



BEAUMONT-CHERRY VALLEY WATER DISTRICT
560 Magnolia Avenue, Beaumont, CA 92223

**NOTICE AND AGENDA
SPECIAL MEETING OF THE BOARD OF DIRECTORS
ENGINEERING WORKSHOP**

*This meeting is hereby noticed pursuant to
California Government Code Section 54950 et. seq.*

Tuesday, February 24, 2026 - 6:00 p.m.
560 Magnolia Avenue, Beaumont, CA 92223

TELECONFERENCE NOTICE

*The BCVWD Board of Directors will attend in person at the BCVWD
Administrative Office and/or via Zoom video teleconference pursuant to
Government Code 54953 et. seq.*

To access the Zoom conference, use the link below:

<https://us02web.zoom.us/j/84318559070?pwd=SXlzMFMZCMGh0YTFIL2tnUGlpU3h0UT09>

*To telephone in, please dial: **(669) 900-9128***

*Enter Meeting ID: **843 1855 9070** / Enter Passcode: **113552***

*For Public Comment, use the “**Raise Hand**” feature on the video call
when prompted. If dialing in, dial ***9** to “**Raise Hand**” when prompted*

*BCVWD provides remote attendance options primarily as a matter of
convenience to the public. Unless a Board member is attending remotely
pursuant to provisions of GC 54953 et. seq., BCVWD will not stop or
suspend its in-person public meeting should a technological interruption
occur with respect to the Zoom teleconference or call-in line listed on the
agenda. Members of the public are encouraged to attend BCVWD meetings
in person at the above address, or remotely using the options listed.
Members of the public are not required to provide identifying information in
order to attend public meetings. Through the link above, the Zoom platform
requests entry of a name and email address, and BCVWD is unable to
modify this requirement.*

Meeting materials are available on the BCVWD website:

<https://bcvwd.gov/document-category/regular-board-agendas/>

BCVWD ENGINEERING WORKSHOP – FEBRUARY 24, 2026

Call to Order: President Williams

Pledge of Allegiance: Director Ramirez

Invocation: President Williams

Request or Announcement, and Verification of Remote Meeting Participation Pursuant To GC 54953.8

Roll Call and Introduction of Staff Members Present

Public Comment

Roll Call - Board of Directors

	President Lona Williams
	Vice President Andy Ramirez
	Secretary David Hoffman
	Treasurer John Covington
	Member Daniel Slawson

PUBLIC COMMENT: RAISE HAND OR PRESS *9 to request to speak when prompted. If you are present in the Board Room, please fill out a Request to Speak card and deliver it to the Recording Secretary.

At this time, any person may address the Board of Directors on matters within its jurisdiction. However, state law prohibits the Board from discussing or taking action on any item not listed on the agenda. Any non-agenda matters that require action will be referred to Staff for a report and possible action at a subsequent meeting.

Please limit your comments to three minutes. Sharing or passing time to another speaker is not permitted.

ACTION ITEMS

Action may be taken on any item on the agenda.

Information on the following items is included in the full Agenda Packet.

- 1. Adjustments to the Agenda:** In accordance with Government Code Section 54954.2, additions to the agenda require a 2/3 vote of the legislative body, or if less than 2/3 of the members are present, a unanimous vote of those members present, which makes the determination that there is a need to take action, and the need to take action arose after the posting of the agenda.
 - a. Item(s) to be removed or continued from the Agenda
 - b. Emergency Item(s) to be added to the Agenda
 - c. Changes to the order of the agenda
- 2. California Environmental Quality Act Notice of Exemption for Installation of 54 Linear Feet of 16-inch Ductile Iron Pipe for the Brookside Avenue Heli-Hydrant Water System Connection Project (APN 404-010-016)** (pages 5 - 10)
- 3. Parcel Measurement Project Update – Eagle Aerial Solutions** (pages 11 - 14)
- 4. Consider Correspondence re: Making Conservation a California Way of Life Regulations - Legislative Advocacy and Statutory Clarification Request** (pages 15 - 36)

5. Nominations for California Special Districts Association Board of Directors, Southern Network Seat C (pages 37 - 43)

6. Topic List for Future Meetings

A Board Member may request that a matter directly related to District business be placed on the agenda of a regularly scheduled meeting of the Board of Directors (Policy 4030.5)

	Item requested	Date of request	Requester
1	Update on Grand Avenue pipeline project	1/22/26	Covington

7. Announcements

Check the meeting agenda for location and potential teleconference information.

- ~~Engineering Workshop: Thursday, Feb. 26 at 6:00 p.m. CANCELED~~
- Finance & Audit Committee meeting: Thursday, Mar. 5 at 3 p.m.
- Regular Board Meeting: Wednesday, Mar. 11 at 6:00 p.m.
- Personnel Committee: Tuesday, Mar. 17 at 5:30 p.m.
- San Gorgonio Pass Regional Water Alliance: Wednesday, Mar. 25 at 5 p.m.
- Engineering Workshop: Thursday, Mar. 26 at 6:00 p.m.
- Beaumont Basin Watermaster Committee: Wednesday, Apr. 1 at 11 a.m.
- Collaborative Agencies Committee: Wednesday, Apr. 1 at 5 p.m.

