

Attachment 3  
District Staff Comments to Draft 2020 UWMP

Section Number	Page Number	Staff Comment
Title Page	-	Include the District's address
TOC	-	Include letter from the Board of Directors and Acknowledgements in the Table of Contents
	-	Coordinate header and footer line coloring
	TOC-3	Remove apostrophe at the end of the page after "6.15 Energy Use"
	TOC-5	Rename "Inclusion of All 2015 Data" to "Inclusion of All 2020 Data"
	TOC-6	Adjust formatting in List of Tables, Table 4-4
	TOC-7	Adjust page formatting - List of Tables to top of Page and Table 5-2 under heading
	TOC-8	Adjust formatting in List of Tables, Table 7-6
	TOC-8	Adjust formatting in List of Tables, Tables 8-3, 10-1, 10-2
	TOC-9	Adjust formatting in List of Figures, Figures 6-8 through 6-15
Abbreviations and Acronyms	ABR-1	Define DoF as "State of California, Division of Finance"
	ABR-2	Define Eto as "Reference Evapotranspiration"
	ABR-2	ft instead of Ft
	ABR-3	Remove the header at the bottom of the page
Executive Summary	ES-1	1st paragraph, last sentence begins with: "The City's 2020 UWMP..." Replace with "The District's 2020 UWMP..."
	ES-1	2nd paragraph: Replace "addresses" with "identifies"
	ES-1	4th bullet point: Replace "...BCVWD must make every effort..." with "... is making every effort.."
	ES-1	5th bullet point: Add "and conservation" after "through recycling"
	ES-1	6th bullet point: Adjust to read "Groundwater banking is essential to BCVWD's continued water reliability."
	ES-2	Section ES-1 Water Supplies, 1st paragraph: Include groundwater from the Beaumont Groundwater Basin as a supply.
	ES-3	Section ES-2 Water Demands, 2nd sentence: Add italicized text to the following statement - "All of the District's water comes from groundwater wells; <i>the imported water supply is recharged and subsequently re-extracted.</i> "
	ES-6	Last paragraph, 1st sentence: Adjust to read - "...and Edgar Canyon in Riverside and San Bernardino Counties."
	ES-6	It is not mentioned that the District banked groundwater account is currently at approximately 39,000 acre-ft, along with the number of years that the supply in storage would be able to provide without imported water. Include in the narrative around ES-4.
Section 1	1-1	Subsection 1.1 Overview, 2nd sentence: Replace "This chapter..." with "This <i>section</i> ..."
Section 3	3-10	Subsection 3.4.4 Flooding, 2nd sentence: Replace "...but noting that..." with "...but <i>nothing</i> that..."
	3-16	Subsection 3.5.2 BCVWD Historic Growth, 3rd paragraph, 2nd sentence: Adjust to read " <i>There was decline after 2010 that was probable due to the high number of foreclosures....</i> "
	3-20	2nd to last paragraph: Adjust line spacing formatting
	3-24	Subsection 3.6 BCVWD's Water Supply System: Remove the word "historical" and adjust the statement to read "...demands were 10.8 mgd and 21.6 mgd for 2020, respectively."
	3-27	Last sentence: Clarify the quantity of interconnections: "...through <i>two</i> temporary interconnections..."
	3-29	Subsection 3.8 Land Use: Coordinate the narrative with Figure 3-7
	3-29	Include land use distribution within the City of Beaumont and Cherry Valley. Rename the title of Figure 3-7 .
	4-2	2nd bullet point, 2nd sentence: Adjust to read "...and was allowed to pump <i>no</i> more than five times..."
	4-8	Table 4-3: Banning's 364 AF in production was not considered in BCVWD's demand. Update footnote (2) by including "... City of Banning <i>and not included in BCVWD's demand.</i> "

Attachment 3  
District Staff Comments to Draft 2020 UWMP

Section Number	Page Number	Staff Comment
Section 4	4-9	3rd paragraph: Add a clarifying statement after the last sentence of the paragraph which reads <i>"This study shows a decline in water use and supports the reduced EDU demand."</i>
	4-11	Last paragraph, 2nd sentence: Amend statement. "In May 2016, an Emergency Conservation Regulation was adopted by the SWRCB which <b>required</b> water suppliers to maintain..."
	4-14	Table 4-5, Note (1): Clarify the statement which clearly reflects the quantities of water supplied to each golf course. "Also includes <b>a portion of the</b> golf course irrigation demands of 268 and 203 AFY for Tukwet Canyon and Oak Valley Greens, respectively."
	4-16	Last paragraph, last sentence: End sentence at "...assumed to be single family units <b>and</b> multi-family units."
	4-17	3rd paragraph, 1st sentence: Amend to read "...in Table 4-5 <b>are based on a portion of</b> a uniform per capita water use per day of 162 gpcd."
	4-17	Reference to Table 4-7, 1st bullet, 3rd sentence: Clarify by amending state to read: <b>"BCVWD did not include any reduction from future codes and ordinances since the impact on new codes and ordinances is difficult to project."</b>
Section 5	5-3	<b>Subsection 5.1.3 - 2020 Targets:</b> The CWC reference should be amended to read as <b>10608.20</b>
	5-5	<b>Subsection 5.1.4:</b> The CWC reference should be <b>"10608.20"</b>
Section 6	6-13	<b>1st Bullet - "Foothill Pipeline":</b> Remove this bullet. The line above indicates the SGPWA has 64 cfs capacity in EBX except for... The foothill pipeline is not an exception.
	6-14	<b>Subsection 6.2.2 facilities for Additional EBX Capacity,</b> 1st paragraph: Amend statement to read <b>"SGPWA purchased an additional 32 cfs in the Foothill Pipeline through the Fourth Joint Facilities Agreement on June 8, 2020 bringing the Agency's total capacity in the Foothill Pipeline to 64 cfs."</b>
	6-14	<b>Subsection 6.2.3 - BCVWD Facilities for Imported Water,</b> 2nd paragraph, 2nd sentence: Amend statement to read "...at the turnout <b>upstream</b> of BCVWD's facilities."
	6-17	1st complete paragraph: Amend to read "Implementation of the Bay Delta Conservation plan <b>and Delta Conveyance Project</b> should..."
	6-18	<b>Subsection 6.3.1 - Edgar Canyon Wells,</b> 1st paragraph, 1st sentence: Amend statement to read "...Well RR-1 is <b>being evaluated</b> . "
	6-23	First paragraph: California Water Board is mentioned throughout, clarify to <b>"SWRCB"</b>
	6-23	First paragraph, 4th sentence: Hyphenate "re-assess"
	6-23	2nd paragraph (1st complete paragraph): Amend to read "At the present time <b>nitrates are not an immediate concern and there may be an MCL for hexavalent chromium, which may require the installation of treatment at some time.</b> "
	6-33	Last paragraph: Amend to read "...does include non-potable (recycled) water <b>planned to be</b> supplied to Tukwet Canyon and Oak Valley Golf Courses <b>since this is not currently occurring.</b> "
	6-41	<b>Subsection 6.6.1 - BCVWD's Existing Non-Potable Water System:</b> The recycled water 3040 Pressure Zone is named. It will actually be 3000 Pressure Zone. This is referenced as 3000 Pressure Zone subsequently on page 6-48.
	6-43	3rd complete paragraph: Omit this paragraph
	6-44	4th complete paragraph, last sentence: Amend to read "...in the dewater biosolids hauled offsite <b>and brine discharge from that portion which is desalinated</b> . "
	6-47	<b>Table 6-16:</b> Far right column "Is WWTP Operation Contracted to a Third Party?" Should be <b>NO</b>
	6-55	Paragraph above Section 6.7: The amount from the City of Beaumont <b>and YVWD-Connections...</b> "
	6-55	<b>Section 6.7,</b> first sentence <b>"As stated above, There</b> are opportunities..."

Attachment 3  
District Staff Comments to Draft 2020 UWMP

Section Number	Page Number	Staff Comment
	6-55	<b>Section 6.7:</b> Omit the last two sentences and replace with " <i>The City of Beaumont is required to provide partial desalination of their recycled water to meet discharge and maximum benefit water quality objectives.</i> "
	6-56	<b>Subsection 6.8.1,</b> 3rd sentence: Amend to read "During the period of <b>2004</b> through 2014..."
Section 7	7-10 - 7-11	Last sentence: Amend as follows - "...including BCVWD, <del>and recognizes the current allotment of Table A capacity is fully subscribed to current users.</del> "
	7-21	3rd sentence: Typographical error - "...BCVWD should keep about <b>12,000 AF</b> in the storage account..."
Section 8	8-10	Omit in last bullet point "Hurricanes"
	8-15	<b>Section 8.12:</b> Change Sample Resolution for New Sample Resolution as presented in the WSCP.
	8-19	Draft Resolution to be changed to the Resolution presented in July 22, 2021 Board Meeting Staff Report.
Section 9	9-1	<b>Figure 9-1:</b> Adjust coloring of figure background to white for clarity
	9-5	Remove the photograph.
	9-6	<b>Subsection 9.2.1 - Conversion to Recycled Water:</b> second sentence: For consistency, amend as follows - "The District has installed over <b>40 miles</b> of non-potable water..."
	9-6	<b>Subsection 9.2.1,</b> last paragraph: Correct 1,800 AFY demand with current 2020 demand.
	9-6	<b>Subsection 9.2.1:</b> Change "by" to "before" 2025.
	9-7	<b>Subsection 9.3.1:</b> Change "Several meters have..." to " <b>The District is converting all of the meters over to AMR to assist the District in monitoring water leaks.</b> "
	9-7	<b>Subsection 9.3.1:</b> Add semi-colon after "local schools;" and correct "is" to "it"
	9-8	<b>Top paragraph:</b> Correct "calculators" to " <b>calculations</b> "
Section 10	10-1	<b>Third paragraph:</b> add " <b>...or at a subsequent Board Meeting.</b> " at the end of the sentence "...after July 22, 2021."
Appendix B	-	Need to insert adopted Resolutions of UWMP and WSCP once approved by the Board
Appendix C	-	Finalize far right column to be more specific with where each item is located in the UWMP.
Appendix E	WSCP Page 7	2nd Paragraph, last sentence: Amend to "Please see Table 3 <b>above</b> ."
	WSCP Page 12	Reference is made to "Table 8-1." In this location and throughout the document, clarification is needed that indicates "Table 6."
	WSCP Page 21	Omit in last bullet point "Hurricanes"
	WSCP Page 28	<b>Subsection 11.1 - Water Shortage Contingency Resolution:</b> Change Sample Resolution for New Sample Resolution as presented in the July 22, 2021 Board Meeting Staff Report.
	WSCP Page 33	Draft Resolution to be changed to the Resolution presented in July 22, 2021 Board Meeting Staff Report.
Appendix G	-	Notices will require copies of the newspaper advertisements and a screen shot of BCVWD's website showing the 2020 UWMP Draft and Final, etc.
Appendix H	-	Delta Reliance, Add a 1-page, small introduction that states the District has relied on the SGPWA for Delta Compliance and attached are their tables.

