

# TARZANA PROPERTY OWNERS ASSOCIATION

February 26, 2012

Planning and Land Use Management Committee, Ad Hoc River Committee  
Los Angeles City Hall  
200 North Spring Street  
Los Angeles, CA 90012

**Comments on the proposed RIO Ordinance.** While TPOA strongly supports efforts to improve the Los Angeles River, we strongly object to provisions of the two proposed ordinances related to the establishment of River Improvement Overlay Districts. The primary objective to the general ordinance to establish River Improvement Overlay Districts is the extremely broad width of the outer boundary. The ordinance would impose significant landscaping and lighting restrictions on properties within 2500 feet of either side of the river channel and imposes yet another layer of approval for new construction and major remodeling of existing properties. Equally important, those restrictions would do little or nothing to improve or preserve any aspect of the river. The City Planning Department cites seven reasons for the ordinance; we fully support the reasons cited but restrictions on the 2500 feet outer boundary do not contribute to this goal.

As an example, Reason 2 states “Contribute to the environmental and ecological health of the City’s watersheds.” We fully support the goal, but the 2500 feet width makes little sense. The reason given by Claire Bowin of the Planning Department for this purpose was to limit the amount of chemicals washed into the river by requiring plants with little need for chemicals. In the first place, residents are likely to use chemicals no matter what plants are used. In the second place, the watershed extends far beyond the 2500 feet specified. For example, the Los Angeles River drains the entire San Fernando Valley; if the goal is to reduce chemical runoff, the entire Valley should be so restricted.

**Establishment of the specific Los Angeles RIO District.** How can you even consider establishing a specific implementation of the proposed RIO ordinance before the ordinance is adopted? **Delay any consideration of the LA RIO until a process is in place to allow establishment of specific implementations.** In addition, the Planning Department has not followed the procedure for establishment of such a district. The proposed RIO ordinance specifies two methods of initiating such a district. The first is that it can be initiated by the City Council. To my knowledge, no such action has taken place. The second is a petition by 75% of the residents of a proposed district. There has certainly not been an attempt to collect the hundreds of thousands of signatures necessary to initiate a RIO district by that method. We brought these two issues up to William Roschen and the representative of the City Attorney’s office at the end of the recent City Planning Commission hearing and they both agreed that they had not thought through the matter and that the LA RIO could not be implemented before the RIO ordinance was passed by the City Council and signed by the Major. Again, **delay any consideration of the LA RIO until a process is in place to allow establishment of specific implementation.**

**Summary.** We strongly urge the City Planning Commission to eliminate the outer boundary conditions and to delay any effort to establish an LA RIO, or any other RIO district, until the necessary conditions for initiation of such a district are complied with.

Sincerely

David R. Garfinkle  
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**[www.tarzanapropertyowners.org](http://www.tarzanapropertyowners.org)**