8. Closed Session

- a) CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION
To which the District is a party pursuant to Government Code Section 54956.9(d)(1):
Draper 26, LLC vs Beaumont-Cherry Valley Water District
Riverside County Superior Court, Case no. CVR12406726
- b) CONFERENCE WITH REAL PROPERTY NEGOTIATORS
Pursuant to California Government Code Section 54956.8
Property: APN 407-170-008 and 407-170-029
Agency Negotiator: Dan Jaggars, General Manager
Under Negotiation: Price and terms of payment
- c) CONFERENCE WITH REAL PROPERTY NEGOTIATORS
Pursuant to California Government Code Section 54956.8
Property: APN 407-150-016
Agency Negotiator: Dan Jaggars, General Manager
Under Negotiation: Price and terms of payment

9. Report on Action Taken During Closed Session

10. Adjournment

NOTICES

AVAILABILITY OF AGENDA MATERIALS - Agenda exhibits and other writings that are disclosable public records distributed to all or a majority of the members of the Beaumont-Cherry Valley Water District Board of Directors in connection with a matter subject to discussion or consideration at an open meeting of the Board of Directors are available for public inspection in the District's office, at 560 Magnolia Avenue, Beaumont, California ("District Office") during business hours, Monday through Thursday from 7:30 a.m. to 5 p.m. If such writings are distributed to members of the Board less than 72 hours prior to the meeting, they will be available from the District Office at the same time or within 24 hours' time as they are distributed to Board Members, except that if such writings are distributed one hour prior to, or during the meeting, they can be made available in the Board Room at the District Office. Materials may also be available on the District's website: <https://bcvwd.gov/>. (GC 54957.5)

REVISIONS TO THE AGENDA - In accordance with §54954.2(a) of the Government Code (Brown Act), revisions to this regular meeting Agenda may be made up to 72 hours before the Board Meeting, if necessary, after mailings are completed. Interested persons wishing to receive a copy of the set Agenda may pick one up at the District's Main Office, located at 560 Magnolia Avenue, Beaumont, California, up to 72 hours prior to the Board Special Meeting.

REQUIREMENTS RE: DISABLED ACCESS - In accordance with Government Code §54954.2(a), and the Americans with Disabilities Act (ADA), requests for a disability related modification or accommodation, including auxiliary aids or services, in order to attend or participate in a meeting, should be made to the District Office. Notification of at least 48 hours in advance of the meeting will generally enable staff to make reasonable arrangements to ensure accessibility. The Office may be contacted by telephone at (951) 845-9581, email at info@bcvwd.gov or in writing at the Beaumont-Cherry Valley Water District, 560 Magnolia Avenue, Beaumont, California 92223.

CERTIFICATION OF POSTING: A copy of the foregoing notice was posted near the regular meeting place of the Board of Directors of Beaumont-Cherry Valley Water District and to its website at least 72 hours in advance of the meeting (Government Code §54954.2(a)).



**Beaumont-Cherry Valley Water District
Special Board Meeting
February 24, 2026**

Item 2

STAFF REPORT

TO: Board of Directors

FROM: Dan Jagers, General Manager

SUBJECT: California Environmental Quality Act Notice of Exemption for Installation of 54 Linear Feet of 16-inch Ductile Iron Pipe for the Brookside Avenue Heli-Hydrant Water System Connection Project (APN 404-010-016)

Staff Recommendation

Accept the findings of Staff that the installation of approximately 54 linear feet (LF) of 16-inch ductile iron pipe extending from the proposed heli-hydrant connection toward a future well site on APN 404-010-016 is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines Section 15303 (New Construction or Conversion of Small Structures), and direct staff to file a Notice of Exemption with the Riverside County Clerk-Recorder.

Executive Summary

On February 11, 2026, the Board of Directors authorized the expenditure of funds for a joint water system connection with the San Geronio Pass Water Agency (SGPWA) to serve a proposed SGPWA heli-hydrant station and future BCVWD well site located on APN 404-010-016.

The SGPWA has addressed CEQA for the connection within Brookside Avenue and for the construction and operation of the proposed heli-hydrant station (SCH No. 2026020284).

The District's current proposed Notice of Exemption applies specifically to the installation of approximately 54 LF of additional 16-inch ductile iron pipe extending from the proposed access road toward a future District well location on APN 404-010-016. District staff has evaluated this limited scope of work and determined that it qualifies for a categorical exemption under State CEQA Guidelines Section 15303 (New Construction or Conversion of Small Structures), including utility extensions of reasonable length. Staff is requesting Board authorization to file a Notice of Exemption for this portion of the Project.

Background

The SGPWA has initiated construction of heli-hydrant stations throughout the Pass Area to improve aerial wildfire response capabilities. One such facility is proposed on APN 404-010-016, located on the south side of Brookside Avenue west of Beaumont Avenue. This parcel is owned by the SGPWA. To serve the heli-hydrant station, SGPWA requested a connection to the District's existing 16-inch water main within Brookside Avenue. As part of the coordinated effort, the project also proposes installation of additional pipeline infrastructure that would allow for a future District well connection on the same parcel.

