



CITY OF CORONADO

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December 14, 2017



State Water Resources Control Board
Attn: Jeanine Townsend, Clerk to the Board
P.O. Box #100
Sacramento, CA 95812

Subject: Coronado Comments on Proposed Parkway Irrigation Regulations

Dear Ms. Townsend:

The City of Coronado requests that the Governor not restrict irrigation of urban area parkways (the strip of turf between public roads and sidewalks) as currently drafted in the Notice of Proposed Regulatory Action regarding Conservation and the Prevention of Waste and Unreasonable Use (Title 23. Waters; Division 3. State Water Resources Control Board and Regional Water Quality Control Boards; Chapter 3.5 on Conservation and Prevention of Waste and Unreasonable Use).

Coronado is an older, built-out City. While design practice has changed with newer development, our City's appearance and character were established at the turn of the nineteenth century, when parkways between the curb and sidewalk were the prevailing design feature, which mitigated the harsh edge of the urban environment. Our parkways are publicly owned but their maintenance is the responsibility of the affronting property owner. The landscape schemes in the parkway are typically extensions of the adjoining property's front yard. As such, the front yard and parkway irrigation systems are most often integrated. Our principal concern is forcing residents/property owners to eliminate irrigation of turf parkways will result in the abandonment of the parkway portion of the irrigation system. The abandonment or removal of the irrigation system results in no water for the street trees that are planted in the parkway; ultimately resulting in the trees' demise. The street trees have important environmental benefits; stripping carbon from the air, reducing noise pollution and lowering the ambient temperature of the built environment, which in turn, reduces the demand on air conditioned cooling in adjacent properties. In addition, they provide much natural beauty to the built, urban environment.

Robust enforcement of the “no runoff” provision of the draft regulations will ensure the volume of water used to irrigate parkways, regardless of plant type, will be a de minimis component of the City’s irrigation water usage. The unintended, but inevitable, consequence of harming the health, and/or killing, of street trees far outweighs any minor water conservation gains accomplished by this proposed regulation. The City of Coronado is amenable to State Regulations that prohibit future development from using ornamental turf in City parkways.

Thank you for your consideration.

Sincerely,



Blair King
City Manager

cc: Coronado Mayor and City Council
Kevin Tilden & Brian Barreto, California American Water