Attachment 4  
District Staff Comments to Draft 2020 WSCP

Section Number	Page Number	Staff Comment
Title Page	-	Include the District's address.
Section 1	7	2nd Paragraph, last sentence: Amend to "Please see Table 3 <i>above</i> ."
Section 3	12	Reference is made to "Table 8-1." In this location and throughout the document, clarification is needed that indicates "Table 6."
Section 7	21	Omit last bullet point "Hurricanes"
Section 11	28	<b>Subsection 11.1 - Water Shortage Contingency Resolution:</b> Change Sample Resolution for New Sample Resolution as presented in the July 22, 2021 Board Meeting Staff Report.
Section 15	33	Draft Resolution to be changed to the Resolution presented in July 22, 2021 Board Meeting Staff Report.



July 22, 2021

Beaumont Cherry Valley Water District  
Dan Jagers, General Manager  
560 Magnolia Avenue  
Beaumont, CA 92223

Via: [dan.jagers@bcvwd.org](mailto:dan.jagers@bcvwd.org)  
[mark.swanson@bcvwd.org](mailto:mark.swanson@bcvwd.org)

Re: Comments on the Draft 2020 Urban Water Management Plan

Dear Mr. Jagers:

The City of Beaumont appreciates the opportunity to review the Draft 2020 Urban Water Management Plan. As Beaumont Cherry Valley Water District is the sole water provider to the City of Beaumont, the City has a vested interest in ensuring the current and future water needs of the City are met.

City staff has reviewed the Draft 2020 Urban Water Management Plan. Comments and questions are as follows:

1. Page 55 - Table 3-7 table references Hidden Canyon II however the II should be dropped as there is no project referred to as Hidden Canyon II.
2. Page 60 – states mixed use in the downtown needs to be evaluated in concert with the 2020 Census. The draft and final General Plan have been available since 2020. How will the evaluation impact the draft UWMP as build out is not expected until after 2045?
3. Page 63 – Statement that the largest well is out of service. What is the status of getting this well back on-line?
4. Page 64 – Temporary interconnections exist for Fairway Canyon and Tournament Hills. When will permanent connections be installed?
5. Page 73 – Table 4-2 Why is the water loss for January 2020 so high?
6. Page 81 – The draft 6<sup>th</sup> Cycle Housing Element is available on our website and the draft UWMP should utilize the updated information.
7. Page 88 – 4. Second paragraph is the date of 2010 correct?
8. Page 109 – Why is the district using a higher ratio of 2.0 over the historic maximum day/average ratio of 1.87?

9. Page 141 – Is infrastructure in place for a City connection to the district’s system regarding Tukwet Canyon Golf Course? Have there been any discussions with the City regarding the statements in the third paragraph?
10. Page 188 – Does staff or the Board appoint the members to the Water Conservation Advisory Committee? Who are typically members, i.e. City Manager, Public Works Director?
11. Page 380 – The letter prepared for the City of Beaumont is addressed to Amer Jakher who has not been an employee for several years, please update your records to reflect Jeff Hart as the Public Works Director/City Engineer.
12. Page 3-24 – The last two sentences reference impacts from development within the City of Beaumont. Are there impacts from development outside the City boundary?
13. Page 4-7 Table 4-4 – First line of the table 01/2020 – 9.77% loss based on 13,818 AF demand in 2020. This is greater than the 783 AF collected from storm water. Should there be a discussion about lowering the loss rate versus the cost to increase the recharge volume? How is this number obtained or estimated?
14. Page 6-41 - The second paragraph should include a discussion about what facilities are ready to receive the recycled water from the City or how long it will take Beaumont Cherry Valley Water District to construct the facilities.
15. Page ES-2 - “The District’s primary source of water is groundwater which is extracted from the Beaumont Basin which is adjudicated and managed by the Beaumont Basin Watermaster. BCVWD augments its groundwater supply with imported State Project Water”. This statement directly conflicts with the final paragraph on page ES-6.
16. Table ES-1 - Provides estimates of water supply from various sources. The recycled water estimates should be verified with expected Plant capacity.
17. Page ES-3 – Paragraph 1 under Water Demands states “All of the District’s water comes from ground water wells.” What about the imported water specified in Table ES-1?
18. Discrepancies exist between between SGPWA and BCVWD projected imported water needs illustrated in BCVWD Table ES-1 and SGPWA Table 3-16. What are the implications of this discrepancy?
19. Page ES-6 - Last paragraph conflicts with the statement on sheet ES-2 as noted in comment number 15.
20. Page 3-10 – first paragraph speaks to additional operating costs. Are these additional costs to the City or the District?
21. Page 3-12 - References the Beaumont Point project having completed a WSA but Table 3-1 does not show that area within the service area boundary.

22. Page 3-17 - The last paragraph, last sentence speaks to population. This information is inconsistent with what was provided on page 3-2 and in Table 3.9.
23. Page 4-11 - The suspension of “will serve” letters directly effect the City’s ability to meet State mandates for housing projects.
24. Page 7-11 - State the District is counting on one source of recycled water which is the City of Beaumont. Table 7-6 provides projects which have not been substantiated by the City.
25. The plan does not appear to contemplate development in the sphere of influence.
26. There is significant commentary throughout regarding the District’s reliance on the City for future recycled water, including detailed capacity estimates and permit requirements. The City looks forward to coordinating efforts with the District to facilitate the use of recycled water.
27. There is no discussion in the report regarding emergency power outages or PSPS implemented by Southern California Edison. The District should demonstrate their ability to maintain service in these situations, including emergency and standby power.
28. There is no discussion of Fire Hazard, or the District’s ability to maintain fire flow in the event of a fire. This should be included due to the areas local fire danger.
29. In some cases, the sources and methodology for data is not presented.

Although BCVWD staff met with City Planning Department staff to discuss demographics and population projections, there has been no other coordination between the District and the City in preparation of this plan. As such, the time available to the City for a thorough review of such an important document containing over 400 pages was limited to nine business days and was insufficient. In reference to Figure 3-1, the City believes the entire boundary of the City of Beaumont should be included in the BCVWD boundary as the District is the only water provider to the City. Due to the fact that the majority of new development will occur in the Districts sphere of influence, additional evaluation is required to determine that the conclusions contained in the report accurately reflect long term water demand requirements.

The City respectfully requests the District provide an additional thirty days of review time for the Draft 2020 UWMP prior to adoption and submission to the State. City staff is available to meet with District staff to discuss comments and gain clarity with respect to the questions provided. We look forward to working with the District on the Draft 2020 Urban Water Management Plan.

Regards,



Todd Parton  
City Manager

Cc: Beaumont Cherry Valley Board of Directors  
City of Beaumont City Council





# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

August 12, 2021

Todd Parton, City Manager  
City of Beaumont  
550 East Sixth Street  
Beaumont, CA 92223

Via: [tparton@beaumontca.gov](mailto:tparton@beaumontca.gov)  
[ctaylor@beaumontca.gov](mailto:ctaylor@beaumontca.gov)

Subject: City of Beaumont - Comments on the BCVWD DRAFT 2020 Urban  
Water Management Plan (UWMP)

Dear Mr. Parton:

The Beaumont Cherry Valley Water District (BCVWD) appreciates the time and effort that you and your staff have put in to reviewing BCVWD's DRAFT 2020 UWMP and providing comments. This letter addresses each of your comments. The City's comments are repeated in italics with BCVWD's response in "regular" text.

1. *Page 55 - Table 3-7 table references Hidden Canyon II however the II should be dropped as there is no project referred to as Hidden Canyon II.*

BCVWD is aware of the recent name change to Potrero Logistics and will insert the name "Potrero Logistics" in Table 3-7 with "Hidden Canyon II" in parentheses since some of BCVWD's records still refer to it as Hidden Canyon II.

2. *Page 60 — states mixed use in the downtown needs to be evaluated in concert with the 2020 Census. The draft and final General Plan have been available since 2020. How will the evaluation impact the draft UWMP as build out is not expected until after 2045?*

BCVWD has incorporated the City's 2020 General Plan Update in the 2020 Draft UWMP and had discussions with City staff particularly related to the mixed use development and the anticipated occupancy of the housing in the mixed use development area. Having an understanding of the occupancy will provide a better estimate of the indoor water use. The reason to wait for the census results is to have an understanding of the current occupancy in the downtown and surrounding areas and what the movement toward mixed use



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

might have on the occupancy. Again, this is to better estimate the impact of these changes on the water demand over time.