SGPWA has addressed CEQA compliance for:

- The connection to the District's existing water main within Brookside Avenue and
- The construction and operation of the heli-hydrant station facility.



The District's CEQA determination is limited to the additional approximately 54 LF of 16-inch ductile iron pipe extending from the proposed access road toward the future District well site. All improvements will occur on previously disturbed land and within areas planned for utility infrastructure development.

Discussion

District staff has reviewed the installation of approximately 54 LF of 16-inch ductile iron pipeline in accordance with CEQA and State CEQA Guidelines.

The proposed work consists of a short utility extension connecting to a planned infrastructure on APN 404-010-016. The installation will occur on previously disturbed property and will not expand the District's service area, increase treatment capacity, or result in new water supply development beyond what is already contemplated in the District's planning documents.

The District will address CEQA separately for the construction of the future well site. Staff has determined that this limited scope of work qualifies for the following categorical exemption:

- **CEQA Guidelines Section 15303 – New Construction or Conversion of Small Structures (Class 3):** This exemption includes construction and location of limited numbers of new, small facilities and utility extensions of reasonable length to serve such construction. The installation of approximately 54 LF of 16-inch ductile iron pipe and associated appurtenances qualifies as a utility extension of reasonable length serving a small public utility.

The work will occur within previously disturbed areas and will not impact sensitive habitats, historic resources, scenic resources, or other environmental resources. There are no unusual circumstances associated with the installation of this limited pipeline segment that would result in a significant environmental effect.

Accordingly, Staff has determined that the installation of the additional 54 LF of 16-inch ductile iron pipe is categorically exempt from CEQA.

Fiscal Impact

The fiscal impact associated with this item is limited to the Riverside County Clerk-Recorder filing fee for the Notice of Exemption and staff time required for preparation and filing of the documentation.

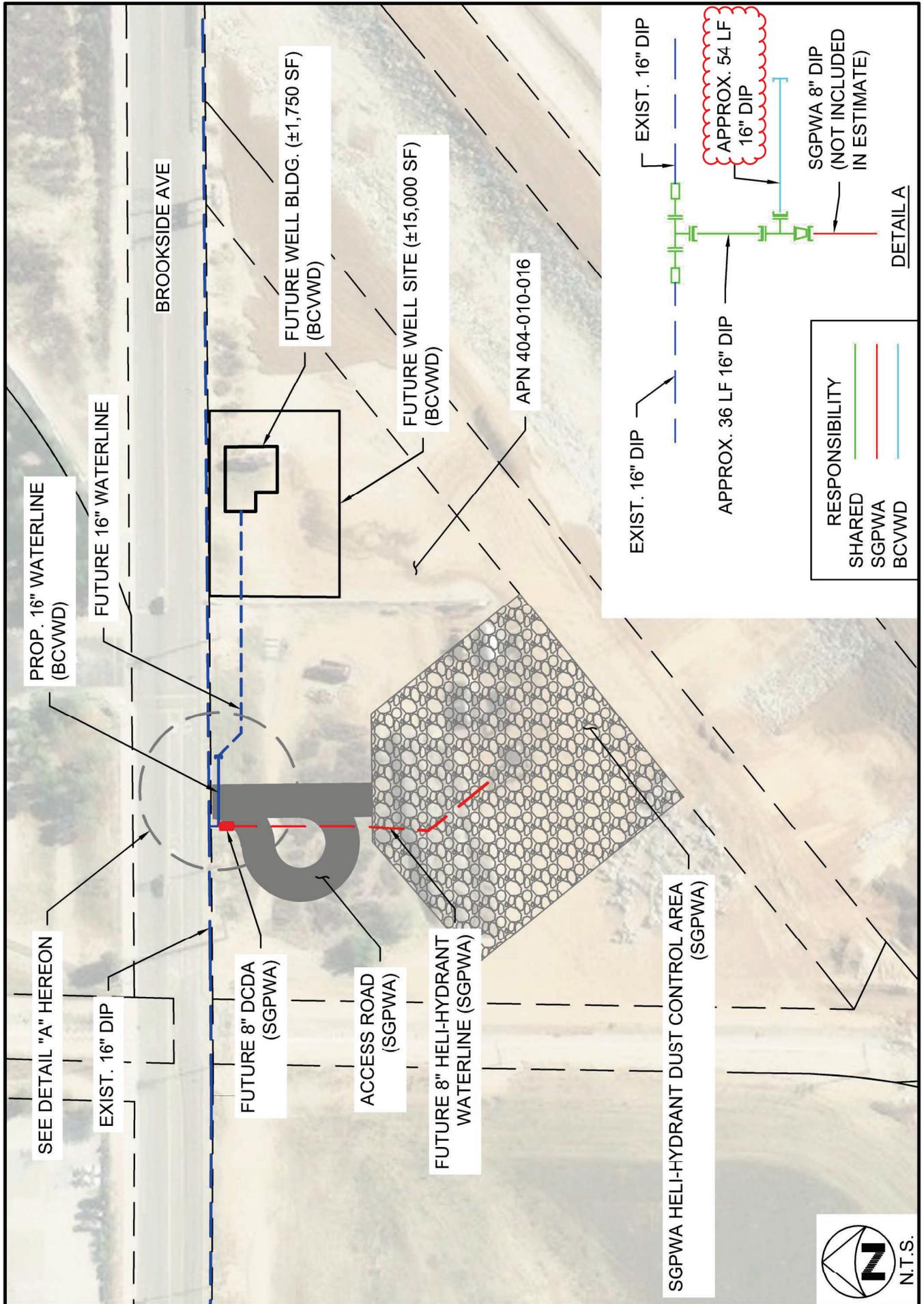
Project construction costs for the pipeline installation were previously authorized by the Board of Directors on February 11, 2026 (total \$101,000). No additional appropriation is requested as a part of this CEQA determination.

