney along with several local Village ladies founded the WSOAE in 1931. Artists like Jackson Pollack, Wilhelm DeKooning and

Alice Neel used this venue to display their art around Washington Square Park. This venture has evolved into the present bi-annual event and has become a major attraction for artists, crafts people and art lovers for over 8 decades. Mayor Ed Koch presented the show with Mayoral Proclamations and attend the show frequently.

We are a SIDEWALK only, juried art show on University Place between Waverly Place and East 13th Street. The 2 shows are the Memorial Day weekend and the 2 day weekend after and the

Labor Day weekend and the 2 day weekend after. We do not need or request Street Closures or additional NYPD involvement beyond the normal.

The premise of our show is to provide juried artists and crafts people from all over the United States and other countries (recently Africa and the Caribbean) a place to display the art they themselves have created.

There are very few participants who reside in Manhattan, more in the Metropolitan area, but the proposed SAPO changes would virtually eliminate our ability to continue the shows and thus end an internationally famous institution that has been part of Greenwich Village and New York City for over decades.

We are therefore asking SAPO to consider our unique situation and not institute changes that would end either WSOAE shows.

Respectfully,
Carl F. Lebowitz, Ph.D., President
John DiBiase, Executive Director

--
Washington Square Outdoor Art Exhibit
PO Box 1045
New York, NY 10276
tel: 212-982-6255
web: <http://www.wsoae.org>

COSTA CONSTANTINIDES

COUNCILMEMBER
22ND DISTRICT, QUEENS

DISTRICT OFFICE

31-09 NEWTOWN AVENUE, SUITE 209
ASTORIA, NY 11102
TEL: (718) 274-4500

CITY HALL OFFICE

250 BROADWAY, SUITE 1808
NEW YORK, NY 10007

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SANITATION
TRANSPORTATION

October 4, 2016

Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Dear Director Carey,

I'm writing today to express concerns with some of the proposed rules changes regarding the requirements for obtaining permits for street festivals. Several seem unduly restrictive and onerous and could make it extremely difficult for some organizations to obtain permits.

My first concern is about the requirement of 30 days' notice for street vendors to sign up for a festival. This seems problematic because some festivals that have carried on for years do not operate in that kind of timeframe. Some of these festivals and vendors may not be able to adapt to this change and thus may be precluded from operating the festivals they have run without incident for years. That would seriously limit vendors signing up if their business models require them to make these decisions in a short period of time.

Secondly, the requirement that at least half of the vendors to come from within the community district is well-intentioned, but too onerous. The effect of such a change is more likely to prevent festivals from being able to operate than it is to promote local business. Some areas might not have the required type of vendors in enough abundance to allow some kinds or sizes of festivals at all. I think that a better solution would be to require that at least half of the vendors be local businesses within the whole city, rather than just within the community district.

Finally, limiting community districts to 10 permits may also be problematic. The changes already give precedence to longstanding festivals that have operated for years or decades. Within Community Board 1, for example, we already have 12 such longstanding festivals that would be forced to compete for the 10 permits. The rules are not clear on which ones, if any, would be grandfathered in, nor is there a clear process for making that determination. Creating a scenario where the city must choose who wins and who loses between festivals that have equal claim to being integral parts of a community's fabric is

unacceptable, and I ask that you make greater allowance for these longstanding community festivals.

Thank you for your consideration on these issues, and please don't hesitate to reach out to my office if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Costa Constantinides", with a long horizontal flourish extending to the right.

Costa Constantinides
New York City Council, 22nd District

DANIEL R. GARODNICK
COUNCIL MEMBER, 4TH DISTRICT

DISTRICT OFFICE
211 EAST 43RD STREET, SUITE 1205
NEW YORK, NY 10017
(212) 818-0580
FAX: (212) 818-0706

CITY HALL OFFICE
250 BROADWAY, ROOM 1762
NEW YORK, NY 10007
(212) 788-7393
FAX: (212) 442-1457

garodnick@council.nyc.gov



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Comment by Council Member Daniel R. Garodnick
On
The Amendment of Street Fair Permit Rules

October 24, 2016

Thank you to the Street Activity Permit Office (SAPO) for holding this hearing, and for your work on this important issue.

I appreciate that you are taking a serious look at how New York City manages and permits street fairs, and I support efforts to reform our process. Street fairs are familiar to most New Yorkers, and what they are likely to find are socks and sausages, cell phone cases and scarves -- a generic, corporate operation, with very few local roots or offerings. And while they are frequently disruptive to traffic, they would still be worth doing if they added real value to our streetscape or local businesses. Unfortunately, today, they do not. When we have street fairs in the city, they should be both beneficial and minimally disruptive for the community in which they are taking place.

While I broadly agree with SAPO's desire to reform street fairs, I wanted to raise the following observations:

1. The local participation threshold should not be so high as to eliminate a real chance for a street fair to take place.
2. Limitations on multi-day and multi-block festivals by Community Board is an important reform. However, SAPO should consider whether these limits will shoehorn the bulk of the festivals into the most highly trafficked area of the Community Boards, further exacerbating traffic issues, and whether specific place-based limitations may be more appropriate; and
3. We need to think about how to mitigate impacts of any reform on local groups which get a significant amount of their funding from sponsoring street fairs.

These proposed rules demonstrate thoughtful attention to the challenges that are posed trying to regulate street fairs while considering both their benefits and drawbacks, and are a good starting point for comprehensive improvements. I thank you for your consideration of these views.



Samaritan Daytop Village

WHERE GOOD LIVES

718-206-2000

138-02 Queens Boulevard
Briarwood NY 11435

samaritanvillage.org

Michael Paul Carey, Executive Director
Office of Citywide Coordination and Management
253 Broadway (6th Floor)
New York, NY 10007

Testimony for Street Activity Permit Office meeting
Mayor's Office of Administrative Trials and Hearings
100 Church Street, 12th Floor, NY, NY 10007
Thursday, October 13, 2016, 10:00am

Good morning. I am pleased to testify today on behalf of Samaritan Daytop Village.

Samaritan Daytop Village (SDV) is a premier health and human services agency providing exceptional services to over 28,000 New Yorkers annually including men, women, and adolescents; young mothers and infants; military veterans; seniors and families. SDV operates more than 50 facilities in New York City, Long Island and upstate New York. Our continuum of care includes substance use services, health and mental health programs, a senior center, shelter and permanent housing, and recovery services to reinforce independent living in the community.

Within New York City's Community Board 4, where the Community Festival takes place, we operate three longstanding facilities: a Veterans Residential facility on West 43rd Street, our Supportive Services for Veterans and their Families Program on West 44th Street and an Outpatient program on West 35th Street.

Our main focus in sponsoring the festival on Ninth Avenue is one of Community Outreach – to let the community know that we are fighting the fight against homelessness and the rising epidemic of substance abuse, and to inform residents of the services available to them through our vast array of programs.

We believe it is important that community residents have opportunities to learn about the resources available to them. This is why we strongly believe the continuation of the Community Fair would be a huge asset to the community. Thank you.

Sincerely,
Dennis E. Kawas
Director of Family Services
Samaritan Daytop Village, Inc.

October 18, 2016

Michael Carey, Executive Director,
Office of Citywide Event Coordination and Management,
253 Broadway, 6th floor,
New York, NY 10007

VIA EMAIL

**Mayor's Office of Citywide Event Coordination and Management
Street Activity Permit Office Public Hearing on Proposed
Rules 100 Church Street, 12th Floor 10:00A.M., October 13, 2016**

Testimony from Independence Plaza North Tenants Association

Dear Executive Director Carey:

Our Tenant Association has been representing thousands of tenants at Independence Plaza North in Tribeca, for 40 years. Our not for profit tenant association has been sponsoring a street fair for over 20 years with full Community Board support. The funding obtained from sponsoring this event has greatly helped in serving our residents in lower Manhattan, especially our seniors who receive a lot of information via our newsletters and advocacy on their behalf. We have no other source of funding except for collection of dues; yet our good and hard work has benefited not only Independence Plaza residents but residents all over New York City – especially the lower to middle income residents. The funding helps allow us to continue organizing and informing folks in the affordable housing sector, something that we feel is important to the future of our great city.

Per recent cut backs, we had to give up some of our funding from this event – we used to sponsor the street fair ourselves. Now we are forced to share the sponsorship. That hurt us a lot. Further cut backs would be pretty devastating to us.

Lifting the existing moratorium while limiting the number of events is already creating dissention within the community – why on earth would anyone want that in the name of the Mayor's office?

Requiring that a percentage (50, 25 or even 10) of local merchant participation makes success of the fair even more difficult. Most of the smaller stores cannot spare staff to be in a street fair which would bring in less than working the business itself; and larger chain stores barely ever respond.

The vendors who DO respond are almost 100 percent licensed vendors who live in New York City. This is a way for them to earn money for their families, opportunities that are important to the success of our city and the people who live here.

There are many other reasons we are against Proposed 2017 street fair rule changes. If you would like us to elaborate further, please feel free to contact Diane Lapson, President IPNTA at 917 751-2825 or Dlapson@verizon.net.

We sincerely hope we can continue sponsoring street fairs into the future and hope at some point we can be the sole sponsor of a fair without having to share the remuneration – so we can continue to do the difficult work we do as volunteers on behalf of the working class citizens of New York City.

We have attached the testimony from CB1, because we are also support their testimony as submitted.

Sincerely,

IPNTA

Diane S. Lapson

President

Dlapson@verizon.net

917 751-2825

CC: Councilmember Margaret Chin, Assemblymember Deborah Glick, Borough President G. Brewer, Senator Daniel Squadron, CB1 NYC.



The City of New York **Manhattan Community**
Board 1

Anthony Notaro, Jr. CHAIRPERSON | **Noah Pfefferblit** DISTRICT MANAGER

Mayor's Office of Citywide Event Coordination and Management
Street Activity Permit Office Public Hearing on Proposed
Rules 100 Church Street, 12th Floor 10:00A.M., October 13, 2016

Thank you for holding this important public hearing today regarding the proposed changes in rules for street fairs. My name is Noah Pfefferblit, and I am the District Manager of Community Board 1 in Lower Manhattan. Community District 1 includes most of Manhattan below Canal Street and south of the Brooklyn Bridge.

At our Community Board 1(CB1) board meeting on September 27, 2016, CB1 unanimously adopted a resolution strongly urging the Citywide Event Coordination and Management (CECM) to postpone today's public hearing by at least one month to enable Community Boards to provide meaningful input on the proposed rules changes, a request also made by Manhattan Borough President Gale Brewer. We noted in our resolution that the extremely and unusually compressed timeframe precluded meaningful input as community boards require at least 45 days advance notice.

The proposed changes would make very significant changes to the rules for street festivals, setting a maximum of 10 multi-block events in any

community district per year and a maximum of 20 one-block events, far fewer than the current number in many Manhattan districts, and a maximum of one festival per organization. This sharp reduction in the number of events would require a lottery to determine which organizations would have the ability to sponsor fairs, making it impossible for CB1 and other organizations that currently sponsor fairs and raise essential funds from them to continue doing so. CECM has not offered any explanation of why it believes that these drastic changes are needed or the reason for the compressed timeframe.

CECM has moved forward with this hearing despite requests to postpone it, and while we therefore cannot address the proposed changes, we have comments regarding how the new rules will affect our internal operations and fundraising.

CB1 has sponsored street fairs in our district for many years. While we review all applications for street fairs and events regardless of the sponsor, we sponsor our own events in order to supplement our budget and conduct work on behalf of our community. In past years CB1 has sponsored as many as six fairs annually, including in the aftermath of 9/11 and post-9/11 reconstruction, when additional funds were needed to provide the services that our members and constituents needed during extraordinarily challenging times. It is inconceivable that we would have been able to meet the challenges of 9/11 and the post-9/11 reconstruction without such funds and other community boards have come to rely on additional funds raised in this way as well to meet unique challenges.

1 Centre Street, Room 2202 North, New York, NY 10007-1209 Tel. (212) 669-7970 Fax (212) 669-7899 man01@cb.nyc.gov www.nyc.gov/html/mancb1

D. Mastrorocco
200 W. 90th St., Apt. 10A
New York, NY 10024-1236

26 Sept 2016

Mr Michael Paul Carey
OCECM

Dear Mr Carey,

Since I cannot attend the 13 October 2016 hearing about limiting street fairs I would like my voice to be heard, hence this letter.

It is time to limit such street fairs as the disruptive nature of these events is too much for a neighborhood. The primary problem is the traffic jams they cause as well as the disruption to mass transportation.

Please consider reducing these events. Thank you.

Steve Mastrorocco

COMMUNITY OFFICE:
71-19 80TH STREET, SUITE 8-303
GLENDALE, NY 11385
(718) 366-3900
FAX: (718) 326-3549

CITY HALL OFFICE:
250 BROADWAY, SUITE 1765
NEW YORK, NY 10007
(212) 788-7381
FAX: (212) 227-7164

EMAIL: ecrowley@council.nyc.gov
WEBSITE: www.council.nyc.gov/crowley



THE COUNCIL OF
THE CITY OF NEW YORK
ELIZABETH S. CROWLEY
COUNCIL MEMBER, 30TH DISTRICT, QUEENS

CHAIR
FIRE AND CRIMINAL JUSTICE SERVICES

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INTERGROUP RELATIONS
MENTAL HEALTH, DEVELOPMENTAL DISABILITY,
ALCOHOLISM, DRUG ABUSE AND DISABILITY SERVICES
WOMEN'S ISSUES

October 27th, 2016

Michael Paul Carey
Executive Director
Office of Citywide Emergency Management
253 Broadway 6th Floor,
New York, NY 10007

Dear Executive Director Carey,

I write with deep concern regarding the proposed limits on block party and street festival permits in my community and throughout the city. In our overcrowded city, we need to use our streets for more publicly accessible and inviting activities. Therefore I disagree with the proposed rules changes for the following reasons:

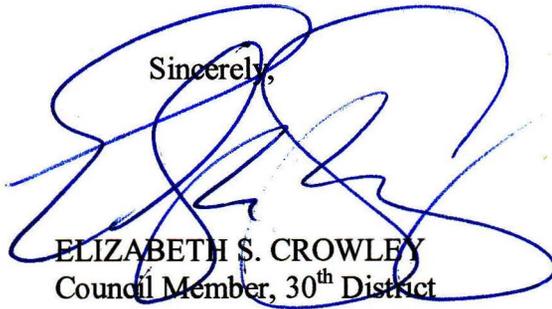
- The proposed rules state that there will be a cap of 20 block parties per community board per year which is very limiting. Queens has over 2 million residents and community board 5 alone had 60 street fairs in 2015.
- The provision requiring 50% of vendors for street fairs to have a local presence within the CB where the event is happening is overly burdensome. Some communities are underserved by local vendors and will not be able to meet this threshold. Street festivals not only represent the neighborhoods that host them but bring new and exciting vendors into the area once or twice a year that attract crowds from across the city.
- Most street festival applicants will have a hard time reaching this arbitrary threshold and some fairs might get cancelled. This provision prevents mobile businesses and other groups from becoming vendors at street fairs.
- Requiring anticipated vendors to commit to a street festival 30 days in advance instead of one week is equally as onerous. Many smaller vendors decide whether or not to attend a street fair based on the weather so the original one week deadline made sense. Many smaller vendors will not be able to absorb the cost associated with higher fees and poor weather.
- The change in the fee scale from 20% of total paid by vendors to \$1375 per day/per block for first day/block and \$705 per day/per block for any subsequent days/blocks is highly restrictive. Many vendors, including local ones will not be able to afford these fees and will be disproportionately affected by this change.



- Furthermore, these fees are unfair to neighborhoods, including the ones I represent, where the grid is not well established and blocks have no clear beginning and end.
- Lastly, I have learned that many community non-profits rely on funding generated by street festivals and block parties. By proposing rules that will reduce the number of street fairs, the city will starve these nonprofits for funds.

The proposed changes to the street festival rules are at best inequitable and I strongly oppose these changes. Please take into account these comments and do not take actions that will reduce street festivals and block parties.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Elizabeth S. Crowley', is written over the typed name and title.

ELIZABETH S. CROWLEY
Council Member, 30th District

EC/dc

The West 47th/48th Streets Block Association

P.O. Box 317, New York, New York 10101

Tuesday, October 11, 2016

Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

RE: 2017 Proposed Street Fair /Festival Rule Changes

Dear Mr. Carey,

To begin, we want to make clear that the four block associations, the West 47th/48th Streets Block Association, the West 46th Street Block Association, the West 45th Street Block Association and the West 44th Street Better Block Association, are AGAINST the proposed 2017 street fair rule changes. Here is why:

For approximately ten years these four block associations have sponsored an annual event on Eighth Avenue with the full support of Community Board(s) 4 and 5, as well as our elected officials. We are community-based associations representing the areas from Eighth Avenue to the Hudson River on West 48th, 47th, 46th, 45th and 44th Streets.

Our organizations are non-profit, all volunteer, pay no salaries, no rent, and no overhead. Any money we earn goes back to the community. We could not be more deeply rooted in the community in which the festival takes place.

Below are a few of the programs we finance with proceeds from the Eighth Avenue Festival:

- The West 47th/48th Streets Block Association (EIN 13-3521466): Gardening supplies and plants for Hell's Kitchen Park; annual neighborhood children's Halloween party in the park, including a hayride for the children; hosts Jazzmobile.
- West 46th Street Block Association (EIN 13-2904750): Currently raising funds to restore the historic Arnold Belkin mural in Matthew Palmer Park.
- West 45th St Block Association (EIN 13-4165062): Purchases tree pit guards and flowers and maintains the block's tree pits.
- West 44th Street Better Block Association (EIN 13-3958120): maintain the garden on Pier 84 (44th Street and the Hudson River); hosts annual children's holiday party.

We are grass roots, non-profit associations made up entirely of volunteers who contribute our time and talent. All events are free. We also make contributions to other local non-profit organizations.

Michael Paul Carey
Tuesday, October 11, 2016
Page Two

We understand that one of the new rules is for a mandatory percentage of local merchant participation. For your information, local merchants on 8th Avenue are mostly chain stores, banks or restaurants that don't want to or feel the need to participate thereby making it impossible to fulfill that requirement.

And we know that over 90% of the licensed, participating street fair vendors live in the five boroughs. We are concerned that many would lose their livelihood with the proposed new rules.

There is no doubt that the work of the four block associations benefits the community – in fact we are the community. Residents would suffer if we couldn't continue with our sponsoring a street festival since that is our main source of income.

Again, the West 47th/48th Streets Block Association, the West 46th Street Block Association, the West 45th Street Block Association and the West 44th Street Block Association **urge all concerned to vote AGAINST the proposed new rules.**

Thank you for listening.

Sincerely,

Elke Fears
President
The West 47th/48th Streets Block Association

Cc: Manhattan Borough President Gale Brewer
NYC Council Member Corey Johnson
NY State Senator Brad Hoylman
NY State Assembly Member Dick Gottfried
Manhattan Community Board #4

FINAL TESTIMONY IN RESPONSE TO PROPOSED RULE CHANGES FOR STREET FESTIVALS

My name is Todd Berman. I am President of Clearview Festival Productions as well as our recently launched premium brand, Pop-Up New York.

I would like to start by acknowledging SAPO and OCECM for your initiative and efforts to enhance street festivals. I support your proposal to lift the current moratorium as it will lay the groundwork for transformation citywide.

As you are aware, we launched Pop-Up NY last year. It has been embraced with tremendous enthusiasm in each of the host communities. We are the only major street festival production company to take the lead in the industry to innovate. We are fully committed and are investing our resources to redefining street experiences.

However, the rule changes you have proposed would disqualify and wipe out most multi-block and single block street festivals, along with the funds they generate for the not-for-profit sponsoring organizations that rely on these funds to provide their vital services. I do not believe that is your intention.

Your proposed requirement that at least 50% of vendors participating have a business or local presence in the respective community boards is onerous.

While I appreciate and share your goal of increasing community participation, I believe this objective can be met by incentivizing the community as I have outlined within.

I have no doubt that with an incentive structure, we can work together to achieve results consistent with your priorities.

In addition, I am respectfully requesting that you increase your proposed cap on multi-block and single block festivals, per community board district. While your proposal may be well-intentioned and designed to address legitimate concerns in any

overburdened district, these rules would have unintended consequences and drastic impacts on the remaining districts and the other portions of the city and its neighborhoods.

The city is a collection of neighborhoods. No two are alike. We urge that the final rules should address this reality.

Issue 1: Community Board cap

Proposed: The proposed limit of 10 multi-block street festivals and 20 single-block festivals per calendar year, per community board is too rigid, and will hurt the groups that rely on them for funding, small business development and community building.

Suggestion: The cap on multi-block festivals should be raised to 15, enabling one multi-block festival in a community board every three weeks, and the cap on single block festivals should be raised to 30. This represents a 50% reduction in the most heavily burdened communities without creating new problems in other parts of the city. The problems identified by SAPO focus on multi-block festivals running for long distances on major north-south thoroughfares in Manhattan, not on a short fair on a few smaller streets, so the cap should only apply to festivals held on those major thoroughfares. In addition, the large number of religious feasts in some parts of the city makes the hard cap impractical and potentially infringes on the free exercise of religion. It also makes sense to create a process where Community Boards can waive the cap when it makes sense—the over-burdened neighborhoods would oppose the issuance of any waiver, while additional festivals might make sense in other parts of the city. Events solely conducted on the sidewalk should not be counted towards this cap. Street festivals, by definition, are conducted on the streets.

Issue 2: 50% local vendor requirement

Proposed: The proposed requirement that 50% of the exhibitors be local to the immediate area is impractical.

Suggestion: To foster local participation by creating a series of incentives. The rules should require that a certain number of exhibition slots be provided at a deeply discounted/little or no cost to local businesses, local artists, craftsmen and residents of the respective community board showcasing non-commercial products or to bona fide members of a local merchants association sponsoring the fair.

- 20% of each Festival will be allocated for participants with local presence in its respective community board.
- 10% of which will be allocated for local artists, artisans, crafters and non for profit at no cost or a deeply discounted rate.
- 10% allocated for local business at no cost or deeply discounted rate. From throughout the entire Community Board.

Issue 3: Annual cap on sponsoring organizations

Proposed: Sponsoring organizations would be limited to one street festival per calendar year.

Suggestion: Many community-based organizations sponsor multiple festivals as part of their services to their respective neighborhoods. This proposal should be rejected.

Issue 4: Fees

Proposed: The proposed rules change the fee structure to a flat fee per block. This is a disincentive to sponsors that wish to offer pro bono spaces to local groups, businesses, or artists, residents, as well as children's activities and community staging areas. In addition, disadvantaged neighborhoods charge significantly less per vendor space, resulting in threatening the viability of conducting their event.

Suggestion: Keep the current 20% rule. Or apply the flat fee structure to blocks utilized, excluding space provided and the equivalent blocks utilized by and for community functions. If the City truly wants to foster local participation, then it should consider keeping the existing 20% fee but offering reductions from that fee

based upon benchmarks for local participation overall percentages .

Issue 5: Festival priority

Proposed: Under the proposed rules, applications will be approved on a first come, first serve basis.

Suggestion: In order to emphasize festivals that provide tangible local benefits, priority shall be given when evaluating applications for approval based on the following criteria:

- Community participation of local residents, merchants, artisans, and artists
- Stakeholder participation such as chambers of commerce/merchants associations, LDCs and BIDs
- Religious and cultural institution sponsorship
- Non-profit, grass roots direct service providers in that local community

Issue 6: Sponsor location

Proposed: The requirement that sponsors be headquartered within the same community with the proposed event does not recognize the reality where groups might provide direct services in one community, while their administrative headquarters is located in another.

Suggestion: Event sponsors may be located within another community board as long as they have clear, tangible relationships to communities where the festivals take place.

Issue 7: 30-day requirement for vendors

Proposed: The requirement that applicants must provide and submit vendor information 30 days prior to the event is unrealistic since many vendors will reserve space much closer to the time of an event based on weather reports and other circumstances.

Suggestion: The current rule should remain.

In conclusion, I have witnessed first hand throughout this process, that the proposed rule changes have been met with overwhelming opposition, from many Elected Officials, Community Boards, and Stakeholders in the Industry.

As a key production company in this space, I very much look forward to working together in an effort to strike a balance meeting the core principals of your objectives, as well as satisfying the overall good for all impacted.

Thank you for your consideration.

Todd Berman
President
Clearview Festivals, Inc. and Pop-Up New York
630 Ninth Avenue, Suite 417
New York, NY 10036
(646) 230-0489

Testimony for SAPO Hearing Thursday, October 13, 2016 100 Church Street, NYC 10:00 A.M.

From: Frank Scala, President, Vincent F. Albano Republican Club, Inc.

I am writing you on behalf of our organization regarding the proposed SAPO street fair rules.

We are opposed to these changes, specifically regarding the 50% vendor item. I'd like to share my thinking with you about this opposition.

Our Club has had street fairs for over two decades and we need to continue with them to provide revenues for various community events. As an example, the Club has donated to the Stuyvesant Cove Association to provide summer concerts. That is just one instance of many donations which only the street fair can provide.

I am also a member of Community Board Six and have been on its Business Affairs and Street Activities Committee for decades. This Committee has had a monitoring eye on street fairs and revenue use for many years. I'm reminded that many CB6 members also have community organizations which rely on revenues to benefit the community. I am sure you will be hearing from them as well.

A look around our neighborhoods shows us a difference type of store. We have huge chains like Starbucks and Duane Reade. The little stores have virtually disappeared. In this barren environment, it would be very unreasonable to expect local participation in a community street fair.

At our street fair, we meet and greet our members while trying to build up the Club. We learn about concerns from our neighbors. These hours outside at the fair give us insight and we have one on one conversations. Sometimes, for seniors, this is the only way they can be an integral part of what's going on.

I am also President of the 13th Precinct Community Council which enables me to provide information to the Precinct about local concerns, concerns which arise at Albano's street fair. So the Club is a conduit very often.

I am honored to be President of the Albano Club and to be at our street fair. The vendors are mainly in New York City, I am sure, and they come to provide a pleasant experience for fair goers. I often see people at our table whom I haven't seen for a while. The fair provides joyful reunions, year after year. And then the Club donates its revenues to local community causes as an added blessing.

The Club urges SAPO not to make these changes so that we may continue doing our share for the community through our street fairs which provide so much for our neighbors, both at the fair and after through our contributions to them. Why fix what isn't broken?

Thank you.

From: [Tolson, Dawn](#)
To: [Dinzey, Ashley](#)
Subject: FW: THANK YOU!
Date: Wednesday, October 26, 2016 4:38:16 PM

See comment below

Best,

Dawn

Dawn Tolson
Director of Street Activity Permit Office
Citywide Event Coordination and Management
Office of the Mayor of New York City
253 Broadway, 6th Floor | New York, NY 10007
O: 212-788-1440 | C: 347-224-7986
dtolson@cityhall.nyc.gov | nyc.gov/cecm

From: Green, Matthew [mailto:MGreen@council.nyc.gov]
Sent: Wednesday, October 26, 2016 4:29 PM
To: Tolson, Dawn
Subject: FW: THANK YOU!

Hi Dawn,

Below is a statement from Chana Widawski from the West 46th Street Block Association.

It appears the public comment period has ended, but wanted to submit to SAPO in case this can be included in your evaluation of the propose rule changes.

Thanks

###

Amendment of Street Fair Permit Rules

Whatever decisions are made regarding the frequency and locations of street fairs, it is critical for an amendment to also include the tremendous environmental impact of the festivals, mandating environmentally conscious packaging and utensils for food vendors (no one-time use plastic). The amount of unnecessary waste produced at these festivals is abominable. These measures would produce less waste, present values in line with other NYC agencies promoting environmental awareness and responsibility, and decrease DSNY over-time clean-up crews. Environmental responsibility MUST be included in any revisions to the current rules for street fairs.

*Chana Widawski, LMSW
Hell's Kitchen, NYC*

###

Matt Green
Deputy Chief of Staff for Community Affairs

NYC Council Member Corey Johnson
224 West 30th Street, Suite 1206
New York, NY 10001
mgreen@council.nyc.gov
212.564.7757 phone
212.564.7347 fax

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From: chana widawski [<mailto:chanawid@gmail.com>]
Sent: Wednesday, October 26, 2016 4:27 PM
To: Green, Matthew
Subject: Re: THANK YOU!

Yeah, I can't enter it on-line.

Here is my statement:

Amendment of Street Fair Permit Rules

Whatever decisions are made regarding the frequency and locations of street fairs, it is critical for an amendment to also include the tremendous environmental impact of the festivals, mandating environmentally conscious packaging and utensils for food vendors (no one-time use plastic). The amount of unnecessary waste produced at these festivals is abominable. These measures would produce less waste, present values in line with other NYC agencies promoting environmental awareness and responsibility, and decrease DSNY over-time clean-up crews. Environmental responsibility MUST be included in any revisions to the current rules for street fairs.

*Chana Widawski, LMSW
Hell's Kitchen, NYC*

On Wed, Oct 26, 2016 at 4:01 PM, chana widawski <chanawid@gmail.com> wrote:
thanx

On Wed, Oct 26, 2016 at 3:55 PM, Green, Matthew <MGreen@council.nyc.gov> wrote:
You can submit them online, but apparently the deadline now says October 24.

If you're unable to submit them online here <https://rules.cityofnewyork.us/tags/sapo> -- please send them to me and we will forward to SAPO.

Matt

Matt Green
Deputy Chief of Staff for Community Affairs
NYC Council Member Corey Johnson
224 West 30th Street, Suite 1206
New York, NY 10001
mgreen@council.nyc.gov
[212.564.7757](tel:212.564.7757) phone
[212.564.7347](tel:212.564.7347) fax

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From: chana widawski [mailto:chanawid@gmail.com]
Sent: Wednesday, October 26, 2016 3:52 PM
To: Green, Matthew
Subject: Re: THANK YOU!

Excellent. Thanks so much Matt!

Would you also be able to tell me where to direct a letter about street festivals, to bring up the environmental concerns I raised last night? Who should it be written to, who should be cc'd, etc. Whatever changes are made regarding the number of events and who participates, I think this aspect is imperative to address as well.

Looking forward,
-Chana

On Wed, Oct 26, 2016 at 2:51 PM, Green, Matthew <MGreen@council.nyc.gov> wrote:
Hi Chana,

Just as follow-up to last night, I wanted you to know that we've reached out to the Department of Health to investigate the following location for rats:

- 425 West 26th Street
- 429 West 26th Street
- 446 West 45th Street

Our office has also requested assistance from NYC Parks and NYPD to address the safety concerns in

Mathews-Palmer Park including, locking the park at night, drug use, and improving the lighting.

We'll also check on the electrical permits at 442 West 45th Street and see what we can find out from the Department of Buildings.

I'll keep you posted as I hear more.

Best,
Matt

Matt Green
Deputy Chief of Staff for Community Affairs
NYC Council Member Corey Johnson
224 West 30th Street, Suite 1206
New York, NY 10001
mgreen@council.nyc.gov
[212.564.7757](tel:212.564.7757) phone
[212.564.7347](tel:212.564.7347) fax

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From: chana widawski [mailto:chanawid@gmail.com]
Sent: Wednesday, October 26, 2016 12:20 AM
To: Green, Matthew; Corey Johnson; Johnson, Christine
Subject: THANK YOU!

Hi Matt and Corey,

A huge thank you! Both for Matt's exceptional patience and presence - and for all you both are doing for our neighborhood and communities.

We had a fantastic, well-attended meeting tonight and Matt handled, with poise, a barrage of questions and complaints.

Many many thanks for all.

And.....I had just learned from Steve Simon about the additional \$360,000 you had allocated for MPP redesign. Wow. Thank you for being so committed to our green spaces and helping move things along.

Looking forward to connecting again soon,

Chana

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From: [Elke Fears](#)
To: [SAPORules](#)
Subject: Fwd: SAPO Letter, please forward to Michael Carey
Date: Wednesday, October 12, 2016 7:04:01 PM
Importance: High

Begin forwarded message:

From: Linda Ashley <ashleyll@aol.com>
Subject: SAPO Letter, please forward to Michael Carey

The West 44th Street Better Block Association/Friends Of Pier 84
410 West 44th Street
Apartment #2
New York, NY 10036

To:
Michael Carey, Director
Office of Citywide Event Coordination and Management

The West 44th Street Better Block Association/Friends of Pier 84, stand together with our neighboring Block Associations and community groups from Hell's Kitchen to strongly oppose the downsizing or elimination of the two 8th Avenue festivals in the Hell's Kitchen neighborhood.

The monies that we earn are funneled back into our block and community. We pay for the care of all our street trees on 44th street, we maintain and purchase tree guards as well. We sponsor the Community Garden on Pier 84 in Hudson River Park. We donate to PS 51 with funds earmarked for the Music and Art Department for the last 14 years. We organize our Annual Holiday Party for the children and parents of the school.

Together with The West 47/48 Streets Block Association, The West 46th Street Block Association, The West 45th Street Block Association, we support the Midtown North Precinct Community Council. The Community Council needs this money to continue the "Cops of the Month" celebration as well as the National Night Out Against Crime Celebration each August.

We are a grass roots organization, run by dedicated volunteers, selflessly giving our energy and time. Our events foster and support community allegiance, friendships, and celebrates and promotes our block and community far beyond our boundaries.

Downsizing or eliminating The Eighth Avenue Festival will severely impede our ability to continue our mission of excellence we need to support our community

Best Regards,

Linda Ashley, Chair of The West 44th Street Better Block Association/Friends of Pier 84.

From: [Elke Fears](#)
To: [SAPORules](#)
Subject: Fwd: SAPO Letter, please forward to Michael Carey
Date: Wednesday, October 12, 2016 7:04:01 PM
Importance: High

Begin forwarded message:

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Subject: SAPO Letter, please forward to Michael Carey

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Apartment #2
New York, NY 10036

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Downsizing or eliminating The Eighth Avenue Festival will severely impede our ability to continue our mission of excellence we need to support our community

Best Regards,

Linda Ashley, Chair of The West 44th Street Better Block Association/Friends of Pier 84.

Michael Paul Carey, Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th floor
New York, NY 10007

Thursday, October 13, 2016

Re: Proposed Rules for Street Activity Permits

Dear Mr. Carey:

The Village Crosstown Trolley Coalition (VCTC) is a Greenwich Village-based nonprofit organization with 501c3 status. VCTC seeks to improve the walking environment and to upgrade local surface public transportation in our community by advocating for a river-to-river crosstown trolley in the Village. Neighborhood streetcars have been gaining favor throughout the U.S. and VCTC was a pioneer in proposing one for our community. Restoring and upgrading Christopher Street, 8th Street and St. Mark's Place into an attractive crosstown commercial corridor would be an important incentive to encourage the growth of small businesses that line these streets.

For over two decades VCTC has sponsored a Street Fair on the block of Astor Place between Broadway and Lafayette Street. This has been an important source of revenue for VCTC helping it to provide information about the benefits of this proposal to interested residents, organizations and businesses in the community. The Street Fair has been overseen by a very capable contractor, who makes arrangements with the several dozen small businesses to display and sell their products. Most of these small businesses are based outside of Manhattan, where rents are more affordable.

VCTC strongly opposes the proposed rules in their current form. By requiring that at least fifty percent of these small businesses be located in the community district where the street fair occurs, many small businesses located elsewhere in the city will be adversely affected. Many of these businesses survive by participating in the many street fairs held throughout the city. This is a specialized business and relies on an adequate volume of events.

While VCTC supports the proposed rule that would limit vendors to those based in NYC, it strongly oppose that they be limited to the district where the event is held.

We respectfully request that these proposed rules be modified accordingly.



George Haikalis
President, Village Crosstown Trolley Coalition



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October 21, 2016

Mr. Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY10007

Dear Mr. Carey,

The OCECM/SAPO public hearing on October 13, 2016 regarding proposed changes to New York City Street Fair Rules is of great concern to the SSMAC and all the charities who depend on the event to support their budget.

The Soldiers', Sailors', Marines', Coast Guard & Airmen's Club, who has for ninety-seven years provided affordable safe accommodations in the heart of New York City for the men and women in our Armed Forces, Veterans, our Allies and their families, and Mardi Gras Festival Productions, Ltd. Has sponsored our event for well over twenty years.

As well as providing funding for the non-profit organizations who participate in the event they are a great attraction for the residents of New York as well as the tourists visiting New York.

I do not feel the proposed changes will be beneficial to the City of New York or to those participating in the event.

Thank you for your consideration.

Sincerely,

Hazel Cathers
Executive Director

MR. COREY,

As a mother, and mother of law to very hard working JAPANESE lady, I will appreciate, if you pay attention to my letter. ^{! appreciate}

Both of them are artists and represent themselves on the Street Festivals and at the Open "Christmas Market" at BRYANT PARK.