BCVWD is interested in the build-out population and has used the land use from the 2020 General Plan Update and the County's updated Pass Area Land Use Plan to estimate a build-out population. Build-out population is important from a planning standpoint when water storage tanks are sited to ensure that sufficient land is acquired to provide additional storage, if needed. It is far less costly to add a storage tank adjacent to an existing tank than to acquire a new site and install the infrastructure (piping, access roads, and sitework).

Knowing the build-out population provides an estimate of ultimate water demands and the need to plan for well sites ahead of time to accommodate the increased demand.

BCVWD believes no further action is required.

3. *Page 63 — Statement that the largest well is out of service. What is the status of getting this well back on-line?*

This appears to be a misunderstanding. Water systems must have a reliable water supply. BCVWD relies exclusively on wells to extract groundwater or recharged imported water. A water system such as BCVWD's relies on a number of wells of varying capacity from 100 gallons/minute (gpm) to over 3,000 gpm. To be reliable, the well supply system must be able to provide the maximum day demand (usually a peak summer day) with the largest source (well) out of service for maintenance, repair, etc. In other words, can the other wells meet the demand? BCVWD's water system planning, as are most others, is based on this principle. This does not mean the largest well is actually out of service.

BCVWD believes no further action is required.

4. *Page 64 — Temporary interconnections exist for Fairway Canyon and Tournament Hills. When will permanent connections be installed?*

The non-potable water system 2600 and 2400 Pressure Zones, south of I-10 will be permanently re-connected to the 2800 Pressure Zone at such time as recycled water is available to BCVWD. A 2800 Zone to 2600 Zone and a 2600 Zone to 2400 Zone Pressure Regulator Station will be constructed prior to the conversion to recycled water. System cross-connection testing, required by the State Water Resources Control Board (SWRCB) Division of



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

Drinking Water (DDW) will immediately precede the conversion to recycled water.

BCVWD believes no further action is required.

5. *Page 73 — Table 4-2 Why is the water loss for January 2020 so high?*

Table 4-2 shows annual amounts. BCVWD's total water loss is comparable with other nearby agencies considering the size of the system; see [https://wuedata.water.ca.gov/awwa\\_plans](https://wuedata.water.ca.gov/awwa_plans). Nevertheless, BCVWD is working to reduce water loss. BCVWD is required to produce an annual water loss audit and provide a report to the State. Some of the water "loss" is due to inaccurate water meters, termed "apparent losses". As water meters age, they lose accuracy and typically "under-report" water usage. BCVWD has a grant project to replace the individual residence water meters with Advanced Metering Infrastructure (AMI) or "smart meters" which will be integrated with BCVWD's data management systems. The new meters will provide more accurate metering and provide real-time water use information which can be used to help control water waste. BCVWD will budget to replace these meters as they age. Some losses are "real losses" which is due to pipe and service line leaks. Pipe leaks are repaired as quickly as they are identified.

A large part of BCVWD's system is new, constructed since 2000; but some is older and BCVWD has a Capital Improvement Program to replace aging pipelines as quickly as possible.

BCVWD believes no further action is required.

6. *Page 81 — The draft 6 Cycle Housing Element is available on our website and the draft UWMP should utilize the updated information.*

BCVWD appreciates the City pointing this out. BCVWD will review the Housing Element and incorporate findings as appropriate in the Final 2020 UWMP.

7. *Page 88 — 4. Second paragraph is the date of 2010 correct?*

Yes, it is correct. BCVWD believes no further action is required.

8. *Page 109 — Why is the district using a higher ratio of 2.0 over the historic maximum day/average ratio of 1.87?*

BCVWD's ratio of the Maximum Day Demand to the Average Day Demand has varied from 2.05 (2005) to 1.51 (2014 drought year with landscape watering restrictions), with an average of 1.87 over the last 15 years.



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

BCVWD has been using 2.0 for planning purposes to be conservative and account for variability. With the limitations on landscape irrigation, a major factor in peak demands, BCVWD expects the ratio to decrease over time and future Potable Water Master Plans may reflect this.

BCVWD believes no further action is required.

9. *Page 141 — Is infrastructure in place for a City connection to the district's system regarding Tukwet Canyon Golf Course? Have there been any discussions with the City regarding the statements in the third paragraph?*

The wording in the Draft 2020 UWMP is misleading and not clear. BCVWD has a 24-inch diameter non-potable pipeline in Champions Drive at the Golf Club entrance road which could serve the Morongo Tukwet Canyon Golf Course. It is really not a "City connection". The paragraph will be reworded as follows:

Surplus water is available during the winter and early spring months. Tukwet Canyon Golf Course is in the 2600 Pressure Zone and could be served with recycled water as soon as the City is able to deliver recycled water to BCVWD at the Wastewater Treatment Plant. The Tukwet Canyon Golf Course would be served either through a connection to the golf course irrigation system or to the "lake" from BCVWD's non-potable pipeline in Champions Dr. Oak Valley Golf Course is in the 2800 Non-potable Pressure Zone and could be served from an existing BCVWD non-potable pipeline in Oakview Drive. Both Tukwet Canyon and Oak Valley Golf Courses are overlying parties in the Beaumont Basin Adjudication and have their own wells.

Reference to State Project Water (SPW) have been deleted since that is not a primary supply any longer.

The use of recycled water by the golf courses during the winter and spring months is an option to maximize the use of recycled water during times when recycled water production exceeds the normal landscape demands. In the summer months there is a shortfall of recycled water and the non-potable water system has to be supplemented by BCVWD well water or SPW. There have been no discussions with either the golf courses or the City regarding serving the golf courses, although it has been included in previous UWMPs.

Distribution of recycled water from the City of Beaumont by BCVWD has been discussed as early as 1987 (see BCVWD 2005 UWMP, pg 8-3); golf



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

courses were discussed in the 2005 UWMP pg. 8-10 and subsequent BCVWD UWMPs (see BCVWD 2015 UWMP page 6-52).

BCVWD is eager to discuss the recycled water system and service as soon as possible.

10. *Page 188 — Does staff or the Board appoint the members to the Water Conservation Advisory Committee? Who are typically members, i.e. City Manager, Public Works Director?*

The final organization participation members and associated details will be identified by the District Directors and District Management, together with identifying all appropriate community partners to participate in the Water Conservation Advisory Committee at the time a (water) shortage level 4 emergency is identified by the District.

BCVWD believes no further action is required.

11. *Page 380 — The letter prepared for the City of Beaumont is addressed to Amer Jakher who has not been an employee for several years, please update your records to reflect Jeff Hart as the Public Works Director/City Engineer.*

BCVWD acknowledges the error and have correct our mailing list to identify Jeff Hart as the Public Works Director and City Engineer.

12. *Page 3-24 — The last two sentences reference impacts from development within the City of Beaumont. Are there impacts from development outside the City boundary?*

The last part of the paragraph is unclear and is being reworded as follows:

BCVWD's average day and maximum day potable water demands were 10.8 mgd and 21.6 mgd, respectively for 2020. Average day and maximum day non-potable water demands for 2020 were 5.6 mgd and 6.7 mgd, respectively. These demands are higher than 2015 when the average day potable and non-potable demand was 9.2 mgd; maximum day was 15.3 mgd. The impact of increased development in the City of Beaumont is evident.

To respond to the comment, for comparison from 2015 to 2020 the total average day potable and non-potable demand increased from 9.2 mgd in 2015 to 16.4 mgd in 2020. Although 2015 was a "drought year", with



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

somewhat reduced demands, the increase is significant. The Cherry Valley area of the District grew only a small amount – about 25 EDUs.

13. *Page 4-7 Table 4-4 — First line of the table 01/2020 — 9.77% loss based on 13,818 AF demand in 2020. This is greater than the 783 AF collected from storm water. Should there be a discussion about lowering the loss rate versus the cost to increase the recharge volume? How is this number obtained or estimated?*

The response to Comment 5 above addressed the loss rate. BCVWD is taking measures to reduce the loss rate as discussed in the response to Comment 5. It is important to understand that a portion of the total water loss is “Apparent Loss” which is the result of inaccurate water meters. The water is not “lost”, but is not generating revenue. This is a financial problem that can be rectified to a degree by meter replacement and master meter calibration (meters on wells, etc). BCVWD is aggressively working on reducing the “real losses” by replacing old pipelines as part of its Capital Improvement Program.

The quantity is determined using the State-mandated AWWA Water Audit Software.

BCVWD believes no further action is required.

14. *Page 6-41 - The second paragraph should include a discussion about what facilities are ready to receive the recycled water from the City or how long it will take Beaumont Cherry Valley Water District to construct the facilities.*

BCVWD has a 24-in diameter non-potable pipeline in Fourth St. fronting the entire length of the City’s Treatment Facility. BCVWD has worked with the City and the City’s Wastewater Consultant to identify a location for a recycled water booster pumping station that would pump water into BCVWD’s 2800 Non-potable Pressure Zone. City staff identified a site on City-owned land on the west side of the Wastewater Treatment Plant and BCVWD staff have made some preliminary layouts of the pumping station on that location. BCVWD’s Board of Directors have not authorized any further work until 1) an agreement between the City and BCVWD for the transfer and distribution of recycled water is in place; 2) an agreement for long term use/lease of the City-designated property is in place; 3) approval is granted by the City to conduct geotechnical engineer and topographic survey work on the designated site. Completion of design and construction will take a minimum of two years or so from recommencement of activities.



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

BCVWD believes no further action is required.

15. *Page ES-2 - "The District's primary source of water is groundwater which is extracted from the Beaumont Basin which is adjudicated and managed by the Beaumont Basin Watermaster. BCVWD augments its groundwater supply with imported State Project Water". This statement directly conflicts with the final paragraph on page ES-6.*

There is no conflict; the final paragraph on page ES-6 could be stated differently. All of the "safe yield" of the Beaumont Basin has been assigned to the Overlying Parties. The only "native groundwater" the Appropriating Parties, like BCVWD, receive are a share of the unused Overlying Party Rights, which is a relatively small amount that varies from year to year. This is the only water that does not need to be "replaced". All pumping in excess of this must be replaced, imported, or taken from the Appropriating Party's banked storage account. Either way it is imported water.