Attachments

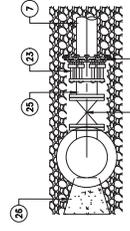
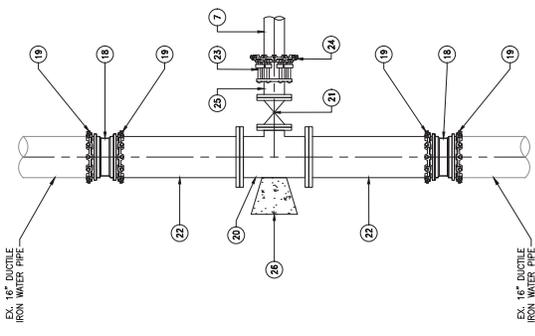
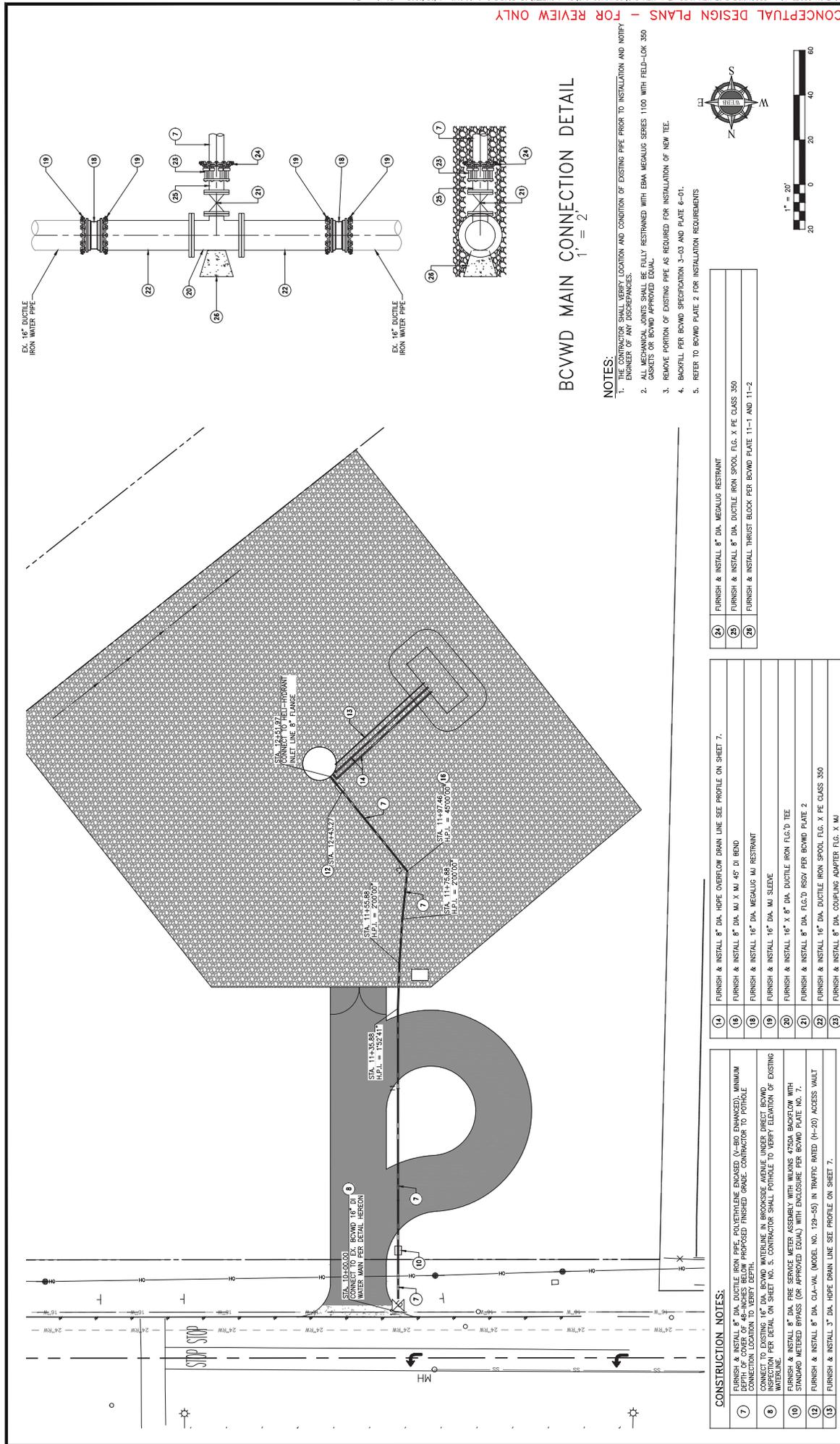
1. Proposed Well Site Location
2. Brookside East Heli-Hydrant Facility Improvement Plans
3. Installation of 54 Linear Feet (Brookside East Heli-Hydrant Water System Connection Project) Notice of Exemption