They deserve respect and love! You can't love them, but please, respect their work, and creativity (and not only theirs).

They were once cut from selling on "UNION PARK" in MANHATTAN, and now their options are smaller and smaller!

We (my son and me) arrived from East Europe, at 1988, to improve the quality of life and be a decent and hard working American citizens!

Please, take a few minutes of your time and look at my son, web. side!

Respectfully: WWW.ALEX-STAR.COM

IRENA MILENKOVIC

63 Main Str. apt. 9

DOBBS FERRY, N.Y. 10522

James Seffens
410 W. 44th St., Apt. #27
New York, NY 10036
jseffens@netzero.net

Mr. Michael Paul Carey, Executive Director
Office of Citywide Event Coordination and Management
253 Broadway - 6th Fl.
New York, NY 10007
saporules@cityhall.nyc.gov

October 12, 2016

Dear Mr. Carey:

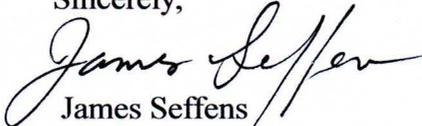
It has come to my attention that a proposed rule change affecting street fairs could jeopardize the existence of the Hell's Kitchen Antiques and Flea Market. This weekend market on West 39th Street has become an important feature in the neighborhood which we would like to keep, and I would urge that it be granted an exception to the proposed rules.

The market is more than an enjoyable pass-time for many in the neighborhood. It is also the principal sponsor of the Hell's Kitchen Foundation, which is the only organization charged with providing financial assistance to artists living in Hell's Kitchen.

I am one of the artist recipients of a Hell's Kitchen Foundation Grant, and it has been a great help. Funds received this past summer are being used to replace worn-out tools, to catch up on a backlog of framing needs, and to cover fees associated with exhibition calls for entry. The generous grant has also enabled me to cover studio rent during a tough patch and focus on my work rather than scraping around for odd jobs. This recognition of my work also led to an interview with an online art-critical publication, and it is a proud addition to my resume.

Residing in Hell's Kitchen for nearly 40 years, I am acquainted with many other artists living in the neighborhood, and have joined with them in numerous attempts to gain some recognition for our community. Until the creation of the Hell's Kitchen Foundation there was little or no institutional support specifically for the artists of Hell's Kitchen. The work of the foundation can have a great impact here, it's continuation depends upon allowing the Hell's Kitchen Flea Market to continue. Both the market and the foundation would be greatly missed if the rules cannot accommodate.

Sincerely,


James Seffens



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036
tel: 212-736-4536 fax: 212-947-9512
www.nyc.gov/mcb4

Delores Rubin
Chair

JESSE R. BODINE
District Manager

October 13, 2016

Michael P. Carey
Executive Director
Office of Citywide Event Coordination and Management
Street Activity Permit Office
100 Gold Street, 2nd Floor
New York, NY 10038

Re: Proposed Rule Changes to Street Events

Dear Mr. Carey:

Manhattan Community Board 4 (“MCB4”) writes to thank the Street Activity Permit Office (SAPO) for extending the comment period for the proposed rule changes for street events.

MCB4’s Art, Culture, Education, and Street Life Committee (ACES) did not have the appropriate amount of time to deliver testimony at the hearing that is scheduled to take place on Thursday, October 13th, 2016 and will be submitting comments after their committee meeting on Tuesday, October 18th. MCB4 wants to express our thanks to you and your staff for its dedication and responsiveness and agreeing to present at the ACES Committee meeting.

Nevertheless MCB4 will like to be on record that many of these community events in the boundaries of MCB4 have a long history with the neighborhoods of Chelsea and Clinton/Hell’s Kitchen. These events do have an impact on both residents and small businesses in terms of noise, accessibility, and traffic congestion. However, they also greatly benefit the quality of life and fabric of the neighborhoods. MCB4 has a number of questions regarding the proposal to lift the moratorium on the number of events and replace it with a yearly cap of 10 multi- block events and 20 single block street festivals per community district. The potential affect in Community District 4 would allow for the addition of two multi-block events and double the number of single block events within Community District 4. In addition, MCB4 would like to better understand the proposed changes to event times and the impact these proposed rules will have on single block street festivals that are sponsored by local, long standing, block associations.

MCB4 looks forward to learning more about the proposed rule changes at the ACES Committee Meeting next week and appreciates your staff's willingness to attend.

Thank you for your attention to this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Delores Rubin", enclosed in a thin black rectangular border.

Delores Rubin

Chair

Manhattan Community Board 4

cc: Hon. Gale A. Brewer, Manhattan Borough President
Hon. Corey Johnson, City Council



Becco Restaurant
355 West 46th Street
New York, NY 10036
212.397.7597
www.becco-nyc.com

Saturday, October 8th, 2016

To Whom it May Concern:

Thank you in advance for taking the time to read my submission.

It was recently brought to my attention at a meeting of the Restaurant Row Committee that a hearing was going to be held regarding the impact of street fairs in the Times Square area. I am, unfortunately, unavailable to attend this hearing in person; however, as a member of the Times Square community for close to 13 years & a member of the Restaurant Row Committee, I felt compelled to submit my feelings on how street fairs in the Times Square area, specifically on West 46th Street completely disrupt the entire neighborhood.

As you are well aware, West 46th Street between 8th and 9th Avenues (better known as Restaurant Row) is the bloodline of Times Square. It is accessible by every form of public transportation & is walking distance from not only Times Square itself, but almost every Broadway & Off-Broadway theatre in the Theatre District. There are roughly 42 businesses on Restaurant Row & at least 35 of these businesses are establishments that sell food. For those who work on Restaurant Row, we pride ourselves on the diversity that can be found on the block & that we are happy to cater to tried-&-true New Yorkers, tourists, the Broadway Community & employees of other Times Square businesses. It is a block that accommodates all walks of life & you can truly “dine around the world” by visiting Restaurant Row since we have an extremely wide variety of cuisine & price points that accommodate the diverse crowd that visit our block.

It seems extremely antiquated to me that on a street that specializes in unique dining experiences to cram an already crowded street with a street fair featuring food carts & an array of “merchandise” with very little advanced notice. Becco has been in business for almost 25 years, we have a very loyal following but I still feel the negative repercussions of a noisy, chaotic & poorly organized street fair. I can only imagine what new businesses or start up restaurants must feel when the façade of their restaurant on, what is expected to be a busy Saturday matinee, is covered by a corn-on-the-cob truck, a pashmina/iPhone case stand or a wall of rugs being peddled in the street. During these recent street fairs on West 46th street; I receive calls from guests cancelling their reservations because they are concerned about getting in & out of the block/restaurant in time for their theatre curtain. It

makes traffic on the adjacent avenues a complete nightmare, dangerously crowded & almost impossible to navigate. It provides direct competition to a well-established restaurant that has been a resident of the block for almost a quarter of a century, paying NYC rent & upholding the standards of Restaurant Row. In that last example, I am directly regarding Becco; however, I feel I would be remised to find any restaurateur on Restaurant Row that would be in favor of these recent street fairs.

This is not for me to say that all outdoor events are an issue. During my time at Becco we have consistently participated in The Taste of Times Square which is an extremely well planned event hosted by The Times Square Alliance that empowers the food scene in Times Square to come out & to show off what they do best directly on Restaurant Row. It is an event that is scheduled on a Monday night in June to help bring business to what is typically a slower night of service. It compels all restaurants in the Times Square area to participate & does not charge the restaurants to do so. It is professionally advertised around the entire Times Square area & encourages everyone (locals & tourists alike) to attend, to support Restaurant Row & to have a wonderful time doing it. The Taste of Times Square is a VERY different event than the recent street fairs that seem to just congest the street, cripple any traffic flow, inhibit the restaurants of getting our needed business deliveries & deter visitors of Restaurant Row from having a relaxed dining experience in one of the establishments that are actually located on Restaurant Row

I thank you in advance for your time & consideration. If you should require any type of follow up, please feel free to contact me at Becco or via email.

Ciao for now,

Jim Brigman

General Manager

jbrigman@becconyc.com

212.397.7597

www.becco-nyc.com

Joe Giovanni

225 Broadway

New York, NY 10007

MY NAME IS JOE GIOVANNI FROM MARDI GRAS FESTIVAL PRODUCTIONS A LOCAL NYC EVENT PRODUCTION COMPANY IN BUSINESS SINCE 1979.

WE REPRESENT MANY OF THE LOCAL NOT-FOR-PROFIT COMMUNITY ORGANIZATIONS, MOST OF WHOM ARE “GRASS ROOTS” THAT HAVE BEEN CONDUCTING THEIR RESPECTIVE STREET FAIRS FOR WELL OVER 20 YEARS & MANY OVER 30 YEARS IN THEIR OWN COMMUNITIES WITH FULL LOCAL COMMUNITY BOARD SUPPORT.

WE ALSO REPRESENT OVER 1000 LOCAL NYC “LICENSED” STREET FAIR VENDORS. THESE VENDORS HAVE ALWAYS BEEN AND WILL LIKELY ALWAYS BE NEW IMMIGRANTS, FROM A VARIETY OF DIFFERENT MINORITIES, MANY THAT ARE PEOPLE OF COLOR, MANY THAT ARE WOMEN BUT MOST IMPORTANTLY THEY ARE OVER 90% NEW YORK CITY RESIDENTS! THEY PAY TAXES, THEY PAY RENTS, THEY PAY MORTGAGES, THEY PAY EVERYTHING THAT ALL THE BIG BUSINESSES OF MIDTOWN PAY TO KEEP OUR ENTIRE CITY & STREETS RUNNING IN “**ONE NYC**”

IT IS CLEAR THAT THESE PROPOSED CHANGES ARE TO GREATLY REDUCE & RESTRICT COMMUNITY EVENTS IN MID-TOWN MANHATTAN – SPECIFICALLY TIMES SQUARE WHILE ADVOCATING INCREASING EVENTS IN THE OUTER BOROUGHES – TO ME & ALMOST EVERYONE ELSE THAT HEARD OF THIS PROPOSAL IT’S CLEAR – NIMBY TIMES SQUARE! NOT IN MY BACKYARD...

IT SOUNDS NICE ON THE SURFACE BUT THE MASTER PLAN OR RESULT I SHOULD SAY, WILL BE ELIMINATION OF THE EVENTS BY FIRST REDUCING THE PERMITTED NUMBER OF EVENTS TAKING PLACE (EVEN THOUGH THERE HAS BEEN NO

PROLIFERATION OF EVENTS AS CLAIMED BECAUSE A VERY SUCCESSFUL MORATORIUM ON ANY NEW MULTI BLOCK EVENTS HAS BEEN IN PLACE & EFFECT SINCE 2004!) IN FACT SINCE 2010 THERE HAS BEEN AN OVER 25% REDUCTION IN MULTI-BLOCK EVENTS.

THE SECOND KNOCK-OUT PUNCH THAT WILL EFFECTIVELY ELIMINATE ALL THE EVENTS IS THE MANDATORY REQUIREMENT TO HAVE 50% OF THE VENDOR SPACES BE LOCAL MERCHANTS OR FROM THE LOCAL COMMUNITY BEFORE A PERMIT IS GRANTED TO CONDUCT THE EVENT. THAT REQUIREMENT IS UNOBTAINABLE NOT EVEN A 10% MANDATORY REQUIREMENT WILL BE RELISTIC! IN ALL OF OUR PROFESSIONAL YEARS, LOCAL MERCHANTS WERE ALWAYS OFFERED DEEPLY DISCOUNTED SPACES IN FRONT OF THEIR LOCATIONS OR WITHIN AN EVENT IF THEY WERE LOCATED NEARBY. IN TODAY'S MANHATTAN REAL ESTATE WORLD, MOM & POP STORES OF YESTERDAY DON'T EXIST. WE ARE DOMINATED BY BIG CORPORATE BUSINESS BOX STORES, BANKS & THE LIKE, THAT WILL NEVER PARTICIPATE. THE REALITY IS THAT VERY FEW IF ANY, LOCAL COMMUNITY ORGANIZATIONS WILL BE ABLE TO CONDUCT THEIR ANNUAL EVENT EXCEPT OF COURSE MAYBE THE LOCAL BUSINESS IMPROVEMENT DISTRICT THAT IS FUNDED BY LOCAL TAX DOLLARS & DOESN'T NEED THE REVENUE GENERATED BY A STREET FAIR AS ALL THE OTHER LOCAL COMMUNITY GROUPS DO...

FINALLY GETTING BACK TO NIMBY – DOES ANYONE REALLY BELIEVE THAT THE STRUGGLING VENDORS THAT MAKE THEIR LIVING FROM BEING LICENSED STREET FAIR VENDORS, THAT PAY THEIR TAXES, MAYBE HIRE AN EMPLOYEE OR 2 TO HELP WORK THEIR BOOTHS, BUY THEIR MERCHANDISE FROM LOCAL WHOLESALERS WHO ALSO EMPLOY ADDITIONAL WORKERS TO HELP FACILITATE THE VENDOR'S NEEDS, WILL DO AS WELL FINANCIALLY IN AN OUTER BOROUGH STREET FAIRS?

THE PRACTICAL MATTER IS THAT VENDORS ARE IN BUSINESS TO MAKE MONEY & SUPPORT THEIR FAMILIES. A FAIR & EQUITABLE BALANCE WOULD BE TO LEAVE THE RULES IN PLACE AS IT WAS IN 2016 BUT ALSO GRANT THE OUTER BOROUGHES THE OPPORTUNITY TO INCREASE THEIR EVENTS IN 2017 & STUDY THE EFFECTS OF THAT BEFORE MAKING ANY ADVERSE IMPACT CHANGES IN THE FUTURE. WE KNOW OUR MAYOR DEBLASIO IS A MAYOR OF ALL THE PEOPLE OF THE CITY AND HE WILL NEVER ALLOW THE BIG BUSINESS INTEREST OF MID-TOWN MANHATTAN TO TAKE PRECEDENCE OVER ITS' LOCAL NON-PROFITS THE STRUGGLING VENDORS.... PLEASE DON'T ALLOW THE STREET FAIR RULES TO CHANGE!



Midtown South Community Council

Board Members:	President John Mudd, Vice President Bill Ottersen,
Recording Secretaries	Eileen Miller and Frank Kelly,
Community Service	Sharon Jazprizza
Legal Council	Howard Lieb
Marketing Director	Cyndie Burkhardt
Executive Editor	Grace Cavallo

Understanding the process:

- Were there any discussions with the all the Community boards?
- Any invites to the Councils to discuss?

Questions:

- What is the reasoning behind the changes?
- Who is behind the changes?

If it is the BIDS, we need to rethink this policy change. We need to think about the whole, not a narrow view of the few. While the BID is heavily funded via a tax, we are not. You have small community groups that need these funds. If it is your intention to keep the council as a mediocre idea or even end them; then this is a good move, but if you want us to help us to be active participants in our community, these funds help.

I believe we are necessary, we're the echo of people who live in Midtown, a dense and impolite commercialized area of Manhattan.

If it is policy of the administration, then we are foolishly focusing on less important issues and possibly cutting off a supporting player.

- Are there not plenty of other things to focus on (street repairs, sidewalk repairs, bike lanes, homelessness?)
- What about the homeless drop in centers, shelters, permanent housing?
- Are we doing business as usual or are we studying the inefficiency of our system or structure?
- What are your plans to curb and cure the growing homeless state?
- What about housing, urban development?

Are we building a playground for the visitors and wealthy, or are we trying to support communities?

Again, we are necessary, we're building a bridge between various networks and doing studies to help others to help our residential and business community.

THE FAIR gives vendors an income...

We know the real-estate costs are way out of hand, they do nothing to nurture small business or communities. You can't have a community when the average residential rent is over 3,000.00 a month.

If we ration these fairs we will not be nurturing communities. This will be another discouraging message.

The council's existence should be important, the small merchants should be important, the visitors recreational needs should be important.

The fairs give small vendors an opportunity for income. They provide funds that are necessary for their existence. You should be thinking about supporting these community group beyond these fairs. Both the fairs and Community Councils can be a partner in bettering our city.

I hope this helps you to make better decisions for a better community.

Respectfully,

John Mudd, President
Midtown South Community Council
midtownsouthcc.org
917-520-3009

THE MIDTOWN SOUTH COMMUNITY COUNCIL (MSCC) NEEDS ITS STREET FAIR

Re: MSCC Sponsored Street Festivals

The allowance Midtown South Community Council receives from the street fair productions supports the work we do.

The Midtown South Community Council (MSCC) has been participating in bettering the community for 33 years. It's been sustained by the sacrifices and commitment of its board members, the Midtown South Police Precinct, public servants, and concerned citizens who attend our meetings. We formed the MSCC to address the issues of yesteryear, when porn stores swamped the area, and theft, drugs, and more were at an all time high. Many times the MSCC has found peaceful solutions for the residential and business communities ([see our Wikipedia page](#)).

The last several years have yielded much more progress—with sponsored festival funds—than in our earlier decade: We are a 501c3, <http://www.midtownsouthcc.org>. We are an engaged community proactively developing programs to better the human condition, by nurturing relationships and working with community, city agencies, legislatures, not-for-profits, and other organizations for a “Better Quality of Life” ([see our 2015 Progress report](#)).

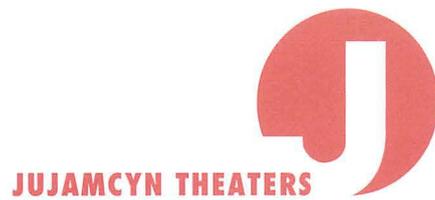
We are building relations with the community, businesses, and visitors through our networking, meetings, YouTube channel, website, newsletters and informed responses to issues raised within our communities ([see our meeting minutes](#)). We invite speakers to our meetings to discuss community issues. Some of these speakers and ensuing discussions can be viewed on our [YouTube channel](#). We are building an infrastructure within our Council which includes legal and accounting representation. We have grown from a three-person operation (President, Vice President, Secretary) to a six-person operation (President, Vice President, two secretaries, Community Service Director, Beautification Director). Our board is progressively working toward solutions for problems in midtown Manhattan from 29th Street to 45th Street, and 9th Avenue to Lexington Avenue. A Director of Health, to advocate for healthier lifestyles, and a Director of Elderly Programs, for in-home assistance, will be appointed to our board in the near future.

We were part of the lobbying efforts to disable the Internet of the LinkNYC kiosks that are replacing the phone booths throughout our city. The free Internet was causing a tremendous problem to businesses and residents (*see pictures attached*). Our emails and letters along with Gale Brewer's office, CB4, Councilman Corey Johnson's office, and the mayor's office, were effective in communicating the necessity for LinkNYC's policy change (*see attached*).

Moreover, we are working on the homeless situation highlighted by the kiosk issues (*see our last email to our community partners attached*). We did a study to engage the homeless in our community for a better understanding of their situations (*see Interview with the Homeless*). Our next study is soon to be released. We are working with our ever-growing networks: Mayor's Community Affairs Unit (CAU) Director Paola Ruiz and DHS team; Manhattan's Borough President Gale Brewer; Council Member Corey Johnson's Chief of Staff for Community Affairs Matt Green and Erik Botcher; Community Board 4's Jesse Bodine and Christine Berthet; AMTRAK's Station Relations Richard Rubel; Urban Pathway's Lisa Lombardi and Darlene Reddish; and others to eradicate homelessness.

Our work of building programs for rescue, education, and more continue to grow, not just in midtown but across New York. Over the last twelve months we've supported and are looking to extend nutritional educational programs involving our youth from schools to shelters.

Our 2016 Progress report will be available in January with more details of our accomplishments and future plans. We would very much like to continue our efforts and expand our possibilities.



JORDAN ROTH
President

October 27, 2016

Times Square is our camel, and there are just too many straws piling up on its back. Many of those straws either can't be helped or are already trying to be addressed. But on weekends, it feels like the unnecessary, unfair straw of closing off long stretches of main avenues for street fairs is not just a straw, but a big bushel. And it's breaking our communal back.

On the weekends, when other neighborhoods may enjoy less traffic and welcome some fun in the streets, Times Square is open for business with traffic that often exceeds weekdays and with Saturday and Sunday matinees at every Broadway and off-Broadway theatre in the district, bringing thousands of people to work and tens of thousands to attend. And when any one of our main avenues is needlessly shut down for blocks, the result is crippling throughout our neighborhood. I myself have sat in parking lot traffic on many occasions trying to make my way to one of our matinees.

While it's extraordinarily frustrating to be kept from work, I and my colleagues have no choice but to push through. Our audiences, however, do have a choice and many of them are choosing to not come at all. Both quantitative surveys and anecdotal evidence make clear that more and more audiences are citing Times Square traffic and frustrations as the reason they are coming to Broadway less and less. This is especially true for local audiences. We all believe that Broadway should serve New Yorkers as well as tourists, but the challenges of getting here are keeping New Yorkers away. This not only hurts our industry now, it hurts the future of our industry.

There are so many compounding challenges in Times Square that adding street fairs can feel so unnecessary and unfair. When I found out that we are burdened with a greatly disproportionate share of them, it actually feels punitive. If Times Square is only 0.1% of the city's land area, how can it have 10% of the city's street fairs? If Times Square is only 11.8% of Community Board 5, how can it have 51% of CB5's multi-block street fairs? There are other neighborhoods in our city that welcome street fairs and have the capacity to host them. We need a more equitable approach that spreads street fairs fairly across our city and that unburdens our Times Square camel. We are at the back-breaking point.

Jordan Roth
President, Jujamcyn Theaters

DISTRICT OFFICE:
118-35 QUEENS BOULEVARD, 17TH FLOOR
FOREST HILLS, NY 11375
TEL: (718) 544-8800
FAX: (718) 544-4452

CITY HALL OFFICE:
250 BROADWAY, SUITE 1872
NEW YORK, NY 10007
TEL: (212) 788-6981
FAX: (212) 788-7052

Koslowitz@council.nyc.gov



THE COUNCIL OF
THE CITY OF NEW YORK

KAREN KOSLOWITZ

COUNCIL MEMBER, 29TH DISTRICT, QUEENS

CHAIR
STATE & FEDERAL LEGISLATION

COMMITTEES
AGING
CONSUMER AFFAIRS
ECONOMIC DEVELOPMENT
SMALL BUSINESS
WOMEN'S ISSUES

CHAIR
QUEENS DELEGATION

October 11, 2016

Michael Paul Carey, Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Executive Director Carey:

I would like to voice my serious opposition to the new rules regarding street festivals being promulgated by the Street Activity Permit Office (SAPO) of the office of Citywide Event Coordination and Management. It is my understanding that under the new regulations governing street activity; block parties and street fairs would now be limited to 100 in total for Manhattan and 100 for all other boroughs. Additionally, I am informed that SAPO would institute a rule that 50% of participating vendors must have a business or local presence within the community board where the festival or block party is to occur.

Street festivals serve as an economic catalyst for local businesses, startup companies, craft vendors and even the large corporate companies that sponsor these outdoor activities. Street fairs highlight, feature, and expose the diverse communities and cultures throughout our great city. The new regulations would severely limit street festivals and if enacted would have an extremely negative impact upon the many local Chambers of Commerce and not for profit organizations holding such activities, as they derive substantial and critical income from these festivals. Additionally, to demand that for each festival, 50% of participating vendors be from the local community board is an onerous, substantially burdensome, and unattainable regulation, as many of our neighborhoods in Queens have lost their small retail "mom and pop" establishments. Moreover, involvement at street festivals even by local "big chain" stores or large corporate owners is often prohibited since their franchise agreements may not allow participation, and managers of stores like Walgreens or Rite Aid cannot participate without consent from their corporate office which has always been rejected.

Street fairs serve an important and necessary function in our neighborhoods. Indeed many of our local street fairs do not charge any participation fees to our local houses of worship, senior centers, sports clubs, outreach centers, civic organizations, volunteer ambulance corps, veteran's groups or other charitable organizations that add value and character to our community.

In light of the above, I would like to recommend a denial of the proposed changes to the rules and regulations governing our city's street fairs and block parties.

Sincerely,

Karen Koslowitz
Council Member
29th District



The 19th Precinct Community Council, Inc
153 East 67th Street, New York, NY 10065

October 13, 2013 Testimony presented to: Office of Administrative Trials and Hearings

I'm Kathy Jolowicz, a community leader, and founding member of both the 16 Block, East 83/84th Street Block Association, and the 19th Precinct Community Council, both started in 1973. I am against the City's new plan for curbing street fairs and the fundraising opportunities for charitable sponsors.

As the present Vice President of the Precinct Council I wish to inform you that besides bringing the community and the police together in a crime prevention forum, we also provide the police with needed funds to support fallen and, or injured officers and their families, pay for necessary supplies and projects for the Precinct which are not readily available from the City, and monetarily support NYPD generated programs, and more.

When we officially started, we funded the Stanley Isaacs Project's Youth Program's basketball tournaments, as well as other programs they started. Later, Precinct Council members also participated in the 19th Precinct funded base ball team, whose star member was the CBS TV news anchor, Jim Jensen, and where we competed against other community teams, in the baseball field under the 59th Street Bridge. We also funded the successful "Choose a Subject, Teach a Kid" program, which not only included class room subjects, but such subjects as sewing, woodworking, and make up classes, for kids.

Our street fair is the main source of income and, should the City's proposal become law, we would be reduced to just holding meetings and be beholden to small amounts of donations.

I have been working with Clearview Festivals and other promoters, since 1987 when Street Festivals were in their infancy. I have seen the wonderful asset these fairs brought to community organizations, via funding for the charitable work they do; they also bring residents together in doing that work. Street Fairs are a wonderful source, not only for charitable income, but to provide a relaxing venue for family outings. Local businesses have always been welcome to take spots, just as outside vendors so how would this change if the rules were changed?

When these street fairs started, I remember the vendors were a wonderful mix of local stores and mom and pop shops. The city's proposal advocates that 50% of the vendors must be local businesses with free or discounted rates. However that is not a realistic idea. These neighborhood businesses no longer exist due to the demolition of their buildings and the freely tripling of rents, in order to increase real estate income by wooing those new evolving chain, and big box stores, who are not interested in taking spots; nor are the fancy new stores who replaced them in the new expensive high rises. Subsequently, the charitable sponsors will be inhibited to do their programs, and this era of retail and charity partnership will cease to exist.



Street Activity Permit Office: Comments

10/24/2016

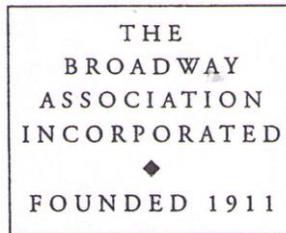
The Women's Housing and Economic Development Corporation (WHEDco) is a community development organization founded on the radically simple idea that all people deserve healthy, vibrant communities. WHEDco's mission is to give the South Bronx access to all the resources that create thriving neighborhoods – from sustainable, affordable homes, high-quality early education and after-school programs, to fresh, healthy food, cultural programming and economic opportunity.

Since the start of the NYC Department of Transportation's One-Day Plaza and Weekend Walks program in 2012, WHEDco has partnered with the NYC DOT to host annual street festivals in both the Crotona Park East and Melrose neighborhoods of the Bronx. Our events provide exciting, fun activities and recreational space for the community. We invite organizations and individuals with engaging activities (not solely tabling) to deliver around the following key themes: Music and the Arts, Health, Education, and Economic Empowerment. We strive to connect community members with needed resources that are often lacking in their neighborhoods as well as bringing events that are often only seen in Manhattan neighborhoods, featuring free food, arts and sports activities as well live music and entertainment.

- While these proposed changes to the SAPO rules may have the effect of ensuring greater coordination among groups so there are fewer events on the exact same day and streamlining city resources like the NYPD , one per day per community district is too strict.
- Bronx events are very neighborhood-specific: community members identify closely with the organizations, businesses, services, resources, and amenities within their neighborhood and consequently, do not customarily travel further afield. Additionally, with scarce resources, community members may not be able to afford to travel to events not held within proximity of their neighborhood. There would be fewer local activities for Bronx community residents to enjoy, which would be a loss for all, and particularly, for the many in our diverse communities who are not as mobile (women and children, elders, disabled etc.).
- Limiting the number of street events and fairs to just one in each community district will negatively impact the access to events in the Bronx and other boroughs outside of Manhattan, as will imposing high costs of fees for permits.
- Imposing exorbitant fees for street events, street festival and single block street festivals will severely impair the ability of community groups to host these type of community-minded events. Many vendors and non-profit organizations who are invited to share their resources already participate for free, and cover the cost of their own staffing and other expenses. Residents are not charged any participation fees. This norm and expectation could be in jeopardy, should higher permit fees be imposed.

- It is unclear how these newly proposed SAPO rules would affect the NYC Department of Transportation's Weekend Walks program, an initiative that seeks to "highlight local cultural institutions, non-profits, and community resources. The events promote healthy, safe recreation as well as local businesses, and create high-quality public space (NYC DOT)." The Weekend Walks program allows community-based organizations to host community events to bring local resources to neighborhoods that are underserved by street fairs, block parties and overall recreational activities. The NYC DOT provides small grants for these events, which supports non-profit organizations realizing these events.
- Limiting Community Sponsors to one event per calendar year for street festivals and two events per calendar year for single block street events will greatly restrict the activities organized by the few organizations who host these in boroughs outside of Manhattan, including WHEDco. We host two separate Weekend Walks events (each over the course of two days of consecutive weeks) in two different neighborhoods in the South Bronx in order to connect thousands of underserved community members to vital health, education, career, recreation, arts, and other resources.

We value the work of the Street Activity Permit Office in facilitating the nurturing of vibrant communities and streets all over New York City. For many decades, the Bronx has had a vibrant street culture that reflects the diversity of people, opportunity and sense of possibility in our too frequently underresourced neighborhoods. The Bronx is the only borough on the mainland, and arguably, the most challenging topographically, and the hardest to navigate east-west given its considerable expanse and insufficient cross-borough public transit options. Neighborhood-level connections here are among the most tightly woven. Given WHEDco's 25 years' serving tens of thousands of Bronx residents, and over six years of experience executing street events with your office's support and approval, we respectfully urge you to reconsider limiting so severely the number of street events per community district. We do not think it would be right or fair to our borough, and to the 1.4 million people here, and in fact, believe it will impede the hard-fought strides the borough has made to create safer streets, encourage street life, increase recreational opportunities, celebrate culture, restore pride of place, and help build crucial linkages to family-supporting resources. Please contact our Vice President of Community Development, Kerry A. McLean, at 718-839-1100, if you have any questions. Thank you for your time and thoughtful consideration.



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BARBARA VON BORSTEL

October 13, 2016

Mr. Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Dear Mr. Carey:

On behalf of the Broadway Association, I am writing in support of the proposed Amendment to SAPO's Street Fair Permit rules to limit the number of street festival and single block street festival permits that can be issued annually within a community board, within Manhattan, and citywide.

The Broadway Association is a 105-year-old business association devoted to the cultural and economic betterment of Midtown West in Manhattan. Our membership includes property owners, major corporations, hotels, advertisers, unions, civic associations, theater companies, developers, banks, law firms, airlines, non-profits and publishers. Working together with city and state entities, the Broadway Association strives to preserve and protect our district through community engagement.

As you are aware, the Theater District is extremely congested. According to the Times Square Alliance, peak pedestrian traffic is 480,000 people per day in Times Square, and the vehicular numbers often exceed the daily pedestrian counts. The ongoing construction in the area is also exacerbating an already overcrowded space which is extremely difficult to navigate for both New Yorkers and the millions of tourists visiting Times Square each year.

Currently, 10% of all street fairs in the City take place in Times Square and the area has more street fairs than anywhere else in the City. This is an overburden for a district which cannot manage the traffic flow without the added congestion of a street fair. New Yorkers and visitors are increasingly avoiding the area due to congestion.

We support the proposed amended rules and thank you for your consideration on this important matter.

Sincerely,

Cristyne L. Nicholas
Chairman

[sell my handmade in New York jewelry at street fairs and this policy would severely negatively impact my business.](#)

[**Cindy Peng**, New York, NY](#)

[1 week ago](#)

8

[I'm signing because I love NY and I love street fairs. When I visit NY I always check out some street fairs. It adds atmosphere to a city.](#)

[**Glenn Lawson**, Australia](#)

[1 week ago](#)

7

[The nyc streetfairs are New York...Just as much as Mulberry Street, Times Square and 5th Avenue. Wake up..](#)

[**Kimberly Bella Pacelli**, Wallingford, CT](#)

[7 days ago](#)

5

[Street fairs are an amazing way to bring people into the area, help promote local businesses, and get people OUTSIDE instead of glued to their phone or tvs.](#)

[**Lauren Nercess**, Babylon, NY](#)

[7 days ago](#)

5

[One of the main reasons I love visiting NYC is the street fairs. It is so diverse with food and wares from so many different cultures. NYC would not be the same without them.](#)

[**Roberta Kizis**, East Branch, NY](#)

[7 days ago](#)

5

[Street fairs are part of the fabric of N.Y.](#)

[Michael Higgins, Copiague, NY](#)

[7 days ago](#)

5

[Street fairs are a big part of my summer & NYC CULTURE !!](#)

[Richard Seven, New York, NY](#)

[7 days ago](#)

5

[Street festivals are a wonderful part of NY, and there's always something interesting to see/eat/buy. Besides, they're free events so they attract a diverse audience.. I can't imagine NYC without street festivals.](#)

[Helena Pires, Chestnut Hill, MA](#)

[7 days ago](#)

5

[IT'S FAIR TO EVERYONE- WE LOVE FAIRS](#)

[alex casten, east elmhurst, NY](#)

[7 days ago](#)

5

[I'm signing because I love the Street Fairs](#)

[**susan izeman, forest hills, NY**](#)

[1 week ago](#)

5

[I don't want you to unlimit street fairs. It would not be NYC without them. We love then plus people who are lonely get to at least get out and enjoy themselves](#)

[**Adrienne Blandford, Brooklyn, NY**](#)

[1 week ago](#)

5

[We love going to festivals with our children and grandchildren](#)

[**Camille Demetrio, Staten Island, NY**](#)

[1 week ago](#)

5

[I can't believe the city wants to do this. Street fairs in NYC are a part of the culture, and helps small businesses. this must be stopped.](#)

[**rachel mason, Staten Island, NY**](#)

[1 week ago](#)

5

[I live in NY. Street fairs are a must!!!](#)

[**Mimi Levitan, Boca Raton, FL**](#)

[1 week ago](#)

5

[I LOVE FOOD](#)

[Michael Kanarek, New York, NY](#)

[1 week ago](#)

5

[I believe in street fairs and I love Forest Hills.](#)

[Rob Osattin, Atlanta, GA](#)

[1 week ago](#)

5

[Kettle corn nyc I come from Texas for your street festivals! Your vendors are unique; From handmade jewelry to Kettle Korn NYC. Nothing like it!](#)

[Linda Ward, Spring, TX](#)

[1 week ago](#)

5

[Street fairs in NYC are good for the economy and helps build small businesses and shouldn't be eliminated.](#)

[frances scott, Bronx, NY](#)

[1 week ago](#)

5

[I go to this Street fair I love going](#)

[Janis Girardi, Mahopac, NY](#)

[1 week ago](#)

5

[This is not what the people want.](#)

[**Bridget Scotto, Queens, NY**](#)

[1 week ago](#)

5

[I like going to Street Fairs](#)

[**Larry Berkowitz, Forest Hills, NY**](#)

[1 week ago](#)

5

[I enjoy street fairs when in NYC and the outer boroughs.](#)

[**Kristin Jimenez, Bakersfield, CA**](#)

[1 week ago](#)

5

[Tired of "Servants "telling the" People "they work for what to do especially when it's not in the best interest of we the People](#)

[**Jeffrey Clark, Farmingdale, NY**](#)

[1 week ago](#)

5

[For the public street fairs is a great way for them to visit the local vendors and craftsmen. For the businesses it is an inexpensive way to introduce ourselves to the public.](#)

[**Franklin Verbsky, Bellmore, NY**](#)

[1 week ago](#)

5

An Instagram contact of mine told me all about this and she's such a great artist whose job is making beautiful jewelry and selling them in the very street fairs that are apparently gonna be taken away. Being an artist myself, I felt the urge of supporting these artists by taking the time to sign this petition.

Noushin Kahfi, Tabriz, Iran

1 week ago

5

I love street fairs!

Lauren Butler, Forest Hills, NY

1 week ago

5

We provides marketing materials to businesses participating in street fairs. A limit on the number of street fairs will have negatively impact us as well as our customers who participate in street fairs to promote their businesses.