However, to avoid any mis-understandings, the first sentence in the last paragraph on page ES-6 will be stated as follows:

As discussed previously, BCVWD relies on groundwater obtained from Edgar Canyon and imported water from the State Water Project or other imported sources to meet the Adjudication obligations for groundwater pumped from the Beaumont Basin.

16. *Table ES-1 - Provides estimates of water supply from various sources. The recycled water estimates should be verified with expected Plant capacity.*

The annual volumes of recycled water in Table ES-1 were extracted from Table 6-15, which is the amount that can be recycled after deducting the Environmental Mitigation Flow and assuming a 10% loss for brine discharge, water in the biosolids disposed offsite, and in-plant water use. Brine discharge is based on reverse osmosis treatment of 1/3 of the main plant flow and 80% recovery. The development of the flow values is explained in Table 6-15 and the associated text. Plant capacity is determined based on estimated population as shown in Table 6-15.

BCVWD believes no further action is required.

17. *Page ES-3 — Paragraph 1 under Water Demands states "All of the District's water comes from ground water wells." What about the imported water specified in Table ES-1?*



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

All of BCVWD's imported water is recharged at the Noble Creek Recharge Facility for subsequent extraction. BCVWD believes this is a more cost effective method than providing a surface water treatment plant.

BCVWD believes no further action is required.

18. *Discrepancies exist between SGPWA and BCVWD projected imported water needs illustrated in BCVWD Table ES-1 and SGPWA Table 3-16. What are the implications of this discrepancy?*

Table 3-16 in the SGPWA 2020 UWMP is not imported water needs. The value for BCVWD is BCVWD's total potable and non-potable water demand which was provided to the SGPWA in April 2020 or so. It does not include the projected "banking" water that BCVWD is anticipating purchasing each year for "drought proofing." There have been some minor adjustments to BCVWD's demand as BCVWD began producing their own UWMP. Table ES-1 in BCVWD's 2020 UWMP is BCVWD estimated water supplies, which are shown to exceed demands, particularly in 2045 when Sites Reservoir is operational.

BCVWD believes no further action is required.

19. *Page ES-6 - Last paragraph conflicts with the statement on sheet ES-2 as noted in comment number 15.*

This was addressed in the response to Comment 15 above; BCVWD will clarify the wording as stated in the response to Comment 15.

20. *Page 3-10 — first paragraph speaks to additional operating costs. Are these additional costs to the City or the District?*

The City operates the reverse osmosis facility at the Wastewater Treatment Plant and any increase in the TDS of the imported water over time as well as irrigation return flow components increasing background TDS concentrations within the groundwater basin due to maximum benefit objectives being exercised will tend to increase the wastewater concentration over time; unless the maximum benefit water quality objective changes. This would most likely result in additional desalting (treatment) being required. Fortunately, the imported water is recharged and will be blended down with native groundwater, and return flow components together with planned captured stormwater which will delay the salinity increase.

BCVWD believes no further action is required.





# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

21. *Page 3-12 - References the Beaumont Point project having completed a WSA but Table 3-1 does not show that area within the service area boundary.*

The table reference should be Table 3-7. It is acknowledged that Beaumont Pointe (Jack Rabbit Trail) is not currently served by the District as the project receives no service, but is within BCVWD's Sphere of Influence (SOI). BCVWD will reword the title of Table 3-7 as follows, since Beaumont Pointe and several others are not in the current service area *per se*:

Table 3-7 – Other Projects in BCVWD's Service area or SOI

22. *Page 3-17 - The last paragraph, last sentence speaks to population. This information is inconsistent with what was provided on page 3-2 and in Table 3.9.*

Page 3-2 states that City of Beaumont build-out population is 134,000; page 3-17 states that the developments in Table 3-7 would bring the Beaumont population to 95,000 ... which would not occur until 2045 or later; Table 3-9 shows the City of Beaumont population at 2045 to be 86,266.

BCVWD recognizes a potential inconsistency and the last sentence on page 3-17 will be reworded:

Based on the estimated build-out year for each project in Table 3-7, this population would not occur until after 2045.

23. *Page 4-11 - The suspension of "will serve" letters directly affect the City's ability to meet State mandates for housing projects.*

So noted.

24. *Page 7-11 - State the District is counting on one source of recycled water which is the City of Beaumont. Table 7-6 provides projects which have not been substantiated by the City.*

BCVWD does not understand the comment. Table 7-6 relies on a previous table (Table 6-15) which shows the average recycled water available during a normal year based on the population projections made by BCVWD for the City of Beaumont. BCVWD believes these growth estimates to be reasonable. For the Dry Year analysis, a reduction in the amount of recycled water normally available was estimated based on a BCVWD staff member's extensive experience with recycled water systems during droughts and water restrictions. A 15% reduction in wastewater flow during a drought is not



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

unreasonable. If this does not occur, then there will be more recycled water available to meet demand. BCVWD does not understand “projects which have not be substantiated by the City” in Table 7-6.

BCVWD believes no further action is required.

25. *The plan does not appear to contemplate development in the sphere of influence.*

BCVWD used GIS to determine the land use areas within its Sphere of Influence to develop the build-out populations as described in Section 3. Also, there are a number of projects in Table 3-7 that are not currently in the City of Beaumont, but within the BCVWD Sphere of Influence. BCVWD has included the growth in Cherry Valley and even some projects that are in Calimesa.

BCVWD believes no further action is required.

26. *There is significant commentary throughout regarding the District’s reliance on the City for future recycled water, including detailed capacity estimates and permit requirements. The City looks forward to coordinating efforts with the District to facilitate the use of recycled water.*

BCVWD concurs and looks forward to continued discussion and coordination with the City.

27. *There is no discussion in the report regarding emergency power outages or PSPS implemented by Southern California Edison. The District should demonstrate their ability to maintain service in these situations, including emergency and standby power.*

BCVWD discussed PSPS on page 6-33. BCVWD has standby power generating capacity at most of the wells or the capability to move-in and attach mobile generating units at critical wells. BCVWD has used these generators when necessary during PSPS events. Further, the District is proceeding with continued augmentation of emergency power generation as part of ongoing capital facilities development activities.

28. *There is no discussion of Fire Hazard, or the District’s ability to maintain fire flow in the event of a fire. This should be included due to the areas local fire danger.*

Wildfire hazards to BCVWD facilities is discussed in Section 6.13. The Apple Fire in July 2020, starting from human causes near Oak Glen Rd. and



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

Appletree Ln. which burned significant areas of BCVWD's watershed, but did not damage any of BCVWD's wells or other facilities. However, the threat of mudflows from heavy rain on burned slopes continues to be a concern to BCVWD and Riverside County Flood and Water Conservation District. BCVWD is coordinating with the County on monitoring the slopes and erosion potential.

The Replier Fire, which started in Banning, in the early 1990s threatened several of BCVWD's facilities in Edgar Canyon, but did no damage despite burning a significant portion of the watershed.

It should be noted that CalFire uses BCVWD's recharge ponds as a source of water for fire-fighting helicopters, when water is available, and ground crews use BCVWD fire hydrants in the fire area.

In terms of providing adequate fire flow, the UWMP is a water supply planning document to ensure adequate and reliable water supply to meet the existing and projected water demands. Although providing adequate flow and pressure for fighting fires, the DWR Guidebook does not require this to be addressed in the UWMP.

29. *In some cases, the sources and methodology for data is not presented.*

The UWMP relies on many of BCVWD's planning documents including past UWMPs, the 2013 Potable Water Master Plan and the Draft Non-potable Water Master Plan (in process), along with a series of White Papers issued by BCVWD to address regional imported water supply which were prepared in 2017-2018. In addition, BCVWD relies on a number of documents issued by DWR including the bi-annual State Water Project Delivery Capability Report. The 2020 UWMP is written to provide the reader with the basic background on how BCVWD came to the conclusions presented in the figures and tables, but does not always include the supporting calculations. The spreadsheets and calculations that support those findings are available in BCVWD's office.

### **Final paragraph response part 1 of 2:**

*Although BCVWD staff met with City Planning Department staff to discuss demographics and population projections, there has been no other coordination between the District and the City in preparation of this plan. As such, the time available to the City for a thorough review of such an important document containing over 400 pages was limited to nine business days and*



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

*was insufficient. In reference to Figure 3-1, the City believes the entire boundary of the City of Beaumont should be included in the BCVWD boundary as the District is the only water provider to the City. Due to the fact that the majority of new development will occur in the Districts sphere of influence, additional evaluation is required to determine that the conclusions contained in the report accurately reflect long term water demand requirements.*

BCVWD met the required public notification requirements in the Water Code for the UWMP public comment period. We do understand there is a vast amount of information in the UWMP to “digest”, but we laud the City in their ability to review the document and provide meaningful questions.

The City makes reference to Figure 3-1 which shows the BCVWD Sphere of Influence (SOI) and the current BCVWD service area. Although the City of Beaumont Boundary is not shown on the Figure, the City’s boundary extends beyond the south of BCVWD’s SOI. BCVWD agrees that it would be beneficial if the BCVWD boundary and the City of Beaumont’s boundary were “common.” However, there are some important factors that make this problematic. This has been discussed with Riverside County LAFCO in late 2020, and earlier in 2021. Riverside LAFCO would have to approve the SOI boundary change. That may be difficult considering other water supply agencies are involved .