Staff Report prepared by Evan Ward, Associate Civil Engineer I

Attachment 1 - Proposed Well Site Location



Attachment 2 - Brookside East Heli-Hydrant Facility Improvement Plans



BCVWD MAIN CONNECTION DETAIL

NOTES:

1. CONTRACTOR SHALL VERIFY LOCATION AND CONDITION OF EXISTING PIPE PRIOR TO INSTALLATION AND NOTIFY ENGINEER OF ANY DISCREPANCIES.
2. ALL MECHANICAL JOINTS SHALL BE FULLY RESTRAINED WITH EBMA MEGALUG SERIES 1100 WITH FIELD-LOCK 350 GASKETS OR BOWND APPROVED EQUAL.
3. REMOVE PORTION OF EXISTING PIPE AS REQUIRED FOR INSTALLATION OF NEW TEE.
4. BACKFILL PER BOWND SPECIFICATION 3-03 AND PLATE 6-01.
5. REFER TO BOWND PLATE 2 FOR INSTALLATION REQUIREMENTS.

(14)	FURNISH & INSTALL 8" DIA. HOPE OVERFLOW DRAIN LINE SEE PROFILE ON SHEET 7.
(15)	FURNISH & INSTALL 8" DIA. M.I. X M.I. 45 DI BEND
(16)	FURNISH & INSTALL 16" DIA. MEGALUG MJ RESTRAINT
(17)	FURNISH & INSTALL 16" DIA. M.I. SLEEVE
(18)	FURNISH & INSTALL 16" X 8" DIA. DUCTILE IRON FLG'D TEE
(19)	FURNISH & INSTALL 8" DIA. FLG'D RISOY PER BOWND PLATE 2
(20)	FURNISH & INSTALL 16" DIA. DUCTILE IRON SPOOL FIG. X PE CLASS 300
(21)	FURNISH & INSTALL 8" DIA. COUPLING ADAPTER FIG. X M.I.
(22)	FURNISH & INSTALL 8" DIA. MEGALUG RESTRAINT
(23)	FURNISH & INSTALL 8" DIA. DUCTILE IRON SPOOL FIG. X PE CLASS 350
(24)	FURNISH & INSTALL THRUST BLOCK PER BOWND PLATE 11-1 AND 11-2

CONSTRUCTION NOTES:

1. FURNISH & INSTALL 8" DIA. DUCTILE IRON PIPE ENVELOPE (EUBASER) (L-80 FINNANSEN) MINIMUM DEPTH OF COVER OF 48-INCHES BELOW PROPOSED FINISHED GRADE. CONTRACTOR TO POHOLE CONNECTION LOCATION TO VERIFY DEPTH.
2. CONNECT TO EXISTING 16" DIA. BOWND WATERLINE IN BROOKSIDE AVENUE UNDER DIRECT BOWND WATERLINE PER DETAIL ON SHEET NO. 5. CONTRACTOR SHALL POHOLE TO VERIFY ELEVATION OF EXISTING WATERLINE.
3. FURNISH & INSTALL 8" DIA. FIRE SERVICE METER ASSEMBLY WITH WILKINS 7550A BACKFLOW WITH STANDARD METERED BYPASS (OR APPROVED EQUAL) WITH ENCLOSURE PER BOWND PLATE NO. 7.
4. FURNISH & INSTALL 8" DIA. CH-VAL (MODEL NO. 129-55) IN TRAFFIC RATED (H-20) ACCESS VAULT.
5. FURNISH & INSTALL 3" DIA. HOPE DRAIN LINE SEE PROFILE ON SHEET 7.

DESIGN BY	REVISION
DRAWN BY	DATE
CHECKED BY:	APPROV
BD	###
DATE	

SUBMITTED UNDER THE SUPERVISION OF:

R.C.E. NO. 38236
DATE: _____

DRAFT

TYLER VIGOREAULT



WEBB
ENGINEERING CONSULTANTS
3750 MACYWAY STREET, SUITE 200
FOLSOM, CA 95758
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SAN GORGONIO PASS WATER AGENCY
1210 Beaumont Ave.
Beaumont, CA 92223
PH. (951) 845-1277
FAX (951) 845-1281

SAN GORGONIO PASS WATER AGENCY
BROOKSIDE EAST HELI-HYDRANT FACILITY
APN 404-010-016
WATERLINE PLAN

DRAWING NO.	5
FILE NO.	XX
SHEETS OF	7

CONCEPTUAL DESIGN PLANS - FOR REVIEW ONLY

**Attachment 3 - Installation of 54 Linear Feet (Brookside East Heli-Hydrant Water System Connection Project)
Notice of Exemption**

NOTICE OF EXEMPTION

To: County of Riverside
County Clerk-Recorder
2724 Gateway Drive
Riverside, CA 92507

From: Beaumont-Cherry Valley Water District
560 Magnolia Avenue
Beaumont, CA 92223

Project Title: Installation of 54 Linear Feet of 16-inch Ductile Iron Pipe – Brookside East Heli-Hydrant Water System Connection Project (APN 404-010-016)

Project Location: The proposed project is located on APN 404-010-016 on the south side of Brookside Avenue, west of Beaumont Avenue, in the City of Beaumont. The work consists of installation of approximately 54 linear feet of 16-inch ductile iron pipe extending from the proposed heli-hydrant connection toward a future District well site.