Judi Nichols, Rego Park, NY

1 week ago

5

Street Fairs are important to those participating and are an exciting part of living in New York. They provide entertainment for kids and adults alike, as well as security for the vendors. It would be a shame and a great loss for all communities if the fairs were reduced or resized or constrained to vendors already in that neighborhood. Please reconsider.

Colleen Martin, Brooklyn, NY

1 week ago

5

Street fairs provide a fun and community oriented atmosphere! I love going to them, as a craft vendor and a spectator.

[**Mirielle Maor**, Woodmere, NY](#)

[1 week ago](#)

4

[Our street helps local business and is a great community event for us.](#)

[**Christopher Collett**, Forest Hills, NY](#)

[1 week ago](#)

4

[I love street fairs, things that locals produce cannot be found anywhere else, they are unique and made with love. We need to support them! Please keep the street fairs, the tradition needs to live on so our children gain by not just buying everything online but have face to face contact with real, creative and passionate sellers. Keep on the good work :\)](#)

[**rano sangwan**, stockholm, Sweden](#)

[1 week ago](#)

4

[Small entrepreneurs will be affected the most](#)

[**Roshni Karnavat**, Forest Hills, NY](#)

[1 week ago](#)

4

[I am signing because I believe in the community benefit of street fairs.](#)

[**Leslie Brown**, Forest Hills, NY](#)

[1 week ago](#)

4

I find these very fun and enjoy attending them

Steven Rewinski, Rego Park, NY

1 week ago

4

The Austin Street festivals are important to my business as a local business person.

Paul Hellman, Queens, NY

1 week ago

4

Eliminating some and not all is discriminatory. There is no good reason to eliminate the Forest Hills Austin Street Fair, as a matter of fact, I believe more police should be present at the fair.

Jack Lippmann, Forest Hills, NY

1 week ago

4

I am an active vendor in the Forest Hills Street Fairs. We are clean, respective participants, and we gain customers this way. It's good, inexpensive publicity for my tiny dance studio. The DanceSource

Dianna Petty, Rego Park, NY

1 week ago

4

I live in Fores hills and w have two a year. They are well attended, they bring the case municipal to together and I look forward to purchasing something every ime. Please do nub are these away

Lari Frank, Forest Hills, NY

1 week ago

4

I'm signing this because these potential changes are absolutely the wrong thing to do! Street fairs bring in new shoppers and fresh eyes to the surrounding area, giving the local brick-and-mortars an opportunity they wouldn't otherwise have. I find this especially disturbing to be happening in NY...a place that has been historically known to be the artistic beginning of this country.
#KeepTheStreetFairs

Trish Cosgrove, Dana Point, CA

1 week ago

4

I love street fairs and local artists. Keep the talents going..

Mei Soon, Australia

1 week ago

4

I love walking street fairs and supporting local artisans

Stephen Brown, Morristown, NJ

1 week ago

4

Because I like street fairs.You get to find old stuff that you like,You're also opened to discover new and interesting things.I love Street Fairs.

Rodney Mahabir, Woodhaven, NY

1 week ago

4

I like street fairs and support local vendors!

[**Sarah Greenberg, Brooklyn, NY**](#)

[1 week ago](#)

4

[NYC loves it's fairs.](#)

[**Luisanna Inoa, New York, NY**](#)

[1 week ago](#)

4

[Street fairs and festivals are a vibrant part of the local communities of the entire city](#)

[**Edward Carey, Queens, NY**](#)

[1 week ago](#)

4

[These street fairs are very important for my livelihood and that of my fellow etsyers and other craftspeople who vend as well as make purchases at these events. The proposed restrictions will also have a negative economic impact on local businesses, startups, and sponsors.](#)

[**phyllis stevens, Fresh Meadows, NY**](#)

[1 week ago](#)

4

[I support small local businesses](#)

[**Matthew Wang, New York, NY**](#)

[1 week ago](#)

4

As a frequent visitor to NYC, I always love coming across a street festival! Please don't limit them.

Maria V, Waltham, MA

1 week ago

4

I'm a jewelry maker based in Brooklyn. There aren't too many street fairs in my immediate neighborhood, but I do participate in several across NYC. While I don't technically have a presence within the community board of each, I do consider myself a LOCAL ARTIST. These rules would hurt a lot of NYC-based artisans.

Amy Madden, Brooklyn, NY

1 week ago

4

THIS IS WERE I CAME FROM!!!!!!!!!!

-A Day To Remember

In all seriousness though this stuff is fuckin awesome too see it go would suck ass.

David Meron, Queens, NY

1 week ago

4

Please keep the street fairs alive.

Kara Hansen, Puyallup, WA

2 weeks ago

4

I love fairs and all the good food. Please don't take away the fairs. They're good for families and tourists

Benjamin Floyd, Irving, TX

[2 weeks ago](#)

4

[Let's not change them!](#)

[Erik Silverman, Brooklyn, NY](#)

[2 weeks ago](#)

4

[I love NYC street fairs!](#)

[Anne B., Brooklyn, NY](#)

[2 weeks ago](#)

4

[I am a full-time artisan and these fairs have let me grow my small business. These fairs add so much to the vibrancy and cultural fabric of NYC. Please save these fairs.](#)

[Jewel A., New York, NY](#)

[2 weeks ago](#)

4

[Because I grew up with these fairs.](#)

[Daniel Maor, Woodmere, NY](#)

[2 weeks ago](#)

4

[I think it's a great family activity to do in the summer. Also enjoy different foods and also my kettle corn. Also support independent/small businesses.](#)

[**shakira Williams, New York, NY**](#)

[6 days ago](#)

3

[I love Street Fairs and helping to support the community!! This is a great family outing day for families to reconnect as well!](#)

[**Randi Hodkin, Bay Shore, NY**](#)

[6 days ago](#)

3

[Street festivals are a great thing to do with the family or take the kids on the weekend. Its a nice outing especially on nice days. Thousands and thousands of people from ny and outside of ny enjoy them](#)

[**Mohammed Khamis, Bayonne, NJ**](#)

[6 days ago](#)

3

[It is a tradition to visit these street fairs with my family every year. We go to all street fairs in Astoria and support small businesses.](#)

[**AJ Greiner, New York, NY**](#)

[6 days ago](#)

3

[i see no reason to change the Street Fair System, which is working just fine, and I certainly see no reason to change it to favor Manhattan so egregiously.](#)

[**Thomas Farrell, Richmond Hill, NY**](#)

[6 days ago](#)

3

[I love street fairs!!](#)

[**Melissa Rodriguez, Queens, NY**](#)

[6 days ago](#)

3

[Don't take away the street fairs. The kids love them when we accidentally stumble across one when we're on a walk. They're part of New York. Don't let them disappear like the subway token.](#)

[**Kenneth Trammell, New York, NY**](#)

[6 days ago](#)

3

[Street fairs are great for the community/ promotes local small businesses](#)

[**Otto Specht, Forest Hills, NY**](#)

[6 days ago](#)

3

[I love street fairs!](#)

[**Juliana Harris, Bronx, NY**](#)

[6 days ago](#)

3

[I really enjoy the street fairs!](#)

[**allison simpson, greenville, SC**](#)

[6 days ago](#)

3

[If it weren't for street festivals I wouldn't have found out about NY Kettle Corn](#)

[Jose Fernandez, Fitchburg, MA](#)

[6 days ago](#)

3

[It brings people to explore great neighborhoods.](#)

[Leo Levine, Forest Hills, NY](#)

[6 days ago](#)

3

[I love street fairs and often go into the city just to enjoy them!](#)

[Luisa elton, Jersey City, NJ](#)

[6 days ago](#)

3

[Love The street fairs](#)

[Keyla Fernández, Corona, NY](#)

[4 days ago](#)

2

[Street Fairs contribute to what makes NYC so wonderful!!!](#)

[Yolandayolic217@yahoo.com Rapp, NY, NY](#)

[4 days ago](#)

2

[Street fairs and festivals are part of the culture in so many towns and cities. It is a chance for the regular people to connect to craftsmen they may not see usually.](#)

[**Deborah L Cressler, Gallion, AL**](#)

[5 days ago](#)

2

[Street fairs are community builders, and helps raise funds for many non-profits, kids causes, churches, etc.](#)

[**Ricardo Agcauli, Brooklyn, NY**](#)

[5 days ago](#)

2

[I signs. Because ita fun day with family ans friends](#)

[**Claudio Donato, Ronkonkoma, NY**](#)

[5 days ago](#)

2

[I look forward to them every summer and fall. It's a fun day out with the family.](#)

[**Nancy Donato, Ronkonkoma, NY**](#)

[5 days ago](#)

2

[Street fairs are very important to my business and our community!!!](#)

[**Rysa Childress, Forest Hills, NY**](#)

[5 days ago](#)

2

[Street fairs promotes local business by giving local business and residents a chance to interact with each other without having to visit each shop indiviually. It also strengthens communication between local businesses and also help local business find potential business ideas form non-local vendor and vice versa, thereby increasing co-operation and harmony. This link should be maintained and encouraged.](#)

[**Chetankumar Patel, Forest Hills, NY**](#)

[5 days ago](#)

2

[I own a yoga studio here and Forest Hills has a GREAT street fair with many important vendors that we don't normally have. So it brings the shopping to us, which is so helpful.](#)

[**Suzanne Scholten, Jersey City, NJ**](#)

[5 days ago](#)

2

[Street fairs are part of new York land Mark many survive by Street fairs](#)

[**Bruno Donato, Ronkonkoma, NY**](#)

[5 days ago](#)

2

[Lillian rodriguez](#)

[**Lillian Rodriguez, Newport News, VA**](#)

[5 days ago](#)

2

This fair is our communitys pride. Brings business to small businesses such as us and we in turn pay taxes for the city. The street fair cut will impact our business greatly. Please do not cut the street fairs directly or indirectly.

Jasleen sabharwal, Forest Hills, NY

5 days ago

2

The fairs are an INTEGRAL part of life in our very international city. Neighbors meeting neighbors, friends going out with friends. They are the new version of the old-fashioned block party and are part of our LIVES!

C. Rosenthal, NYC, NY

5 days ago

2

This is completely wrong.

Nicole Frantser, Staten Island, NY

5 days ago

2

I love this fair, this is something I wait for all year for.

Anu Dutta, Forest Hills, NY

5 days ago

2

I am a business owner on Austin Street. Our customers look forward to the 2 festivals. It's a great source of revenue and a community builder.

Marla Cornejo, Forest Hills, NY

5 days ago

2

I think it's great for the community and local businesses

Jacques Ambron, Queens, NY

5 days ago

2

I am a local business owner and street fair vendor. These changes will negatively impact my business and my community.

Michael Mansfield, Forest Hills, NY

5 days ago

2

Street fair next year 2017

Ganjana Noomahunt, Forest Hills, NY

5 days ago

2

I love it buy something stuffs n eat ..
enjoy walk .. please don't shut down .. keep it fair street thank you

maribell coriano, bronx, NY

5 days ago

2

just the opportunity to meet new people, listen to music and be in the hussle and bussle - never mind the food and games, rides, its something of a tradition im already bringing my 3 yr old granddaughter and soon her brother as well **joyce r, New York, NY** 5 days ago

Testimony from Leslie Brown, President of the Forest Hills Chamber of Commerce
PO Box 751123, Forest Hills, NY 11375
Email fhchamber@aol.com
Phone: 718 268 6565

Date: October 13, 2016

Good Morning, Executive Director Michael Paul Carey, Office of Citywide Coordination and Management

I'm Leslie Brown president of the Forest Hills Chamber of Commerce. It is my pleasure to serve as chamber president, to have owned a business in Forest Hills and to be a life-long resident of Forest Hills. I understand what it is like to run your own small company and I know what the challenges that being self-employed entails. I am here today to speak about what the proposed rule changes for street fairs would do to my not for profit organization, to vendors, startup businesses, and to the community that loves and supports our fairs.

The Forest Hills Chamber of Commerce has held two fairs, in the Spring and the Fall for over 16 years. By reducing our fairs to one puts us in serious jeopardy of closing our doors. I urge you to consider allowing all existing sponsoring organizations such as the Forest Hills Chamber to continue to conduct two (2) street fairs per calendar year as has been our tradition. Families and businesses alike look forward to coming out and being together as one community to enjoy the sights, the sounds and the tastes of a New York street fair.

Requiring as the new proposed rule states that 50% of participating vendors have a business or presence in the community board where the fair is taking place will in all actuality not be possible. I am proud to say that in my fairs I have close to 40% participation of my membership and I have been told that this is one of the highest participation rates. More than half of our members join the street fairs and I do not see how I would be able to meet this requirement.

My 40% will not meet the 50% requirement .I would be happy to see a specified number of exhibitor spaces be made available at little or no cost to some local businesses or artisans and other not for profit organizations at no cost or at a nominal cost to foster additional participation at the fairs.

Many, many of our members sign up at the last minute due to staffing or scheduling issues that small businesses with only 1, 2 or 3 employees have. Some register late because they have not had the time as they work in many cases 7 days a week to get everything in place to exhibit. The current rule of providing the addresses and phone numbers of participating vendors to be submitted 30 days in advance of the event would be quite a hardship for so many. Also the weather plays a factor. The city does not allow a rain date. Participating vendors must exhibit and pay the fee even if the fair will be a washout, and this contributes to signing up closer to the event than 30 days you may now be requiring. Losing even a small amount of money when you are self-employed really can cause a hardship. The more vendors we have the better our fair is.

There is a proposed cap on 10 multi block street festivals and 10 single block street festivals per Community Board district. Please increase this cap so that the number of fairs per community board district meets the needs of each community.

Establishing a flat fee per block rate will discourage offering free or reduced rates for more community participation. Please keep in place the option to allow the sponsoring organization to pay 20% of rental fees from vendors or pay the flat fee structure proposed based on the number of blocks that the fair runs.

I could say in my own words what the street fairs have meant and do mean to everyone involved in making them the great events that they are. But I would like to read some comments from the people that attend, work and support our fairs. The comments come from a petition I started on change.org a few days ago and I have well over 600 signatures in a very short time.

Here are some of the comments (see attached)

From: [Jessica Maffia](#)
To: [SAPORules](#)
Subject: Letter in Support of HKF
Date: Wednesday, October 12, 2016 6:19:26 PM

Dear Mr. Carey,

I am writing as a Native New Yorker, a Hell's Kitchen resident and a grant recipient of the Hell's Kitchen Foundation Artist's Grant to urge you to please make an exception to the proposed changes in street fair rules so that the antique and flea market can continue to exist.

As you well know, our neighborhood is changing very rapidly. This market is one of the few remaining staples that continues to offer low and middle income residents an affordable place to buy and sell. It is a critical element of the cultural fabric of our gentrifying neighborhood and it would be a tremendous loss to the market's vendors and its patrons if they were not granted an exception to the new street fair regulations.

The Hell's Kitchen Foundation awarded me a \$3000 grant this summer which made a TREMENDOUS difference in my career as a young full-time professional visual artist. I was able to afford new materials, the entry fee to participate in a new art fair in the city, I received a great deal of publicity, and much more! The Hell's Kitchen Foundation offers struggling emerging artists like myself important support. I would hate for other Hell's Kitchen artists to be denied access to this precious resource.

Please amend the new rules to save our market!

Thank you very much,
Sincerely,
Jessica

--

www.jessicamaffia.com
<https://vimeo.com/139265019>
<https://www.instagram.com/jessicamaffia/>
917.991.0968

From: Mortandray@aol.com
To: [SAPDRules](#)
Subject: LETTER REGARDING PROPOSED CHANGES TO STREET FAIR RULES
Date: Friday, October 21, 2016 3:30:09 PM

MORT & RAY PRODUCTIONS
1674 BROADWAY, SUITE 401 • NEW YORK, NY 10019
Mort Berkowitz, President
Ph. 212-764-6330 • Fax. 212-944-0469 • E-mail: mortandray@aol.com

October 21, 2016

Mr. Michael Carey
Executive Director
Citywide Event Coordination and Management
253 Broadway, 6th floor
New York, NY 10007

Dear Michael:

I am writing to you regarding your proposed changes to street fair rules.

While I agree with the general premise that there are too many street fairs, I believe that there are more effective ways to cut down, rather than arbitrarily saying that no Board can have more than 10 fairs per year. Twenty years ago Community Board #7 in Manhattan, responding to the objections about the number of street fairs in the area, required producers to combine two to three fairs into one. The result was that the number of street fairs was cut in half and the Board and the neighborhood were pleased with the outcome.

I think that the number of fairs in each Community Board District should be set by each Board itself with no organization having more than one fair per year and no stretch of avenues being used more than twice. I think that if a sponsor's fair is ten blocks or more, producers should be required to merge another sponsor's fair with it. I would not require sponsors of fairs fewer than six blocks, such as the Murray Hill Neighborhood Association, to do this. If the street fair glut is in a particular area of the city, I believe that the points I made would help to resolve the problem.

Regarding the desire to make fairs more inclusive of the neighborhood, I think that requiring 50% to be local businesses will prove difficult to achieve. For three years, Mort and Ray Productions offered all merchants in the area of the street fair a free space in front of their store in which to exhibit. We did this by hand delivering fliers to each of the effected businesses. No more than five or six merchants per fair chose to take advantage of the offer. At each fair, we give free spaces to any nonprofit organizations in the area as well as to city agencies and elected officials. We've had up to 15 groups at the most.

Regarding local craftspeople and artists, there aren't that many local craftspeople and artists who are licensed. I publicize our offers of free and reduced fees through the Community Board and local newspapers.

In order to make our events different from the usual street fair, we have special events such as opera and cabaret competitions, an author's corner featuring local authors (including Eli Walach, who participated for five years until his death, and Malachy McCourt among others), and a pumpkin patch for children during our Fall fairs.

Since the mayor ran on a platform of one city, I believe it would be unfair to prohibit vendors from one borough to participate in street fairs in other boroughs.

I have been producing events for close to 40 years and believe that they have been well received. I'm always on the lookout for crafts and other vendors who would improve the quality of our fairs.

I hope you will consider the points that I've made before making your final determination. I strongly believe that, if you implement the proposed changes in the rules as currently written, it will be the end of street fairs in the city.

Sincerely,
MortBerkowitz

Mort Berkowitz

Date: October 11, 2016

To: Street Activity Permit Office (saporules@cityhall.nyc.gov)

Re: Points on Proposed Street Fair Rule Changes

To Whom It May Concern:

Revenue sharing from street fair sponsorships provides a significant source of income for community organizations like Chelsea Reform Democratic Club. We rely on this income to fund activities that benefit our community, such as:

- § Educational programs about public policy and related issues
- § Community and issue advocacy
- § Forums with elected and appointed public officials
- § Petitioning for ballot access on behalf of candidates

We believe that the proposed new street fair permit rules are likely to result in reduced income for CRDC and similar organizations. There is also the danger that, in some years, this income will be eliminated altogether. We worried about three things in particular:

§ The proposed new rules will cap the number of street fairs to ten per community board. In some years, CB4 has hosted as many as 14 multi-street fairs. This will mean that established sponsors may be denied their event.

§ The recommended new fee calculation increases the City's share of street fair revenue without taking into account unpredictable participation by vendors due to inclement weather and other factors beyond control of the organizer and community sponsors. While we understand that the City's expenses need to be recouped, we would hope there is a way to do this that does not shift all of the risk onto the organizers and local sponsors.

§ The proposal to require that 50% of vendors be from the local Community Board area sets a threshold that will be difficult to meet, particularly at the beginning. This will likely result in unanticipated cancellations by the mayor's office with resulting loss of revenue. Rather than implementing this change all at once, we request that you consider phasing it in.

We understand that there is some concern about the resources consumed by street fairs – including rerouted traffic and support from police and sanitation workers, and we applaud SAPO for attempting to deal with these issues proactively. However, we request that SAPO carefully consider the impact any proposed changes to the permit rules might have on community organizations like CRDC.

Sincerely,

David Warren

David Warren, President
Chelsea Reform Democratic Club



Chelsea, Madison Sq., Flatiron, Rosehill

P.O. Box 1120
Old Chelsea Station
New York, NY 10013-1120
Phone: 212-929-9188
Website: www.crdcnyc.org

Home Club Of

Assemblyman: Richard Gottfried
Councilman: Corey Johnson
Former Council Speaker: Christine Quinn
Former State Senator: Tom Duane
Former DNC Member: Esther Smith+

District Leaders

Sylvia E. Di Pietro
Steven Skyles-Mulligan

State Committee

Francine Haselkorn

Exec. Committee President

David Warren

Exec. Vice-President

Judy Richheimer

Treasurer

R. Brent English

Secretaries

Linda Longstreet: Mailing

Mindy Rosier: Recording

Dave Silverstone: Digital

Communications

Donathan Salkaln

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Miguel Acevedo

Jesse Campoamor

Louis Cholden Brown

Carol Demech

Dion George

Paul Groncki

Brian Mangan

Lisa Nearier

Tony Setteducate

Evelyn Suarez

Joel Vatsky

Past President

Michael Schreiber

Honorary Members

Muriel Beach

Hon. Doris Corrigan+

Hon. Mary Dorman

Hon. Tim Gay

Hon. Tom Schuler

Carole Sclar

Lee Sinovoi+

Jay Stockman

Gloria Sukenick



servicing our community since 1976

September 23, 2016

Mr. Michael Carey
C/O Citywide Event Coordination and Management
253 Broadway 6th Floor
New York, NY 10007

Dear Mr. Carey,

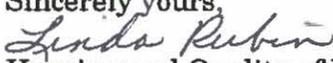
The above tag line says "serving our community since 1976." One of the ways we have been doing it since 1977 is holding the Annual Midwood Mardi Gras Street Fair.

Our event attracts mostly local residents who come up for a day of shopping, strolling, and running into old friends and acquaintances. Our agency provides a variety of needed services to the community young, old, new Americans, and individuals with developmental disabilities. We rely on the Mardi Gras to raise supplemental funds to cover our operating costs not covered by our City and State contracts.

It was with great dismay when we, the members of MDC's Housing and Quality of Life committee, heard that the proposed rules would require "at least fifty percent of vendors participating in a street fair would have to be businesses with locations inside the same community board where the event is being held." If the requirement has to be met, and documented, in order to secure a permit, it would pose a severe hardship on MDC. It would be extremely labor intensive for MDC to reach out to all the business in Community Board 14 Brooklyn. Staff time would be spent without knowing that we would get a permit.

We fear, if these regulations are passed, it will effectively end a 38 year old event that the community looks forward to and supports by their attendance, and shopping on Mardi Gras Day.

We strongly urge that this burden not be placed on us, and the regulations not be approved.

Sincerely yours,

Linda Rubin
Housing and Quality of Life Committee
Midwood Development Corp.

Chair
Shelly Eisenhart

President
Alan J. Dubrow

Executive Director
Linda S. Goodman

1st Vice President
Marc Katznelson

Vice President
Ronald Joanis

Treasurer
Frank Miller*

Secretary
Alice Miller

Directors
Yolanda Belcher
Mary Jo Cullinan*
Melissa Freidling
Jonathan Grunfeld
Adam Katz
Marc Kutner
Mari Anne Pecorella
Elaine T. Moss
V. Rev. Eugene N. Pappas
Lori Raphael
Linda Rubin
Sandra Rodolico
Allen Schaeffer
Harry Schiffman L.M.S.W.
Lynne Spevack L.C.S.W.
Marshall Tames

Advisory Council
Gary Chervinsky
Dr. Leslie Dreifus
Beverly Jiminez-Talavern
Joelene Avila Jean
Mohammed Razvi
Inge Rosenthal
Jackie Smith
Svitlana Tsaryova
Rosalie Travers

**Past Presidents*

Testimony on the Proposed Amendment to NYC Street Fair Rules

Mark Caserta
Executive Director
Park Slope Fifth Avenue BID

My name is Mark Caserta. I am the Executive Director of the Park Slope Fifth Avenue Business Improvement District. Our BID is located along Fifth Avenue from Dean Street, adjacent to the Barclays Center, to 18th Street and is comprised of 30 commercial blocks with more than 500 small businesses.

I am also a board member of the New York City BID Association and the Park Slope Civic Council and a former New York City small business owner. I actually owned a shop on Park Slope's 5th Avenue for 7 years, so I have lots of experience in the community and the small business sector and I'd be happy to work with you and answer any questions you might have.

I want to start by thanking you for tackling this important issue. As a member of the BID Association, I have been a part of the discussions about the problems and challenges that street fairs impose on the city. I think that the focus on reducing the number of street fairs in Manhattan, the kind that have no local flavor and simply offer socks and sausages, is a good thing. We support it! However, some of the rules, as written, would have the opposite effect in cancelling long-standing street fairs that are traditions in outer borough communities. They could lead to a reduction in revenue for small businesses and the loss of funds for community organizations like Business Improvement Districts.

As you know, Park Slope's Fifth Avenue is host to and sponsor of The Fabulous Fifth Avenue Fair, which takes place every year on the Sunday following Mother's Day. The fair is decades old and is attended by between 40,000 and 70,000 people, according to NYPD estimates. We pride ourselves in having a street fair that focuses on local businesses. According to Clearview Festival, which manages our fair, approximately 42 % of our vendors are from within the BID and surrounding community. How do we do it? We sell the fair spots to the merchants who want to be a part of the event at a steep discount (\$50) and we offer spots to local artists for just \$75. The rest of the spots are sold to mostly outside vendors by Clearview at a much higher rate. Through our revenue sharing arrangement, the sale of hundreds of spots to local merchants at a discount means that the BID loses out on a lot of potential revenue. Still, we would rather lose that revenue because we believe it is important to make the fair as locally focused as possible and we strive to improve it every year.

As written, here is how the proposed rules would affect The Fabulous Fifth Avenue Fair. We have also provided some recommended changes to help our fair thrive and grow in the future:

- 50% of participating vendors have a business or local presence in the Community Board where the festival will be taking place.

We believe that this is a good goal for street fairs, however:

- Last year The Fabulous Fifth Avenue Fair sold 578 spaces, of which 241 were occupied by local vendors and non-profits. We would need to sell another 50 spots to meet or exceed this 50% rule. This would lead to a significant loss in revenue that we need to help clean and program our street and it would be very difficult thing to do in just one year. In addition, our BID is located in 2 community districts. As written, vendors from the south end of the BID would not count as "local" vendors because

they are in Community Board 7. Clearly this is not the case! They ARE local! Also, some of our artists and artisans who come from nearby communities would not count as local either. Should we turn away vendors from Brooklyn Heights, Fort Greene and Sunset Park just to make sure that we meet the 50% threshold? We think not. They are just as local!

I might add that two other traditional, much loved street fairs in our community; Seventh Heaven (7th Avenue) and the Brooklyn Pride Festival (5th Avenue) would have a difficult time meeting these thresholds. Brooklyn Pride's event serves Park Slope's large gay and lesbian community, yet the non-profit vendors at the festival are from all over the borough. Should this event be destroyed because of an arbitrary percentage? We think not.

Possible Solutions-

- Increase the definition of local to include surrounding community boards or zip codes or the Borough, as a whole and allow for some discretion in the rule,
- Give sponsoring organizations time to change their street fairs to meet the 50% goal (or whatever percentage is agreed upon through this process). Traditional outer borough fairs cannot change overnight. Sponsors need at least 2-3 years to meet and exceed the 50% goal and change their event. These rule changes should not be about destroying street fairs, but rather making street fairs better. Work with us to make that happen.

-All information pertaining to anticipated Vendors participating in a [street fair] Street festival or Single Block Street festival must be submitted thirty (30) days [one week] prior to the date of the event.

If the goal is to improve our street fairs and make them more local, a rule that requires proof of local vendors in writing 30 days prior to the event is unworkable. Local merchants and artists often make their decisions at the last minute, based on staffing, weather and family concerns. We often get last-minute artists and merchants committing to the fair in the week before the event. The rule should remain at 1 week prior to the date of the event if the goal is to have strong, locally flavored fairs in NYC.

In closing, I want to say that we initially saw this rule changing process as an opportunity to potentially expand our street fair. Currently, The Fabulous Fifth Avenue Fair runs through 18 of the 30 blocks in the BID. Merchants outside of these 18 blocks have been upset for years because they are paying for the BID assessment without receiving the benefits of the fair outside their front doors every May. Instead of expanding, however, we now find ourselves defending what is a very local and well-loved community event. We hope that you will take these comments into account as you draft the final rules.

Thank you for the opportunity to provide comments. If you have any questions, please feel free to reach out to me at (718) 551-5545 or mark@parkslopefifthavenuebid.com.

Mark Wilensky
6359 74 Street
Middle Village, NY 11379
October 12, 2016

Mr. Michael Carey
Executive Director
Mayor's Office of Citywide Event Coordination and Management
253 Broadway
6th Floor
New York, New York 10007

Mr. Carey

I am the president of the Sunnyside/Woodside M.G. Lottero Lions Club in Queens. We want to state that we feel the proposed changes to the the Street Fair Permit Rules would be detrimental to our organization and our community as a whole. Our annual Street Fair is our only source of income and that income goes directly back into the community through donations to local schools, extended care facility and food pantries as well as our two holiday parties for the community children and a local church summer camp.

It would be more feasible for us if the 50% rule regarding vendors was changed to allow for the vendors to also possibly be ones who live and/or have a business in NYC. We would them be able to also welcome more hand made crafts and a larger variety of items from outside the community.

We believe all new block festivals could be limited to one per calendar year but all existing sponsoring organizations conducting two festivals per calendar year for ten or more years which is a tradition in our neighborhood be honored by the Mayor's office. We are a twenty year sponsor.

We believe each district's individual needs should be considered with regard to the proposed cap in the number of multi/single festivals.

We feel that the sponsoring organization should have the option at the lose of their event to pay 20% of rental fees from vendors or pay according to the flat fee structure proposed based on the number of blocks utilized.

Regarding the current rule that all addresses and phone numbers of participating vendors be available one week prior to the event should remain in place. Any change would mean vendors would be worried about losing money since the City eliminated Rain Dates and they wouldn't join us at all.

We need our street fairs to continue for the benefit of our community. They are fun days for all and would like you to visit our street fair here in the Sunnyside/Woodside Community.

Thank you for your attention and consideration to our ideas.

Mark Wilensky
President
Sunnyside/Woodside M.G. Lottero Lions Club

David Daraio
President
718-335-1300

Joseph B. Papavero
Executive Vice President
(718) 651-3535

Nick Bamonte
Vice President
(718) 478-5493

October 7, 2016

Michael Carey
Executive Director
Office of Citywide Event Coordination and Management
253 Broadway, 6th floor
New York, NY 10007

Dear Mr. Carey:

On behalf of Maspeth Chamber of Commerce, I object to the proposed Street Festival rules from the Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management (OCECM), which will put an end to our long time annual festival.

Specifically, the following rule changes are a burden for our street festival:

- 1. Applicants will have to prove that 50% of vendors for street fairs have a business or local presence within the CB where the event is happening.*

Our group suggests that 50% of exhibitors have a business or local presence in the Community Board our festival takes place and/or live in or have a business in the City of New York. We also suggest, to foster local participation, rules should require a certain number of exhibitor spaces be provided at little or no cost to local businesses, local artists, and local residents selling handmade (non-commercial) products, as well as non for profit organizations and to members of the Chamber of Commerce in the community district.

- 2. Street Fair/festival fees have been raised from 20% of total paid by vendors to \$1375 per day/per block for first day/block and \$705 per day/per block for any subsequent days/blocks.*

Our group suggests that we will have the option at the close of the event to pay 20% of rental fees from vendors or pay according to the flat-fee structure proposed based on the number of blocks utilized.

- 3. There will be a cap of 10 street fair/festivals per CB each year.*

Our group suggest that the Mayor's Office increase the proposed cap for the number of multi-block and single block per community district to reflect the individual needs of each district.



P.O. Box 780265
Maspeth, New York 11378
(718) 779-1111

www.maspethchamberofcommerce.org

Mary Anna Zero
Corresponding Secretary
(718) 326-2400

Michael Terry
Recording Secretary
(718) 898-0871

Joseph A. Papavero
Treasurer
(718) 651-3535

David Daraio
President
718-335-1300

Joseph B. Papavero
Executive Vice President
(718) 651-3535

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The Maspeth Chamber of Commerce has been active since 1953 and our goal is to promote the general welfare of the community of Maspeth, to foster its commerce and to dedicate itself to the perpetuation of a free economy and competitive enterprise to the end that the community of Maspeth shall make the greatest possible contribution to the advancement of society. We rely on funding from the Festival to help with many programs within our area. If these new proposed rules go in effect, it could result in ending our current festival and many of the programs that we fund along with it.

I ask that your office reconsider these proposed amendments. In the meantime, if you have questions, please contact me. I can be reached by e-mail or phone. My contact information is above.

Sincerely,

David Daraio
President

Folsom Street East, Inc.
P.O. Box 1695
New York, NY 10113

Michael Carey
Executive Director of the Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

October 13, 2016

Dear Mr. Carey,

I am writing to you on behalf of Folsom Street East, Inc., to share feedback regarding changes proposed by the Street Activities Permitting Office (SAPO) to rules regarding street activities permitting in New York City.

A little about us: Folsom Street East celebrates and inspires participation and pride in fetish, kink, and LGBTQ communities through the creation of safe spaces for public expression of our sexual identities. Folsom Street East promotes and provides grants to other nonprofit organizations serving these communities.

Since 1997, the Folsom Street East street festival has welcomed thousands of guests to Manhattan's West Side for a day of spectacle and fun. Each year, we also welcome over 50 specialty vendors, whose offerings range from fetish attire and adult novelties to HIV education and testing. We are an entirely volunteer-led and -run organization, with over 100 community members supporting us with their time and talents on the day of the festival and a core group of 7 to 10 people planning for the event throughout the year.

Since our incorporation as a 501(c)(3) nonprofit in 2009, we have made over \$100,000 of gifts from festival revenues to other New York City-based LGBTQ community nonprofits, notably the New York City Anti-Violence Project (AVP) and Visual AIDS. In 2016, AVP honored Folsom Street East with their Community Heroes Award in recognition of our two decades-long partnership.

We are New Yorkers who are deeply interested in the life of our city and its neighborhoods. Our work preserves and honors a vital aspect of New York's public culture which otherwise might be in danger of disappearing, and creates face-to-face community connections in a world where virtual ones are increasingly the norm. In this effort we have enjoyed the strong support of Manhattan Community Board 4 (CB4) as well as Friends of the High Line.

Folsom Street East has read with interest reports produced by the Center for an Urban Future regarding street festivals in New York City, and we are happy to see SAPO's interest in modifying their permitting rules in alignment with some of those reports' recommendations. Like other New Yorkers, we support lively, community-centered activity on our streets.

We are concerned, however, that some of the proposed rule revisions may be inadvertently be in conflict with the spirit of that goal and have potentially negative effects on the Folsom Street East street festival, our community, and our beneficiaries. These revisions are outlined below, along with our responses to each.

Local presence of vendors

SAPO has proposed that at least 50 percent of event vendors would need to have a business or local presence within the community board where the event is held. Currently, there are no restrictions on locations from which event vendors may be sourced.

- Folsom Street East understands and supports the intention of this restriction, which is to promote community participation and benefit from street festivals by not producing cookie-cutter events staged by professional event producers that have the effect of limiting local business participation.
- However, the Folsom Street East street festival, as described above, is far from a cookie-cutter event. The majority of our vendors are small businesses or sole proprietors, not corporate interests. While not all of them have a presence in CB4, their provocative and unusual offerings are not to be found at any other event in New York City. Excluding them on the basis of geography not only diminishes the revenue potential for our beneficiaries, it also contributes to a decline in the public availability of material culture produced by and oriented towards fetish/kink communities resident in CB4 and throughout New York City.
- The Folsom Street East street festival has also been a mainstay on New York City's Pride Month calendar for twenty years. Like other Pride events, we draw a sizable number of our vendors from among nonprofit organizations serving New York's LGBTQ and HIV-affected communities. Our street festival provides significant exposure for these vital organizations serving our neighborhood and our city. Excluding them on the basis of geography is a lost opportunity to connect New Yorkers with important health-related resources.
- In producing the street festival, Folsom Street East strives to patronize local merchants wherever possible. Additionally, the street festival draws several thousand nonresident guests to West Chelsea annually, thereby delivering significant in revenue for CB4's restaurants, bars, hotels, and professional service providers.

In light of the above considerations, we would request that the geographic restriction on event vendors be moderated or exempted at the discretion of community boards for events serving a constituency which extends beyond a given board's boundaries.

Vendor information submission deadlines

SAPO has proposed that all vendor info, including contact information (to verify location within community board boundaries), tax IDs and license numbers, must be submitted 30 days prior to the event; the current deadline is one week prior.