The water retailer to the south of BCVWD’s SOI is Eastern Municipal Water District (EMWD) which is a member agency of the Metropolitan Water District of Southern California (Metropolitan), another State Water Contractor. BCVWD is within the boundaries of the SGPWA. Both Metropolitan and SGPWA collect taxes to pay for the State Water Project facilities through ad valorem taxes. If BCVWD were to extend south and serve the City area within EMWD, that would mean SGPWA imported water would be transferred across the Metropolitan/SGPWA boundary through BCVWD’s system. This requires concurrence from DWR and the State Water Contractors. Also, there would need to be a water transfer agreement between Metropolitan and SGPWA for the imported water supplied to the City.

If that area of the City were to request de-annexation from Metropolitan and annexation to SGPWA, there would be property tax issue since Metropolitan’s ad valorem taxes “run with the land” and the property owners would be paying taxes to Metropolitan and SGPWA. Annexation and subsequent de-annexation should not be considered.



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

BCVWD believes the best solution is that EMWD supply water to that area of the City which is outside of BCVWD's SOI. If EMWD is not able to supply the area or it becomes too expensive to supply that area of the City, Metropolitan, SGPWA, BCVWD and EMWD would enter into an agreement allowing BCVWD to supply the area, with the amount of imported water used in that area to be exchanged between Metropolitan and SGPWA. The agreement would have to identify the means and methods for calculating the imported water used in the area.

### **Final paragraph response part 2 of 2:**

*The City respectfully requests the District provide an additional thirty days of review time for the Draft 2020 UWMP prior to adoption and submission to the State. City staff is available to meet with District staff to discuss comments and gain clarity with respect to the questions provided. We look forward to working with the District on the Draft 2020 Urban Water Management Plan.*

The Board of Directors at the July 22, 2021 Board Meeting deferred action until the next Board Meeting. It is anticipated that the Draft 2020 UWMP will be presented at the August 26, 2021 Board Meeting.

Again, we appreciate the thoroughness of the City's review and we look forward to working with the City to finalize the 2020 UWMP and in the preparation of future UWMP's. Please call at (951) 845-9581, extension 217 if you have any questions or email me at [dan.jaggers@bcvwd.org](mailto:dan.jaggers@bcvwd.org).

Sincerely,

Dan Jaggers, PE

**Beaumont-Cherry Valley Water District**

General Manager

Attachment: City of Beaumont letter regarding comments on Draft 2020 Urban Water Management Plan dated July 22, 2021

CC: Beaumont Cherry Valley Board of Directors  
City of Beaumont City Council



July 22, 2021

Beaumont Cherry Valley Water District  
Dan Jagers, General Manager  
560 Magnolia Avenue  
Beaumont, CA 92223

Via: [dan.jagers@bcvwd.org](mailto:dan.jagers@bcvwd.org)  
[mark.swanson@bcvwd.org](mailto:mark.swanson@bcvwd.org)

Re: Comments on the Draft 2020 Urban Water Management Plan

Dear Mr. Jagers:

The City of Beaumont appreciates the opportunity to review the Draft 2020 Urban Water Management Plan. As Beaumont Cherry Valley Water District is the sole water provider to the City of Beaumont, the City has a vested interest in ensuring the current and future water needs of the City are met.

City staff has reviewed the Draft 2020 Urban Water Management Plan. Comments and questions are as follows:

1. Page 55 - Table 3-7 table references Hidden Canyon II however the II should be dropped as there is no project referred to as Hidden Canyon II.
2. Page 60 – states mixed use in the downtown needs to be evaluated in concert with the 2020 Census. The draft and final General Plan have been available since 2020. How will the evaluation impact the draft UWMP as build out is not expected until after 2045?
3. Page 63 – Statement that the largest well is out of service. What is the status of getting this well back on-line?
4. Page 64 – Temporary interconnections exist for Fairway Canyon and Tournament Hills. When will permanent connections be installed?
5. Page 73 – Table 4-2 Why is the water loss for January 2020 so high?
6. Page 81 – The draft 6<sup>th</sup> Cycle Housing Element is available on our website and the draft UWMP should utilize the updated information.
7. Page 88 – 4. Second paragraph is the date of 2010 correct?
8. Page 109 – Why is the district using a higher ratio of 2.0 over the historic maximum day/average ratio of 1.87?

9. Page 141 – Is infrastructure in place for a City connection to the district’s system regarding Tukwet Canyon Golf Course? Have there been any discussions with the City regarding the statements in the third paragraph?
10. Page 188 – Does staff or the Board appoint the members to the Water Conservation Advisory Committee? Who are typically members, i.e. City Manager, Public Works Director?
11. Page 380 – The letter prepared for the City of Beaumont is addressed to Amer Jakher who has not been an employee for several years, please update your records to reflect Jeff Hart as the Public Works Director/City Engineer.
12. Page 3-24 – The last two sentences reference impacts from development within the City of Beaumont. Are there impacts from development outside the City boundary?
13. Page 4-7 Table 4-4 – First line of the table 01/2020 – 9.77% loss based on 13,818 AF demand in 2020. This is greater than the 783 AF collected from storm water. Should there be a discussion about lowering the loss rate versus the cost to increase the recharge volume? How is this number obtained or estimated?
14. Page 6-41 - The second paragraph should include a discussion about what facilities are ready to receive the recycled water from the City or how long it will take Beaumont Cherry Valley Water District to construct the facilities.
15. Page ES-2 - “The District’s primary source of water is groundwater which is extracted from the Beaumont Basin which is adjudicated and managed by the Beaumont Basin Watermaster. BCVWD augments its groundwater supply with imported State Project Water”. This statement directly conflicts with the final paragraph on page ES-6.
16. Table ES-1 - Provides estimates of water supply from various sources. The recycled water estimates should be verified with expected Plant capacity.
17. Page ES-3 – Paragraph 1 under Water Demands states “All of the District’s water comes from ground water wells.” What about the imported water specified in Table ES-1?
18. Discrepancies exist between between SGPWA and BCVWD projected imported water needs illustrated in BCVWD Table ES-1 and SGPWA Table 3-16. What are the implications of this discrepancy?
19. Page ES-6 - Last paragraph conflicts with the statement on sheet ES-2 as noted in comment number 15.
20. Page 3-10 – first paragraph speaks to additional operating costs. Are these additional costs to the City or the District?
21. Page 3-12 - References the Beaumont Point project having completed a WSA but Table 3-1 does not show that area within the service area boundary.

22. Page 3-17 - The last paragraph, last sentence speaks to population. This information is inconsistent with what was provided on page 3-2 and in Table 3.9.
23. Page 4-11 - The suspension of "will serve" letters directly effect the City's ability to meet State mandates for housing projects.
24. Page 7-11 - State the District is counting on one source of recycled water which is the City of Beaumont. Table 7-6 provides projects which have not been substantiated by the City.
25. The plan does not appear to contemplate development in the sphere of influence.
26. There is significant commentary throughout regarding the District's reliance on the City for future recycled water, including detailed capacity estimates and permit requirements. The City looks forward to coordinating efforts with the District to facilitate the use of recycled water.
27. There is no discussion in the report regarding emergency power outages or PSPS implemented by Southern California Edison. The District should demonstrate their ability to maintain service in these situations, including emergency and standby power.
28. There is no discussion of Fire Hazard, or the District's ability to maintain fire flow in the event of a fire. This should be included due to the areas local fire danger.
29. In some cases, the sources and methodology for data is not presented.

Although BCVWD staff met with City Planning Department staff to discuss demographics and population projections, there has been no other coordination between the District and the City in preparation of this plan. As such, the time available to the City for a thorough review of such an important document containing over 400 pages was limited to nine business days and was insufficient. In reference to Figure 3-1, the City believes the entire boundary of the City of Beaumont should be included in the BCVWD boundary as the District is the only water provider to the City. Due to the fact that the majority of new development will occur in the Districts sphere of influence, additional evaluation is required to determine that the conclusions contained in the report accurately reflect long term water demand requirements.

The City respectfully requests the District provide an additional thirty days of review time for the Draft 2020 UWMP prior to adoption and submission to the State. City staff is available to meet with District staff to discuss comments and gain clarity with respect to the questions provided. We look forward to working with the District on the Draft 2020 Urban Water Management Plan.

Regards,



Todd Parton  
City Manager



Cc: Beaumont Cherry Valley Board of Directors  
City of Beaumont City Council



JOHN O. PINKNEY, ESQ.  
ADMITTED IN CALIFORNIA

REPLY TO:  
1800 E. Tahquitz Canyon Way  
Palm Springs, California 92262  
T (760) 322-2275 • F (760) 322-2107  
[pinkney@sbemp.com](mailto:pinkney@sbemp.com)

July 22, 2021

Beaumont-Cherry Valley Water District  
Board of Directors  
560 Magnolia Avenue Beaumont, CA 92223

**Subject: Request to continue July 22, 2021 hearing and adoption of Urban Water Management Plan to allow coordination with the City of Beaumont and compliance with requirements of the California Water Code**

HONORABLE MEMBERS OF THE BOARD OF DIRECTORS:

On behalf of the City of Beaumont (“City”), this is to request that the Board of Directors continue the hearing on the draft 2020 Urban Water Management Plan (“Plan”) scheduled for hearing and adoption at tonight’s meeting. A thirty day continuance is requested to allow the City and its consultants to review and comment on the draft Plan before it is adopted. The City was only given nine business days to review the draft Plan, which was not sufficient time for the City to review and comment on the Plan.

Moreover, there has been no coordination between the District and the City in the preparation of the Plan. Water Code Section 10633 mandates that “the preparation of the plan shall be coordinated with local ...wastewater...and planning agencies that operate within the supplier’s service area...” The City of Beaumont is a wastewater and planning agency within the District’s service area. As such, the Water Code requires the District to coordinate with the City in preparation of the plan. This has not occurred.