Project Location - City: City of Beaumont

Project Location - County: Riverside

Description of Nature, Purpose,

and Beneficiaries of the Project: The proposed project consists solely of the installation of approximately 54 linear feet (LF) of 16-inch ductile iron pipe and associated appurtenances on APN 404-010-016. The pipeline segment will extend from the planned heli-hydrant system connection toward a future Beaumont-Cherry Valley Water District well site. The San Geronio Pass Water Agency (SGPWA) has completed CEQA review for the water system connection within Brookside Avenue and for the proposed heli-hydrant station that will support aerial firefighting operations in the San Geronio Pass area. The District's project is limited to the short pipeline extension described above, which will facilitate future District water supply infrastructure planning. The installation will occur on previously disturbed land and will not expand the District's service area or increase water capacity.

Name of Public Agency Approving Project: Beaumont-Cherry Valley Water District

Name of Person or Agency Carrying Out Project: Beaumont-Cherry Valley Water District

Exempt Status: (Check One)

- Ministerial (Sections 21080(b)(1); 15268)
- Declared Emergency (Sections 21080(b)(3); 15269(a))
- Emergency Project (Sections 21080(b)(4); 15269(b))
- Categorical Exemption (Section 21084; 15301(d))

Reasons why project is exempt: The State CEQA Guidelines provide a series of Categorical Exemptions for projects that have been deemed to have minimal impacts on the environment. The installation of approximately 54 linear feet of 16-inch ductile iron pipe qualifies for the following categorical exemption. Categorical Exemption Class 3 exempts "construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. (d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction." The project will occur within previously disturbed areas and will not impact biological resources, cultural resources, scenic resources, or other environmentally sensitive areas. There are no unusual circumstances associated with the project

that would result in a significant environmental impact. Therefore, the project is categorically exempt from CEQA pursuant to Section 15303(d).

Lead Agency

Contact Person: Daniel K. Jagers Telephone: (951) 845-9851

Signature: _____ Title: General Manager Date: _____



**Beaumont-Cherry Valley Water District
Special Board Meeting
February 24, 2026**

Item 3

STAFF REPORT

TO: Board of Directors
FROM: Dan Jagers, General Manager
SUBJECT: Parcel Measurement Project Update – Eagle Aerial Solutions

Staff Recommendation

This item is provided for information only. No Board action is required.

Executive Summary

In order to improve the accuracy of annual water use targets established under California water-use-efficiency legislation (AB 1666 and SB 606), and upon Board approval at the November 20, 2025 meeting, staff engaged Eagle Aerial Solutions (Eagle Aerial) to update residential parcel data within the District.

The State Water Resources Control Board (SWRCB) currently calculates water use targets using 2018 baseline landscape area measurement (LAM) data derived from aerial imagery. Since 2018, BCVWD has experienced significant residential growth and development. Updating irrigated landscape area measurements for parcels added or misclassified since 2018 will improve the accuracy of the District's water use target calculations and provide a more reliable representation of actual residential water demands.

District staff completed the 2024–2025 Urban Water Use Objective (UWUO) data analysis and uploaded the District's UWUO data to the State Department of Water Resources on December 31, 2025. At the time of submission, the District's actual water use exceeded the calculated State objective by 931 acre-feet (AF). In response, District staff has conducted multiple coordination meetings with Eagle Aerial beginning in December 2025 to provide supporting parcel, development, and landscape data necessary to analyze and compute updated UWUO values that have not been accounted (or misclassified) for by the State since the initial 2018 baseline dataset was developed. Staff continues to work extensively with Eagle Aerial to prepare a comprehensive submittal package intended to update and modernize the District's UWUO calculations. Completion of this package is anticipated in the near future.

Eagle Aerial Solutions will update the District's parcel dataset and incorporate a new GIS layer into the WaterView platform in accordance with State Water Board guidelines (see Attachment 1 – Landscape Area Measurement (LAM) Update Framework). The updated dataset will be submitted to the SWRCB for review and inclusion in future target calculations.

Background

California's long-term water use efficiency framework (AB 1666 and SB 606) requires urban retail water suppliers to meet annual residential water use targets. These targets are calculated using several parcel-level and demographic variables, including:

- Irrigated landscape area (square feet)
- Weather data (ETo)
- Indoor residential water use standards (currently 42 gpcd)



- Population and household occupancy factors

The SWRCB's baseline landscape area measurement (LAM) dataset is derived from aerial imagery collected in 2018. Because BCVWD has experienced substantial residential growth since that time, many parcels are not included in the baseline dataset or may be misclassified. As a result, the State's current target calculations may not accurately reflect existing development patterns within the District.