- Many if not most of Folsom Street East's vendors register within 30 days of the event; reducing the window during which they are able to register has the potential to result in a significant negative impact to our event revenue as well as a diminished experience for our guests.
- Resource constraints on soliciting and formatting vendor information for delivery to SAPO already pose a challenge for Folsom Street East, as many of our vendors do not regularly vend at on-street events in New York City.

For these reasons, we would request that the current deadline of one week prior to the event for delivery of vendor information to SAPO be maintained.

Fees

Rather than calculating a percentage of exhibitor fees, as is current policy, SAPO has proposed assessing a flat fee of \$1375 for single-block street festivals.

- We understand per SAPO that this fee structure more accurately assesses the cost of city services needed to support events of this kind.
- If implemented as proposed, this will result in as much as a 33 percent increase over fees assessed on Folsom Street East's 2016 street festival.
- There is a proposed introduction of a fee waiver or reduction appeals process in case of hardship, but since this would apply only in cases where the fee would exceed 25 percent of an event's overall revenue, it is unlikely to apply to Folsom Street East.

Since every dollar saved in fees is a dollar which can go directly to supporting our beneficiaries, we would be interested in seeing an alternative fee structure for events produced by tax-exempt nonprofit organizations.

Folsom Street East appreciates the opportunity to share feedback on these proposed rule revisions. We are happy to entertain further conversations with SAPO, CB4, and other City agencies about our organization and our signature event as these rules evolve. Please do not hesitate to reach out to me directly with questions.

Sincerely,

Matt Johnson
Board Chair, Folsom Street East
matt@folsomstreeteast.com
347-729-4884

cc: Chris Frederick, Managing Director, Heritage of Pride, Inc.
Jesse Bodine, District Manager, Quality of Life, Manhattan Community Board 4
Maritza Carmona, Community Engagement Manager, Friends of the High Line



Street Fair Rules Testimony of Matthew Shapiro, Staff Attorney, Street Vendor Project

My name is Matthew Shapiro and I am a staff attorney at the Street Vendor Project at the Urban Justice Center. The Street Vendor Project (SVP) is a membership based organization with over 2,000 street vendor members in New York City. We organize vendors to build leaders who will have a voice in policies that affect all street vendors. We also provide legal and small business services to our members so they can keep and grow viable businesses.

In June, 2010 we had the experience applying for and running a successful street fair in New York City. Since our organization is made up of local street vendors, we thought it would be a good idea to put on a street festival in downtown Manhattan, where our organization is headquartered. We wanted to put together a diverse, different kind of festival, and to allow local vendors to sell without the aggressive enforcement and pressure from private property owners that they face daily at their usual sidewalk locations. We called it the "Pushcart Market," and it was a huge success. Instead of being run by a large corporation, the street festival was run by actual vendors who work on the streets of New York every day.

We are encouraged by the City's efforts to have street festivals be more representative of local neighborhoods rather than having the same generic food and goods that are sold at most of the current festivals. We strongly believe that community-based organizations put on the best street festivals given the deep ties to their neighborhoods. These organizations should be given preference over the large corporations that put together most of the street festivals that currently exist.

However, some of the proposed rules will make it difficult for local organizations to organize street festivals and will still favor the corporations that put on the majority of existing street fairs. One proposed rule prohibits applications for multi-day, multi-block street festivals unless the applicant has held a permit for the closest date and same location continuously since 2008. This type of "grandfather clause" will only protect existing street festival organizers and stifle creativity since any local organizations that want to put on a new multi-day, multi-block street festival would be prohibited.

We agree that street festivals should be reflective of the local community and the majority of participating vendors should come from the neighborhood. However, requiring local vendors to have a "presence" in the very same community board as the street festival is too restrictive. This rule should be modified to allow participants from any community board including or adjacent to the community board where the festival is located. This will allow participants who may just outside the boundary, but still a part of the local community, to participate. We would also like assurances that local street vendors, who have a regular location

in a particular neighborhood, will be allowed and invited to participate in a street fair taking place in their community.

Additionally, we are concerned that the limit on the number of street fairs will make it more difficult for local organizations to put on street festivals. Street fairs are good. The problem is not necessarily their number, but how they are run, and who benefits. What we do not want is the same large corporations applying for and managing the same street fairs that have existed, leaving local organizations without any opportunity to put on their own street festival. The rules should establish that street festivals that are organized and executed by a local community-based organization should receive preference over those organized by an outside corporation with a mere "community sponsor."

We look forward to future street festivals that represent the diverse communities of New York City, highlighting local vendors, and benefiting real community organizations and the New York City Public.

MELINDA KATZ
PRESIDENT



(718) 286-3000
web site: www.queensbp.org
E-mail: info@queensbp.org

CITY OF NEW YORK
OFFICE OF THE
PRESIDENT OF THE BOROUGH OF QUEENS
120-55 QUEENS BOULEVARD
KEW GARDENS, NEW YORK 11424-1015

Written testimony to the
Office of Citywide Event Coordination and Management (OCECM)
on the proposed rule change by the Street Activity Permit Office
in reference to establishing rules for Street Festivals.
Submitted by: Queens Borough President Melinda Katz

October 21, 2016

I am writing in reference to the rules being promulgated by the Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management (OCECM) in reference to establishing rules for Street Festivals. I am supportive of Street festivals that have become a summer favorite among New Yorkers. Street festivals benefit the community, community based organizations and religious organizations that sponsor and organize them. Bringing in outside vendors, at times, provides new products that might not be available to a neighborhood locally. Street Festivals help small entrepreneurs get started, and affords them an opportunity to test their products in markets across the City. Street festivals play an integral role in bringing communities together and street festivals help to highlight a community or local business group.

I am concerned about the unintended consequences of arbitrarily capping the total number of events Citywide and the first come-first serve methodology for Queens' applicants in this process. These new rules if implemented will have a dire effect on our non-profits, religious

institutions, and Business Improvement Districts and retail corridors here in Queens. The current rules support the overall mission of these groups and these groups depend heavily on these events for a portion of their income; without which many of the organizers will have to reduce staffing and programs. In addition, these community based organizations conduct multi-block street festivals, concerts and fairs, many of which are managed and operated by a single entity. To expect these groups to enter into a competitive market of early submission well in advance of the application filing date, with financial obligation, in a business where commitments by vendors is a last minute objective, puts the sponsoring organizations at a disadvantage to meet goals that the SAPO unit itself has stated, does not function in reality as stated on paper. While we all try for an ideal scenario, why go forth with a rule change that will create a hardship that no one can honor in its execution.

In addition, while I appreciate the goal of requiring local merchant participation, a target goal of 50 % local merchant participation is a challenging goal for some communities to reach. The local businesses are usually happy to participate in the street festivals. They too see an influx of customers, and repeat customers. Oftentimes however, the local mix of businesses are not diverse enough to allow full 50% participation nor are some business products always conducive for set up in a street festival setting. This is a challenge.

I am also strongly opposed to the proposal to limit sponsoring organizations to one multi-block festival per year. There are many worthwhile and reputable organizations that sponsor more than one multi-block event annually that enjoy strong local support. Therefore, I suggest that the local community board be empowered to waive that cap in those circumstances. For generations Community Boards have made the decision on what is appropriate for their areas, and they work closely with the larger community to decide what is best for their individual board.

The legitimate concerns of the communities that feel overburdened by festivals should be

addressed, and I commend your office for seeking to do so in these proposed rule change.

However, a rigid policy that fails to address the concerns of other communities where street fairs are a cherished tradition would be a mistake. Queens' organizations and communities will be severely impacted by the proposed new rules. Therefore, I urge the re-evaluation of the proposed changes to the Street Activity Permit Rules to allow organizations who have conducted two festivals per calendar year for ten years (or more) to continue to do so, so that we are able to keep the current summer street festival tradition alive for all New Yorkers.

METROPOLITAN PARKING ASSOCIATION, INC.

350 7th Avenue, Suite 1703
New York, New York 10001
(212) 760-8383
(212) 760-8384 *fax*

October 20, 2016

The Metropolitan Parking Association (MPA) strongly supports the City's proposed rules related to street festivals citywide.

MPA is especially supportive of restrictions to street festivals in the most heavily congested community boards in Manhattan (Boards 2, 5, and 7).

The traffic burden caused by an excessive number of street festivals is of particular concern in Community Board 5 (in the vicinity of Times Square.)

We believe that the Street Activity Permit Office (SAPO) has correctly determined that a disproportionate concentration of street festivals in past years within Community Board 5 has overly burdened the local community and does not serve the public interest.

MPA members operate numerous parking facilities in the Times Square area. These facilities play an important and necessary role in the economic strength of the entire community.

Times Square is already the most congested community in New York City. Residents from each of the five boroughs and tourists from outside New York flock to this entertainment mecca -- which boasts approximately 47,000 Broadway seats; 7,500 theater seats; and 8,900 comedy club, music hall, and off-Broadway seats.

The neighborhood's numerous restaurants, theaters and office buildings depend on the vital service provided by parking garages operated by MPA members.

Currently, approximately 50% of all street festivals in CB5 occur in the Times Square area -- while approximately 30% of all Manhattan Street festivals occur in CB5. This is an unfair and unsustainable burden.

The excessive concentration of street festivals in Times Square creates a potentially dangerous situation because ambulances, fire trucks, and other emergency vehicles cannot get through the overly congested streets.

Congestion in the Times Square is extremely high on both weekdays and weekends. We therefore do not support different standards (for different days of the week) for when street festivals can be permitted in Times Square.

In previous years, Times Square has hosted near-weekly street fairs and multi-block festivals – this is an unfair, excessive and potentially dangerous burden.

While Metropolitan Parking Association (MPA) supports the City's current proposal to limit street festivals in Boards 2, 5, and 7 – we also believe that important improvements to the current proposed rules can and should be made.

The MPA supports suggested changes to the proposed rules submitted by the Times Square Alliance. Specifically, MPA supports changes to close potential loopholes that could distort the intended impact of the proposed rules.

The Times Square Alliance and other stakeholders have put forward a number of suggestions that would close these potential loopholes. MPA is supportive of the following recommendations:

- Street fairs on a street or avenue that borders two community boards should count toward the total cap for both districts.
- Multi-block street fairs in Manhattan should not be longer than the distance between major two-way thoroughfares (e.g. 34th, 42nd 57th Street).
- No multi-block street segment between such thoroughfares should be used more than once per year, nor should any single-block be closed for a street fair more than once a year.
- If there is a street fair on or next to a block with a 500 plus seat theater, it must be cleared by 7:00 PM.

We congratulate the Office of Citywide Event Coordination and Management (OCECM) and the Street Activity permit Office (SAPO) for its careful and thoughtful review of the City's policies related to street festivals.

October 13, 2016

Dear OCECM/SAPO Committee:

I am proudly answering the clarion call: The state of NYC street fairs. The Samuel J. Tilden Democratic Club has participated in the Third Avenue Street Fair since 1983 and has donated over \$ 300,000 to projects in the CB Six Manhattan area, on the eastside. The revenues benefit our community and **I am opposed to the 2017 rule changes for street fairs.**

After Super Storm Sandy, in 2012, at Bellevue Hospital, the clothing room was housed in the basement. Everything was destroyed. It was the Tilden Club that replaced new underwear for patients to leave the hospital from street fair funds.

There is also a need to provide meals for homebound seniors within the Board Six area. We did that.

Respite programs at The Friends Seminary and the Brotherhood Synagogue, serving the homeless, have received support from Tilden.

The Gallop autistic children's riding program has benefited. An Environmental overnight retreat was provided to the students at the School of the deaf and hard of hearing.

Funds have also been given to the Public Library.

To deny donations for needy populations from street fair revenues...is wrong.

To deny donations for art and music programs in our community....is wrong.

To deny the ability for seniors to stroll down the avenues free of cars...is wrong.

To deny our families to participate in free activities in the fresh air...is wrong

To deny our residents the right to buy a new chapeau at a street fair...is wrong.

Is this really a war on immigrants, who are the majority of the workers at the fairs? In a line from the *Hamilton* musical, "It's the immigrants getting the job done."

So, I say, enough is enough... leave the street fairs which helps make the city a vibrant place to live!

Vote No! Reject the 2017 rule changes for street fairs! Thank you.

Michelle D. Winfield (Samuel J. Tilden Democratic Club, Donation Committee Member)

320 East 25th Street, 8 DD, New York, NY 10010

212-779-0657



The City of New York

Manhattan Community Board 1

Anthony Notaro, Jr. CHAIRPERSON | Noah Pfefferblit DISTRICT MANAGER

Mayor's Office of Citywide Event Coordination and Management

Street Activity Permit Office

Public Hearing on Proposed Rules

100 Church Street, 12th Floor

10:00A.M., October 13, 2016

Thank you for holding this important public hearing today regarding the proposed changes in rules for street fairs. My name is Noah Pfefferblit, and I am the District Manager of Community Board 1 in Lower Manhattan. Community District 1 includes most of Manhattan below Canal Street and south of the Brooklyn Bridge.

At our Community Board 1 (CB1) board meeting on September 27, 2016, CB1 unanimously adopted a resolution strongly urging the Citywide Event Coordination and Management (CECM) to postpone today's public hearing by at least one month to enable Community Boards to provide meaningful input on the proposed rules changes, a request also made by Manhattan Borough President Gale Brewer. We noted in our resolution that the extremely and unusually compressed timeframe precluded meaningful input as community boards require at least 45 days advance notice.

The proposed changes would make very significant changes to the rules for street festivals, setting a maximum of 10 multi-block events in any community district per year and a maximum of 20 one-block events, far fewer than the current number in many Manhattan districts, and a maximum of one festival per organization. This sharp reduction in the number of events would require a lottery to determine which organizations would have the ability to sponsor fairs, making it impossible for CB1 and other organizations that currently sponsor fairs and raise essential funds from them to continue doing so. CECM has not offered any explanation of why it believes that these drastic changes are needed or the reason for the compressed timeframe.

CECM has moved forward with this hearing despite requests to postpone it, and while we therefore cannot address the proposed changes, we have comments regarding how the new rules will affect our internal operations and fundraising.

CB1 has sponsored street fairs in our district for many years. While we review all applications for street fairs and events regardless of the sponsor, we sponsor our own events in order to supplement our budget and conduct work on behalf of our community. In past years CB1 has sponsored as many as six fairs annually, including in the aftermath of 9/11 and post-9/11 reconstruction, when additional funds were needed to provide the services that our members and constituents needed during extraordinarily challenging times. It is inconceivable that we would have been able to meet the challenges of 9/11 and the post-9/11 reconstruction without such funds and other community boards have come to rely on additional funds raised in this way as well to meet unique challenges.

1 Centre Street, Room 2202 North, New York, NY 10007-1209

Tel. (212) 669-7970 Fax (212) 669-7899

man01@cb.nyc.gov

www.nyc.gov/html/mancb1

The drastic reduction in the number of street fairs would severely limit our ability to raise essential funds. We are also concerned about the tension that would be created when local organizations would be competing for a limited number of permits and some would be able to continue to sponsor events and others would not.

We understand the need to reassess existing rules but we believe that this process should occur in consultation with community boards and not in a way that circumvents us. This would also enable the organizations that sponsor fairs to work with CECM and the Street Activity Permit Office (SAPO) to ensure that any new rules for street fairs are practical. For example, while the requirement to have 50% local merchants is commendable, it is not clear that it will be possible to achieve in a district such as ours that is rapidly growing but still a central business district with large corporations and both regional and national chain stores.

Given the many serious problems that these proposed rules would cause, we urge you to reconsider the proposed changes and to engage community boards and other stakeholders in an inclusive process that would result in equitable and viable solutions.

Thank you for the opportunity to testify today.



Diane Collier
Chair

Angel D. Mescain
District Manager

COMMUNITY BOARD ELEVEN

BOROUGH OF MANHATTAN
1664 PARK AVENUE
NEW YORK, NEW YORK 10035
TEL: (212) 831-8929/30
FAX: (212) 369-3571
www.cb11m.org

RESOLUTION

Date: October 18, 2016

Committee of Origin: Licenses & Permits

Full Board Vote: 42 In Favor, 1 Opposed, 0 Absentions, 0 Present/Not Voting

In response to: Proposal by the Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management (OCECM) to establish new rules for Street Festivals

Whereas, the Street Activity Permit Office (SAPO) of the Office of Citywide Event Coordination and Management (OCECM) has proposed establishing a new rule for Street Festivals; and

Whereas, OCECEM/SAPO has provided public notice of a public hearing on the matter to be held on October 13, 2016 at 100 Church Street, New York, N.Y. 10007 and will accept public comments on the proposed rule until October 24, 2016; and

Whereas, the proposed rule seeks to

- redefine street fairs as street festivals to conform to agency permit issuing practices and distinguish between multi-block/multi-day and single-block/single day festivals; and
- limit the number of street festival and single block street festival permits that can be issued annually within a community board, within Manhattan, and citywide, and
- require applicants to submit applications for single block street festival permits no later than 90 days prior to the proposed event; and
- establish November 1 through December 31 as the time when applications for street festivals must be submitted for the subsequent year; and
- limit the length of time street events can occur; and
- clarify the definition of community sponsor; and
- require that at least 50% of vendors participating in an event have a business or local presence within the same community board where the street festival or single block street festival occurs, and
- change the fees imposed for street fairs to a method that reflects the City's costs related to administration and traffic control for these events;

Therefore, be it resolved that Manhattan Community Board 11 (CB11M) supports the proposed rule as it relates to redefining street fairs as street festivals to distinguish between multi-block/multi-day and singleblock/single day festivals; and

Be it further resolved, that CB11M supports limiting the number of street festival permits to now more than ten (10) and single block festival permits to not more than twenty (20) that can be issued within Manhattan Community District 11; and

Be it further resolved, that CB11M supports requiring applicants to submit applications for single block festival permits no later than ninety (90) days prior to the event; and

Be it further resolved, that CB11M supports establishing November 1 through December 31 as the time when applications for street festivals must be submitted for the subsequent year; and

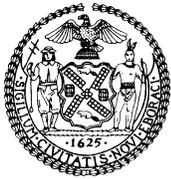
Be it further resolved, that CB11M supports limiting the length of time street events can occur; and

Be it further resolved, that CB11M supports the clarification of the definition of community sponsor to mean a community-based, documented not-for-profit organization, association, corporation or the like that has an indigenous relationship to the specific street or geographic community where the Street event is proposed and (a) if the organization, association, corporation or the like is charitable in nature, is (1) registered with the Charities Bureau of the New York State Attorney General's Office or (2) registered as a non-profit under 26 U.S.C. sections 501(c)(3), 501(c)(4), 501(c)(5) or 501(c)(6) and in good standing with the United States Internal Revenue Service; or (b) if the organization, association, corporation or the like is a religious congregation it has automatic section 501(c)(3) status and provides a letter on letterhead with its mailing address to that effect.; and

Be it further resolved, that CB11M supports requiring that the applicant include documentation that at least at 50% of the vendors participating in an event have a business or local presence within the same community board where the street festival or single block street festival occurs, and

Be it further resolved, that CB11M supports the proliferation of the changed rules in multiple languages in the spirit of accessibility and to accommodate the diversity of languages in New York City; and

Be it further resolved, that CB11M supports a grandfather clause securing availability for Street Festivals 25 years or older.



The City of New York

Manhattan Community Board 1

Anthony Notaro, Jr. CHAIRPERSON | Noah Pfefferblit DISTRICT MANAGER

September 28, 2016

Mr. Michael Carey, Executive Director
Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey

At its full board meeting on September 27, 2016, the Manhattan Community Board 1 adopted the following resolution:

COMMITTEES OF ORIGIN: NEW BUSINESS

BOARD VOTE: 36 In Favor 0 Opposed 1 Abstained 0 Recused

RE: Proposed Changes by Mayor's Office of Citywide Event Coordination and Management

WHEREAS: The Mayor's Office of Citywide Event Coordination and Management presented proposed changes to the regulations for street festival rules to Manhattan Community Boards at the Manhattan Borough Service Cabinet Meeting on September 23, 2016; and

WHEREAS: This was the first presentation of the proposed rules to Manhattan Community Boards and a public hearing has been scheduled regarding these proposed rules on October 13 which is the deadline for community boards to comment; and

WHEREAS: This extremely and unusually compressed timeframe will not allow an opportunity for community boards to comment on the proposed rules as community boards require at least 45 days advance notice prior to a public hearing so that there will be time for items to be scheduled at committee meetings which occur on set dates each month, and for any action taken at a committee meeting to be considered by the full board meeting which also occurs on a set date each month; and

WHEREAS: The proposed changes would make very significant changes to the rules for street festivals, setting a maximum of 10 multi-block events in any community district per year and a maximum of 20 one-block events, far fewer than the current number in many Manhattan districts, and a maximum of one festival per organization; and

WHEREAS: This sharp reduction in the number of events would require a lottery to determine which organizations would have the ability to sponsor fairs, making it impossible for many organizations that currently sponsor fairs and raise essential funds from them to continue doing so; and

WHEREAS: These proposed changes would have a very significant adverse effect on Community Board 1 and other community boards as well as numerous not-for-profit organizations which rely on the proceeds from these funds for essential funding for operations; and

WHEREAS: CECM did not offer any explanation of why it believes that these drastic changes are needed or why they are attempting to rush the changes through in such an extremely compressed timeframe that appears designed to make it impossible for concerned parties to provide input; and

WHEREAS: Manhattan Borough President Gale Brewer requested at the Borough Service Cabinet Meeting on September 23 that CECM postpone the October 13 deadline by at least one month to allow community boards an opportunity to comment on these proposed rules; now

THEREFORE
BE IT
RESOLVED

THAT: CB1 strongly urges CECM to postpone the October 13 deadline by at least one month to allow Community Boards to comment on the proposed rules changes.

Regards,



Anthony Notaro, Jr.
Chairperson

cc: Manhattan Borough President Gale Brewer
City Councilmember Margaret Chin
Dawn Tolson, Director, SAPO
Citywide community boards

/NP/LA

Tobi Bergman, *Chair*
Terri Cude, *First Vice Chair*
Susan Kent, *Second Vice Chair*
Bob Gormley, *District Manager*



Antony Wong, *Treasurer*
Keen Berger, *Secretary*
Daniel Miller, *Assistant Secretary*

COMMUNITY BOARD NO. 2, MANHATTAN

3 WASHINGTON SQUARE VILLAGE

NEW YORK, NY 10012-1899

www.cb2manhattan.org

P: 212-979-2272 F: 212-254-5102 E: info@cb2manhattan.org

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October 24, 2016

Michael Carey
Executive Director
Citywide Event Coordination Management Office
100 Gold Street, 2nd Floor
New York, NY 10038

Dear Executive Director Carey:

At its Full Board meeting on October 20, 2016 Community Board #2, Manhattan (CB#2, Man.) adopted the following resolution:

Review of the new street festival rules proposed by the Mayor's Street Activity Permit Office

Whereas:

Dawn Tolson, Director of the Mayor's Street Activity Permit Office, made a presentation about the proposed new rules and took questions to clarify the provisions.

Representatives of three local non-profit organizations, and the president of one of the firms that is hired to produce street activities sponsored by non-profit organizations, appeared to raise concerns about certain rules.

Of particular concern are the new rules that relate to what have been called street fairs, which are now defined as Street Festivals and Single-Block Street Festivals.

The proposed rules were summarized in the presentation as follows:

Community Sponsor, Street Festival and Single Block Street Festival are re-defined

- Community Sponsor means a community-based, documented not-for-profit organization, association, corporation or the like that has an indigenous relationship to the specific street or geographic community where the Street event is proposed (along with specific requirements for documenting not-for-profit status).
- Street Festival means a Street event sponsored by a Community sponsor headquartered within the same community board as the proposed event that requires a street closure of one Block for multiple calendar days or more than one Block for one or more calendar days in which the general public can purchase goods or services provided by Vendors and Vendors may pay a fee to participate.
- Single Block Street Festival means a Street event sponsored by a Community sponsor headquartered within the same community board as the proposed event that requires a street

closure of one Block for a single calendar day in which the general public can purchase goods or services provided by Vendors and Vendors may pay a fee to participate.

Street Festival applications are open from November 1 to December 31.

Single Block Street Festival must be submitted 90 days in advance.

At least 50% of vendors must have a business or presence in the community board.

Vendors require documentation.

Caps on Street Festivals and Single Block Street Festivals are:

- 10 Street Festivals per Community Board
- 20 Single Block Street Festivals per Community Board
- No more than 200 Street Festivals citywide
- No more than 100 Street Festivals in Manhattan

Update to Fee Structure:

- \$1,375 per day per block fee for the first day
- \$705 per day per block fee for subsequent days

The new requirements for non-profits to document their status and indigenous relationship will help correct a long-standing problem that has been experienced in CB2. The rules do not address the status of state-wide or national organizations, which can be argued to have indigenous relationships to any area.

Under the proposed caps, Street Festivals in CB2 would be reduced from 22 to 10 (a reduction greater than 50% and the most drastic reduction on all but one other community board in Manhattan); the number of single-block Street Festivals would be reduced from 21 to 20.

Capping the number of festivals is in principle a desirable goal, but instituting the cap at one time could have the unintended consequence of doing harm to local, small non-profits.

The SAPO system date/time stamps every application and, under the proposed rules, would consider applications on a first come/first served basis.

The cap on Street Festivals would potentially give production companies the power to decide which of their clients would be able to apply successfully.

The SAPO system alerts community boards immediately when applications are submitted, and the intention is for community boards to have the opportunity to comment on all applications. The community board process requires a committee hearing that is publicized on the board calendar, followed by a resolution that must be adopted at a full board meeting. As a practical matter, a 45-day time frame is the minimum necessary for a community board to be able to comment on any application. Application deadlines for some street and plaza events are less than 30 days under the proposed rules.

The proposed rules include new categories for First Amendment protected activities, such as demonstrations, for which application deadlines are much shorter because of Constitutional protections.

The representatives of local non-profits testified about the negative impacts of certain rules:

- Most vendors don't confirm participation until the last minute, based on weather reports, so confirming vendor information 30 days before an event is for all intents and purposes impossible.
- Similarly, ensuring that 50% of vendors are local cannot be guaranteed in advance of the event.
- The 50% requirement itself seems arbitrary, and it does not take into account that many desirable vendors for street activities are entrepreneurs and artisans who cannot afford to be headquartered within the community board and are largely drawn from the three-state region. In addition, the

SAPO director would not say whether a non-profit would be denied a permit if it failed to reach the 50% threshold.

- The proposed per-block flat fee structure can be detrimental to smaller organizations and smaller festivals that occur on narrower streets. The current structure based on a percentage of proceeds is fairer to smaller organizations and festivals.

The non-profits and the production company complained that they, as stakeholders in this process, had not received the notifications that had supposedly been sent to stakeholders early in the process.

Now, therefore, be it resolved that:

CB2 commends the Office of Citywide Event Coordination and Management and the Street Activity Permits Office for their efforts to update the rules for street and plaza events.

CB2 encourages SAPO to diligently enforce the rules regarding documentation of non-profit and indigenous status of street festival sponsors and clarify the status of state-wide and national organizations under the indigenous requirement.

CB2 recommends that the minimum application time for every application, except for First Amendment protected activities, be no less than 45 days.

CB2 is concerned that local non-profits that rely on street festivals for their financial stability will be disadvantaged by the new rules and recommends that:

- The cap on Street Festivals be two years for CB2 and for any other community board that faces a drastic reduction in the number of street festivals.
- SAPO consider a fee structure that takes into account the size and budget of non-profits so that small, local, community-based non-profits not be unduly burdened.
- The 50% local vendors rule be reconsidered in light of the practical experience of non-profit sponsors of street festivals.

CB2 further recommends that CB2 SAPO should strongly give CB2 recommendations and resolutions primary consideration for both non-profit Street Activity permits and especially for commercial Street Events permits.

VOTE: Unanimous, with 43 Committee Board Members in favor.

Please advise us of any decision or action taken in response to these resolutions.

Sincerely,



Tobi Bergman, Chair
Community Board #2, Manhattan



Robert A. Woodworth, Chair
Quality of Life Committee
Community Board #2, Manhattan

TB/EM

c: Hon. Jerrold L. Nadler, Congressman
Hon. Carolyn Maloney, Congresswoman

Hon. Nydia Velázquez, Congresswoman
Hon. Brad Hoylman, NY State Senator
Hon. Daniel L. Squadron, NY State Senator
Hon. Deborah J. Glick, Assembly Member
Hon. Gale Brewer, Man. Borough President
Hon. Corey Johnson, Council Member
Hon. Margaret Chin, Council Member
Hon. Rosie Mendez, Council Member
Dawn Tolson, Director, Street Activity Permit Office

Tobi Bergman, *Chair*
Terri Cude, *First Vice Chair*
Susan Kent, *Second Vice Chair*
Bob Gormley, *District Manager*



Antony Wong, *Treasurer*
Keen Berger, *Secretary*
Daniel Miller, *Assistant Secretary*

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3 WASHINGTON SQUARE VILLAGE
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October 24, 2016

Michael Carey
Executive Director
Citywide Event Coordination Management Office
100 Gold Street, 2nd Floor
New York, NY 10038

Dear Executive Director Carey:

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Review of the new street festival rules proposed by the Mayor's Street Activity Permit Office

Whereas:

Dawn Tolson, Director of the Mayor's Street Activity Permit Office, made a presentation about the proposed new rules and took questions to clarify the provisions.

Representatives of three local non-profit organizations, and the president of one of the firms that is hired to produce street activities sponsored by non-profit organizations, appeared to raise concerns about certain rules.

Of particular concern are the new rules that relate to what have been called street fairs, which are now defined as Street Festivals and Single-Block Street Festivals.

The proposed rules were summarized in the presentation as follows:

Community Sponsor, Street Festival and Single Block Street Festival are re-defined

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Street Festival applications are open from November 1 to December 31.

Single Block Street Festival must be submitted 90 days in advance.

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Vendors require documentation.

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Update to Fee Structure:

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The new requirements for non-profits to document their status and indigenous relationship will help correct a long-standing problem that has been experienced in CB2. The rules do not address the status of state-wide or national organizations, which can be argued to have indigenous relationships to any area.

Under the proposed caps, Street Festivals in CB2 would be reduced from 22 to 10 (a reduction greater than 50% and the most drastic reduction on all but one other community board in Manhattan); the number of single-block Street Festivals would be reduced from 21 to 20.

Capping the number of festivals is in principle a desirable goal, but instituting the cap at one time could have the unintended consequence of doing harm to local, small non-profits.

The SAPO system date/time stamps every application and, under the proposed rules, would consider applications on a first come/first served basis.

The cap on Street Festivals would potentially give production companies the power to decide which of their clients would be able to apply successfully.

The SAPO system alerts community boards immediately when applications are submitted, and the intention is for community boards to have the opportunity to comment on all applications. The community board process requires a committee hearing that is publicized on the board calendar, followed by a resolution that must be adopted at a full board meeting. As a practical matter, a 45-day time frame is the minimum necessary for a community board to be able to comment on any application. Application deadlines for some street and plaza events are less than 30 days under the proposed rules.

The proposed rules include new categories for First Amendment protected activities, such as demonstrations, for which application deadlines are much shorter because of Constitutional protections.

The representatives of local non-profits testified about the negative impacts of certain rules:

- Most vendors don't confirm participation until the last minute, based on weather reports, so confirming vendor information 30 days before an event is for all intents and purposes impossible.
- Similarly, ensuring that 50% of vendors are local cannot be guaranteed in advance of the event.
- The 50% requirement itself seems arbitrary, and it does not take into account that many desirable vendors for street activities are entrepreneurs and artisans who cannot afford to be headquartered within the community board and are largely drawn from the three-state region. In addition, the

SAPO director would not say whether a non-profit would be denied a permit if it failed to reach the 50% threshold.

- The proposed per-block flat fee structure can be detrimental to smaller organizations and smaller festivals that occur on narrower streets. The current structure based on a percentage of proceeds is fairer to smaller organizations and festivals.

The non-profits and the production company complained that they, as stakeholders in this process, had not received the notifications that had supposedly been sent to stakeholders early in the process.

Now, therefore, be it resolved that:

CB2 commends the Office of Citywide Event Coordination and Management and the Street Activity Permits Office for their efforts to update the rules for street and plaza events.

CB2 encourages SAPO to diligently enforce the rules regarding documentation of non-profit and indigenous status of street festival sponsors and clarify the status of state-wide and national organizations under the indigenous requirement.

CB2 recommends that the minimum application time for every application, except for First Amendment protected activities, be no less than 45 days.

CB2 is concerned that local non-profits that rely on street festivals for their financial stability will be disadvantaged by the new rules and recommends that:

- The cap on Street Festivals be two years for CB2 and for any other community board that faces a drastic reduction in the number of street festivals.
- SAPO consider a fee structure that takes into account the size and budget of non-profits so that small, local, community-based non-profits not be unduly burdened.
- The 50% local vendors rule be reconsidered in light of the practical experience of non-profit sponsors of street festivals.

CB2 further strongly recommends that CB2 SAPO should give CB2 recommendations and resolutions primary consideration for both non-profit Street Activity permits and especially for commercial Street Events permits.

VOTE: Unanimous, with 43 Committee Board Members in favor.

Please advise us of any decision or action taken in response to these resolutions.

Sincerely,



Tobi Bergman, Chair
Community Board #2, Manhattan



Robert A. Woodworth, Chair
Quality of Life Committee
Community Board #2, Manhattan

TB/EM

c: Hon. Jerrold L. Nadler, Congressman
Hon. Carolyn Maloney, Congresswoman

Hon. Nydia Velázquez, Congresswoman
Hon. Brad Hoylman, NY State Senator
Hon. Daniel L. Squadron, NY State Senator
Hon. Deborah J. Glick, Assembly Member
Hon. Gale Brewer, Man. Borough President
Hon. Corey Johnson, Council Member
Hon. Margaret Chin, Council Member
Hon. Rosie Mendez, Council Member
Dawn Tolson, Director, Street Activity Permit Office



THE CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 3
59 East 4th Street - New York, NY 10003
Phone (212) 533-5300
www.cb3manhattan.org - info@cb3manhattan.org

Jamie Rogers, Board Chair

Susan Stetzer, District Manager

October 27, 2016

Michael Carey, Executive Director
Citywide Event Coordination and Management
Office of the Mayor
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

At its October 2016 monthly meeting, Community Board 3 passed the following resolution:

VOTE: Community Board 3 is opposed to elements of Street Activity Permit Office rule changes

WHEREAS, new regulations to the Street Activity Permit Office rules propose the following changes:

Street Fairs will be capped at 10 festivals per community board and there will be a requirement that 50% of the vendors must have a business or presence in the community board,

Single Street Festivals will be capped at 20 per Community Board and have a requirement that 50% of the vendors must have a business or presence in the community board,

Health Fairs are now a new category and require 30 days' notice,

Plaza events are a new category and require 14-60 days' notice

WHEREAS, these types of events can result in closures and obstructions that significantly impact the community; and

WHEREAS, notice less than 60 days from date of the event does not allow time for Community Board comment; and

WHEREAS, the goals cited by SAPO in the rule change include increased notifications regarding events and transparency for community boards; so

THEREFORE BE IT RESOLVED, that although CB 3 agrees to the general cap on the number of street festivals and 1-block street festivals, CB 3 believes that community boards

should have the ability to issue a waiver to the cap for an event that the board deems in the best interest of the community; and

THEREFORE BE IT FURTHER RESOLVED, that because the CB is the platform for the community to give input and be involved in decision making for the community, community boards need a minimum of 60 days' notice for all events, including Plaza events, to schedule and post the event for public notice; and

THEREFORE BE IT FURTHER RESOLVED, that CB 3 believes the requirement to have 50 percent of vendors at street festivals have a business or presence in the community board is an impossible goal as many local businesses in CB 3 have very few employees and do not have staff or resources for a second business opportunity and would be currently participating in street festivals if they wanted to take this opportunity and believes creating an incentive for local vendors would be more productive; and

THEREFORE BE IT FURTHER RESOLVED, that CB 3 believes that fees collected from vendors should remain the same as the current fee structure as they would otherwise place an unfair burden on nonprofits who dedicate a block to local artists and performances and who donate free tables to local civic organizations; and

THEREFORE BE IT FURTHER RESOLVED, that CB 3 believes that requiring a 30 –day notice for finalized street fair vendor's lists is unrealistic given that most vendors wait until shortly before the event for the weather report and other events that may conflict.

Please contact the community board office with any questions.