In addition, the City’s consultants have noted that there is a lack of documentation and references to sources of data and information and methodology on how calculations were made in the draft Plan. The Plan also contains discrepancies with San Geronio Pass Water Agency (“SGPWA”) projected water import needs as illustrated in the draft Plan’s table ES-1 and SGPWA Plan Table 3-16.

In light of the above, a thirty day continuance of the hearing on the draft Plan is hereby requested

Sincerely

JOHN PINKNEY, BEAUMONT CITY ATTORNEY

---

**SLOVAK BARON EMPEY MURPHY & PINKNEY LLP**

Palm Springs, CA  
T (760) 322-2275

Indian Wells, CA  
T (760) 322- 9240

Costa Mesa, CA  
T (714) 435-9592

San Diego, CA  
T (619) 501-4540

Princeton, NJ  
T (609) 955-3393

New York, NY  
T (212) 829-4399

[www.sbemp.com](http://www.sbemp.com)



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

August 10, 2021

John O. Pinkney, Esq.  
SBEMP, LLP. Beaumont City Attorney  
1800 E. Taquitz Canyon Way  
Palm Springs, CA 92262

Via: [pinkney@sbemp.com](mailto:pinkney@sbemp.com)

Subject: SBEMP Comments on the BCVWD DRAFT 2020 Urban Water Management Plan (UWMP)

Dear Mr. Pinkney, Esq:

The Beaumont Cherry Valley Water District (BCVWD) reviewed your letter, on behalf of the City of Beaumont (City), dated July 22, 2021, related to BCVWD's public hearing on the Draft Urban Water Management Plan (UWMP) and is providing responses to your comments herewithin. SBEMP's comments are repeated in italics with BCVWD's response in "regular" text.

1. *On behalf of the City of Beaumont ("City"), this is to request that the Board of Directors continue the hearing on the draft 2020 Urban Water Management Plan ("Plan") scheduled for hearing and adoption at tonight's meeting. A thirty day continuance is requested to allow the City and its consultants to review and comment on the draft Plan before it is adopted. The City was only given nine business days to review the draft Plan, which was not sufficient time for the City to review and comment on the Plan.*

At the public hearing the Board did grant a continuance to August 26, 2021 (35 days). BCVWD recognizes that the UWMP is a lengthy document, however, BCVWD did comply with the notification requirements in the Water Code, including the 60-day notice to the City stating that BCVWD was in the process of updating their UWMP on March 30, 2021. BCVWD does acknowledge that City staff listed on the notice was for an employee who is no longer employed with the City.

2. *Moreover, there has been no coordination between BCVWD and the City in the preparation of the Plan. Water Code Section 10633 mandates that "the preparation of the plan shall be coordinated with local ...wastewater ...and planning agencies that operate within the supplier's service area..." The City of Beaumont is a wastewater and planning agency within BCVWD's service*



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

*area. As such, the Water Code requires BCVWD to coordinate with the City in preparation of the plan. This has not occurred.*

As stated above, BCVWD did send a 60-day notice to the City, as required by the Water Code, stating that BCVWD has started the process of updating their UWMP on March 30, 2021. BCVWD did not receive any correspondence from the City offering any input.

BCVWD did receive a request from the City in April 2020 to prepare a water supply assessment of the City's 2020 General Plan Update (General Plan) which was still in the process of being developed. BCVWD responded that a water supply assessment was not appropriate (A water supply assessment is a specific document required in the Water Code for a new development exceeding specific size. The General Plan did not identify a specific project.) BCVWD offered to prepare a water supply evaluation of the impact of the land use changes in the General Plan, along with a scope of work/tasks for the City's approval. The City did not respond.

The City prepared a draft of their General Plan in late October 2020 and BCVWD offered extensive comments relating to population potential, development projects, and recycled water. One of the comments BCVWD made related to BCVWD's UWMP which, cited on page 176 of the General Plan, was as follows: *"BCVWD has initiated the process for the 2020 update to the UWMP and looks forward to working with City staff on quantifying the impacts of the General Plan 2020 update on water supplies."*

BCVWD's Senior Engineer, Mark Swanson, contacted the City after the adoption of the General Plan, to discuss the downtown village, mixed use areas, specifically to identify what the occupancy would be in a mixed use project. A virtual meeting was held on June 9, 2021, with City Planning Department staff and BCVWD Engineering staff to discuss the mixed use areas, status of various projects, and low-income housing requirements and needs. (The City's draft 6<sup>th</sup> Cycle Housing Element was not available until late July 2021 and is not yet approved.) After much discussion, City Planning indicated that BCVWD's development and population projections in the UWMP looked reasonable.

BCVWD had been working with City Management and Administration on the location for a recycled water booster pumping station either on the wastewater treatment plant site or adjacent to it as well as the integration of the repurposed secondary clarifiers as storage/equalization tanks. The City indicated a site to



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

the west side of the treatment plant could be used for the proposed booster station site to be constructed by BCVWD. Currently, BCVWD also identifies progress related to the non-potable water system integration has suffered a slow down in forward movement due to concerns by the City regarding recycled water reuse potential legal exposure and securing of updated National Pollutant Discharge Permit from the Regional Water Quality Control Board (RWQCB), as well as issues related to recent emergencies such as COVID-19 and Apple Fire and El Dorado Fire emergencies within BCVWD's sphere of influence. At this time, BCVWD has prepared a draft Agreement for the Purchase and Distribution of Recycled Water for use of recycled water in BCVWD's service area. It is anticipated that a version of this agreement would be executed prior to significant expenditures by BCVWD related to implementation of recycled water reuse including, but not limited to items such as preparation of the final booster station drawings which include permission to conduct geotechnical investigations, utility research, and site surveys. Upon execution of said agreement, BCVWD would begin to implement use of recycled water including items such as recordation of all recycled water permitting, finalization of all recycled water activities, verification, testing, and regulatory approval of all non-potable water system existing connection sites for acceptance of recycled water. A schedule of these implementation activities and time lines have been historically provided to City staff as a coordination effort as early as the Fall of 2018.

In summary, the statement that no coordination has taken place is inaccurate.

- 3. In addition, the City's consultants have noted that there is a lack of documentation and references to sources of data and information and methodology on how calculations were made in the draft Plan.*

The UWMP relies on many of BCVWD's planning documents including past UWMPs, the 2013 Potable Water Master Plan and the Draft Non-Potable Water Master Plan (in process), along with a series of White Papers issued by BCVWD to address regional imported water supply which were prepared in 2017-2018. These White Papers were discussed at Board Meetings, in public. In addition, BCVWD relies on a number of documents issued by the Department of Water Resources (DWR) including the bi-annual State Water Project Delivery Capability Report and others. The 2020 UWMP is written to provide the reader with the basic background on how BCVWD came to the conclusions presented in the figures and tables, but does not always include



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

the supporting calculations. The spreadsheets and calculations that support those findings are available in BCVWD's office.

4. *The Plan also contains discrepancies with San Geronio Pass Water Agency ("SGPWA") projected water import needs as illustrated in the draft Plan's table ES-1 and SGPWA Plan Table 3-16.*

Table 3-16 in the SGPWA 2020 UWMP is not imported water needs. The value for BCVWD in SGPWA Table 3-16 is BCVWD's total potable and non-potable water demand which was provided to the SGPWA in approximately April 2020, not the "imported water demands." And it does not include the projected "banking" water that BCVWD is anticipating purchasing each year for "drought proofing." There have been some minor adjustments to BCVWD's potable water demand as BCVWD began producing their own UWMP. Table ES-1 in BCVWD's 2020 UWMP is BCVWD's estimated water supplies, which are shown to exceed demands, particularly in 2045, when Sites Reservoir is operational. The "discrepancies" are not discrepancies; the referenced tables present different information.

Thank you for your comments and we look forward to working with you and the City to finalize the 2020 UWMP and in the preparation of future UWMP's. Please contact me at (951) 845-9581, extension 217 or [dan.jaggers@bcvwd.org](mailto:dan.jaggers@bcvwd.org), if you have any questions..

Sincerely,

Dan Jaggers, PE

**Beaumont-Cherry Valley Water District**

General Manager



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

August 19, 2021

Todd Parton, City Manager  
City of Beaumont  
550 East Sixth Street  
Beaumont, CA 92223

Via: [tparton@beaumontca.gov](mailto:tparton@beaumontca.gov)  
[ctaylor@beaumontca.gov](mailto:ctaylor@beaumontca.gov)

Subject: City of Beaumont – Virtual Meeting on August 18, 2021 to Discuss  
BCVWD Responses to City Comments on the BCVWD DRAFT 2020  
Urban Water Management Plan (UWMP)

Dear Mr. Parton:

The Beaumont Cherry Valley Water District (BCVWD) appreciated the opportunity to meet with the City on August 18, 2021, to discuss our responses to the City's comments and provide additional explanations and clarifications. This letter summarizes the meeting discussion.

The City and BCVWD discussed BCVWD's August 10, 2021 response to City Attorney Pinkney's letter to BCVWD dated July 22, 2021. BCVWD acknowledged that the coordination between the City and BCVWD could have been better and the City and BCVWD agreed that there will be more coordination on projects of mutual interest in the future. BCVWD agreed that, although not required by the Department of Water Resources, but where appropriate, references to sources of information presented in tables would be provided as either footnotes or text. In addition, BCVWD invited the City Staff to meet and discuss the methodologies and view the spreadsheet projections and calculations used in the preparation of the UWMP. The City concluded that these clarifications satisfactorily addressed the issues raised by Attorney Pinkney.

There were 29 comments made by the City in a separate letter from Todd Parton (City Manager) dated July 22, 2021, with corresponding BCVWD responses dated August 12, 2021. Each comment and response was discussed individually during the August 18, 2021 meeting. The City agreed that BCVWD had adequately addressed comments 1, 3, 4, through 5, 7 through 11, 15, 17, 19 through 24 and 26 through 28.