BCVWD is also required to report water consumption on a fiscal year basis for both residential customers and commercial customers with dedicated irrigation meters. Accurate parcel data is critical to ensuring compliance with legislative reporting requirements and properly calculating water use objectives.

Discussion

Eagle Aerial Solutions has over 30 years of experience in aerial imagery analysis and water-use-efficiency compliance. Eagle Aerial Solutions and its partner NV5 were the original contractors who developed the State's baseline dataset and are familiar with SWRCB specifications and reporting requirements. Their familiarity with SWRCB specifications ensures that updates meet State requirements.

Eagle Aerial Solutions also developed the WaterView platform, a GIS-based tool that allows agencies to:

- View customer consumption data on a monthly basis
- Compare usage against estimated water budgets
- Identify high-use trends
- Track selected customer groups
- Export targeted outreach lists
- Stay current with evolving legislative requirements

Eagle Aerial Solutions will update BCVWD parcel data by identifying:

- New residential parcels not included in the 2018 DWR dataset
- Parcels inside and outside the agency boundary meeting residential classifications
- Previously misclassified parcels
- Residential parcels with minimal irrigated area that now have residential meters

The updated parcel information will be incorporated into a new GIS layer within WaterView and accessible to District staff as part of an official submittal package to the SWRCB for approval.

Fiscal Impact

The Parcel Measurement Project is being funded through the District's approved operating budget for water-use efficiency compliance and reporting activities.

No additional budget appropriation is requested at this time.

Attachments

1. Landscape Area Measurement (LAM) Update Framework

Staff Report prepared by Evan Ward, Associate Civil Engineer I

Attachment 1 – Landscape Area Measurement (LAM) Update Framework

State Water Board guidelines allow for updates of the 2018 baseline landscape area measurement (LAM) data. In accordance with these guidelines, Eagle Aerial Solutions developed the following methodology to update BCVWD's parcel maps.

Methodology for Estimating LAM Values for New Residential Parcels

Eagle Aerial Solutions will update the following parcel data for BCVWD:

1. **New parcels** not in the 2018 DWR Parcel dataset that meet the DWR residential land use classifications OR have a residential meter on them
 - a. Inside the agency boundary
 - b. Outside the agency boundary (areas not yet annexed in 2018)
2. **Misclassified parcels** existing in the 2018 DWR dataset that DID NOT have a DWR Residential land use classification but now do have a DWR qualified Residential land use classification
3. **Residential parcels existing in the 2018 DWR dataset** with a Residential classification that have very low to no Irrigated Area but have a Residential meter on them

To assign Landscape Area Measurement (LAM) values to newly developed residential (RES) parcels that do not appear in the 2018 baseline dataset, Eagle Aerial Solutions employs a quantile-based proxy estimation framework augmented with a targeted refinement for large-lot parcels. This allows Eagle Aerial Solutions to produce statistically consistent, scalable LAM estimates without requiring manual measurement or costly remote sensing.

1. Create Parcel-Size Cohorts (Quantile + Upper-Tail Refinement)

Eagle Aerial Solutions began by generating parcel-size quantiles for the majority of existing RES parcels, creating equal-frequency stratification bins that group parcels with similar lot sizes.

Because parcel size is highly skewed—particularly at the upper end of the distribution—Eagle Aerial Solutions then applied a targeted refinement for the upper tail. Specifically, after forming the initial quantile bins, Eagle Aerial Solutions manually subdivided the largest parcel-size segment(s) to create additional cohorts.

This refinement provides:

- Better resolution among unusually large or outlier parcels
- More accurate LAM estimation for parcel classes whose landscape characteristics diverge from the general RES population
- Improved model fidelity for districts with heterogeneous residential development patterns

The resulting set of parcel-size cohorts balances statistical rigor with practical modeling sensitivity.

2. Calculate Representative LAM Values per Cohort

For each parcel-size cohort (including the refined upper-tail segments), Eagle Aerial Solutions computed the average LAM component values:

- II — Irrigable Irrigated Area
- INI — Irrigable Not-Irrigated Area
- NI — Not-Irrigable Area

These cohort-level averages form a set of reference LAM profiles that characterize landscape allocation patterns for parcels of comparable size.

3. Map New Parcels to the Appropriate Cohort

Each new RES parcel is assigned to the cohort whose parcel-size range it falls within. The manually refined upper-tail cohorts ensure appropriate classification for large-lot parcels that would otherwise be overgeneralized in a pure quantile model.

4. Inherit Cohort-Level Baseline LAM Values

Once matched, each new parcel inherits the representative LAM profile (II, INI, NI values) for its assigned cohort. This approach yields:

- Consistent and reproducible estimates
- Statistical alignment with real-world parcel patterns
- A scalable method suitable for annual updates

This process provides a defensible, data-driven approximation of baseline LAM values in the absence of parcel-specific measurements.