Sincerely,



Jamie Rogers, Chair
Community Board 3



Trever Holland, Chair
Parks, Recreation, Cultural Affairs & Waterfront Committee

Cc: Paola Ruiz, Manhattan Borough Director, Community Affairs Unit, Office of the Mayor
Vincent Fang, Office of New York City Council Member Margaret Chin
Sheila Rodriguez, Office of New York City Council Member Rosie Mendez
Eli Szenes-Strauss, Office of New York State Senator Brad Hoylman
Mauricio Pazmino, Office of New York State Senator Daniel Squadron
Charlie Anderson, Office of New York State Assembly Member Deborah Glick
Edward Cerna, Office of New York State Assembly Member Brian Kavanagh
Monica Guardiola, Office of New York State Assembly Member Alice Cancel
Andrew Lombardi, Office of Manhattan Borough President Gale Brewer



THE CITY OF NEW YORK
MANHATTAN COMMUNITY BOARD 3
59 East 4th Street - New York, NY 10003
Phone (212) 533-5300 - Fax (212) 533-3659
www.cb3manhattan.org - info@cb3manhattan.org

Jamie Rogers, Board Chair

Susan Stetzer, District Manager

September 30, 2016

Michael Carey, Executive Director
Citywide Event Coordination and Management
Office of the Mayor
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

At its September 2016 monthly meeting, Community Board 3 passed the following resolution:

VOTE: Request to Street Activity Permit Office to extend deadline for comments to proposed street fair/block party rules to allow opportunity for community boards to comment and to also ensure new rules always allow a minimum of 60 days notification of events to community boards to allow for scheduling at community board meetings

WHEREAS, Street Fairs are a very important fundraising tool for local nonprofit organizations; and

WHEREAS, Street Fairs have an impact on the community including residents, houses of worship, and small businesses; and

WHEREAS, block parties held by tenant organizations, health organizations, schools, and other local not-for-profit organizations are very important for building community; and

WHEREAS, Street Activity Permit Office in September, 2016 issued new rules and require comments to the proposed rules to be submitted by October 13, 2016, which does not allow time for community boards to post the notification on their agendas and engage in community discussion to inform a community board vote; and

WHEREAS, among the new changes are various submission times, some of which are less than 60 days before the event, which is not enough time for a community board to post for public meeting and have a committee and full board vote; so

THEREFORE BE IT RESOLVED, that CB 3 asks that the deadline for submission of comments be extended until November so that all community boards have the opportunity to testify based on public vote taken at public meeting with a posted agenda; and

THEREFORE BE IT FURTHER RESOLVED, that all events that have a community impact, such as fairs, block parties, significant plaza events, DOT events (weekend walks, etc)

have a minimum submission deadline of 60 days before the event so that community boards have an opportunity to place on the agenda with public notification and have a community board vote.

Please contact the community board office with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Rogers', with a stylized flourish at the end.

Jamie Rogers, Chair
Community Board 3

Cc: Paola Ruiz, Manhattan Borough Director, Community Affairs Unit, Office of the Mayor
Andrew Lombardi, Office of Manhattan Borough President Gale Brewer
Vincent Fang, Office of New York City Council Member Margaret Chin
Sheila Rodriguez, Office of New York City Council Member Rosie Mendez



CITY OF NEW YORK

MANHATTAN COMMUNITY BOARD FOUR

330 West 42nd Street, 26th floor New York, NY 10036
tel: 212-736-4536 fax: 212-947-9512
www.nyc.gov/mcb4

Delores Rubin
Chair

Jesse R. Bodine
District Manager

October 27, 2016

Michael P. Carey
Executive Director
Office of Citywide Event Coordination and Management
Street Activity Permit Office
100 Gold Street, 2nd Flr
New York, NY 10038

Re: Proposed Rule Changes to Street Events

Dear Mr. Carey,

The Arts, Culture, Education & Street Life Committee ("ACES") of Manhattan Community Board 4 ("MCB4") thanks Director Dawn Tolson of the Street Activity Permit Office ("SAPO") for presenting at our October 18, 2016 meeting. Also in attendance were several community groups and event operators.

Based on the comments from the community, the committee recommends that the current rules remain in effect and that SAPO reach out and hold hearings with community groups and operators in all five boroughs to develop new regulatory reforms. We are concerned that having operated under the current regulations since 2007, introducing this wide range of significant rule changes on such short notice will create a chaotic environment for both the operators and community organizations, that have relied on these street activities for their community needs and programs. Some of the groups have already begun planning their events for 2017. The community groups are especially concerned that a number of the changes SAPO has proposed will lead to their inability to comply and they will not be able to continue their street events. These new proposed changes include:

- Requiring that 50% of the vendors have a business or local presence within the same community board.
- Requiring a community sponsor to have an indigenous relationship to the specific street where the event is proposed.
- New fees that make it impossible for many smaller events to be economically viable.

The committee agrees that these events do have an impact on both residents and small businesses in terms of noise, accessibility and traffic congestion. However, the results from

SAPO's analysis of its own study suggest that the impact is mostly felt in Community Boards 2, 5 and 7. The committee feels that SAPO is proposing a "one size fits all" remedy.

The committee also requests that SAPO review the permitting of operators such as the Hell's Kitchen Flea Market ("HKFM") which supports a non-profit foundation, Hell's Kitchen Foundation, Inc. which is dedicated to advancing the needs of local artists. The HKFM operates year round on West 39th Street between 9th and 10th Avenues, an almost unpopulated side street. HKFM is self-sufficient for waste removal, security and traffic control. Using no City resources, operators such as HKFM should not be subject to the same regulations as Multi-Block Street Festivals. These operations often result from community requests with support from local officials.

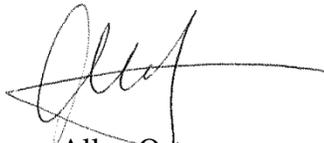
The committee agrees that revisions to the current regulations may be necessary to address the changes that have developed throughout the City of New York. The changes being proposed are significant but there has not been sufficient time nor opportunity for the community and operators to adequately engage with SAPO. Implementing these proposed rules changes without a constructive dialogue about the issues raised before the committee will negatively impact local community sponsors.

Thank you very much and we look forward to a continuing dialogue with your office on this matter.

Sincerely,



Delores Rubin
Chair
Community Board 4



Allen Oster
Co-Chair
ACES Committee



Austin Ochoa
Co-Chair
ACES Committee

cc: Hon. Gael A. Brewer, Manhattan Borough President
Hon. Corey Johnson, City Council

Resolution re Statement Regarding Proposed Rules for Street Fairs
October 26, 2016

WHEREAS, street fairs are long-standing institutions across the City of New York, including the Borough of Manhattan and within Manhattan Community District 7;

WHEREAS, street fairs are utilized by non-profit organizations to raise funds, increase visibility, and give back to other non-profit organizations;

WHEREAS, street fairs serve as community events that increase foot traffic, attracts tourists and residents to different parts of our Community District, and increase exposure of our local businesses;

WHEREAS, certain Community Districts are saturated with street fairs, but Community District 7 is not;

WHEREAS, the Street Activity Permit Office (“SAPO”) of the Office of Citywide Event Coordination and Management (“OCECM”) has reevaluated the 12-year long moratorium on allowing additional street fairs in the City of New York;

WHEREAS, in light of this review, the SAPO of the OCECM has circulated proposed revisions to the rules for Street Festivals (“Proposed Rules”);

WHEREAS, when read in the best light, certain goals reflected in the Proposed Rules, including encouraging street fairs outside of Manhattan, maximizing community involvement in street fairs hosted in a particular Community District, and encouraging innovation in street fairs by lifting the moratorium on the number of street fairs and the Community Sponsors that are able to host said fairs, are worthy and shared by Community Board 7;

WHEREAS, it is also clear that certain of the Proposed Rules would have the negative effects of: shutting out Community Boards from engaging with producers to improve fairs; disincentivize fairs from providing free space to community-based organizations; impact the ability of street fairs to be profitable or exist at all; and eliminate long-standing fairs in our Community District;

WHEREAS, the Proposed Rules would have SAPO, not the Community Boards, review applications on a first come, first served basis, and allow Community Board input only in the form of a disapproval “for cause”, which would shut out Community Board engagement with producers of street fairs;

WHEREAS, the Proposed Rules would change the fee structure from a percentage to a fee per block, which would have the negative effect of preventing producers from being able to give free space to community-based organizations, such as the Greenmarket, which gets free space between 77th and 81st streets during the Columbus Avenue Street Fair;

WHEREAS, the Proposed Rules would immediately require that “50% of vendors participating in an event have a business or local presence within the same community [district] where the [street fair] occurs”, which, in the experience of Community Board 7, is an untenable requirement as good faith efforts have been made to include local businesses in street fairs and there is not enough interest to meet this high percentage;

WHEREAS, the Proposed Rules would limit organizations to hosting only one street fair per year, which would eliminate the West Manhattan Chamber of Commerce’s ability to host their longstanding Amsterdam Avenue and Columbus Avenue Street Fairs;

WHEREAS, neither Community Board 7 nor the Business and Consumer Issues Committee of Community Board 7 was asked for their input before the Proposed Rules were released;

THEREFORE, BE IT RESOLVED, that Community Board 7 endorses the effort of the SAPO of the OCECM to modernize and revise the rules governing street fairs, but requests that the Proposed Rules be altered so that community boards retain their traditional role in reviewing proposed fairs, street fairs are incentivized to provide free space to community-based organizations, street fairs are not required to meet the proposed 50% local presence requirement as this is untenable, and existing street fairs are not eliminated in a community district without its consent.

James G. Clynes
Chairman

Latha Thompson
District Manager



505 Park Avenue, Suite 620
New York, N.Y. 10022-1106
(212) 758-4340
(212) 758-4616 (Fax)
www.cb8m.com - Website
info@cb8m.com - E-Mail

The City of New York Manhattan Community Board 8

September 22, 2016

Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Flr.
New York, NY 10007

Dear Mr. Carey,

At the Land Use/Full Board meeting on Wednesday, September 21, 2016, the board adopted the following resolution regarding the proposed rule changes for Street Festivals by a unanimous vote:

Whereas the new rules and regulations proposed by the Office of City Wide Events Coordination and Management for Street Activity Permits would have a deleterious effect on many not-for-profit organizations which benefit from the proceeds generated by the multi-block festivals currently authorized within Manhattan Community District 8, and

Whereas many not-for-profits within CD #8 derive much of their operating income from the funds generated by their single block or small multi-block festivals,

THEREFORE, BE IT RESOLVED THAT Manhattan Community Board 8 requests that the Chair of Board 8, James G. Clynes, write a compelling letter to Mr. Michael Carey, Executive Director of the Office of City Wide Events Coordination and Management for Street Activity Permits that urges his department to reconsider for the following changes:

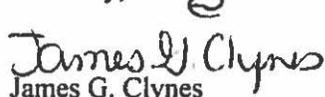
- Each community Board would be limited to the same number of multi-block festivals and single block festivals as the prior years 2016 & 2015, so there would be no increase in the amount of festivals; and
- All existing sponsors conducting two festivals for more than 5 years would be allowed to continue doing so, all new applications would be limited to one fair per calendar year; and
- Gradually increasing the community participation by vendors over the years and starting with 5% from within the district taking the time necessary to be inclusive and to involve the community boards, community groups as well as all interested parties; and
- Sponsors should be able to reserve the right at the close of their event when filing the final income summary to have the option to pay 20% of all rental fees paid by the vendors **OR** pay based on the number of blocks utilized, not the number of blocks listed on the permit—which is a proposed new fees structure under these rule; and

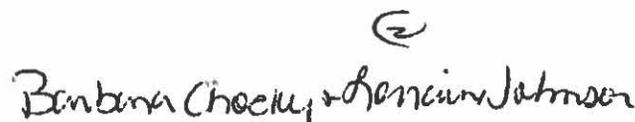
- Eliminate submission of addresses and phone numbers of vendors 30 days prior to the event—which is a proposed major change under new rules, as vendors wait for the week of the event before they book their space based on the weather forecast; and

BE IT FURTHER RESOLVED with these new rules the goal should be to allow the local Community Boards to best regulate the assignment of multi-block street festivals and single-block street fairs within its district as distinct from a one-size fit all rules and regulations set forth by City Hall.

Please advise this office of any action taken regarding this matter.

Sincerely,


James G. Clynes
Chairman


Barbara Chocky and Lorraine Johnson
Co-Chairs, Street Fair Committee

cc: Hon. Bill de Blasio, Mayor of the City of New York
Hon. Gale Brewer, Manhattan Borough President
Hon. Carolyn Maloney, 12th Congressional District Representative
Hon. Liz Krueger, NYS Senator, 28th Senatorial District
Hon. Dan Quart, 73rd Assembly District
Hon. Rebecca Seawright, 76th District
Hon. Ben Kallos, NYC Council Member, 5th Council District
Hon. Daniel Garodnick, NYC Council Member, 4th Council District



MYRTLE AVENUE BUSINESS IMPROVEMENT DISTRICT

62-14 MYRTLE AVENUE • GLENDALE, NY 11385
718-381-7974 • 718-366-3806 • Fax: 718-381-7080
E-mail: MyrtleBID@gmail.com website: www.Ridgewood-NY.com

Michael Carey
Executive Director
Office of Citywide Event Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

Dear Mr. Carey,

The Street Activity Permit Office (SAPO) of the Mayor's Office of Citywide Event Coordination and Management has established new rules for street festivals.

While we are grateful for these efforts and many of the changes that CECM would implement there are a number of issues in the new proposed rules that may have negative and/or unintended consequences.

Signing up 30 days prior to the event

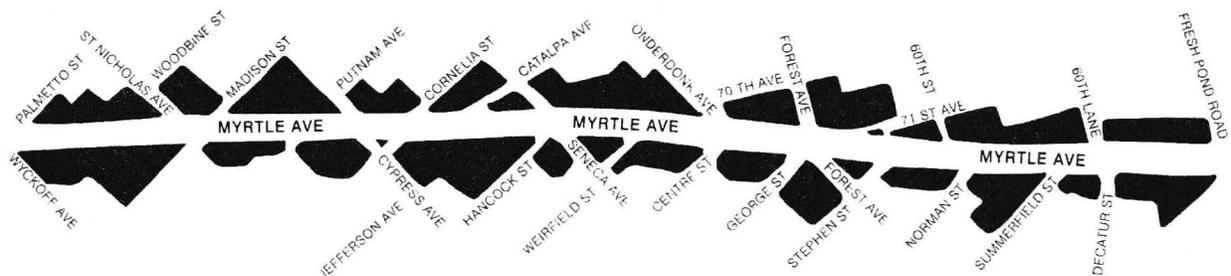
We oppose the 30 day notice period. Most vendors whether local or not (including merchants) often wait until a week before the event date or so to sign up due to the weather forecast. This proposed change if implemented should be phased in over a multi-year phase in process.

Applicants will have to prove that 50% of vendors for street fairs have a business or local presence within the Community Board where the event is held.

The city should re-evaluate this and consider the concerns of the diverse neighborhoods throughout the city. While we agree with the city that some fairs have become too generic, the 50% local vendor requirement may be too onerous to implement immediately for most local sponsor groups. While this is a lofty goal perhaps there should be a multi-year phase in process.

New Street Fair Fee Structure

We recognize the city's intent regarding to these changes is to help the city recover costs related to administration, police presence and traffic costs among others for these events.



**MYRTLE AVENUE DISTRICT MANAGEMENT ASSOCIATION
PROGRAM SUPPORT PROVIDED BY RIDGEWOOD LOCAL DEVELOPMENT CORPORATION**

However, again this new fee structure cannot be a one-size fits all solution given the many differences and circumstances in each neighborhood.

Many groups are small and this places an additional burden on them. For some it may result in operating a fair at a loss.

The city needs to re-evaluate this fee structure. Again, some sort of phase in time frame should go into effect giving groups time to adapt and find other cost savings methods. For example, many communities have civilian patrols and perhaps they could handle traffic control at intersections instead of NYPD.

Though not in the set of recommendations the city should take a look at multi day/multi block fairs and consider not allowing them along bus routes.

The Ridgewood LDC applauds the many positive changes that were indicated in the new proposed rules we again remind you to look at our aforementioned recommendations and/or changes.

Thank you

Sincerely Yours,


Theodore M. Renz



Historic Murray Hill

The Murray Hill Neighborhood Association

October 13, 2016

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To: The New York City Council

As the person who has been primarily responsible for trying to get local businesses to join us at The Murray Hill Neighborhood Association Street Fair over the last several years, I can tell you that if the 1/1 ratio of local/out-of-town vendors becomes NYC Street Fair policy, it will have an enormous detrimental effect on our fair. In fact, I would go so far as to say that our street fair might well cease to exist since it would become cost prohibitive. Our professional event manager would still need to be paid for his services, but the total revenue would be drastically reduced.

For years, I have tried to persuade local restaurants and other businesses to join us and have a presence at our fair. I've stressed the advantages which such a presence affords these local businesses, i.e., almost free advertising, positive community involvement, and attracting new customers who might have been unaware of the vendor beforehand.

As time has passed, I have found it more and more difficult to convince local area businesses to join us at our street fair. I don't know why this is the case, but I know it to be true.

Our yearly street fair is a major source of revenue for the Association. In my opinion, requiring as many local merchants to attend NYC street fairs as non-local merchants would have an immediate and severely detrimental impact on our fair.

I believe the same would be true for many, if not all, neighborhood-sponsored street fairs in NY City.

Respectfully submitted,

Thomas Horan
VP MHNA
Chair, Street Fair Committee



The Murray Hill Neighborhood Association

212-886-5867 • PO Box 1897, NY, NY 10156-1897 • www.murrayhillnyc.org

From: [Stefan Minovici](#)
To: [SAPOrules](#)
Cc: ["Joseph Giovanni"](#)
Subject: New SAPO Proposed Ruling
Date: Tuesday, October 18, 2016 2:33:30 PM
Importance: High

Dear Sir/Madam:

The newly proposed SAPO Rule governing Street Fairs in New York City is simply absurd, against local and ethnic communities and if approved, it will create greater fragmentation of our wonderfully diverse city.

The Romanian-American Community that I represent for over two decades has had a unique festival on Broadway for the last seventeen years dedicated my native country from Eastern Europe. Our compatriots have fought and died and continued to do so in Iraq and Afghanistan, shoulder to shoulder with their American fellow soldiers. The United States has two military bases in Romania as the country remains the staunchest and most loyal allied in the Black Sea region and beyond. There are more native Romanian doctors in New York City than Poles, Czechs, Hungarians, Bulgarian and Ukrainians combined; more IT people, engineers, architects than other far larger nations represented in our great city and state. All that my 300,000 strong Diaspora in the York City area has is the Romania Day Festival on Broadway. This event televised five years in a row live to an audience of millions in Romania was honored over the years by the King and the Queen of Romania, by Nadia Comaneci, tennis great Ilie Nastase, two Heads of State, two congressmen, two mayors, scores of dignitaries and diplomats and over years. It was also attend by more than half a million people since its creation. Under the proposed new SAPO ruling, the Romania Day Festival on Broadway will simply cease to exist and this will be impossible to explain to my people and community. The end of our event will have a very negative impact on the bilateral US-Romanian relations and will deal a severe blow to our community and its achievement over the last century.

Kindly reconsider this proposed ruling and allow for our great Diaspora and community to continue a long-standing tradition that we have fought so hard and long to create.

Respectfully yours,

Stefan Minovici
Founder & Producer

45 Broadway New York,
NY, 10006, USA
Tel: (212) 668 0400
Fax: (212) 668 1791

Cell: (646) 258 8882

Romania

Calea Floreasca 91-111
Suite 301 Bucuresti 1
Tel: + 40 21 529 27 00
Fax: + 40 21 529 27 10
Cell: + 40 758 309 900



www.romaniabroadway.com

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From: [Joan Dineen](#)
To: [SAPORules](#)
Subject: new street fair rules
Date: Friday, September 23, 2016 4:40:07 PM

I applaud all efforts to encourage real meaning in street fairs, curtail their number, and limit their negative effects.

In particular, I would like to see MUCH better attention given to traffic signage. Avenues that are affected by closures should have temporary signs posted warning of the upcoming blockage so that drivers can filter off the avenue well before the ultimate barriers.

I understand that there are people who make money from these events and others who enjoy them, but the cost to those who are inconvenienced needs to be considered far more than it is now.

joan gould dineen aia

dineen architecture + design pc

224 east 62nd street

new york new york 10065

212 249 2575

www.dineenarchitecture.com

From: [jamyang lama](#)
To: [SAPORules](#)
Subject: New street fair rules
Date: Wednesday, October 12, 2016 11:13:39 AM

Dear Sir/Madam,

This letter is regarding the new street fair rules which are going to be imposed in the city of New York from next year. It came as a bit of a shock for me and the other vendors when we heard the new proposals. Below I will state a few reasons as to why street fairs are integral part of the city and for the vendors.

1. Street fairs are a stepping stone for entrepreneurs who want to try their new product or service and get a first hand experience. It helps build confidence in the individual and get funds to increase the business. This not only benefits the individual but also the city as the business could thrive and create more jobs and revenue.
2. These fairs help bring a sense of community in areas where they are held as local residents come out with their family and friends. They can try out various cuisines from around the world, purchase goods from local artisans and meet vendors who can share their stories, help build new friendships, get inspiration and celebrate life.
3. New York city has always been a supporter of small businesses and these new rules would definitely stifle this great opportunity the city has provided us. This city has always been a place of diversity, growth and taking risk. Hence people come from all over the world to be a part of this culture. Street fairs may not seem significant to those not involved but to the vendors it is a integral part of their lives. Lot of us not only depend on them to survive and take care of our loved ones but also to improve our businesses and take it to the next level.

Please do reconsider the new rules and help keep alive the hopes and dreams of not only the existing small businesses but also the thousands more who would want to be a part of this venture.

Thank you
sincerely,

Jamyang Tashi Lama

COMMUNITY OFFICE
 37-32 75TH STREET, 1ST FLOOR
 JACKSON HEIGHTS, NY 11372
 TEL: (718) 803-6373
 FAX: (718) 803-9832

CITY HALL OFFICE
 250 BROADWAY, ROOM 1826
 NEW YORK, NY 10007
 TEL: (212) 788-7066

EMAIL: dromm@council.nyc.gov



**THE COUNCIL
 OF
 THE CITY OF NEW YORK**
DANIEL DROMM
 COUNCIL MEMBER, 25TH DISTRICT, QUEENS

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 OVERSIGHT & INVESTIGATIONS
 SUBCOMMITTEE
 NON-PUBLIC SCHOOLS

October 13, 2016

Michael Paul Carey, Executive Director
 Office of Citywide Coordination and Management
 253 Broadway, 6th Floor
 New York, NY 10007

Re: Rulemaking for Street Festivals

Dear Mr. Carey:

I am submitting these comments to express my opposition to several provisions of the proposed rules. I encourage you not to change the current rules or, where relevant, adopt the language I suggested.

Applicability and Definitions	
Proposed Rule	Our Comment
§1-01 “Single Block Street Festival” and “Street Festival” Definitions	<ul style="list-style-type: none"> Delete “headquartered within the same community board as the proposed event.” Event sponsors may be headquartered in other community boards. Many sponsors, for instance, may be headquartered in Manhattan but have “indigenous relationships” to communities outside of Manhattan where festivals take place. Tying this requirement to the geographic location of administrative headquarters is not appropriate since the location does not necessarily reflect the communities where sponsors work. In addition, certain communities straddle community boards while others, such as the lesbian, gay, bisexual, and transgender community, are dispersed across the city.

Application Requirements and Deadlines	
Proposed Rule	Our Comment
§1-03(d)(15) Deadlines	<ul style="list-style-type: none"> Do not adopt the proposed rule. The sixty (60) day window is far too short for Applicants, creating unnecessary scrambling during the application period and also short notice, especially for events that occur

	towards the beginning of the year.
§1-03(e) Limits on number of applications	<ul style="list-style-type: none"> Do not adopt rule limiting the number of events per sponsor per year. Many community-based organizations sponsor multiple festivals as part of their services to their respective neighborhoods. This proposal should either be rejected or a procedure established for local community boards to waive the cap.

Approval or Denial of Applications by the Street Activity Permit Office	
§1-05(d) Vendor Participation	<ul style="list-style-type: none"> Change “fifty percent (50%) of the participating Vendors” to no more than “twenty-five percent (25%).” Fifty percent is too high, particularly for Single Block Festivals. Add: “This requirement can be met by providing slots at little or no cost to local businesses, artists, or members of local merchants associations.” Do not adopt rule regarding the requirement that Vendors submit information “thirty (30) days” prior to the event. Keep the “one week prior to the date of the event” as Vendors need flexibility when making final decisions due to factors such as forecasted weather.
§1-05(g) Street Festival Permit Allocation, Street Festival Limitation, Street Festival Permit Denial	<ul style="list-style-type: none"> Change “The Director shall issue no more than ten (10) permits...” to “The Director shall issue no more than fifteen (15) permits....” Also, a procedure should be established for community boards to waive these limits. These limits are intended for large festivals on major thoroughfares and should not apply to religious observances or to festivals on smaller streets. In addition, do not adopt the proposed rule limiting the number of Street Festival permits to 200 citywide in a year. This proposed limit is far less than the potential maximum of 590 if there are 10 Street Festival permits granted per calendar year to each of the 59 community boards. If the 12 community boards in Manhattan make use of all 100 of the permits they are potentially allowed to issue, there will only be 100 permits left for the 47 remaining community boards. Do not adopt rule regarding denial of applications for “multi-day, multi-Block Street festivals unless the Applicant has held a permit for the closest date....” This will effectively create a moratorium for all events except those established before 2008, potentially leaving new

	and emerging community groups without the opportunity to hold such events.
--	--

Rules of the city of New York	
§ 3. Section 1-06(a) of Title 50 Conditions for Appeals and Denial of Applications	<ul style="list-style-type: none"> • Add: “In its denials, SAPO shall include an explanation of its reasoning and instructions for appealing.”
§ 4. Subdivision c of section 1-08 of Chapter 1 of Title 50 Event Type Fee and Deadline Schedule	<ul style="list-style-type: none"> • Do not adopt proposed rule. For events run by smaller sponsors, “\$1375 per day/per block fee for first day/block and \$705 per day/per block” may be significantly more than “20% of the total fee,” effectively making this cost-prohibitive for smaller events and events that offer slots at little or no cost to local groups, businesses, artists, and nonprofit organizations. In addition, events that use fewer blocks than originally planned would have to pay for those unused blocks.

Thank you for your careful consideration of these comments.

Sincerely,



Daniel Dromm
New York City Council Member, 25th District

From: [Don Uts](#)
To: [SAPORules](#)
Subject: NYC Proposed Rule Changes
Date: Thursday, October 13, 2016 8:48:02 AM

Hello,

The purpose of the email is to voice my opinion on the proposed rule changes of NYC street fairs.

My name is Daniel Petryszyn, Owner and operator of Glazed & Confused Mini Donuts. My company is less than 2 years old. We are strictly mobile and DO NOT have a store front. Instead, we serve and operate at various street fairs and festivals across New York City. We have worked with companies such as Mort and Ray Productions, Mardis Gras, Clearview and Pop UP New York for the last two years.

Every weekend we setup at one of the various fairs across New York City. With the new rule changes I do not see how we can continue to operate our business. Currently I employ about 10 employees per year. The employment ranges from full time to seasonal. I pride myself in being able to have a business that affords other people the opportunity to provide for their families. The new rule changes will force me to downsize and layoff good people who deserve better.

Furthermore, my company will generate over \$10,000 of sales tax revenue for the city of New York. With the new rule changes, I will be forced to either shut down my business or look for opportunities outside of New York City. Speaking to my other food vendor friends, I know they are in the same boat. This means hundreds of thousands of dollars that are generated from sales tax revenue will be forced out of New York City.

If the reason for the rule changes are to freshen up the street fair scene, I am all for it. I urge you to take a look at what Pop UP NY has done over the last year. Their first ever event was this past April. I was SHOCKED on how much they could change the scene of a street fair. In fact, I had community members come up to my booth and remark how different the fair seemed compared to past events. Pop UP NY set standards for their vendors. Everyone needed a unique clean look in order to be accepted as a vendor. Every vendor offered a different style of food and no two booths were the same. Also, the organizers were very well prepared. Several picnic style tables were laid out throughout the fairs so patrons can enjoy the event. Street style games were setup for kids. Information booths were aplenty. Pop Up NY gets it, they know what street fairs once were and what street fairs could be again.

I urge this committee to work with us vendors instead of completely demolishing what we have built. The proposed rule changes will be a death blow to several hundred people who make their livings on the streets of New York. Instead of making such radical changes I suggest we work together to find a solution. Making these changes without giving vendors time to adjust and adapt to a new system would be extremely disappointing.

I am hopeful that the hearing today sheds some light on our side of the story. Change can be good, but both sides need to compromise.

Daniel Petryszyn

201-951-3864

From: [Stonewall Vetz NYC](#)
To: [SAPOrules](#)
Cc: [Carey, Michael](#); DTolson@CityHallNYC.gov; [Beach, Desiree](#)
Subject: NYC StreetFairs status!
Date: Wednesday, October 12, 2016 10:48:06 PM

STONEWALL Veterans Association
70-A Greenwich Av., Suite 120
Manhattan, New York 10011

NYC Street Activity Permit Office
253 Broadway
Manhattan, New York 1007

11 October 2016

The STONEWALL Veterans Association (SVA) is officially responding to the proposed, dramatic changes in the New York City streetfair guidelines and rules as published by the NYC Street Activity Permit Office (SAPO).

Streetfares, which also benefit the City of New York in revenue and all of the merchants who participate plus extra business generated for local businesses, are an important and integral part of life in the City of New York as well as streetfairs in thousands of cities across America. The streetfare proceeds for the SVA are crucial for the, unfortunately, limited resources of the SVA. For example, a promised grant at an in-person meeting at the NYC Municipal Building by the prior Manhattan Borough President was never realized. It was fortunate that the organization had its annual streetfair. The SVA has had the needed benefits of its streetfair for thirteen years. It provides funds for the Greenwich Village-based SVA's crucial outreach to the public including educational administrators and students from high schools and colleges. As most everyone knows, world-changing history was made in Greenwich Village in 1969; the SVA's members are a large part of that history. The SVA keeps the torch burning and, in effect, educates the world. It costs money; NYC streetfairs help us!

A serious NYC community problem would traumatically evolve from the proposed new streetfair guidelines and parameters. As SAPO knows, there is much consternation and dysfunction in many of, if not most, of the local community boards over many issues including streetfairs. Community Board #2 in Manhattan, for example, is as a matter of fact known for personal attacks, vitriol and favoritism. The S.V.A. and its director Williamson Henderson have been victimized, as SAPO well knows, to the extent of slander, defamation and libel. All of this happens without any control of the haters and liars nor are there repercussions for their disdainful actions and words. The unfair and gross problem has existed for a half-dozen years!

Imagine how much out-of-control worse the situation would be if the current streetfair rules were, hopefully not, imposed creating real havoc, extreme dissention and public fighting of organizations with each other to get one of the limited and coveted streetfair events. Add to that the turmoil which is bound to occur from limiting current streetfair sponsors yet adding new streetfair sponsors. That, in and of itself, is contradictory and it is guaranteed to result in trouble. Imagine the endless criticism and fodder for all of the N.Y.C. press!

To be reasonable and fair, one idea that the S.V.A. endorses is not closing major thoroughfares such as any part of Broadway for street-fairs or anything else! Many of our members and supporters have seen and experienced the major traffic problems and the commuter congestion caused when Broadway below East 14th Street is closed for a streetfair. There are abundant alternatives on medium-travelled streets throughout Manhattan. That reality can allow streetfairs to continue safely and benefitting the worthwhile non-profit and non-political organizations.

SVA appreciates this opportunity to express our collective opinions and thoughts on this germane topic of streetfairs in NYC. SVA also appreciates the diligence and good work SAPO does all year for NYC!

Pridely,
STONEWALL Veterans Association
Leigh P. McManus, Chairperson
S.V.A. Executive Committee
email: SVA@StonewallVets.org
telephone: 212-627-1969
<http://www.StonewallVets.org>

Proposed New York City street festival rules:
<http://www1.nyc.gov/site/cecm/permitting/rules.page>

Thank you to those that dedicated their time and energy to this process.

Best,
Michael Paul Carey
Executive Director
Mayor's Office of Citywide Event Coordination and Management

+++++++ NEXT S.V.A. MONTHLY MEETING ++++++

The SVA's meetings are 'the last Saturday of every month',
tributing Stonewall Uprising on last weekend in June 1969
- unless said last Saturday is a national holiday weekend!
Next Meeting: Saturday, October 29, 2016 @ 4:15 to 6 p.m.

Actual 1969 veterans of Stonewall Rebellion shall provide their informative, so unique and interesting experiences. NY public officials regularly attend the S.V.A. meetings. Guests are scheduled by Miss Marmelstein at 347-627-1255. Meeting is at the New York City LGBT Community Center at 208 West 13th Street between Seventh Avenue and Greenwich Avenue in Greenwich Village, Manhattan, N.Y.C. @ 4:15 pm. Attendees sign SVA Guest Book w/ofc. mgr. AnDre Christie. For more 411 on upcoming S.V.A. happenings, please visit:
<http://www.STONEWALLvets.org/upcomingevents.htm>

+++++++ S.V.A. BUSINESS ADS & POLITICAL JOURNAL ++++++

See New York City business advertisements info at:
<http://www.STONEWALLvets.org/businessadvertisers.htm>
...and to arrange payment through PayPal, please see:
https://www.paypal.com/cgi-bin/webscr?cmd=_s-xclick&hosted_button_id=GNE9AUTTJ56VJ

+++++ STONEWALL REBELLION VETERANS on S.V.A. WEBSITE ++++++

- 01) WILLIAMSON HENDERSON, Founder + Director of the S.V.A. and Founder + Owner of Proofreaders Unlimited, Ltd. in NYC:
<http://www.STONEWALLvets.org/WilliamsonHenderson.htm>
- 02) STORME DeLARVERIE, legendary star of Jewel Box Revue:
<http://www.STONEWALLvets.org/StormeDeLarverie.htm>
- 03) JEREMIAH NEWTON, New York University Film & TV Liaison:
<http://www.STONEWALLvets.org/JeremiahNewton.htm>
- 04) REV. MAGORA KENNEDY, pioneer openly-Gay woman Chaplain:
<http://www.STONEWALLvets.org/RevMagoraKennedy.htm>
- 05) R. BERT COFFMAN, founder of the Zappalorti "Z" Society:
<http://www.STONEWALLvets.org/BertCoffman.htm>
- 06) JACKIE BARRETT, renowned Greenwich Village Entertainer:
<http://www.STONEWALLvets.org/JackieBarrett.htm>
- 07) EMILE GRIFFITH, 6-time World Middleweight Boxing Champ:
<http://www.STONEWALLvets.org/EmileGriffith.htm>
- 08) CRISTINA HAYWORTH, founder of Puerto Rico GLBTQ Pride:
<http://www.STONEWALLvets.org/CristinaHayworth.htm>
- 09) DAVID BERMUDEZ, first Massachusetts Gay couple married:
<http://www.STONEWALLvets.org/DavidBermudez.htm>
- 10) QUEEN ALLYSON, President of the Imperial Queens of NYC:
<http://www.STONEWALLvets.org/QueenAllyson.htm>

+++ PLAN AHEAD: SVA 48th CONFERENCE & STONEWALL REUNION +++

The "SVA's 48th Conference & Stonewall Veterans Reunion" is happening Saturday, June 24th, 2017 @ GLBT Community Center from 4:15 p.m. to 7 p.m. Actual Stonewall veterans of the rebellion provide informative and interesting experiences. NY public officials pay tribute. Confirmed guest speakers include congressmembers, state senators and assemblymembers, councilmembers, as always, and many NYC Gay group leaders! Singer / songwriter Sandy Rapp is the "opening" legendary entertainment performing 3 songs. D.J. Ro-Ro Havana plays original "Songs of The Stonewall" from the '69 SW-Jukebox! They include records of Diana Ross & The Supremes, Frankie Valli & The Four Seasons, Barbra Streisand, Frank Sinatra, The Shangri-Las, The Temptations, Shirley Bassey, Marvin P. Gaye, Martha Reeves & The Vandellas, The Rolling Stones, Dusty Springfield, Michael Jackson & The J-5 and many more! Minimum entry donation for the non-profit S.V.A. is \$10.00. For 411 on S.V.A. events of the "Past, Present And Future":
<http://www.STONEWALLvets.org/upcomingevents.htm>

+++++ S.V.A. CONTACT 411 ++++++

STONEWALL Veterans Association
70 Greenwich Avenue, Suite 120
Manhattan, New York, USA 10011
phone: (212) 627-1969
email: SVA@STONEWALLvets.org
faxes: (718) 294-1969
<http://www.STONEWALLvets.org>

13th Precinct Community Council

230 East 21st Street, New York, New York 10010



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Carol Schachter
Vice-President

Patricia Sallin
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Community Affairs Officer

PO John Considine
Community Affairs Officer

PO Jose Moronta
Auxiliary / Explorers
Coordinator

TO: SAPO
DATE: October 10, 2016
SUBJECT: Proposed Rules for Street Festivals

We are against the proposed changes in rules for street fairs.