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

Comments 2, 5 (and 13, similar), 6, 12, 14, 16, 18, 2,5 and 29 required additional clarification. The City's comments are repeated in italics with meeting discussion in "regular" text.

- 2. Page 60 — states mixed use in the downtown needs to be evaluated in concert with the 2020 Census. The draft and final General Plan have been available since 2020. How will the evaluation impact the draft UWMP as build out is not expected until after 2045?*

BCVWD's response to the comment was satisfactory but, in the discussion, the City mentioned they had some State mandates on affordable housing. BCVWD acknowledged this. BCVWD's is required to include water supply requirements for low-income housing and made projections for low-income housing in the UWMP.

- 5. Page 73 — Table 4-2 Why is the water loss for January 2020 so high? And similarly comment 13, Page 4-7 Table 4-4 -- First line of the table 01/2020 — 9.77% loss based on 13,818 AF demand in 2020. This is greater than the 783 AF collected from storm water. Should there be a discussion about lowering the loss rate versus the cost to increase the recharge volume? How is this number obtained or estimated?*

There was discussion about the BCVWD's water loss; BCVWD stated that it must submit a report on estimated water loss to the Department of Water Resources annually using a methodology and software mandated by the State. BCVWD explained there are two types of water loss: apparent loss and real losses. Apparent losses are not true losses; it is the difference between the well production meters and the total amount of water billed (residential and commercial meters). As meters age, they under-register. BCVWD has a program to replace aged meters and registers, or registers only with AMR/AMI type (smart meters) which could ultimately set up to identify service line or customer leaks. This program should reduce the apparent losses. BCVWD recognized that there are areas of the City that have aging pipes and they are being replaced on a priority basis, with the most problematic getting the highest priority for replacement. These aging pipes are identified in BCVWD's Capital Improvement Program (CIP) which is published annually. BCVWD did mention that this program has to be coordinated with the City's street repaving schedule. Leaks in the BCVWD pipelines are repaired as quickly as possible once detected.





# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

BCVWD did explain that the audit relies on estimates of pipe leakage, fire hydrant losses, etc. and is only as precise as the estimating methodology.

With respect to Comment 13, there was a discussion of the source of funding for meter replacement and leak repairs vs. new water sources such as stormwater. As stated above, BCVWD has programs in place to replace meters and aging pipelines.

6. *Page 81 — The draft 6 Cycle Housing Element is available on our website and the draft UWMP should utilize the updated information.*

The City acknowledged that 6 Cycle Housing Element is out for public review and comment until September 9, 2021 and will probably be on the City Council Agenda in the November/December 2021 time frame. Before it goes to City Council, it must go through the Planning Commission.

12. *Page 3-24 — The last two sentences reference impacts from development within the City of Beaumont. Are there impacts from development outside the City boundary?*

There was some discussion about the City being identified as the source of increased water demand in BCVWD's service area. BCVWD proposed to reword the last sentence as follows:

*"The increase in water demand is associated with development in areas of high density and high growth."*

14. *Page 6-41 - The second paragraph should include a discussion about what facilities are ready to receive the recycled water from the City or how long it will take Beaumont Cherry Valley Water District to construct the facilities.*

There was discussion on when recycled water would be available. BCVWD's water supply tables indicated that recycled water would be available in 2025. The City believed there should be a brief discussion that it would be available before then. BCVWD agreed, but was unsure of the exact timing. The City is awaiting a new NPDES/Waste Discharge Permit from the Regional Water Quality Control Board for the upgraded treatment plant. This will probably occur in November/December 2021. The City indicated that once a new permit is in place, an agreement for recycled water can be developed with BCVWD. City staff indicated that recycled water would be available in approximately 18 months.

BCVWD reiterated that City staff identified a site on City-owned land on the west side of the Wastewater Treatment Plant and BCVWD staff have made



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

some preliminary layouts of the pumping station on that location. But BCVWD's Board of Directors have not authorized any further work until 1) an agreement between the City and BCVWD for the transfer and distribution of recycled water is in-place; 2) an agreement for long term use/lease of the City-designated property is in-place; 3) approval is granted by the City to conduct geotechnical engineering and topographic survey work on the designated site. BCVWD stated a temporary pumping system can be installed while completion of design and construction of a permanent pumping takes place.

In terms of the UWMP, BCVWD agreed to insert the following wording at an appropriate place (bottom of page 6-50). *"Although Table 6-18 indicates recycled water use in the BCVWD service area in 2025, much of the infrastructure is in-place and the upgraded wastewater treatment facility is nearing completion. The City and BCVWD are working to develop agreements and complete construction of pumping and other facilities needed for recycled water use prior to 2025, perhaps as soon as mid- to late-2022."*

16. *Table ES-1 - Provides estimates of water supply from various sources. The recycled water estimates should be verified with expected Plant capacity.*

There was discussion on how BCVWD arrived at the amount of recycled water available during a "normal" water supply year and during single and multi-year drought period. The methodology and assumptions are in Tables 6-15, text on the bottom of page 6-45, section, 7.4.3, and Table 7-6. Data on the new treatment plant was obtained from sheet G-10 of the Bid Set. BCVWD made projections of the amount of recycled water available in the UWMP. The City stated the available recycled water estimates "appear reasonable" but the methodology was inconsistent with the City's calculations regarding the supply.

The City is to provide BCVWD with their methodology in sufficient time to be incorporated into the UWMP for adoption.

18. *Discrepancies exist between SGPWA and BCVWD projected imported water needs illustrated in BCVWD Table ES-1 and SGPWA Table 3-16. What are the implications of this discrepancy?*

The City stated that they had been in contact with the General Manager at San Geronio Pass Water Agency and the General Manager indicated that the Pass Agency had taken a very conservative approach and BCVWD's imported water supply projections were reasonable.



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

25. *The plan does not appear to contemplate development in the sphere of influence.*

There was discussion on how BCVWD developed EDU and population projections. BCVWD stated they used the City's major project status reports as well as developer inquiries and requests. BCVWD's estimate of the build-out population is land-use based within BCVWD's Sphere of Influence (SOI).

There was discussion of the fact that BCVWD's southern SOI boundary does not align with the the City's. BCVWD indicated that its SOI now aligns with Eastern Municipal Water District and Metropolitan Water District of Southern California. Should the City develop south of BCVWD's SOI, appropriate water exchange agreements would need to be developed to allow BCVWD to serve that area, if that were the preferred water supply alternative.

The City also mentioned that there were some projects/project areas that were not on BCVWD's list of future projects – namely the area between CA 60, Oak Valley Parkway, east of Potrero Blvd – formerly called Mountain Bridge. Table 3-7 lists the project as "Beaumont Village (mixed use)", with an estimated 2,350 EDUs, and is included in future EDUs.

29. *In some cases, the sources and methodology for data is not presented.*

BCVWD agreed that, although, not required by the Department of Water Resources, but where appropriate, references to sources of information presented in tables would be provided either as footnotes or discussion in the text. In addition, BCVWD invited the City Staff to meet and discuss the methodologies and view the spreadsheet projections and calculations used in the preparation of the UWMP.

Again, we appreciated to meet and discuss the 2020 UWMP prior to adoption and we look forward to working with the City in the preparation of future UWMP's as well as other projects of mutual interest. Please call at (951) 845-9581, extension 217 if you have any questions or email me at [dan.jaggers@bcvwd.org](mailto:dan.jaggers@bcvwd.org).

Sincerely,

Dan Jaggers, PE

**Beaumont-Cherry Valley Water District**

General Manager



## CITY OF BEAUMONT

550 E. 6th Street, Beaumont, CA 92223  
Phone (951) 769-8520 Fax (951) 769-8526  
**BeaumontCa.gov**

August 25, 2021

Beaumont Cherry Valley Water District  
Dan Jagers, General Manager  
560 Magnolia Avenue  
Beaumont, CA 92223

Via: [dan.jagers@bcvwd.org](mailto:dan.jagers@bcvwd.org)  
[mark.swanson@bcvwd.org](mailto:mark.swanson@bcvwd.org)

Re: 2020 Urban Water Management Plan

Dear Mr. Jagers:

The City of Beaumont (City) sincerely thanks the Beaumont Cherry Valley Water District (District) for providing additional time to more fully review the Draft 2020 Urban Water Management Plan (UWMP) and meet with District staff to discuss the City's comments. The City understands the District's need to proceed with adoption of the plan at the Board meeting scheduled for August 26, 2021, and appreciates the District's willingness to amend the plan in the future should the need arise. With that understanding, the City does not object to the approval of the UWMP and offers the remaining comments and clarifications from the joint meeting of August 18, 2021. Additionally, the City respectfully requests that this letter become part of the official comments to be submitted with the approved UWMP.

**Water Reliability During PSPS Events** – The District's letter states the City is satisfied with the District's response. The City still maintains that it is in the public interest to provide a statement in the UWMP of the measures taken and the District's ability to provide water during these events.

**Growth Projects and Water Availability** – During a meeting between District and City staffs, District growth projections and water availability were discussed in detail. While the City believes it would be advisable for all property located within the overlapping annexed areas and spheres of influence of the District and the City and that the boundaries of both entities be reflected in the UWMP as planned for regardless of project status, the District clarified that all land is accounted for and planned for based on the land use categories/assumptions outlined in the City of Beaumont General Plan which was adopted December 2020. The UWMP, much like the City's Wastewater Management Plan (WWMP), forecasts water needs for future development of land without a specific project pursuant to an equivalent development unit (EDU) calculation that is based on the designated land use(s) and related policy(ies) specified by the City's General Plan.

**Brine Line Flow** (Pg. 6-45) – The maximum flow deduction to the brine line should be listed as a maximum 450,000 gallons per day as opposed to the percentage format. Additionally, approximately 200,000 gallons of recycled water is utilized daily in the City's non-potable system.

