

# LATE COMMENT

**From:** Crane, Brian  
**To:** [commentletters](#)  
**Subject:** Comment Letter – Prohibiting Wasteful Water Use Practices  
**Date:** Tuesday, December 26, 2017 1:09:21 PM

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Ms. Jeane Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> floor  
Sacramento, CA 95814

**Subject: City of Redding Public Works Department – Comment Letter – Prohibiting Wasteful Water Use Practices**

Ms. Townsend,

Please accept this email as the City of Redding Public Works Department comments regarding the proposed regulations regarding prohibited wasteful water use practices in California. In general, we are supportive of the proposed regulations prohibiting certain uses, many of which were included in the emergency regulation and we adopted in our municipal code. However, we do have significant concern with the expansion of the increase of the turf on street medians to include “verges”. Our understanding is this will include the parkways (area between curb and sidewalk) which are part of street sections throughout much of Redding.

The concern with turf in these areas isn’t a moving forward concern but the difficulty and cost in removing what exists today. Our policy/practice with new development largely eliminates use of turf in parkways moving forward. However, many existing parkways, although City has roadway easements over the areas, are maintained by the adjacent property owner (residential, commercial, institutional and industrial), homeowners associations, and/or by landscape maintenance districts paid for by the adjacent property owners. The cost, potential legal problems, and community outcry we expect to encounter by mandating removal of turf in these existing areas is significant. Our recommendation is as follows:

- Require that turf not be allowed in “verges” moving forward with new development. Note that the current State MWELo allows for turf in these areas with subsurface irrigation.
- Require that turf not be allowed with retrofits/rehabilitation projects within existing “verge” areas.

Again, we are supportive of the new regulation in general. However, we absolutely believe an allowance in the “verge” areas should be allowed for existing conditions.

Sincerely,

Brian Crane, Director  
City of Redding – Public Works Department