The 13th Precinct Community Council has been sponsoring a local street fair for at least 20 years. About 5 years ago when you reduced the number of street fairs, we had to share the funds from the fair with another organization so we have already felt the effects of that change.

The funds from the street fairs have been used over the years to buy new bicycles and pay for bike repairs for the Auxiliary officers of the precinct, new telephone answering machines for the Community Affairs officers, rain gear and other equipment for the Auxiliary officers, and plaques for Cop of the Month, as well as contributions to the Explorers group. The funds also enable the Community Council to sponsor a popular National Night Out event every August.

It concerns us that our local Council Member Daniel Garodnick did not ask us about the proposed changes before he presented them to City Hall. He did not ask us how we spend the funds to help the 13th Precinct or how we would be affected if we can no longer sponsor a street fair.

We are concerned that with the limitations on street fairs, we may not be allowed to sponsor one anymore and then we have no funds.

Additionally, the mandate that 50% of participating vendors be businesses within the community board is untenable. These businesses have always had the opportunity to participate in the street fairs in their community without it being a requirement. Do you think that the mandate will really change that? This will simply eliminate the street fair.

We are against the proposed changes in rules for street fairs.

Sincerely yours,

Frank Scala, President
Patricia Sallin, Treasurer

Cc: Manhattan Borough President Gale Brewer
Council Speaker Melissa Mark-Viverito
Council Member Daniel Garodnick



BRIGHTON NEIGHBORHOOD ASSOCIATION

1002 Brighton Beach Avenue, Brooklyn, New York 11235

Tel: (718) 891-0800 Fax: (718) 891-1163

Website: www.brightonbeach.com Email: bnapsinger@aol.com

Executive Director/Founder

Pat Singer

Officers

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Staff

Kristina M. Yiannaki

Fiscal Officer / Bookkeeper

Viktoriya Proskurnyak

Russian Community Liaison

Maria Padilla

Spanish Community Liaison

HEARING OCT. 13TH ON STREET FAIRS

I am the Founder and the Executive Director of the Brighton Neighborhood Association in Brighton Beach.

Back in 1977 we came up with concept of the **Annual Brighton Jubilee** which has grown **over 40 years** into one of Brooklyn's most popular events drawing a culturally diverse population of over 100,000 people.

The Jubilee was conceived by our grassroots organization and it is run by that same grassroots organization today. **We do not use a professional promoter**, as we are hands on! We are **volunteers** dedicated to our community and to raising the quality of life of our residents.

A core of us were up over 24 hours voluntarily mapping out and putting this event together.

Our Jubilee not only helps us to encourage visitation, raise our image, but it serves as a fundraiser for our not-for-profit. Running a not-for-profit is like being on a roller coaster ride. Some days you're economically climbing and in the following year you're struggling to keep the door open.

We **DO NOT NEED** more guidelines for our Jubilee. We **need support**. Although we pay over \$5,000 for sanitation. Our volunteers find themselves sweeping the streets at 3am in the morning because we never get swept before the events. We have to push dirty unsanitary water out of the curbs along with the filth left behind by private commercial garbage trucks. We fight to keep the street empty early in the morning working closely with our 60th Precinct and the tow trucks assigned. It takes hard work on the part of all our volunteers young and old. **It truly takes a "village"**. Great neighborhoods don't just happen. They are usually the product of hard work and dedication on the part of the local community group.

We pay 20% of our income to the City for closing the streets and we spend thousands of dollars marketing the event. Over 30 local youngsters are hired each year for a stipend so they can experience community pride in putting this fun event together. We spend thousands on supplies and printing.

We reach out to the local businesses, but the event is in **the heart of the commercial area** and it **draws people in who then shop** at those stores within the Fair. Some of those stores even put their wares out, but we do not charge them. We freely give space to local religious institutions, other not for profits and even city agencies such as OEM who brought in a 30' truck. We pay for one stage with a day full of entertainment. We bring in a secondary stage in which local Hispanic musicians entertain voluntarily and we give close to a half block of the Jubilee to a local Russian Radio Station who perform all day and encompass their own corporate support.

Asking us to put a **percentage** together for local businesses to participate is **prohibitive**. We can't **force them to come in**. We do **encourage them** as a means of moving their summer- end inventory, but to make it a mandate is **unfair** and **stifles our efforts** to raise **funds** to meet **our operational needs** as well as to **entice tourism and investment** in our area. Let me add that some of our local stores do participate. This proposed new guidelines **puts power** in the hands of **a few** and it will become a **political tool** to hurt and show favoritism. As a not-for-profit in an immigrant community, this event from its inception has helped us to show case our community and underwrite our operational cost. Our diverse audience of participants look forward to coming to this end of summer event. It is the **only** multi-block festival held in Brighton Beach. We should not be put in a position to fight for it each year and that is what will happen with this new guideline.

Ms. Pat Singer, Founder and Executive Director
Brighton Neighborhood Assoc., Inc.
1002 Brighton Beach Avenue
Brooklyn, NY 11235
bnapsinger@aol.com
www.brightonbeach.com
718 891-0800

The Women's Democratic Club of New York City, based since its founding in 1993 in Greenwich Village, has had a one-block street fair in CB2 since 1994. This event is usually held on Astor Place on a Saturday or Sunday, and in recent years has been co-sponsored with one or more local organizations. We appreciate SAPO's efforts to maintain a local connection between the street activities and local businesses, but we have misgivings about some of the proposed changes.

The requirements that "50% of all participating vendors have a business of local presence" and that this be documented with all vendors' addresses and phone numbers being submitted 30 days prior to an event are onerous. It may be possible to line up enough local vendors, but it may not be possible to get the documentation in that brief a time. This will also require local not for profit organizations to engage in extensive recruitment of local businesses for their street festivals, and, depending on how many fairs these businesses have done elsewhere in the CB that year, may result in real difficulty getting sponsors. This will put organizations that sponsor these events at a great disadvantage. It may not be possible for events scheduled late in the year even to find locally based vendors.

We also question the proposal for a flat fee per block. This runs counter to the local focus that these rules seem aimed at supporting. Surely a block of Sixth Avenue is worth a higher fee than a non-residential, largely pedestrian block off the beaten track. Local differences must always be taken into account, and a blanket rule like this runs counter to respect for local communities.

There is no question that street festivals can benefit local businesses as well as local organizations, and we acknowledge that city resources must be deployed effectively. However, these proposals may have consequences beyond what are intended.

Sincerely
Patricia S. Rudden
President
Women's Democratic Club of New York City
PO Box 651
Old Chelsea Station
New York NY 10011

Midtown East-Stuyvesant CERT/MN6

Patricia Sallin, Chief
Eugene Thomas, Deputy Chief
Anthony Solomita, Deputy Chief



TO: SAPO
FROM: Patricia Sallin, Team Chief, Manhattan 6 CERT
DATE: October 10, 2016
SUBJECT: Proposed Rules for Street Festivals

I am against the proposed changes in rules for street fairs.

I am the Team Chief of the local Manhattan 6 Community Emergency Response Team (CERT) and our team relies on the funds we receive from our annual street festival to buy equipment and clothing. We are a volunteer organization trained by NYC Emergency Management and we receive no funding or financial support from the Agency or from the City of New York.

Typically, when a CERT member graduates, he/she is given a CERT polo shirt, ID lanyard, and CERT response bag. With funds received from the street festival, our team has purchased Motorola radios, rain jackets, CERT jackets, caps, head lamps, first aid items and other gear. These are all items that make our team more efficient and prepared to help the community in an emergency.

The other side of that is what our presence at the street fair offers the community. We hand out NYC Ready New York brochures that educate and help people prepare for disasters. We recruit for people to take the CERT training and become members of their local team.

The proposal to limit the number of street festivals in a Community Board may result in our team being eliminated from sponsoring a festival and therefore losing funds that we rely on to purchase equipment for the team.

The requirement that 50% of the vendors be local businesses in the community is untenable. The local businesses have always had the opportunity to participate in street fairs and have not done so. A mandate will not change that. Such a mandate will eliminate street fairs altogether.

I am concerned that my Council Member Daniel Garodnick did not reach out to the community organizations before making his proposals. He did not ask me if our team would be affected by the restrictions of his proposed changes or how we use the funds we receive.

For the above reasons, I am against the proposed changes in rules for street fairs.

Sincerely yours,

Patricia Sallin
Team Chief, Manhattan 6 CERT

Cc: Manhattan Borough President Gale Brewer
Council Speaker Melissa Mark-Viverito
Council Member Daniel Garodnick



DISTRICT OFFICE
 42-40 BELL BOULEVARD, SUITE 507
 BAYSIDE, NY 11361
 (718) 619-8611
 FAX: (718) 631-4100

CITY HALL OFFICE
 250 BROADWAY, SUITE 1841
 NEW YORK, NY 10007
 (212) 788-7250
 District19@council.nyc.gov

THE COUNCIL
 OF
 THE CITY OF NEW YORK
PAUL A. VALLONE
 COUNCIL MEMBER
 19TH DISTRICT, QUEENS

CHAIR
 SUB-COMMITTEE ON SENIOR CENTERS

COMMITTEES
 AGING
 FIRE AND CRIMINAL JUSTICE
 MENTAL HEALTH
 SMALL BUSINESS
 VETERANS
 WATERFRONTS

October 18, 2016

Mayor's Office of Citywide Event Coordination and Management
 253 Broadway, 6th Floor
 New York, New York 10007
Attn: Mr. Michael Carey, Executive Director

Dear Mr. Carey:

I am writing in opposition to the proposed changes to the street festival rules and regulations. The rules as currently proposed will create an unfair burden and negatively impact all parties involved in creating a successful street festival. If approved, the changes may ultimately decrease the amount of community street festivals in the outer boroughs.

The proposed changes that would have the most negative impact on smaller street festivals commonly found in the outer boroughs are:

- 1) Requiring 50% of vendors to have a business or local presence within the same community board where the street festival occurs. This rule as currently proposed will likely disqualify many of the outer borough street festivals, as a majority of the vendors attending these events are located throughout the City of New York and not necessarily within the community board. With the example of the College Point Street festival in my district, several of the local businesses are professional services such as attorneys, doctors, printers, nail/hair salons with the occasional deli, food/drug store franchise mixed in, many of which would rarely consider participating in events like this. What makes New York City great is its vibrant diversity and culture. Limiting vendors to only its host community board will suppress this.
- 2) Imposing a flat-fee for street festivals, exponentially increasing for each additional block. This rule change would create an unfair monetary burden on smaller street festivals. It would force community sponsors to charge higher spot/table rates which would eliminate many of the smaller vendors. Many street festivals would not have enough qualified vendors to support this type of event. Rather than charging based on revenues collected the day of the event, this change would force "community sponsors" to put up thousands of dollars beforehand. Local community sponsors have stated that with this type of flat-fee, a street festival which is rained out will still cost the community sponsor thousands of dollars without a chance to recoup any of the expenses. Lastly, many street festivals will not charge a fee to groups such as houses of worship, senior centers, sport clubs, civic organizations, volunteer ambulance corps, veterans groups, elected officials and other various non-for profit organizations who may want to participate. This is a day that each of these groups can reach out to a majority of the community without having to spend money.



I would appreciate if your office would reconsider the proposed rule changes, as I believe the one size fits all approach is unfair and burdens smaller, outer borough street festivals. Street festivals are an essential part of bringing communities together and it would sadden me to see them disappear due to overregulation. I thank you in advance for your anticipated cooperation herein. Waiting your reply, I remain.

Very Truly Yours,



HON PAUL A. VALLONE

From: [Thomas Palma](#)
To: [SAPORules](#)
Subject: proposed changes to street fairs
Date: Tuesday, September 27, 2016 1:26:02 PM

This is in response to the proposed changes for Street Fairs.

These new proposals would make it impossible for a small community like ours (College Point, Queens, NY) to continue to have street fairs.

By requiring 50% or any percentage of vendors to have a local business is impractical.

Over the years most "Small Towns" in America have lost their local retail establishments due to the large department stores opening malls and shopping centers. In addition, the internet has also had a dramatic effect on local business.

Our community and most other local small communities have seen the shoe stores, clothing stores, butchers, toy stores, hardware stores, drug stores, and most other local retail stores close their doors.

What we are left with are deli's, some food franchises, hair studios, small mini mart type stores, pizzerias, local printers, and a number of professional offices... lawyers, real estate offices and banks. In addition, many of the stores/offices that are listed above close on the weekends and are not willing to participate in Street Fairs since they do not have merchandise to sell and want their day off. It is also impossible for some local franchise owners or larger corporate owned stores to participate since the franchise agreements may prohibit participation or managers of large corporate stores like Walgreens or Rite Aide cannot participate without consent from the corporate office which has always been rejected.

All **Small Towns USA** no longer have the retail establishments that were once the heart of local communities and therefore this single new regulation would make it impossible for us to have a Street Fair.

Your new flat fee- regulation... a flat billing for the first block and an additional amount for additional blocks, will also make it impossible for a local small community to continue to have these fairs.

Please consider that due the City's regulation that there can be no "Rain Date" many vendors will not commit to a spot in the Street Fair until the last minute on the day of the Fair. So in effect, your flat fee puts additional financial pressure on the organization holding the Street Fair because they cannot know if they will recoup the proposed flat-fee costs you are now proposing.

These organizations are usually nonprofit, and or volunteer organizations. These flat fees would be **"The Straw That Breaks The Camel's Back"** and would force the organization to not have a Street Fair.

You cannot look at Street Fairs as an income producing product for the city. You need to consider the many positive effects it has on a community. A Street Fair adds pride to the community and offers many of our local organizations a way to reach out and help the community... to let new

people know what is available to them.

In our Street Fairs, we do not charge our local churches, senior centers, sports clubs, outreach centers, civic organization, volunteer ambulance corps, boy or girl scouts, veteran centers or any organization that adds value to our community. This is a day when they can try to get new members, inform the public what they do and offer their services.

In addition, our Street Fair gains sponsorship from larger companies such as banks, large corporations, local professional and local stores plus some of our elected officials to pay for FREE rides for our children for the entire day. Doesn't this add value to a community, doesn't this help New Yorkers, and isn't this worth reconsidering your new regulations that would stop our yearly Street Fair?

Your new regulations would make it impossible for our community and other local small communities to continue to have Street Fairs.

I hope that you will reconsider your new regulations and understand that Street Fairs are an essential part of bringing a community together. Street fairs are a day for the community to come out and enjoy something that is not normal to the community... it is a day when the entire family can enjoy a fun filled day and in truth is a festival for everyone!

Thank you.

Tom Palma

Chairman

College Point Board of Trade

718-939-3393

From: [Allison Tupper](#)
To: [SAPORules](#)
Subject: Proposed new rules for street fairs
Date: Wednesday, October 12, 2016 1:33:03 PM

To the Street Activity Permit Office

The Sierra Club New York City Group objects to the proposed new rules for street fairs.

The Sierra Club street fair provides a significant portion of the income of the Sierra Club NYC Group, a local organization that receives only very limited support from the national Sierra Club. The NYC Group supports environmental protection and improvement in the five boroughs.

Although the Sierra Club national headquarters has paid staff, the NYC Group consists entirely of local volunteers. We work to preserve open spaces, to protect the Hudson River and other waterways, to encourage conservation of food, energy, and water, and to decrease the use of fossil fuels. We support youth excursions into nearby nature zones, and encourage White Roofs-that reflect the sun. We conduct frequent public panel discussions that give New Yorkers the opportunity to learn about environmental issues.

To do all this, we need the funds that come from the street fair. At the same time, we respect the needs of local establishments for uninterrupted business. There must be a way to have the street fairs and minimize detriment to local businesses. Are there incentives to businesses to participate in the street fairs? Could street fairs be themed in a way to encourage businesses to take advantage of them? Would street fairs on cross streets be less disruptive? In some neighborhoods bringing people into the area on weekends increases business.

We urge action AGAINST the new rules without substantial changes.

Allison Tupper
Chair
Sierra Club New York City Group

From: [Mark Baker](#)
To: [SAPORules](#)
Subject: Proposed new rules for street festivals
Date: Friday, October 21, 2016 11:11:49 AM

I live in Gramercy Park and read the below article concerning the proposal to reduce the number of street fairs. I fully support the proposal. I live on E. 18th St. and 3rd Ave., and the fairs are generic, unnecessary, and a blight on our neighborhood. Moreover, many of the fairs this year were sparsely attended by vendors. We have wonderful shops and restaurants in our neighborhood already. There is no need to bring in fast food vendors selling fried food. I don't care how much money the community gets from the street fairs. If people want the money from the street fairs, then they should have the fair on their street, not mine.

Best regards,
Mark Baker

<https://town-village.com/2016/10/21/civic-groups-oppose-city-proposal-for-half-of-street-fair-vendors-to-be-community-based/#more-13643>

From: [Allison Tupper](#)
To: [SAPORules](#)
Subject: Proposed new street fair rules: objection
Date: Sunday, October 23, 2016 10:09:34 PM

To The Street Activity Permit Office
Office of Citywide Event Coordination and Management

saporules@cityhall.nyc.gov

The proposed new rules for street fairs should be rejected or drastically revised. The rules are unfair to vendors and to the nonprofit sponsors who depend on the income, and are based on an entirely inadequate outreach.

The requirement that 50% of vendors be from within the community board area is a mistake for two reasons. First, the vendors are from all over the city, and the vendors ARE the street fairs. Craftspeople and carnival-like food wagons make the street fair interesting. Without them the tourists would stop coming. Second, not enough local businesses see the street fair as a way to increase their business. More incentives might help, and should be tried, but 50% is not possible and would not produce a successful street fair.

The increase in fees to the city would cut into the amounts for the nonprofit sponsors, a detriment to the communities they serve. Reducing the number of street fairs would reduce the number of and proceeds to the nonprofit organizations that depend on the income from the fairs.

The outreach, as presented at the October 18 meeting of the ACES (Arts, Culture, Education, Street Life) Committee of Manhattan Community Board 4, was misguided and sparse. Approximately 1,000 customers were included, a tiny fraction of the thousands of visitors to our street fairs, and they are tourists, from all over the country and all over the world. They don't know the neighborhood as defined by community board areas. For them to say they want more local representation is meaningless. Only 6% of the vendors were included in the outreach. The vendors are what the street fairs are made of. They should all have been polled, or at least a substantial sample. Community boards were included in the outreach, but I'm confident that my board, MCB4, had not agreed to the proposed rules.

It's true that some provision should be made to minimize the interruption to businesses during street fairs. For some, there may be ways not yet explored to use the fair to increase business. There are some instances now where street fairs have brought business to local operators, whether they have a booth on the street or not. On some blocks Sunday may be better than Saturday. Perhaps more street fairs should be on cross streets where there are few or no businesses-and not where there are houses of worship on the days of their services.

The nonprofit sponsors of street fairs are volunteer, grass roots activities that provide substantial support and enhancement to their communities. The new rules would detract from the quality of life all over the city, and should not be enacted.

Sincerely yours,
Allison Tupper
Chair, Sierra Club NYC Group (which gets virtually no support from the national Sierra Club)

Vice President, West 46th Street Block Association, Inc.

From: [judy negron](#)
To: [SAPORules](#)
Subject: Proposed regulations for street fairs
Date: Thursday, October 13, 2016 4:32:37 PM

>

> Good morning,

> I've just heard about the proposed regulations for street fairs. I was quite upset by these ideas, for several reasons:

> 1. The effect these would have on Hell's Kitchen Flea Market would make it almost impossible for it to function. I am a longtime Hell's Kitchen resident, and I am aware of the market's ongoing efforts to include local businesses (and residents). The proposed number of 50 percent is extremely unrealistic, especially given the unique nature of Hell's Kitchen Flea Market as a somewhat out-of-the-way location for local businesses to set up at. The flea market isn't like a regular street fair--only once a year and blocks long. It's more like a pop-up local market for New Yorkers, each of them a small business in their own right, to sell antiques, collectibles, etc.

> 2. The permit time of 12 hours is also a problem. I know that vendors arrive at 4 a.m. and need time to set up. Their set up often involves unloading large objects, such as furniture, paintings, china, etc. A 12 -hour permit would mean they'd have to start reloading no later than 3 pm, often the busiest part of the day, resulting in a huge loss of income for the vendors, most of whom are New Yorkers, and potentially in a decrease in funds to Hell's Kitchen Foundation, the arts non-profit that is the flea market's community sponsor.

> 3. For me, and other visual artists living in Hell's Kitchen, the Hell's Kitchen Flea Market is a source of material and inspiration. Recently, I was honored to receive a grant from Hell's Kitchen Foundation. It would be cruel to aspiring grant applicants who live in the neighborhood to have this valuable neighborhood resource taken away. The market is also a place for artists to sell. As a foundation grant recipient, I was given a free space at the market and invited to do a mosaic demo in September, and it was very well received by the attending public.

>

> Your truly,

> Judy Negron

> 646-505-9103

>

> Sent from my iPhone

From: [judy negron](#)
To: [SAPORules](#)
Subject: Proposed regulations for street fairs
Date: Wednesday, October 12, 2016 11:53:37 AM

>

> Good morning,

> I've just heard about the proposed regulations for street fairs. I was quite upset by these ideas, for several reasons:

> 1. The effect these would have on Hell's Kitchen Flea Market would make it almost impossible for it to function. I am a longtime Hell's Kitchen resident, and I am aware of the market's ongoing efforts to include local businesses (and residents). The proposed number of 50 percent is extremely unrealistic, especially given the unique nature of Hell's Kitchen Flea Market as a somewhat out-of-the-way location for local businesses to set up at. The flea market isn't like a regular street fair--only once a year and blocks long. It's more like a pop-up local market for New Yorkers, each of them a small business in their own right, to sell antiques, collectibles, etc.

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>

> Your truly,

> Judy Negron

> 646-505-9103

>

> Sent from my iPhone

From: vilinsky@gmail.com
To: [SAPORules](#)
Subject: Proposed rules on Street Festivals
Date: Monday, October 03, 2016 12:50:17 PM

To Whom it May Concern,

We have had our street fair for the Church now for many years. It's vital it continue. We have adjusted the day we hold it to accommodate life in NYC -- in other words, ours happens on Monday when it's the off day for Broadway shows. We have been a good and gracious neighbor -- even when the streets were packed with enormous crowds for our neighbor Richard Rodgers theatre for the show Hamilton. We love our city and we appreciate the needs, however, please do not eliminate our street fair. It's a vital element and help to our purpose and cause. I live here in this neighborhood and have for the past 25 years.

We only take one block and it's on a Monday.

We also love the fact that Taste of Times Square also shuts down our block in June. That's what we do in NYC. Yes, sometimes it's a hassle in a taxi if we don't know but the NYPD events unit gives us the details on when the fairs are so one can work around it.

We work together. Please don't shut down my church's street fair.

Sincerely,

Pamela Vilinsky
Church of Scientology of New York
227 West 46th St
New York, NY 10036
212.921.1210

From: [Lewis, Terry](#)
To: [SAPOrules](#)
Subject: Proposed SAPO Rules
Date: Thursday, October 27, 2016 11:06:23 AM
Attachments: [image002.png](#)

To Whom it may concern:

My name is Terry Lewis, General Manager of the Sheraton New York Times Square Hotel, and I am writing in support of the proposal to restrict NYC street fairs and events.

As the General Manager of the city's third largest hotel, I can attest to the strain and inconvenience that street events place on both hoteliers and their guests.

First, the street closures related to street fairs make it very difficult for our vendors to travel to and from the hotel, causing significant delays on daily deliveries. It is very difficult to efficiently run a hotel without timely delivery of products and services, and these delays drastically affect our ability to provide quality service. Linens and food are just two examples of basic products that we require daily and we simply cannot operate successfully without them.

Additionally, the traffic caused by these street events makes it difficult for our guests to travel to and from the hotel. This is an inconvenience that has considerable impact on our guests' experience and, therefore, their decision to stay with us again. Our Corporate travelers in particular are displeased by event-related traffic and have remarked that they will think twice before staying with us in the future for this very reason.

Finally, and most significantly, event-related street closures and traffic significantly impact our ability to attract and retain Group business. Street closures are a "hot topic" for experienced Meeting Planners who are aware of the types of inconveniences that can result and are easily swayed to take their business elsewhere. As a convention hotel, our ability to book Group business is vital to our success and the large number of street closures in the area appear to deter would-be business.

I strongly support the increased restrictions on street events included in the proposed SAPO rules.

Thank you for taking the time to read and consider my perspective.

Warm regards,

Terry

TERRY LEWIS

General Manager

T 212 841 6500 F 212 841 6504

[sheraton.com](#) | like us on [Facebook](#) | follow us on [Twitter](#) | follow us on [Instagram](#)

SHERATON NEW YORK TIMES SQUARE HOTEL

811 Seventh Avenue, New York, NY 10019



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transmission in error, please notify the sender immediately by replying to the address listed in the "From:" field.

From: [Erik Torkells](#)
To: [SAPORules](#)
Subject: Proposed street-fair rules
Date: Monday, September 26, 2016 3:56:33 PM

I strongly support the proposed rules for street fairs, as I'm sure does everyone else who lives on a street that has hosted one (Warren Street this past summer). In fact, I'd even more strongly support not allowing them at all. They lose the city money, and for what? The interests of one specialized industry should not outweigh the needs of a city's residents.

Thanks,

Erik Torkells
261 Broadway #7B
New York, NY 10007
917-209-6473

From: [Mickey Heller](#)
To: [SAPOrules](#)
Subject: Public Hearing - Proposed Rules
Date: Wednesday, October 12, 2016 11:11:47 PM

Dear Mr. Carey & SAPO:

Brooklyn Pride is entering it's 21st year. We are the organizers and producers of the LGBTQIA+ Brooklyn Pride Week and events throughout the year. Our main events are on Pride Saturday which is the second Saturday in June and has been so for the last 20 years. The day begins with a 5K run in Prospect Park, our incredible Street Festival with two stages of entertainment, our Family Fun Zone, And finally, the only twilight Parade in the northeast. Our events during the year, and also during the rest of pride week take the organization all over the borough, serving all of Brooklyn.

We focus today on our wonderful street festival, which, while held in Park Slope under community board six, is designed to serve all of Brooklyn, as well as people from all of the boroughs.

Under the present SAPO rules, we have been able to give very discounted space rates to community organizations and nonprofits that give excellent services throughout Brooklyn including healthcare & testing, anti-violence education, faith communities and the arts. We have also given discounts and preferences to local stores and vendors to encourage them to participate. Through the present guidelines, we have been able to secure a small profit from the festival to help offset the costs for the entire pride week to make most of our events free.

We are very concerned about the effects the suggested amendments will have on the Brooklyn Pride Festival.

1. 50% of the exhibitors being from the local community board.

While we do go to many of the businesses in Community board six, and even offer discounts, our organization serves all of Brooklyn, and we push very hard to get businesses from all over Brooklyn in order to encourage attendance from people all over Brooklyn. Additionally, past experience has shown that 50% is a very unrealistic number from within the local community board, and could spell the cancellation of our street festival.

2. Increased fees. While we have had our street fair encompass six blocks for many years, we were hoping to add additional blocks to serve the people of Brooklyn even more. However, the fees of \$1375 for one block and a \$705 for each additional block would more than likely cause us to lose many of our community-based organizations and nonprofits who receive a large discount because they do not have the funds to pay full price, and because they offer such great services to the entire Brooklyn community. We would have to either raise their rates to pay these fees, or replace them with additional full price vendors. This would be a great disservice to the entire Brooklyn community.

3. Requiring addresses and phone numbers of participating vendors 30 days prior to the event.

As with many street festivals, many vendors wait until the week before to register, checking the possibility of bad weather.

I would be more than happy to meet with you at your convenience to discuss this further, but we really need your help. Brooklyn Pride wants to continue to serve the entire Brooklyn community, and we are now concerned that with the implementation of some of these new rules, it could create a possibly grave situation.

Please do not hesitate to reach out with any questions, and I hope that you can help us.

In Pride,
Mickey Heller, cochair
Brooklyn Pride 2017

Sent from my iPhone



Community Board No. 5

Borough of Queens
Ridgewood, Maspeth, Middle Village and Glendale
61-23 Myrtle Avenue • Glendale, NY 11385
(718) 366-1834
Fax (718) 417-5799
E-mail: qnscb5@nyc.rr.com



Vincent Arcuri, Jr.
Chairperson

Gary Giordano
District Manager

October 27, 2016

Michael P. Carey, Executive Director
Mayor's Office of Citywide Event Coordination and Management
253 Broadway (6th Floor)
New York, N.Y. 10007

Re: Proposed Street Festival/Street Activity Rules

Dear Mr. Carey:

After discussions with our Executive Committee and at our October 19, 2016 regular monthly meeting, I submit the following comments regarding Proposed Street Festival/Street Activity Rules:

Section 1-05 Approval or Denial of Applications by the Street Activity Permit Office

(e) – From what we know, requiring that all information pertaining to anticipated Vendors participating in a Street Festival be submitted 30 days prior to the date of the event may present problems for both sponsors and vendors, as vendors do not want to commit unless weather conditions will permit them to operate and have an opportunity to at least break even.

The second proposed change in this section that the Applicant must include documentation that at least 50% of the participating Vendors have a business or local presence, within the same community board where the Street Festival is to occur, seems very difficult to meet, especially in the short term. Vendors often go from one festival to another as their normal livelihood, and many existing festival sponsors likely have a much smaller than 50% current participation by local businesses. Phasing this in over a 3-5 year period seems more reasonable, as it gives busy not-for-profit sponsors much more opportunity to solicit local businesses to participate.

(g) This provision would limit the number of Street Festivals to 200, within the City of New York, and to no more than 100 in Manhattan in any calendar year. There is concern that, if permits are issued on a first come first serve basis, long standing not-for-profit sponsors could be squeezed-out, if new applicants apply before the long-standing applicants apply.

Your attention to these comments is appreciated.

Sincerely,

Gary Giordano
District Manager

CC: CB5Q Executive Committee Members



City of New York
Community Board #1, Queens
 The Pistilli Grand Manor
 45-02 Ditmars Boulevard, LL Suite 1025
 Astoria, N.Y. 11105
 Tel: 718-626-1021, Fax: 718-626-1072
 E-mail: qn01@cb.nyc.gov

Melinda Katz
Borough President, Queens
 Vicky Morales
Director, Community Boards
 Joseph Risi
Chairperson
 Florence Koulouris
District Manager

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Public Relations
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Public Safety
 Antonio Meloni
Street Festivals/Special Events
 Ann Bruno
Transportation
 Robert Piazza
Youth Services
 Jose Batista

October 20, 2016

Mr. Michael Carey
 Executive Director
 Citywide Event Coordination and Management
 253 Broadway, 6th Floor
 New York, NY 10007

Dear Mr. Carey,

At its full board meeting on October 20, 2016, the Queens Community Board 1 adopted the following resolution:

RE: Proposed Changes by Mayor's Office of Citywide Event Coordination and Management

WHEREAS: The new rules and regulations proposed by the Office of City Wide Events Coordination and Management (OCECM) for Street Activity Permits would have a serious adverse effect too many not-for-profit organizations which benefit from the proceeds generated by the multi-block festivals currently authorized within Queens Community District.

WHEREAS: The community at large enjoy and look forward to these neighborhood festivals which are a tradition.

WHEREAS: Many not-for-profit within Community Board 1 derive much of their operating income from the funds generated by their single block or multi-block festivals. The majority of sponsoring organizations are Merchant Groups, LDC, Chambers of Commerce **supporting local small business development and community building.**

BOARD MEMBERS (cont.)

Rose Anne Alafogiannis
 George Alexiou
 Joan Asselin
 Edwin Cadiz
 John Carusone
 Joanna D'Elia
 Mackenzi Farquer
 Dean O. Feratovic
 Evie Hantzopoulos
 Amy Hau
 Pauline Jannelli
 Vanessa Jones-Hall
 Nancy Konipol
 Jerry Kril
 Melanie La Rocca
 Frances Luhmann-McDonald
 Prabir Mitra
 Kevin Mullarkey
 Stella Nicolaou
 Mary O'Hara
 Gus Prentzas
 Yawne Robinson
 Rodolfo Sarchese
 Nancy Silverman
 Dominic Stiller
 Marie Torniali
 Rod Townsend

THEREFORE
BE IT
RESOLVED
THAT:

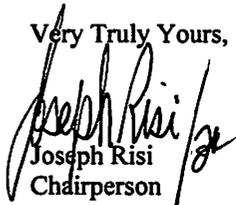
Queens Community Board 1 recommends the following changes:

- The cap of 10 festivals per board would create havoc in determining which organizations would sponsor fairs, pitting one group against another, with the potential of ripping apart and dividing our community. We recommend the cap be amended to 15 festivals per board to avoid this with the ability for the Community Board to issue a waiver. All festivals hosted by religious organizations would be treated separately and not count towards the cap.
- 50% of the participating vendors be from the community and/or the City of New York.
- All existing sponsors conducting festivals twice a year for more than 10 years would be allowed to continue doing so, any new applications would be limited to one fair per calendar year.
- Sponsors should be able to reserve the right at the close of their event, to have the option to pay 20% of all rental fees paid by the vendors, which is an incentive to promote often, free space to local residents, not-for-profits and small business in our community. The flat fee would cause an undue hardship on sponsoring groups, therefore, we request keeping the original fee structure of 20%.
- Current rule should remain the same; all addresses and phone numbers of participating vendors be available 1 week prior to an event. This would seriously limit vendors signing up, as their business models require them to make these decisions in short period of time, particularly given the fact that vendors do not want to lose their money and many sign up the week before, due to the city eliminating rain dates.
- All existing festivals and their sponsors shall be grandfathered in.

BE IT
FURTHER
RESOLVED:

Queens Community Board 1 strongly urges OCECM to amend its rules in accordance with the community board's needs as stated above.

Very Truly Yours,


Joseph Risi
Chairperson

cc: Honorable Mayor Bill de Blasio
Honorable Melinda Katz, Queens Borough President
Council Member Costa Constantinides
Council Member Jimmy Van Bramer
Dawn Tolson, Director, SAPO



COMMUNITY BOARD No. 3, Q.
82-11 37th Avenue, Suite 606
Jackson Heights, New York 11372
Telephone: (718) 458-2707 Fax: (718) 458-3316
Website: www.CB3QN.NYC.GOV
Email: Communityboard3@nyc.rr.com

**Office of Citywide Event Coordination and Management
(OCECM) On The Proposed Rule Change for Street Festivals.**

Adopted 10/20/16

Street festivals and Block Parties play an important part in our community. Various community, religious, ethnic and business groups participate in street festivals because it provides an opportunity to highlight the services of the organizing group, share cultural practices and is a means of fund raising.

While we commend CECM for looking into this issue; we believe that the proposed changes would have a devastating impact on our community. Putting a cap on the number of street festivals, block parties and applications granted on a first come first served basis regardless of event history; inadvertently would have a negative effect. CECM proposed plans may not work as intended. Applicants would be forced to compete against each other thereby casting a negative light on the process. Applicant groups would call into question, why was that group approved and not ours? Further, the new rules may not work for all community districts, it is important to note that this year CB3 activities exceeded the proposed 10 festivals and 20 block parties. Under the new rules, would we have been required to turn away groups that have held their events for years? For us and perhaps other community boards the proposed rule change would not work.

What has worked is the current process and that is community boards taking the lead in the application process. Community Boards have and must continue to play a significant role in the

application process; we know best what is happening on our local streets. We are familiar with the organizations that are applying for permits. Overtime, we have established an excellent working relationship with these groups and they have become familiar with the community's rules and expectations.