**TIN Limit** (Pg. 6-44) – While the NPDES permit does not list a TIN limit in the recycled water parameter list, it does state that a recycled water TIN limit is based on Maximum Benefit per management zone. Furthermore, the permit states that Maximin Benefit levels are used to calculate limits for recycled water use. The TIN limit in the recycled water table should state 6.7 mg/L, except for irrigation use which has no limit.

**WWTP Expansion Project** (Pg. 6-43) – Phase 1 of the City's wastewater treatment plant construction has been completed, increasing the rated capacity from 4 MGD to 6 MGD. Process upgrades include redundant coarse screens, a grit removal system, a flow equalization basin, a fine screen system, an activated sludge process coupled with a new MBR system followed by partial RO, and a new UV disinfection system. Please note that the references to sludge pump and secondary clarifiers are in error. The City submitted a Title 22 recycled water engineering report to the Santa Ana Regional Water Board in September 2019 and is awaiting formal comment. In light of these advances, the City questions whether the 2007 letter remains relevant.

**Lift Stations** (Pg. 6-42) – Please note that the City's wastewater conveyance system currently includes 11 operating lift stations.

Again, the additional time provided by the District to review the Draft UWMP is greatly appreciated. Through the review process and discussions with District staff, areas for further alignment and coordination to achieve mutual success were highlighted. The City looks forward to coordinating with the District in the future to provide the greatest degree of sustainability and cost effectiveness for the community.

Sincerely,



Todd Parton  
City Manager

Cc: Beaumont City Council



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

August 26, 2021

Todd Parton, City Manager  
City of Beaumont  
550 East Sixth Street  
Beaumont, CA 92223

Via: [tparton@beaumontca.gov](mailto:tparton@beaumontca.gov)  
[ctaylor@beaumontca.gov](mailto:ctaylor@beaumontca.gov)

Subject: City of Beaumont – Additional Comments on the BCVWD DRAFT  
2020 Urban Water Management Plan (UWMP)  
Letter: Todd Parton to BCVWD Dan Jagers, August 25, 2012

Dear Mr. Parton:

Thank you for the letter stating that the City does not object to approval of the 2020 UWMP based on our previous discussions and suggested revisions. The City offered comments and clarifications to the BCVWD letter dated August 19, 2021 related to the virtual meeting between the City and BCVWD, which we appreciate.

BCVWD reviewed the City's clarifications (shown in italics) with our resolution as to how we intend to incorporate into the final 2020 UWMP that will be submitted to the Department of Water Resources (in "regular" text). The City's previous letters and BCVWD's responses, as well as these clarifications will be included in the "Public Comment" Appendix to the 2020 UWMP when it is submitted to the Department of Water Resources. You will be notified when the final version is available for use.

1. **Water Reliability During PSPS Events** – *The District's letter states the City is satisfied with the District's response. The City still maintains that it is in the public interest to provide a statement in the UWMP of the measures taken and the District's ability to provide water during these events.*

BCVWD agrees and will reword and expand the third full paragraph on page 6-13 as follows:

"In 2019 and 2020, SCE has implemented Public Safety Power Shutoffs (PSPS) due to increased wildfires in the area. When notified of any local PSPS, BCVWD immediately actuates wells to ensure storage tanks are full so as to minimize the time wells could be on standby power. BCVWD has



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

four (4) wells in Edgar Canyon and eight (8) wells in the Beaumont Basin that have standby generators, auxiliary engine drives, or connections for portable generators, which, in total, can provide over 22 mgd of water supply<sup>1</sup>. During the PSPS event(s), BCVWD operates its wells using the standby generators, as needed, to ensure adequate water in storage and to meet demands. Standby generator capacity may be added to new wells as they are constructed to ensure adequate supply to accommodate increased demands.”

2. ***Growth Projects and Water Availability*** - *During a meeting between District and City staffs, District growth projections and water availability were discussed in detail. While the City believes it would be advisable for all property located within the overlapping annexed areas and spheres of influence of the District and the City and that the boundaries of both entities be reflected in the UWMP as planned for regardless of project status, the District clarified that all land is accounted for and planned for based on the land use categories/assumptions outlined in the City of Beaumont General Plan which was adopted December 2020. The UWMP, much like the City's Wastewater Management Plan (WWMP), forecasts water needs for future development of land without a specific project pursuant to an equivalent development unit (EDU) calculation that is based on the designated land use(s) and related policy(ies) specified by the City's General Plan.*

BCVWD agrees that the land use in the City's 2020 General Plan was used as a basis for EDU calculation and subsequent water supply requirements. BCVWD pointed out that the City's southerly boundary and Sphere of Influence do not coincide with BCVWD's Sphere of Influence. BCVWD's southerly Sphere of Influence boundary was set by Riverside County Local Agency Formation Commission (LAFCO) in late 2020 or early 2021 to coincide with Eastern Municipal Water District's. It would be difficult to change the Sphere of Influence and consequently service area boundaries, since there are two State Water Contractors (San Geronio Pass Water Agency and Metropolitan Water District of Southern California) involved. However, water exchange agreements could be developed in the future to provide service.

BCVWD believes no further action is needed at this time.

---

<sup>1</sup> BCVWD 2015 Potable Water Master Plan, pg 2-10.



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

3. **Brine Line Flow** (Pg. 6-45) - *The maximum flow deduction to the brine line should be listed as a maximum 450,000 gallons per day as opposed to the percentage format. Additionally, approximately 200,000 gallons of recycled water is utilized daily in the City's non-potable system*

The second last paragraph on page 6-45 will be re-worded as follows:

"Table 6-15 shows the estimated recycled water produced... The estimated amount which can be recycled is reduced by 1) the amount of recycled water used on-site (200,000 gal/day) and 2) the reject water from the reverse osmosis process facility to meet the TDS limit of 330 mg/L, maximum of 450,000 gal/day".

The last paragraph on page 6-45 will be deleted.

In Table 6-15 on page 6-45, the "(10% loss)" will be deleted from the "Estimated amount which can be recycled, mgd."

4. **TIN Limit** (Pg. 6-44) - *While the NPDES permit does not list a TIN limit in the recycled water parameter list, it does state that a recycled water TIN limit is based on Maximum Benefit per management zone. Furthermore, the permit states that Maximin Benefit levels are used to calculate limits for recycled water use. The TIN limit in the recycled water table should state 6.7 mg/L, except for irrigation use which has no limit.*

Table 6-14 will be modified as follows:

**"Table 6-14 – City of Beaumont Wastewater Discharge Requirement for TDS and TIN"**

Parameter	DP-001 Cooper's Creek		DP-007 Unnamed Creek	Recycled Water
	Discharge up to 1.8 mgd	Discharge over 1.8 mgd	All Discharges	All Discharges
TDS	400 mg/L	300 mg/L	230 mg/L	330 mg/L
TIN	6 mg/L	3.6 mg/L	2 mg/L	See Note 1

(1) The TIN limit in recycled water used for non-irrigation purposes, which could affect groundwater quality, is 6.7 mg/L; irrigation use has no limit since it is assume the irrigated plants will utilize the nitrogen per the current permit R8-2015-0026, NPDES CA 0105376."





# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

5. **WWTP Expansion Project** (Pg. 6-43) - Phase 1 of the City's wastewater treatment plant construction has been completed, increasing the rated capacity from 4 MGD to 6 MGD. Process upgrades include redundant coarse screens, a grit removal system, a flow equalization basin, a fine screen system, an activated sludge process coupled with a new MBR system followed by partial RO, and a new UV disinfection system. Please note that the references to sludge pump and secondary clarifiers are in error. The City submitted a Title 22 recycled water engineering report to the Santa Ana Regional Water Board in September 2019 and is awaiting formal comment. In light of these advances, the City questions whether the 2007 letter remains relevant.

The second full paragraph on page 6-43, "The existing treatment facility provides secondary treatment..." will be deleted as it is no longer applicable.

The third full paragraph on page 6-43, "In a 2007 letter from CDPH..." will be deleted as it is no longer relevant.

The picture of the wastewater treatment plant will be replaced with an up-to-date photo.

The fourth full paragraph "The City has been upgrading and expanding..." will be reworded as follows:

"Phase 1 of the City's wastewater treatment plant construction has been completed, increasing the rated capacity from 4 MGD to 6 MGD. Process upgrades include redundant coarse screens, a grit removal system, a flow equalization basin, a fine screen system, an activated sludge process coupled with a new MBR system followed by partial RO, and a new UV disinfection system. The City submitted a Title 22 Recycled Water Engineering Report to the Santa Ana Regional Water Board in September 2019 and is awaiting formal comment.

6. **Lift Stations** (Pg. 6-42) - Please note that the City's wastewater conveyance system currently includes 11 operating lift stations

The last paragraph on pg 6-42 will be reworded as follows:

"The City of Beaumont provides wastewater collection, treatment and disposal for wastewater generated within the City plus the Highland Springs area of Cherry Valley. Wastewater generally flows by gravity to the City's wastewater treatment plant; however there are 11 operating lift stations in the system."



# Beaumont-Cherry Valley Water District

Phone: (951) 845-9581 Fax: (951) 845-0159

<http://www.bcvwd.org>

## Board of Directors

David Hoffman

Division 5

John Covington

Division 4

Daniel Slawson

Division 3

Lona Williams

Division 2

Andy Ramirez

Division 1

Again, we appreciate the thoroughness of the City's comments and clarifications, and we look forward to working with the City in the preparation of future UWMP's as well as other projects to provide sustainable and cost effective operations and facilities for our community.

Please call at (951) 845-9581, extension 217 if you have any questions or email me at [dan.jaggers@bcvwd.org](mailto:dan.jaggers@bcvwd.org).

Sincerely,

Dan Jaggers, PE

**Beaumont-Cherry Valley Water District**

General Manager