Specific to community board3, our procedure requires the applicant have at least 75 percent of the constituents of the affected block sign off on a petition in support of the street closing. In addition, the applicant organization must be based in the immediate neighborhood. As part of our process, the community board notifies the local block or civic association and elected officials about the application. Further, several times during festival and block party season, we convene with our local precinct. We look at and discuss all the activities that will take place on our streets while also making sure that there is no undue strain on our resources. In the event that there is a conflict or problem, we work with the applicant to come up with a feasible solution. CECM proposed plans may not work as intended, we therefore recommend that there be No change to current policies, procedures and practices as it relates to festival and block party applications. We however recommend that CECM take a closer look at the applications for activities at plazas. Further clarification is needed,



COMMUNITY BOARD # 4Q

Serving: Corona, Corona Heights, Elmhurst, and Newtown

46-11 104th Street

Corona, New York

11368-2882

Telephone: 718-760-3141

Fax: 718-760-5971

e-mail: qn04@cb.nyc.gov

Melinda Katz
Borough President

Louis Walker
Chairperson

Melva Miller
Deputy Borough President

Christian Cassagnol
District Manager

October 24, 2016

Michael Carey
Citywide Event Coordination And Management (CECM)
253 Broadway, 6th Fl.
New York, NY 10007

Dear Mr. Carey:

Community Board 4 is opposed to the proposed changes to the street fair rules. The stipulation which would require at least half of the festival's vendors be from the community district where the event is held will drastically hurt our community. Point in fact, Community Board 4Q recently hosted its first annual Youth Fair on October 1, 2016. The purpose of the event was to bring nonprofit organizations, businesses and city agencies under one umbrella group to benefit the community and the youth to see firsthand the benefits and advantages those organizations had to offer. Close to two hundred families were serviced. Approximately, twenty-five vendors were in attendance, with a handful of those vendors local. If this rule were implemented, those families would not have gained the knowledge that those organizations exist and the assistance and expertise they provide would be lost.

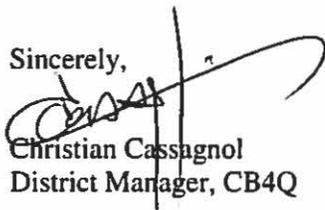
Additionally, the new rule that limits community boards in outer boroughs to host a maximum of 20 "single block street festivals" each year negatively impacts our area. CB4 is a multi-cultural and ethnic diverse community. The many cultures have much to offer and support our local businesses. Limiting the street festivals, would have local vendors vying for those very few coveted permits which would cause a hardship and cause businesses to lose income. Within the district's confines is Roosevelt Avenue, a commercial corridor that boasts many thriving businesses. Bringing a diverse mix of vendors from all over the city instead of each community would bring much needed money into the community and also provide the opportunity to sample foods and goods from other cultures.

Moreover, we have severe concerns with regards to the "first come first serve" policy hereby instated. This careless practice puts an undue burden on us as a Board, and leaves applicants who have been holding street events for decades, to fend against those who may carelessly rush to get their permits in first.

For those reasons, Community Board 4Q recommends denial of the proposed changes without further dialogue and input from boards as a whole.

Louis Walker
Louis Walker
Chairman, CB4Q

Sincerely,


Christian Cassagnol
District Manager, CB4Q

Cc: Queens Borough President Melinda Katz
Council Member Daniel Dromm, CD25
Council Member Julissa Ferreras, CD21

From: david.rabin
To: SAPORules
Subject: Re: times sq street fairs//corrected
Date: Thursday, October 27, 2016 5:25:30 PM

On Thu, Oct 27, 2016 at 5:06 PM, david rabin <davidrabin8@gmail.com> wrote:
Dear Mr. Michael Carey et al

I'm emailing to add my voice to those of other Times Sq business operators who are weighing in to complain as to the imbalanced and unfair burden of weekend street fairs in the Times Sq area.

Whether or not street fairs are of any benefit or not to neighborhoods in NYC is not for this discussion. I refer you to the two articles below. Restaurants are in constant danger of failure as it is--failure that leaves 30 to 100 people looking for work.

Native NY customers already find Times Sq, with it's near constant construction, the overflow of Elmo's (now somewhat controlled) and the general chaos of tourists, to be an impassable obstacle.

So, for higher end restaurants that do not primarily serve the tourist trade looking for fast food, the deck is already stacked against us. Add in the frequent and crippling traffic that attends these street fairs, and, trying to convince someone to come grab brunch or early dinner at your restaurant on a weekend becomes laughable.

I urge you to give fair consideration to thoughtfully reducing the # of street fairs in the Times Sq area

thank you for your time

David Rabin
The Lambs Club (www.thelambsclub.com)

<http://www.nytimes.com/2016/10/26/dining/restaurant-economics-new-york.html?mwrsm=Email>

<http://nypost.com/2016/10/26/is-new-york-citys-dining-scene-over/>



Diane Mastrococco
200 W. 90th Street
Apartment 10A
New York, NY 10024-1236

Bill de Blasio
Mayor

Michael P. Carey
Executive Director
Office of Citywide Event
Coordination and Management

Dawn Tolson
Director
Street Activity Permit Office

253 Broadway, 6th Floor
New York, NY 10007

212 788 0025 tel

September 28, 2016

Dear Ms. Diane Mastrococco,

Thank you for your comments regarding the proposed rules changes for Street Festivals in New York City.

Your comments will be officially submitted into public record.

Thank you,

A handwritten signature in black ink, appearing to read "Mike", with a long horizontal flourish extending to the right.

Michael P. Carey
Executive Director
Office of Citywide Event Coordination and Management

Ridgewood Local Development Corporation

62-14 MYRTLE AVENUE • GLENDALE, NY 11385

Phone (718) 366-3806 • Fax:(718) 381-7080

E-mail: RidgewoodLDC@aol.com website: www.Ridgewood-NY.com



Michael Carey
Executive Director
Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey,

Re: NYC Street Festival Reforms

Thursday I testified that the reforms contained in my testimony on the above mentioned subject were recommendations of both the Myrtle Avenue Business Improvement District and the Ridgewood Local Development Corporation.

Those recommendations were that of the Myrtle Avenue Business Improvement District, Queens, and not the Ridgewood Local Development Corporation.

Very truly yours,
Theodore M. Renz
Executive Director

Cc: Paul Kerzner, President
Ridgewood Local Development Corporation

From: aluke@hotelshocardnyc.com
To: [SAPORules](#)
Subject: SAPO Proposed Rules
Date: Sunday, October 16, 2016 11:18:04 AM

RE: SAPO Proposed Rules

As a manager of a hotel in Times Square, I am in favor of reducing the number of street fairs and minimizing the impact of these fairs in Times Square. This is an area that does not need more congestion or attention. Relocating fairs to less trafficked areas in the city will likely have more of a benefit to the surrounding businesses. Whereas in Times Square, the closures and added crowds are more of a hindrance to tourists unfamiliar and already confused with the area. Furthermore, creating additional crowding in an already high profile area increases security concerns.

Thank you for allowing me to provide input on this matter.

Alicia Luke
General Manager

Hotel Shocard New York
206 West 41st Street
New York, New York 10036
212-703-8600 / 212-302-0895 (Fax)

**Please note the new address aluke@hotelshocardnyc.com

From: [HKF Hell's Kitchen Foundation, Inc.](#)
To: [SAPOrules](#)
Cc: [Robert J. Benfatto Jr. Esq.](#); [Inge Ivchenko](#); [Kathleen Treat](#); [Ruth Lande Shuman](#)
Subject: SAPO's proposed rules changes
Date: Monday, October 24, 2016 5:02:06 PM

Mr. Michael Paul Carey, Executive Director

Office of Citywide Event Coordination and Management

253 Broadway

6th Floor

New York, NY 10007

Dear Executive Director Carey,

Hell's Kitchen Foundation would like to thank you, SAPO's Director Dawn Tolson, and the SAPO staff for being helpful, informative, and accommodating relative to our street fair, Hell's Kitchen Flea Market (HKFM), which operates on West 39th Street between 9th and 10th Avenues every Saturday and Sunday throughout the calendar year. The guidance has been invaluable.

We would also like to thank you for the research conducted into street fair permitting improvements. Our board includes past and present members, officers, and district managers of Manhattan Community Boards 4 and 5, and we understand that a reevaluation of street event permitting is appropriate.

However, Hell's Kitchen Foundation is deeply concerned about SAPO's proposed rule changes. If enacted, SAPO's new rules will make it impossible for the flea and antiques market to operate, which will leave the foundation in an untenable situation because the market is currently our sole source of funding.

The general purpose of the proposed new rules seems to be to inject new, non-traditional types of vendors into street fairs around the City, thus improving the overall consumer experience while also enhancing the community's willingness to host the events.

However, HKFM has already accomplished this goal. HKFM is a unique experience with a unique set of vendors/artisans that provides a unique service to a distinctive South Hell's

Kitchen neighborhood. No other street festival in NYC has vendors like we do or a consumer experience like we do. Losing HKFM would seem counterproductive to SAPO's goal and would be detrimental to the neighborhood as well as the vendors and artists who rely on income from the market to survive.

Unlike a typical multi-block street fair on a significant avenue that uses NYPD resources, the flea and antiques market:

1. is uniquely an antiques, flea, and artists market—no batteries, brats, bedding, bonsai trees, etc.—one of only three left in Manhattan (other 2 are on private property)
2. was founded at the behest of the community following public discussions and planning for a local commerce activity in South Hell's Kitchen;
3. pedestrianizes an almost entirely unpopulated overpass above Dyer Avenue, a stretch that is only a single block in length; and
4. doesn't use any NYPD resources.

Also, HKFM provides income for NYC resident vendors—70% of HKFM's 175 vendors come from the five boroughs (this is a vital part of their income and in some cases their sole source of income).

The market also provides free space to any local registered charity, local neighborhood non-profits, City agency, and local resident in an effort to try and incorporate more local participation. Outreach is ongoing, including extensively canvassing local businesses repeatedly in 2016 as part of a storefront window poster campaign.

Therefore, we would ask that a few exemptions be made for festivals like ours who already provide a unique customer and community experience.

First, and most importantly, we request that our fair be protected and be guaranteed to be 1 of the 10 fairs permitted in CB4 annually. We are the only multi-day street fair to operate 52 weeks a year Citywide and have been doing so since the fair's inception in 2003. While we are happy to support the cap on fairs per community board, we respectfully request that we be given the right of first refusal to be 1 of the 10.

Second, we would request that our festival be exempt from the 50% local vendor participation requirement. HKFM has been trying to improve local vendor participation all year, and have not had very much luck in attracting new local participants. Any suggestions the City or its Agencies may have are most welcome, and HKFM will continue to offer spots for free to promote local participation, but this cannot be a mandated requirement, as it is infeasible for us to meet it.

Third, the fair's daily hours cannot be limited to 12 hours in duration. Vendors bring large ornate furniture out to the street. This takes significant time to carefully unload and load these pieces at the beginning and end of the day. Currently, the fair is permitted for 14 hours a day and we request that this go unchanged.

Fourth, the fair should be allowed to operate every Saturday and Sunday. The limit of only 1 permit per day in each community board would also hugely harm HKFM, which needs to be able to operate on every Saturday and Sunday for the sake of business continuity and revenue. This proposed requirement when combined with the 10-permit cap in MCB4 would mean HKFM would lose 9 market days a year. That's 8.7% of market days but not all market days are equal. The other permits in MCB4 would almost certainly be for fair-weather, thus prohibiting HKFM's operation on its highest-revenue days. The 9 lost days would be equal to more than 8.7% of HKFM's revenue; it would probably be closer to 15%–20% of revenue.

Lastly, the proposed SAPO fee change would be a 350% increase in SAPO fee expense for the market. The rationale for the fee increase is stated as being “the City's costs related to... traffic control,” but HKFM does not use City resources for traffic control. HKFM hires at its own expense Pedestrian Traffic Managers (PTMs).

HKFM has been a staple in the community for the past 13 years, and we hope that the market and we as a foundation can continue to serve our community for the foreseeable future.

Sincerely,

Inge Ivchenko, Chair

Scott Isebrand, Treasurer

Robert J. Benfatto, Jr., Secretary

THE SENATE
STATE OF NEW YORK



TONY AVELLA
SENATOR, 11TH DISTRICT

ASSISTANT CONFERENCE LEADER
FOR POLICY & ADMINISTRATION OF THE
INDEPENDENT DEMOCRATIC CONFERENCE

CHAIR
CHILDREN & FAMILIES
TASK FORCE ON THE
DELIVERY OF SOCIAL SERVICES IN NYC

VICE-CHAIR
ENVIRONMENTAL CONSERVATION

COMMITTEES
BANKS
CULTURAL AFFAIRS, TOURISM,
PARKS & RECREATION
EDUCATION
ELECTIONS
HOUSING
INSURANCE
JUDICIARY
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ALBANY OFFICE: ☐
ROOM 902, LOB
ALBANY, NEW YORK 12247
(518) 455-2210 OFFICE
(518) 426-6736 FAX

DISTRICT OFFICE: ☐
38-50 BELL BOULEVARD
SUITE C
BAYSIDE, NEW YORK 11361
(718) 357-3094 OFFICE
(718) 357-3491 FAX

INTERNET ADDRESS:
AVELLA@NYSENATE.GOV

Statement
New York State Senator Tony Avella

Mayor's Office of Citywide Event Coordination and Management
Street Activity Permit Office

Proposed Rule Changes for Street Festivals

October 13th 2016

I hereby submit the following statement in opposition to the proposed rules for Street Festivals as set forth in the Notice of Public Hearing dated September 7, 2016.

My primary objection to the proposed rules is the financial burden being placed on organizers or sponsors of street festivals. This includes the proposed use of a flat fee as opposed to the current situation where the city takes a percentage of the vendor fees paid to the organizers of a street festival. This additional expense is especially burdensome given the fact that organizers of the street fair are required to shoulder the cost of insurance, advertising, restroom facilities and clean-up operations.

I also join in the objections raised by Mr. Thomas Palma, Chairman of the College Point Board of Trade, a long time sponsor of the annual College Point Street Fair, which I hereby incorporate by reference to my official statement:

By requiring 50% or any percentage of vendors to have a local business is impractical.

Over the years most "Small Towns" in America have lost their local retail establishments due to the large department stores opening malls and shopping centers. In addition, the internet has also had a dramatic effect on local business.

Our community and most other local small communities have seen the shoe stores, clothing stores, butchers, toy stores, hardware stores, drug stores, and most other local retail stores close their doors.

What we are left with are deli's, some food franchises, hair studios, small mini mart type stores, pizzerias, local printers, and a number of professional offices... lawyers, real estate offices and banks. In addition, many of the stores/offices that are listed above close on the weekends and are not willing to participate in Street Fairs since they do not have merchandise to sell and want their day off. It is also impossible for some local franchise owners or larger corporate owned stores to participate since the franchise agreements may prohibit participation or managers of large corporate stores like Walgreens or Rite Aide cannot participate without consent from the corporate office which has always been rejected.

All Small Towns USA no longer have the retail establishments that were once the heart of local communities and therefore this single new regulation would make it impossible for us to have a Street Fair.

Your new flat fee- regulation... a flat billing for the first block and an additional amount for additional blocks, will also make it impossible for a local small community to continue to have these fairs. Please consider that due the City's regulation that there can be no "Rain Date" many vendors will not commit to a spot in the Street Fair until the last minute on the day of the Fair. So in effect, your flat fee puts additional financial pressure on the organization holding the Street Fair because they cannot know if they will recoup the proposed flat-fee costs you are now proposing. These organizations are usually nonprofit, and or volunteer organizations. These flat fees would be "The Straw That Breaks The Camel's Back" and would force the organization to not have a Street Fair.

You cannot look at Street Fairs as an income producing product for the city. You need to consider the many positive effects it has on a community. A Street Fair adds pride to the community and offers many of our local organizations a way to reach out and help the community... to let new people know what is available to them.

In our Street Fairs, we do not charge our local churches, senior centers, sports clubs, outreach centers, civic organization, volunteer ambulance corps, boy or girl scouts, veteran centers or any organization that adds value to our community. This is a day when they can try to get new members, inform the public what they do and offer their services. In addition, our Street Fair gains sponsorship from larger companies such as banks, large corporations, local professional and local stores plus some of our elected officials to pay for FREE rides for our children for the entire day. Doesn't this add value to a community, doesn't this help New Yorkers, and isn't this worth reconsidering your new regulations that would stop our yearly Street Fair?

Your new regulations would make it impossible for our community and other local small communities to continue to have Street Fairs.

I hope that you will reconsider your new regulations and understand that Street Fairs are an essential part of bringing a community together. Street fairs are a day for the community to come out and enjoy something that is not normal to the community... it is a day when the entire family can enjoy a fun filled day and in truth is a festival for everyone!

Thomas Palma

The Shubert Organization, Inc.

225 West 44th Street New York, N.Y. 10036 212 944-3790
Fax 212 944-4191

ROBERT E. WANKEL
President & Co-Chief Executive Officer

October 24, 2016

By USPS Mail and Email: (saporules@cityhall.nyc.gov)

Michael Carey
Executive Director
Office of Citywide Event Coordination & Management
253 Broadway, 6th Floor
New York, NY 10007

Re: Proposed Amendments of the
City Street Fair Rules

Dear Mr. Carey:

Enclosed please find a copy of The Shubert Organization, Inc.'s statement in support of the proposed amendments of the street fair permit rules.

Very truly yours,



Robert E. Wankel
President

Enclosures

**STATEMENT OF THE SHUBERT ORGANIZATION
IN SUPPORT OF AMENDMENTS OF STREET FAIR PERMIT RULES**

October 24, 2016 -- The Shubert Organization (“Shubert”) supports the proposed amendments to the rules governing street fairs. The proposed rule amendments would help reduce the traffic and congestion that currently plague the Time Square area, while continuing to allow for street festivals that contribute to the vibrancy and diversity of City life. The proposed rules represent an intelligent and thoughtful approach to re-distribute the City’s street fairs so as not to over-tax any given area. We applaud the Office of Citywide Event Coordination and Management (OCECM) in its efforts to establish a better process for the permitting and placement of street fairs.

According to the OCECM, approximately 200 street fairs will take place in calendar year 2016, with the majority located in the borough of Manhattan and concentrated in Community Boards 2, 5 and 7. It specifically notes the following: The high number of street fairs in Manhattan increases traffic congestion and burdens on local communities, particularly within Community Board 5 in the vicinity of Time Square.

We couldn’t agree more. Time Square is the City’s tourist and entertainment hub. Maintaining its vibrancy while not overwhelming its capacity and resources takes careful oversight. Putting street fairs in this nerve center of the City simply doesn’t make sense. Traffic and congestion in Time Square are at historic highs and threaten the very fabric of the area. Over 300,000 pedestrians walk through the center or bowtie of the Time Square (7th and Broadway between 42nd and 47th streets) each day, making the Time Square area one of busiest pedestrian areas in the world. Over 20 bus carriers transport over 200,000 people every day from the Port Authority terminal located at 42nd and 8th Avenue. And then there are the tour buses, taxi cabs and other vehicles that snake through and around the main arteries of Broadway and Seventh and Eighth Avenues, and the congested side streets in order to reach their destinations.

Shubert has been operating legitimate theatres in the Time Square area for over 100 years. We have witnessed the cycles of growth, decay and revitalization that have transformed the area over the past decades. As the operator of seventeen Broadway theatres, our health is tied

to the health of the City and the Time Square area. We know the importance of maintaining the area as one that is safe and welcoming to all who come its way.

Tourism has played a central role in the revitalization of the City as a whole and the Time Square area in particular. 2016 is expected to see a record number of tourists to New York City (over 59 million visitors) and Broadway is a major reason why tourists come to the City. During the 2014-2015 season, Broadway as an industry contributed \$12.57 billion to the economy of New York City. During the same season, over 4.3 million “Broadway Tourists” (defined as people who did not live in NYC who said that Broadway was a very important reason in their coming to the City) came to the Time Square area and saw an average of almost two shows each. These Broadway Tourists are vital to the economic well-being of both Broadway and the City of New York.

Not so long ago Times Square and tourism where both looking much worse. In the 1960s and 1970s, the Time Square area was in desperate straits. By the late 1970s, the Time Square area was overrun by crime, drugs and urban decay. Tourism had plummeted. Only through tremendous time, money and effort, has the area seen significant revitalization and transformation into its current form.

We want to make sure that the Time Square area retains its status as a tourist mecca with world class attractions. This will not be possible if it becomes overrun with activity making it impossible to navigate its streets, and taxing our police and private security forces to the breaking point. We have already significantly increased the security presence in the Time Square area to address the threat of terrorist attacks and ensure the public’s safety. Adding more street fairs into the mix makes the job that much more difficult.

Street fairs create a particular burden on the Time Square area. Unlike other areas of the City, traffic in Time Square increases on the weekends, when most street fairs are held. Moreover, over 50% all Broadway attendees come on the weekends, and 1 in 3 arrive by vehicle. In addition, Time Square has the highest density of hotels in the City, with 27,000 people staying at Time Square area hotels on an average weekend. It is no wonder that 77% of businesses surveyed in the Time Square area said that street fairs had a negative impact on their businesses.

We are not opposed to street fairs, we just don’t think it makes sense to place them in the Time Square area. We believe that the OCECM’s proposed rules strike a sensible balance of allowing street fairs to continue to prosper while not choking its central thoroughfares and

unduly straining the resources of any given area within the City. The proposed rules would continue to allow for 200 Street fairs throughout New York City. However, it would restrict the total number in Manhattan to 100 and the number within each community Board to 10. This makes perfect sense. New York City has an amazing array of diverse and vital neighborhoods in all five boroughs. Street fairs should continue to thrive throughout the City and to contribute to the vitality and diversity of the City. But sensible urban planning means that placing the street fairs on what are already some of the most travelled streets in the world simply doesn't make sense. We can do better. The proposed rule amendments reflect a thoughtful reexamination of where and when we hold street fairs. We support the proposed rule amendments.

From: [Tim Tompkins](#)
To: [SAPORules](#)
Subject: Specific proposed language related proposed street fair rules
Date: Thursday, October 27, 2016 1:21:18 PM

Michael Carey
Executive Director
CECM

Dear Mr. Carey,

Under separate submission, the Times Square Alliance is submitting updated and additional documents related to the proposed street fair rules.

While we have submitted a number of fairly specific conceptual proposals, we thought that it would be most helpful if we also submitted very specific proposed amendments for you to consider as you consider recommendations from other parties.

Accordingly, we propose the following specific amendment to Section 1-05 (c) (2):

(2) the proposed activity, when considered in conjunction with other proposed activities, would produce an excessive burden on the community, City services or City personnel; such excessive burden may be analyzed with respect to the time or place of such proposed activity relative to any or all of the following:

(i) the amount of traffic and/or traffic congestion, in the absence of such proposed activity, in a given neighborhood on on a given day or time or street relative to other times or locations, based upon historical data, using commonly accepted measures including but not limited to level of service analyses;

(ii) the cumulative number of street fairs on a given street, avenue, streets and avenues in close proximity to each other, or neighborhood relative to other streets, avenues or neighborhoods;

(iii) the proposed activity's proximity to streets or avenues which have, or are directly adjacent to streets or avenues which have, relative to other streets or avenues in the city, a disproportionate concentration of hotels, entertainment and transit uses which are both vehicle dependents and have significant egress and exit needs. To be classified as disproportionate a street must meet two or more of the following criteria: (a) two or more hotels with 150 or more rooms within a block; (b) two or more entertainment venues with 500 or more seats/capacity within any block; (c) one 500 seat/capacity theater and one 150 or more room hotel within any block; (d) being within a five block radius of a bus terminal serving multiple bus lines or a major commuter train station;

or

Thank you for your consideration of these amendments.

Sincerely,

Tim Tompkins

President

Times Square Alliance

Sent from my iPhone

I'm Steve Herrick, Executive Director of the Cooper Square Committee. We are a non-profit organization that works to preserve affordable housing for low and moderate income residents in the Lower East Side/East Village in Manhattan. We have sponsored a multi-block 3rd Avenue Festival for about 25 years. The modest income we receive from this multi-block festival, usually about \$5,000 per year, provides us with some unrestricted funding that helps cover our non-payroll expenses. We have occasionally sponsored a one block festival although this has not been an annual occurrence. This year we sponsored a one block festival called "A Taste of the East Village", which also netted a few thousand dollars.

The street permit rules being proposed by the Mayor's Office of Citywide Event Coordination and Management Street Activity Permit Office (SAPO) contain a number of valid goals – reducing congestion in some community districts, increasing local business participation – but they were not carefully crafted to promote these goals. Instead, they will threaten the viability of many street festivals in New York City. Non-profit organizations like ours rely on street festivals to generate some additional income, foster a stronger sense of community, and publicize their programs and services to hundreds, if not thousands, of area residents.

Specifically, Section 1-03(e), reducing the number of multi-block or multiple day street festivals to "one event per calendar year" impacts non-profit sponsors that serve multiple community districts by not permitting them to sponsor 2 events in different parts of the community district, or in different community districts. The current limit of two events per calendar year should be left intact.

Section 1-05(e) requiring that the applicant must include documentation that at least fifty percent (50%) of the participating Vendors have a business or local presence within the same community board where the Street festival or Single Block Street festival is to occur" is not realistic. Sponsors and festival producers can make good faith efforts to attract local vendors but the reality is that vendors reach out to festival producers and often pay online to participate in the event. If they have to go through a screening process, it raises the risk that some that are denied will claim discrimination if other vendors from outside the community board are selected over them. SAPO should simply require that 50% of vendors have a business address in the City of New York. To foster local participation, rules should require a minimum number of exhibitor spaces be provided at little or no cost to local businesses, artists and non profits. SAPO could also incentivize more local participation by creating a two-tiered permit fee structure that reduces the proposed rate for festivals with more than 50% local participation.

This same section of the proposed rule changes also requires that sponsors provide “all information pertaining to anticipated vendors participating in a street festival or single block street festival... thirty days prior to the day of the event”. The reality is that many vendors wait til as little as a week before the event to assess the weather forecast before they commit to participate. Current rules should remain the same, allowing sponsors to submit vendor information one week before the event.

The proposal in Section 1-05(g) of “no more than 10 permits for Street festivals per community board” and “no more than 20 permits for single block street festivals per community board” should allow some flexibility for the small number of community boards that currently hold more than the proposed rules allow.

My greatest concern has to do with the proposed increase in fees for street festivals and single block festivals. The flat fee per block structure of \$1,375 per day per block fee would have cost us an additional \$775 to hold our recent Taste of East Village festival which consisted entirely of local restaurants and non-profits. The event netted a small amount of revenue for us, and the added fees as well as other proposed rule changes will create uncertainty and reduce our incentive to hold this community building event again next year. We are hoping to make the Taste of East Village Festival an annual event. SAPO should devise rules that incentivize community building, especially in communities struggling with the polarization that gentrification has fostered in New York City, and not discourage community building efforts.

Thank you for this opportunity to submit comments regarding the proposed street festival rule changes.

From: [Jena Pincott](#)
To: [SAPORules](#)
Subject: street fair agenda/air pollution
Date: Wednesday, October 12, 2016 11:54:56 AM
Importance: High

Mr Carey,

We'd like to add an item to the agenda for the upcoming meeting on street fairs.

The air quality at the street fairs is terrible because vendors use gas generators and charcoal grills to cook food. These generators make air and noise pollution. My six-year-old daughter, who is helping me write this letter, has difficulty breathing at the street fairs. With air pollution already an urban problem, and high rates of asthma and respiratory issues in our population, we need rules to prevent vendors from using these grills and generators. The air quality on the street during street fairs makes children and the elderly particularly nauseous.

There are easy solutions, such as enforcing a rule that vendors must use nonpolluting electric generators for cooking.

Please consider adding this important item to the agenda.

Thank you,

Jena Pincott and Una Joy Hornick
154 W 73 St
NY, NY 10023

From: [Gabriel Ovanessian](#)
To: [SAPORules](#)
Subject: street fair hearing
Date: Friday, September 30, 2016 10:08:09 PM

Dear City Hall,

I applaud your measures to cut back the number of street fairs for 2017 and beyond. It is getting beyond control in the borough of Manhattan. Please consider these facts

- 1) The neighborhoods are overcrowded due to the density of the population of Manhattan. Being able to walk in one's neighborhood becomes a choir when ten city blocks are blocked off for a fair.
- 2) The fairs provide a venue for vendors of all sorts..selling socks, food, etc.. that have nothing to do with the neighborhood. The majority of these vendors are not local. Fairs have not character.
- 3) How many fairs does a single neighborhood really need? Is it really necessary for some neighborhoods to host 4 street fairs over a seven month period? (Fairs are not held during the colder winter months)
- 4) Fairs contribute to congestion. Vehicles that normally travel down a boulevard that is now closed off because of a fair just move to the next major boulevard. Congestion then builds up on that boulevard. What was accomplished?
- 5) Street fairs contribute very little to the city coffures. Does it benefit the city after subtracting for additional police presence, sanitation etc. The answer is No.
- 6) The streets are filthy the evening after a fair is done. Sanitation comes by for a quick cleaning but the streets still need a cleanup.

I could go own, but I will stop here.

Thank you.

A concerned citizen,

Gabriel Ovanessian
Upper west Side resident

From: [David Mogentale](#)
To: [SAPORules](#)
Subject: STREET FAIR NEW RULE PROPOSALS
Date: Wednesday, October 05, 2016 9:59:15 AM



Dear Mr. Michael Paul Carey

October 5th 2016

I am hearing that the De Blasio administration through your Office (OCECM) is trying to eliminate our annual street fair. Our organization has sponsored this for 5 years now. We are situated in Community Board 5 and I see that you are especially targeting this district.

Mr. Carey I don't think you realize what this street fair does for our organization in keeping us afloat year to year. The annual event which brings people in our community together but also, for us, is vital in bringing in added income needed to keep our very small not-for-profit theater alive and running.

I know that a one block street fair (which is what we have) is a drop in the bucket in the scheme of things. But it is a huge swimming pool for us. Discontinuing it would make it much more difficult to operate. I look at theaters that have been closing. Soho Rep (a theatrical landmark institution) just announced this week they will probably be shuttering because of zoning issues that were not found for 20 years! It seems that special considerations can be made to keep places like ours (and Soho Reps) alive in the greatest theatrical city in the world. And not just the commercial theater.

Also I strongly think that further limiting the number of pre-existing & previously approved events will create a "community war" within for future approval. And the truly misguided mandated "*percentage of merchant participation*" clause would eliminate most if not all of the events!

We are not asking for much. We try to be self-sufficient and make income in other ways to not burden the city, but this is something that is much needed. It would be another hardship that we as an organization and the community that we serve, should not have to endure. As a Community Board 5 organization, we strongly oppose the 2017 proposed rule changes!

With much respect,

David Mogentale

29th Street Rep

From: [Michael J. Rabus](#)
To: [SAPOrules](#)
Cc: [Kathy Jolowicz](#); [lederhosenlen](#)
Subject: Street Fair Proposal
Date: Friday, October 07, 2016 2:39:14 PM

To whom it may concern,

I write on behalf of The German American Committee of Greater New York regarding the Hearing Scheduled for next Thursday, October 13th concerning Street Fairs in the City. My organization has had a very positive experience with the Street Fairs.

Our organization stages The Annual German American Steuben Parade in Manhattan on Fifth Avenue from 67th to 86th Streets on the Third Saturday of September.

Our Parade supports the community by bringing thousands to the neighborhood and patronage to its stores and restaurants. We are a not for profit 501 (3) (c) Corporation and depend on donations and fund raising to put on our Parade each year.

A few years ago we began participating in the six block Street Fair in Yorkville by having a table where we promoted attendance at and donations to our Parade. The experience was so positive that this year, for the first time, we ran our own one block Street Fair on May 14th on East 60th Street between Madison and Fifth.

Our Street Fair met with much success in raising needed funds and promoting attendance at this year's Parade.

It would be a shame to deprive us of this needed avenue for promotion of the German American Steuben Parade in the very neighborhood where German Immigrants helped to create a vibrant community. The Parade offers scholarships for The Parade Queen and her Court, subsidizes schools by providing transportation to and from the Parade, Supports the Central Park Conservancy with our yearly Oktoberfest at Summer Stage and generally promotes German American Friendship and highlights the contributions of German Immigrants to New York City.

This past year we welcomed The German Ambassador to the United States, Peter Wittig and world renowned figure skater Katarina Witt as Grand Marshalls.

I urge the City of New York to continue to support the Street Fairs to assist not for profit corporations in going about their good works

Please feel free to contact me to discuss further and I regret that work commitments prevented me from being in attendance at the Hearing

Sincerely,

Michael J Rabus
President
The German American Committee
of Greater New York
A 501 (3) (c) Corporation
Organizer of the Annual German American

Steuben Parade of New York City

direct: (646) 536-5748

cell: (516) 524-0400

michael.rabus@admlaw.com

From: [Jeff Prant](#)
To: [SAPOrules](#)
Subject: street fair regulations
Date: Wednesday, October 12, 2016 12:39:26 PM

I serve on the board of Transportation Alternatives. We have sponsored street fairs for over 25 years. These events have been a source of funding for our work as well as a valuable opportunity to familiarize New Yorkers with our organization. Additionally, street fairs are a perfect illustration of Transportation Alternatives' core principle; that the highest purpose of our streets is to maximize the quality of human lives. Street festivals provide a rare opportunity for people to experience their streets as places that are walkable, social, and healthy.

Transportation Alternatives appreciates efforts to enhance the street fair experience and we look forward to partnering with SAPO toward this end.

Sincerely,

Jeff Prant

From: [Raphael Stern](#)
To: [SAPORules](#)
Subject: Street Fair Regulations
Date: Saturday, October 22, 2016 9:31:06 AM

We agree with Dan Garodnick regarding the new street fair regulations in his district. Street fairs should reflect the community they are in and not be so generic. As a reasonable resolution, why not require 25% participation of local organizations and have 14 per year rather than 18?

Best,

Rafi Stern and Suzanne Wasserman
526 E. 20th Street
Apt 7H
New York, NY 10009

From: [Ingrid Eisen](#)
To: [SAPORules](#)
Subject: Street fair rules
Date: Monday, October 03, 2016 8:28:41 AM

Street fairs have become a great bore, all identical vendors. Please do make a change in the rules requiring at least 50% local vendors/stands at every street fair.

From: [Paula](#) on behalf of [Paula Moerland, LMT](#)
To: [SAPORules](#)
Subject: Street Fair Suggestion
Date: Friday, September 23, 2016 11:18:38 AM

To Whom It May Concern;

I am a long-time resident who long ago stopped feeling the pull of the street fair due to the lack of uniqueness. Might I suggest a tweak that might resolve the issue regarding the new 50% local vendor proposal?

Have two application deadlines. The first deadline includes the 50% local requirement. If, after this date, there are not enough vendors from the community where the event is being held, then the empty spots can be filled by vendors from outside the area.

However, I suspect that the true reason there are few local vendors is cost. It seems to me that these street fairs should not be in the business of making money so much as helping local communities have terrific, participatory street fairs. Independent artists, crafters, etc., should be allowed to participate at very low cost compared to those in the "business" of doing street fairs. I am not privy to the costs, of course, but one can surmise.

If I may, there is one other issue I have been meaning to write someone about. Perhaps I could tag it on here? Regarding local, one-block, one-day street fairs, like Dominican Day on W 108th Street in Manhattan? Every year the stage is located in the same place, and is extremely and unnecessarily loud, vibrating the prewar buildings and making working at home impossible. I cannot even hold a phone conversation without locking myself in the bathroom. Who do I talk to for establishing or enforcing reasonable sound levels and staggering the stage each year so that some buildings get a break?

Thank you, and All the best,

Paula Moerland

From: [nina.pfeffer](#)
To: [SAPORules](#)
Subject: street fairs
Date: Monday, September 26, 2016 4:42:45 PM

I would like to add my voice to those wishing to limit the ridiculous number of street fairs in our neighborhood. They are mostly all the same vendors every time. There is little cultural value in them, no surprise and too much food! The traffic problems are nothing short of obscene: last weekend the fair on Amsterdam tied up 96th street bus traffic so horribly that the wait was 30 minutes for a crosstown bus. No traffic officer was on hand to facilitate the northbound flow which was detoured at 96th causing hundreds of cars to have to turn left- there was complete gridlock with everyone ignoring the light and clogging up the cross walks and affectively stalling everything.

Please- these fairs were perhaps once a novelty, or a fun neighborhood distraction.
- they are not so any longer.

Be creative and make room for something more worthwhile!

Thank you

Nina Pfeffer

From: a2aaron@yahoo.com
To: [SAPORules](#)
Subject: Street fairs
Date: Thursday, October 27, 2016 2:53:34 PM

To: Michael Paul Carey, Executive Director
Office of Citywide Coordination and Management

Mr. Carey,

I am a partner of Duffy Square Associates, a longtime property owner in Times Square.

I am writing you to voice my frustration at the preponderance of street fairs in Times Square.

Just last week, a fair took up 10 BLOCKS (1/2 mile) on Broadway between 47th & 57th St.

During these fairs, vehicular traffic is gridlocked on surrounding streets especially at matinee time.

The fairs are especially unfair to surrounding retailers and restaurants as the fairs are mainly run in the warmer busier months of April thru October. I've witnessed people buying food and merchandise at these fairs not get charged the 8 7/8 % NYC sales tax. Are the vendors paying the tax to the city?

At these fairs, all sorts of bootleg merchandise, cheap trinkets, and hot foods with unknown cleanliness certification are offered. Smoky odors permeate the area.

It gives the appearance of a bazaar in a third world country.

As we know, Times Square has become the crown jewel of New York City.

Rents for retail and office space are up exponentially since the dark days of the 70s and 80s.

I do know that the fairs are helpful to other parts of the city where the residents 'empty out' for the summer weekends. However, the need for these fairs in Times Square is long gone.

Aaron Cohen
Duffy Square Associates, Inc.

From: [Helen Rogers](#)
To: [SAPORules](#)
Subject: Street Fairs
Date: Friday, September 23, 2016 5:09:49 PM

I think it's a great idea to have vendors from the neighborhood given the 1st priority to introduce people to the neighborhood.

If not enough people from the local community, than those spots can be given to those outside outside the community. It's all about getting to know the local community & people.

Thank you & great idea!

From: [Barry Polinsky](#)
To: [SAPOrules](#)
Subject: Street Festival Rules Suggestion
Date: Tuesday, September 13, 2016 11:08:39 AM

To whom it may concern,

1) Please consider establishing a policy for rain dates for events. This year two events run through the Midwood Development Corporation were hurt because the scheduled date conflicted with the weather. Weather cannot be predicted months in advance, but SAPO requires people to schedule outdoor events months in advance.

MDC does a lot of work with local businesses. It is hard enough to coordinate a single date for events that many people can agree on. Between different philosophies on when events should be held, to different schedules based on retailers seasons, to different types of businesses involved, there is a huge confusion regarding the running of these events, even without the added uncertainty because these events are held outdoors. The events that were hurt were a Weekend Walk, run in conjunction with NYC Department of Transportation in August, and a Sidewalk Sale in May.

--

Barry Polinsky
Director of Community Projects
Midwood Development Corporation
1416 Avenue M, Brooklyn, NY 11230
bpolinsky@middev.org
646.257.4772

From: [Martinique](#)
To: [SAPORules](#)
Subject: Street Vendors Ruling
Date: Thursday, October 13, 2016 12:39:27 PM

To Whom it May Concern,

I have been horrified at the endless week after week street fairs that are in Time Square. they are taking advantage of tourists by claiming it is some kind of special event, when in fact it is exactly the same, with the same booths every time.

Please limit or eliminate these so called street fairs in the time square area.

Thank you,
Alan Tobias
Martinique Jewelers

From: [Rosalee Isaly](#)
To: [SAPORules](#)
Subject: Stuyvesant Park Neighborhood Association
Date: Thursday, October 13, 2016 2:31:24 AM

We are a 501 C3 organization that depends on the revenue from sponsoring our street fair to do the work we do in our community. This summer we sponsored 11 musical events, 4 movies, plus yoga and meditation events in the park. In addition, we have organized a volunteer gardening group that weeds, plants and mulches our park. We have purchased the gardening supplies for these activities.

Sincerely,
Rosalee O. Isaly
President, SPNA



Sunset Park District Management Association



Sunset Park Business Improvement District

Serving Sunset Park's 5th Avenue Community since 1995
5116A 5th Avenue, Suite 200 / Brooklyn NY 11220

PHONE: (718) 439-7767 / FAX: (718) 439-7794
EMAIL: info@sunsetparkbid.org / WEBSITE: sunsetparkbid.nyc



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Brooklyn's Fifth: Many cultures, many shops, ONE avenue!

TESTIMONY FOR OCTOBER 13, 2016 HEARING RE: SAPO PROPOSED STREET FESTIVAL CHANGES

I am Renee Giordano, Executive Director of the Sunset Park Business Improvement District. I would like to thank the Mayor's Office of Citywide Event Coordination and Management Street Activity Permit Office for undertaking the task of revising some of the regulations governing street festivals.

We have been hosting our festival since 1999; however, the Sunset Park BID took over the management of the festival in 2003. Since then, we have had a very successful event, which sees over 50,000 attendees along 15 blocks on 5th Avenue in Sunset Park Brooklyn.

The BID offers many unique experiences. We have one whole block of free rides for the children to enjoy. We also have two (2) stages with all day free entertainment from both famous and local entertainers. We have hula hoop contests, giveaways, free games with prizes, free face painting, free sand art that the children can do themselves, and more. While the vendors who sell items pay to be part of this festival, we also offer numerous free spots to local not-for-profits, and health providers to disseminate information to the large crowds. Several city agencies take part, such as the NYPD doing free fingerprinting for Child ID kits, and the FDNY with a recruitment table and the Fire Safety House.

Many people don't understand that it is neither simple nor free to produce a street festival. The fee to the NYC Fire Department has risen from \$385 to \$460. NYC Department of Sanitation does the final cleanup, but the BID pays for the equipment and crew for that day plus \$1 for each bag and box that is collected. The fee for this has risen from \$1,200.93 in 2003 to \$5,448.24 in 2016. In addition, the Sunset Park BID hires its own crew to clean throughout the day, bagging the litter in the overflowing baskets and sweeping. The BID has to maintain its own insurance for that day, which costs us another \$1,700.

It is often thought that the BID makes a huge profit on the festival. However, not only does the BID have many expenses, including the fees owed the various city agencies mentioned above, we need to pay the city 20% of the vendor fees collected. This usually amounts to around \$4,000, depending on how much we collected. In a good year, when proceeds are over \$20,000, we have to pay a CPA to do a separate audit which has to be submitted too.

With all that said, we believe that the Street Festival is an important community event. It is greatly anticipated by both vendors and residents. Our event draws not only the residents of Sunset Park, but brings in potential customers from all over the city and neighboring vicinities. This creates an economic boom for the district, through an event that brings together the business and residential communities in a fun event. **We are extremely glad that you are looking to open up the chance for new street festivals. Many of the newer and smaller BIDs, especially in the outer boroughs, can use this exposure.**

However, the requirement that 50% of the participating vendors must come from the same community

board is a difficult constraint that could actually hinder organizations from hosting festivals. It is impossible to dictate where the vendors come from. Does that mean we need to keep a tally and not allow a vendor to take part if there isn't a corresponding local vendor? And what would happen if we don't have that percentage on the day of the festival? Does that mean the festival will be cancelled at the last minute?

It also will be virtually impossible to submit any accurate information regarding the majority of the participants 30 days prior to the event. As it stands now, it is understood by all involved that the information submitted one week before is not complete. Many vendors wait to see the weather forecast before registering for a festival. For us, most of the vendors register with the last two weeks, and even with a late fee imposed, we find a significant number wait until the last week.

And lastly, I think it is a good idea to charge a fee based upon the number of blocks a festival uses just as you do for sidewalk sales, instead of based upon how much we collect. I assume that the 20% we are charged is used to pay for the assigned police officers who are on duty that day. But since our festival will be 15 blocks no matter how much we collect, it isn't a factor in how many officers are assigned that day.

However, the amount you are proposing is extremely high and could force us to cancel our festival. At present, as mentioned above, we pay about \$4,000 per year. **Should the fees you suggested become instituted, we would now be charged \$11,245, or nearly 3 times the amount!**

Street festivals in many neighborhoods are important for the residents, the local businesses and numerous other vendors who depend on festivals for their companies. Thank you for allowing us to respond to your suggested changes and we trust you will take into consideration our concerns.

Respectfully,



Renée Giordano
Executive Director

From: [Carol Schachter](#)
To: [SAPORules](#)
Subject: This morning
Date: Thursday, October 13, 2016 12:04:42 PM

A hearing room for 50 seats and 10 standees? Really? And two holding pens with no televised proceedings? And new sign-up to speak rules changed at 10:30 so that pre-registered speakers had to go on a regular line after the fact? And lines downstairs which would make a jury duty lobby look professional?

I am re-sending testimony for one group where I did not receive confirmation. After today's non-performance, I can't afford to take any chances.

A sad day for the City and an image of how grotesque it can be to want to do good for it.

Carol Schachter



THE SENATE
STATE OF NEW YORK
ALBANY 12247

TOBY ANN STAVISKY
Senator, 16th District

**ASSISTANT LEADER
DEMOCRATIC CONFERENCE**

**RANKING MINORITY MEMBER
COMMITTEE ON HIGHER EDUCATION**

COMMITTEE MEMBER

EDUCATION

FINANCE

HEALTH

JUDICIARY

TRANSPORTATION

NYC EDUCATION SUB-COMMITTEE

ALBANY OFFICE
ROOM 706
LEGISLATIVE OFFICE BUILDING
ALBANY, NEW YORK 12247
PHONE (518) 455-3461
FAX (518) 426-6857

DISTRICT OFFICE
142-29 37TH AVE, GROUND FLOOR
FLUSHING, NEW YORK 11354
PHONE (718) 445-0004
FAX (718) 445-8398

STAVISKY@NYSENATE.GOV

October 14, 2016

Mr. Michael Paul Carey
Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, NY 10007

Dear Mr. Carey:

I am writing to express my concerns about the new rules concerning street fairs proposed by the Street Permit Activity Office of the Mayor's Office of Citywide Event Coordination and Management. In my district, a number of local groups host annual street fairs. They are well-respected institutions in the community, contribute to the vibrancy of our neighborhood, and provide sorely needed financial support to the sponsoring organizations. These proposed changes puts the future of these events as well as the organizations themselves in jeopardy.

The proposed rules impose a rigid cap of ten multi-block festivals in any community board annually, twenty single-block fairs in any community board annually, and no more than one festival in a single community board daily. I believe that it makes sense to raise the annual cap on multi-block festivals to 15 and establish a procedure where a community board can waive the other caps. In addition, while the annual cap on multi-block festivals is clearly designed to address legitimate concerns about large numbers of festivals on major thoroughfares, it makes sense to add language clarifying that the cap does not apply to festivals on smaller streets. Festivals as part of legitimate religious observances should also be excluded.

While I appreciate the goal of requiring local merchant participation, I believe that this objective can be better met by requiring a significant share of exhibition slots be reserved, at little or no cost, to local businesses and artists, or to members of local chambers of commerce.

I also have concerns about the proposal to limit sponsoring organizations to one festival per year. There are many worthwhile organizations sponsoring local events that enjoy strong local support. The local community board should be empowered to waive that cap in those circumstances.

The legitimate concerns of those communities that feel overburdened by festivals should be addressed. However, a rigid policy that fails to address the concerns of other communities where street fairs are a cherished tradition would be a mistake. I hope that you will consider the impact of these proposed rules on communities such as the ones I represent and incorporate my suggestions into the final adopted rules.

RECEIVED
OCT 18 2016
STREET PERMIT

Sincerely,

Toby Ann Stavisky

STATEMENT OF THE BROADWAY LEAGUE
IN SUPPORT OF THE PROPOSED RULES ON STREET FESTIVALS

October 21, 2016

The Broadway League has been the principal trade association for the commercial theatre industry in New York State and across North America for over 80 years. It represents more than 750 theatre owners, producers and road presenters nationwide – with over 400 of its members maintaining offices in New York City. The League cannot overstate its appreciation to New York City’s Street Activity Permitting Office for proposing rules aimed at addressing a massive and escalating problem.

The League has always encouraged legislation and regulation aimed at enhancing the flow of vehicular and pedestrian traffic, improving access to the Theatre District, and bettering the quality of life for residents, visitors and businesses in the Times Square area. In the past, we have endorsed sensible restrictions that support economic activity on the streets of New York City, including licensing pedicabs, improving oversight of street vendors, implementing location restrictions for tip-seeking performers and delineating pickup/drop-off locations for tour buses.

The League wishes to express its support and endorsement for this proposal to provide additional oversight of the city’s many street festivals to ensure that these events are more evenly distributed among New York. This much needed reform will help reduce the intense overtaxing of Times Square on weekends, as well as ensure that more neighborhoods profit from the patronage and economic benefits such events often provide.

With respect to SAPO’s proposal, we wholly concur with the statement of the Times Square Alliance and incorporate by reference the declarations set forth in The Alliance’s submission.

Times Square is already one of New York’s most costly and traffic-infused neighborhoods, boasting a population that, unlike most areas of New York, increases on Saturdays and Sundays with peak pedestrian traffic exceeding 480,000 people. Navigating midtown is a significant burden and a seemingly unending array of outdoor events regularly

drive foot-traffic into the streets, as well as divert attention from local store-fronts. 54% of weekly Broadway attendees come on the weekend and 1 out of 3 arrive by motor-vehicle. However, these frequent events mandate significant alterations to traffic patterns which frustrate motorists, lead to increased vehicular congestion and create a significant barrier to accessing Broadway's theatres.

Approximately 13.3 million theatre tickets were purchased during the 12-month Broadway theatre season ending in May 2016. During that period, Broadway had a direct economic impact of \$12.6 billion on New York City. Over 80% of those tickets were sold to patrons residing outside New York City and nearly 60% of tourists reported that attending a Broadway show was a principal reason for visiting New York. Broadway spending generates over \$500 million in local tax revenue and directly supports approximately 89,000 jobs. Therefore, it is essential that lawmakers ensure every effort is taken to cultivate and maintain a welcoming environment that includes unobstructed access to the Theatre District for our patrons, actors, stage hands, musicians and other workers this industry employs (directly and indirectly).

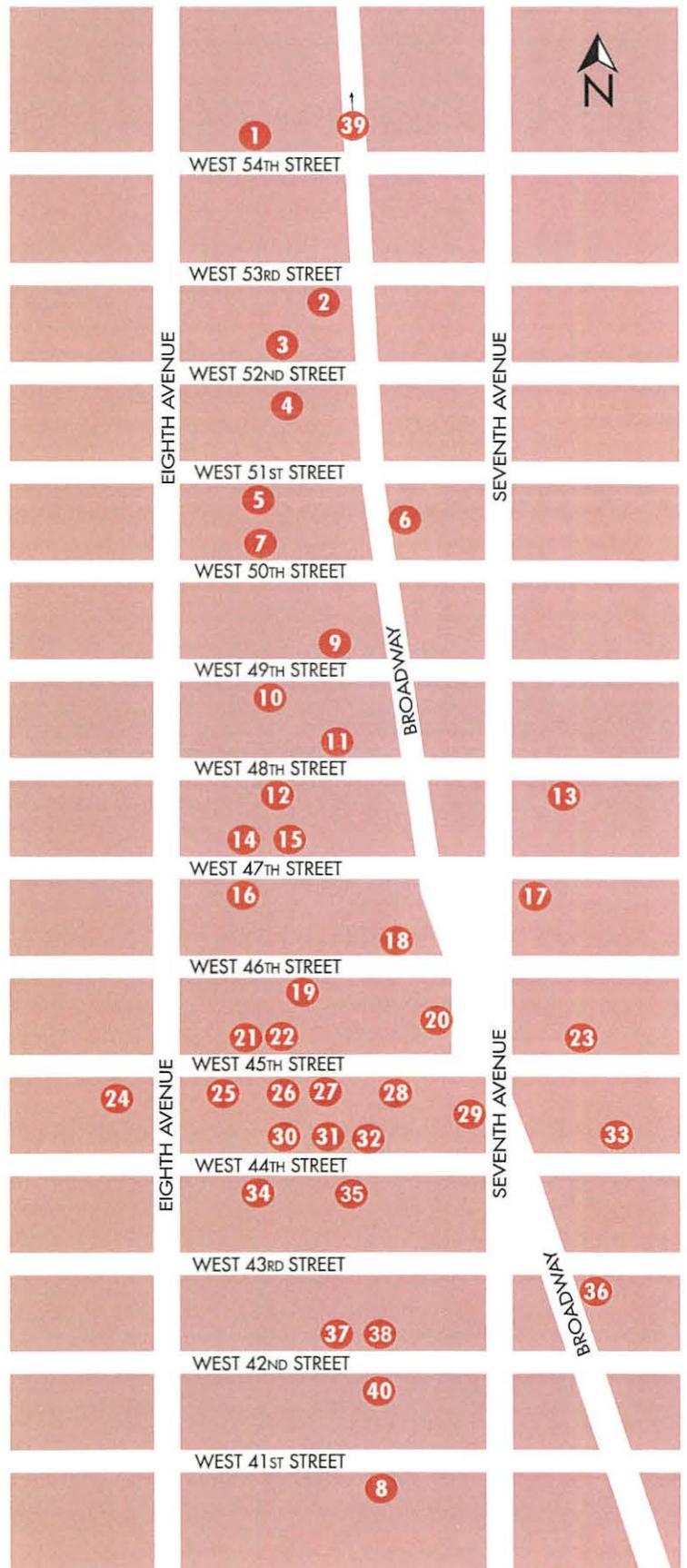
Midtown has simply become chaotic. The designation of Broadway (between 42nd and 47th Streets) as an outdoor plaza has increased vehicular and pedestrian congestion as construction and revised traffic patterns overlapped with a proliferation of outdoor events. Accordingly, it is imperative that the City take measures to more effectively regulate the public activity in and around Times Square.

The Broadway League feels this proposal is a positive step in addressing several challenging issues facing Times Square. We wish to note that we are available to work with SAPO and The City Council towards our shared goal of continuing to provide residents and visitors with a unique and safe experience. On behalf of the Broadway theatre community, the League applauds SAPO's dedication to addressing this problem in a fair and balanced manner.

Al Hirschfeld	24
Ambassador	9
American Airlines	37
August Wilson	3
Belasco	33
Bernard B. Jacobs	26
Booth	28
Broadhurst	31
Broadway	2
Brooks Atkinson	16
Circle in the Square	7
Cort	13
Ethel Barrymore	15
Eugene O'Neill	10
Gerald Schoenfeld	27
Gershwin	5
Helen Hayes	35
Imperial	21
John Golden	25
Longacre	12
Lunt-Fontanne	18
Lyceum	23
Lyric	38
Majestic	30
Marquis	20
Minskoff	29
Music Box	22
Nederlander	8
Neil Simon	4
New Amsterdam	40
Palace	17
Richard Rodgers	19
St. James	34
Samuel J. Friedman	14
Shubert	32
Stephen Sondheim	36
Studio 54	1
Vivian Beaumont	39
Walter Kerr	11
Winter Garden	6

For more information on Broadway's 40 historic theatres, visit SpotlightOnBroadway.com

BROADWAY THEATRE MAP



From: [Greater Woodhaven Development Corp. Woodhaven Business Improvement District](#)
To: [SAPORules](#)
Subject: Topic: Proposed Changes to Street Festivals
Date: Friday, September 23, 2016 10:37:51 PM

I am in receipt of the Mayor's Office of Citywide Event Coordination and Management/Street Festivals. The part of these proposed rules that concern me are

1. In the Plaza area rules. Our Woodhaven has a small WWII Monument sitting seating area with wooden benches. A small part of this area the Woodhaven BID uses for promotional events. A musical group performs there 3 times a year. We also hold a Memorial Day Observance there once a year. These events are not for profit and held with the permission and support the Plaza partner the Greater Woodhaven Development Corporation, a non-profit organization. These events occupy a very small area of this seating area and does not affect pedestrian traffic. Our Community has always referred to it as a Plaza Area, but it is really a bench seating WWII Memorial area. Can you please clarify this "Plaza Area" designation for me especially because in Queens NYC, it may not be the same designation as in Manhattan.
2. I would respectfully suggest that Manhattan, NYC Street Festivals have a separate set of Rules from the outer boroughs. This because there are so many Street Festivals held there and the fact that they are more disruptive to traffic and require more NYPD Police presence

Sincerely,

Maria A. Thomson
Executive Director
Greater Woodhaven Development Corporation
Woodhaven Business Improvement District
84-01 Jamaica Avenue
Woodhaven, NY 11421
tel: (718) 805-0202
fax: (718) 805-2929
gwdcbid@hotmail.com
Facebook.com/WoodhavenBID



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October 8, 2016

Mr. Michael P. Carey
Executive Director
Mayor's Office of Citywide Event Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Re: Proposed Street Festival Rules

Dear Mr. Carey:

We are a group of street fair (festival) vendors coming from the 5 boroughs of New York City. This is our collective view in reference to the Proposed Street Festival Rules.

While we strongly support and appreciate the efforts of our City Government to foster street festivals and lessen the burden on the NYPD, we respectfully offer the following comments with the hope and goal to making street festivals part of the fabric of what New York City has to offer to tourists and residents. These comments are based on the premise that we are all New Yorkers and ONE New York.

Over the years, many vendors depend on street festivals as the only source of income. Some have achieved the American Dream in buying houses and sending children to schools and colleges. The Proposed Rules may hinder and in some cases may terminate this source of income. Furthermore, the Proposed Rules may divide New York City into at least two cities, Manhattan and non-Manhattan. The Non-Manhattan New Yorkers do not have equal access to opportunities in Manhattan.

The current 200 street festivals may or may not be overwhelming in terms of congestion, sanitation and policing. Street Festivals occur usually on weekends. These are days with lesser traffic and congestion. New York City has constructed pedestrian plazas and closed streets in the summer for people to enjoy. Street Festivals offer food and shopping while people enjoy the closed streets and avenues.

In limiting the number of Street Festivals to 100, the local Community Boards, non-profit organizations and other entities will not be able to generate revenues from Street Festivals to fund their respective goals and purposes. These local Boards, Organizations and entities represent the very fabric of New York City. The implications may be much deeper than congestion, sanitation and policing.

Local community businesses have always been welcome to participate in Street Festivals. In fact they have been given special priority by Street Festival promoters including but not limited to not having street vendors blocking their entrances or store fronts. Only very few local community businesses participate in Street Festivals. The 50% local community participation rule change will make Street Festivals totally not feasible. This is not the spirit of the Proposed Rules.

Many of us have lived in New York City for generations. This is home. We look forward to working with the Mayor's Office to foster and make Street Festivals a more attractive alternative to tourists and residents but we, as tax paying NYC residents oppose your proposed rule changes for 2017.

Respectfully Yours,

We oppose the proposed street festival rules

Print Name	Signature	Borough	Print Name	Signature	Borough
Jian Hua Yang	Jian Hua Yang	Queens	Adiorawati	Adiorawati	Queens
Rosemarie Hill	Rosemarie Hill	Brooxe	Ari Katayev	Ari Katayev	Queens
Kate Yan Wong	Kate Yan Wong	Brooklyn	Rahab Hat	Rahab Hat	Queens
Stacey Long	Stacey Long	Brooklyn	KELVIN MWANGI	KELVIN MWANGI	Brooklyn
xue haozheng	xue haozheng	Brooklyn	Rubiel castano	Rubiel castano	
Zheng Li	Zheng Li	Queens	Osar Valencia	Osar Valencia	
Anthony Acevedo	Anthony Acevedo	Brooklyn	Jose Fajardo	Jose Fajardo	Queens
JOSE BURGA	JOSE BURGA	QUEENS	Tenzin Kalsang	Tenzin Kalsang	Queens
LOH CHEE	LOH CHEE		Jenny Jin	Jenny Jin	Queens
NANCY CHEE	NANCY CHEE		M. Misga	M. Misga	
ROSALIA S'OPACHIA	ROSALIA S'OPACHIA		Rosanna Madani	Rosanna Madani	MANHATTAN
SONAM GURUNG	SONAM GURUNG	QUEENS	Miguel Martinez	Miguel Martinez	Queens
Mukhiya Gurung	Mukhiya Gurung	Queens	Adela Cobarrubias	Adela Cobarrubias	Bronx
Tiffany/Hanlin Huang	Tiffany/Hanlin Huang	Queens	C. RESURRECCION	C. RESURRECCION	NYC
SHUJAT KEMMA	SHUJAT KEMMA	BROOKLYN	Sunclay Wong	Sunclay Wong	Brooklyn
Najatt Ajarar	Najatt Ajarar	BronxNY	Emel Ceran	Emel Ceran	Queens
NAZIR-A-SHEIKH	NAZIR-A-SHEIKH	Queen.	ISSA NIANG	ISSA NIANG	MANHATTAN
Lurline Joy	Lurline Joy	Bronx	Richard	Richard	Queens
Migene Lane	Migene Lane	Queens	PAIROGHT JARUSUWANNARUX	PAIROGHT JARUSUWANNARUX	Queens
ARENOU A	ARENOU A	QUEENS	JoAnn Gaudio	JoAnn Gaudio	Brooklyn
Adam Lin	Adam Lin	Queens	Charlie Gaudio	Charlie Gaudio	Brooklyn
Wei Li	Wei Li		Patricia Gambis	Patricia Gambis	Queens
Abbas	Abbas	Queens 667	Joel Kuyic	Joel Kuyic	Queen
Karma Ghale	Karma Ghale	Queens	Jermis Cakioglu	Jermis Cakioglu	Brooklyn
NAGWA AWAD	NAGWA AWAD	Manhattan	Mert OUSAL	Mert OUSAL	Brooklyn
DWA YASSIN	DWA YASSIN	Manhattan			

We oppose the proposed street festival rules

Print Name	Signature	Borough	Print Name	Signature	Borough
David Owens		Manhattan	STELLA		STATEN IS.
Martin Ortega		Queens	Ray Ramos		Bronx
Lurline Fox		Bronx	Luis Rivera		MANHATT
Nicolas Casio		Brooklyn	Cesar Hernandez		BROOKLYN
Jogesh R. Shukya		Queens	SOE SOE CITERA		Brooklyn
SOFIA ISHAK		Brooklyn	Daniel Gutierrez		Queens
AJAZ GRANIE		Queens	Bonita Balarin		STATEN ISLAND
AI SAI HUANG		Queens	Alfredo Balarin		STATEN ISLAND
Fred Manzola		Brooklyn	Rodolfo Casas		Brooklyn
CARMINE		BROOKLYN	Viviana Rivera		Manhattan
Steve Manzola		BKlyn			
SERGE NE		Staten Island, NY			
Kayani Facey		Staten Island			
SUSAN DEMETRIO		Brooklyn			
Jie Wang Yan		Brooklyn			
Aronov Marina		Queens			
Emilio Edo		Staten Island			
Christopher Priolo		N.Y.C			
ANTHONY PRILO		NYC			
sergio Diaz		Queens			
Amor Saundis		Bklyn			
Anthony Saundis		Bklyn			
EDUARDO VILLAVICENCIO		Queens			

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

Director Carey,

It has been brought to my attention that the Street Activity Permitting Office (SAPO) intends on changing the rules regulating New York City Street Fairs. I applaud OCCM and SAPO for attempting to regulate the overwhelming number of fairs in lower Manhattan. However, correcting the problem does not mean hurting the communities in which they take place.

Therefore, I encourage you to re-visit the proposed regulations and raise the proposed cap to ensure all village community based non-profits are capable of raising their much needed funds.

Thank you

HOWIE SQUARE
3 WASHINGTON SQUARE VILLAGE SUITE 1F
NEW YORK NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Mariam Samund
1 Washington Sq Village, PH-C
NY NY 10012

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

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Thank you

Arthur Harris
25 Fifth Ave 2F
NY NY 10003

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Jachin Malki
505 La Guardia Pl
NY NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Jonathan Pearlman
505 La Guardia Pl
NY NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Mary Brosnan
3 Washington Sq. Village, Suite 1F
New York, NY 10012

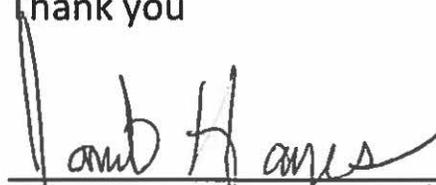
Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you



505 Laguardia Plc.

10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Judith Monaco-Calket
505 La Guardia Pl. 18C
NY NY 10012

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

Director Carey,

It has been brought to my attention that the Street Activity Permitting Office (SAPO) intends on changing the rules regulating New York City Street Fairs. I applaud OCCM and SAPO for attempting to regulate the overwhelming number of fairs in lower Manhattan. However, correcting the problem does not mean hurting the communities in which they take place.

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Thank you



540 BROADWAY SA

NY NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Lora Tenenbaum *LJT*
423 Broome St
New York N Y 10013

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

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Thank you


505 Columbus Pl.
NY NY 10012
Winkowsky

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

Director Carey,

It has been brought to my attention that the Street Activity Permitting Office (SAPO) intends on changing the rules regulating New York City Street Fairs. I applaud OCCM and SAPO for attempting to regulate the overwhelming number of fairs in lower Manhattan. However, correcting the problem does not mean hurting the communities in which they take place.

Therefore, I encourage you to re-visit the proposed regulations and raise the proposed cap to ensure all village community based non-profits are capable of raising their much needed funds.

Thank you

GENAMA TURBOT
505 LAZAVANDIA PLACE
N.Y. N.Y. 10012

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

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Anil Cannon
505 Lexington Pl
NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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47 Ave B
NY NY 10009

Sam Jacobs

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

LAMIA FUNN 
568 GRAND St #j206
NY-NY 10002

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

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Thank you

Ellen Rynick

300 Marler St

Nyc Ny 10003

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

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Thank you

Barbara Cal
300 Mewar St
NYC 10003

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Karin Kioutke

34 W 139th St. Apt 66

New York, NY 10037

Michael Paul Carey

Executive Director

Office of City Wide Coordination & Management

253 Broadway 6th Floor

New York, NY 10007

Director Carey,

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Thank you

Sara Johnson
171 Thompson St
NYC NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Will Hunt
45 Grace Ct. SE
Brooklyn, NY 11201

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Edmund X. Qiu
28 East 10th St # 126
NYC 10003

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Raymond Cline
505 LaGuardia Place 26A
NY NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Erica Uhlenbeck
80 Wooster 4R
NY NY 10012

Michael Paul Carey
Executive Director
Office of City Wide Coordination & Management
253 Broadway 6th Floor
New York, NY 10007

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Thank you

Pete De...
30/W 48th ST NYC
NYC NY 10036

Michael Paul Carey, Executive Director
Office of Citywide Coordination and Management
253 Broadway, 6th Floor
New York, New York 10007

Dear Mr. Carey,

My name is Lisa Sorin and I am writing in response to the proposed rule changes for street festivals, particularly those that would gravely impact neighborhoods in the outer boroughs. On behalf of the Westchester Square Business Improvement District and the other BIDs of the Bronx, I urge you to consider amending some of these proposed changes. While we applaud SAPO and the OCECM for their efforts to better regulate harmful business practices for locally based businesses, applying the same rules for event coordination to the outer boroughs would have an adverse effect on the success of our events and ultimately our communities. As an alternative, we suggest amending the following proposed rules in an effort to be more equitable to the business environments in place in the outer boroughs:

- A. Section 1-05, Article e. “All information pertaining to anticipated Vendors participating in a [street fair] Street festival or Single Block Street festival must be submitted thirty (30) days [one week] prior to the date of the event. If this information is not provided, the final permit may not be issued...Applicant must include documentation that at least fifty percent (50%) of the participating Vendors have a business or local presence within the same community board where the Street festival or Single Block Street festival is to occur by submitting a list of Vendors that includes the name, address, telephone number, e-mail or other contact information for Vendors along with tax identification numbers or tax exemption information and license numbers from the Department of Consumer Affairs or Department of Health and Mental Hygiene, where applicable.”

Suggested Revisions for Section 1-05, Article (e)

- a. **The current rule should remain in place with vendors reporting their participation 1 week prior to the event.** Considering the elimination of rain dates and the nature of small businesses, especially in smaller districts, restricting the time limit to 30 days would discourage local businesses from committing to event participation.
- b. **Requiring 50% participation from local businesses or those with a “local presence” would gravely limit the options some neighborhoods have in vendor participation.** While we understand the intention to increase local participation from community based entities, imposing such a rule would not benefit communities that are in the process of improving their business mix. Instead, rules regarding vendor participation should incentivize local entities by requiring little to no cost for participation.

- B. Section 1-05, Article g. “The Director shall issue no more than ten (10) permits for Street festivals per community board in any calendar year. No more than one Street festival permit per calendar day will be issued in any community board. No more than two hundred (200) Street festival permits will be issued within the City of New York in any calendar year, with no more than one hundred (100) of those permits to be held in the borough of Manhattan in any calendar year. No applications shall be granted for multi-day, multi-Block Street festivals unless the Applicant has held a permit for the closest date and same location continuously since January 1, 2008 and applies for the closest date and same location on or after November 1, 2016, and complies with the requirements of section 1-05 of this chapter. Applicants will be notified if its application has been denied by the second Tuesday in January of the calendar year when the Street festival is scheduled to occur. By February 1st of the calendar year in which the Street festival is scheduled to occur, Applicants who have not received a denial or who successfully appealed a prior denial will be notified that the application is being processed or that they have been placed on a waitlist for future processing if an opening becomes available.”
- C. Section 1-05, Article h. “The Director shall issue no more than twenty (20) permits for Single Block Street festivals per community board in any calendar year. If more than twenty (20) applications are submitted for Single Block Street festivals in any community board for a calendar year, a waitlist shall be established and Applicants shall be notified of their processing status and whether an opening has become available forty-five (45) days prior to that Applicant’s proposed Event time.”

Suggested Revision to Section 1-05, Articles (g) and (h)

The number of festivals per community board should depend on the need and mix of community based organizations that consistently plan events for their community. Limiting the amount of festivals to 100 in the outer boroughs and no more than 10 within a community board, directly opposes the results analysis detailed in the notice of proposed rules which states:

The OCECM surveys identified high public interest in street fairs in boroughs other than Manhattan where residents do not currently have the same access to street fairs. Furthermore, street fairs have the potential to better support local business development and community building when they are more closely tied to the communities which host them. Strong public support exists for increasing the representation of neighborhood businesses at street festivals.

In the case of the Bronx, where a number of our community boards include ten or more neighborhoods, limiting the amount of festivals to ten could prove to be problematic as community organizations compete to promote community engagement in their respective neighborhoods. This especially restrictive rule change would be a disservice to residents and other outer borough stakeholders.

D. Subdivision c, Section 1-08. Event Type: Street Festival or Single Block Street festival & Fee: \$1375 per day/per block.

Suggested Revision to Subdivision c, Section 1-08

This fee could impose a great burden on community organizations that have a more limiting financial base. As result, this will also limit which community entities that are able to pay and coordinate events. Furthermore, this fee, if it is left to local vendors to pay, will discourage local vendor participation in events. Instead, we recommend that the sponsoring organizations have the option to continue employing the rule of paying 20% of rental fees from vendors.

In short, the BIDs of the Bronx recommend that the proposed rules be more inclusive of the needs and potential opportunities seen in specific neighborhoods. We respectfully opposed the above proposed rules because they would ultimately limit our stakeholders' access to community engagement and enjoyment. It is our hope that the impact of such proposals are viewed from our perspective, and addressed in a manner that will provide more equitable means for successful community event planning citywide.

Thank you,

The Bronx BIDs

Westchester Square, Lisa Sorin
Fordham Road, Wilma Alonso
Jerome-Gun Hill, Melissa Cebollero

NoHo Bowery

Stakeholders

October 27, 2016

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Dan Rafalin
Ian Schragger
Brett Traussi
Adrian van Shie

Michael Carey,
C/O Citywide Event Coordination and Management
253 Broadway, 6th floor,
New York, NY 10007

Dear Mr. Carey:

The updated proposed rules are an improvement. The rules and requirements for "Special Events Permits" are still too lenient.

In at least one area the new rules seem to have regressed: the time for local – Community Board – review. The time to respond to most applications is less, now 30 days, with the exception of large Plaza events which will have 45 days. The time frame for "Special Events" (commercial promotion events) has been reduced to 10 days.

Again, the responsibility lies with the Community Board to be proactive with insufficient time to respond: outreach to constituents, scheduling of Committee hearing, approval of the Full Board, resolution response to SAPO. Further, should the Community Board impose conditions or denial, it must be issued five days **before** the event deadline for an applicant to respond. At no time does the Community Board – or the Community – have an opportunity to evaluate the applicant's response. The decision is left to CECM/SAPO also tasked with producing City income.

Still of concern are the fees for events, which seem to have been raised particularly for larger Plaza events, with no portion made available for the Partners who maintain, schedule and monitor Plaza activity. ([See page six](#) of Sapo Rules)

We urge that all events have a minimum 60-day review and response period.

Sincerely,



CC: NYS Senator Brad Hoylman
NYS Assemblymember Deborah Glick
Comptroller Scott Stringer
Councilmember Rosie Mendez
Councilmember Margaret Chin
Councilmember Corey Johnson
CB#2 Manhattan Chair, Tobi Bergman
CB#2 Traffic and Transportation Chair, Shirley Secunda

17 Bleecker St., Fifth Floor, New York, NY 10012
917-686-8385
www.nohomanhattan.org