**Beaumont-Cherry Valley Water District
Regular Board Meeting
February 24, 2026**

Item 4

STAFF REPORT

TO: Board of Directors

FROM: Dan Jagers, General Manager

SUBJECT: Consider Correspondence re: Making Conservation a California Way of Life Regulations – Legislative Advocacy and Statutory Clarification Request

Staff Recommendation

1. Review and provide direction regarding the attached draft Legislative Advocacy Letter addressing statutory clarification, implementation flexibility, and legal certainty associated with the State Water Resources Control Board’s “Making Conservation a California Way of Life” regulations; and
2. Authorize transmittal of the finalized letter to identified State and Federal legislators, relevant legislative policy committees, ACWA, and regional partner agencies, or
3. Direct staff as desired

Executive Summary

The State Water Resources Control Board’s “Making Conservation a California Way of Life” regulations establish Urban Water Use Objectives (UWUOs) for urban retail water suppliers pursuant to AB 1668 and SB 606. While BCVWD supports long-term water use efficiency, implementation of the regulations presents legal, fiscal, and operational challenges that warrant legislative clarification.

As discussed in prior District comment letters and in the comparison agenda item addressing parcel dataset corrections, implementation relies heavily on State-provided datasets and prescriptive compliance timelines that may not reflect local conditions.

The attached Legislative Advocacy Letter seeks statutory alignment, implementation flexibility, and legal certainty – particularly regarding affordability impacts, Proposition 218 compliance, reporting structure, and sequencing flexibility – to ensure conservation mandates remain achievable and equitable for BCVWD ratepayers. Board direction is requested prior to distribution of the Legislative Advocacy Letter.

Background

AB 1668 and SB 606 (2018) directed the State Water Resources Control Board (SWRCB) to adopt long-term efficiency standards establishing Urban Water Use Objectives (UWUOs). These objectives combine:

- Indoor residential standards,
- Outdoor residential efficiency standards,
- CII landscape requirements,



- Water loss performance standards.

While the legislation contemplated flexibility, local data, and variances, implementation through regulation has introduced structural and technical challenges.

BCVWD serves approximately 28 square miles within the City of Beaumont and the unincorporated Cherry Valley community. The District serves more than 22,000 service connections and a population exceeding 64,000 residents. The District serves a rapidly growing community that includes disadvantaged areas, a significant senior population, and ratepayers sensitive to affordability impacts. These local characteristics materially influence implementation feasibility and fiscal impacts associated with mandatory conservation objectives.

Discussion

The State Water Resources Control Board's "Making Conservation a California Way of Life" regulations establish long-term Urban Water Use Objectives pursuant to AB 1668 and SB 606. While the statutory framework anticipates flexibility and local data inputs, implementation through regulation presents practical, fiscal, and legal challenges that warrant legislative clarification.

As documented in the District's prior comment letters, the proposed compliance timelines are compressed and do not reflect the operational and economic realities facing urban water suppliers. Implementation requires significant administrative and technical effort, including updating billing systems, verifying landscape data, classifying CII customers, developing compliance plans, and potentially restructuring rate frameworks. These tasks require time and resources to be implemented cost-effectively. Compressed schedules increase administrative costs and risk unintended affordability impacts, particularly in disadvantaged and fixed-income communities.

As identified through District data verification efforts (including the parcel dataset update identified by Eagle Aerial Solutions), measurable discrepancies exist between State-provided landscape datasets and locally validated information. These discrepancies have material implications for assigned Urban Water Use Objectives. Legislative recognition of dataset variability and allowance for locally verified adjustments would improve compliance accuracy and fairness.

Concerns also remain regarding the proposed Landscape Efficiency Factor values and their impact on existing landscapes. Many residents installed landscaping consistent with local ordinances in place at the time of development. Conservation policy should emphasize efficient water use rather than effectively requiring retrofit or removal of established landscapes, particularly where such requirements may disproportionately affect older neighborhoods and vulnerable populations.

Implementation of CII Performance Measures presents additional challenges. Prescriptive interim completion deadlines limit local flexibility and may divert limited resources toward administrative compliance rather than targeting the highest water-use customers. Greater sequencing flexibility and recognition of existing conservation programs would improve cost-effectiveness while still advancing conservation goals.

The District has also noted statutory inconsistencies within the draft regulation, including non-functional turf timelines that conflict with AB 1572 and reporting requirements that remove



flexibility to report on a calendar year basis. Regulatory implementation should align with enacted statute and existing reporting frameworks.

mandatory conservation standards must be paired with clear legal authority for enforcement tools. Agencies may need to rely on budget-based or tiered rate structures to meet assigned objectives. However, uncertainty under Proposition 218 creates litigation risk when implementing conservation-oriented pricing. Without statutory clarification or safe-harbor protections, agencies face a structural tension between mandatory compliance and legally defensible rate-setting authority. Without statutory clarification or safe-harbor protections, agencies face a structural conflict between mandatory conservation compliance and constitutional rate-setting limitations. This expose water suppliers to litigation risk while simultaneously requiring achievement of assigned Urban Water Use Objectives.

Finally, credit for use of recycled water increases of landscape efficiency values are directly affected by reductions in indoor water use factors (e.g., less indoor water use results in reduced recycled water availability for outdoor water use thereby negating the benefit of increases to the landscape factors). Conservation mandates interact with other state water policies in ways that may unintentionally undermine long-term planning. Indoor efficiency standards reduce wastewater flows, which may reduce recycled water supply available for irrigation and other beneficial uses. At the same time, state policy encourages expanded recycled water utilization.

Greater inter-agency coordination is necessary to ensure conservation, recycled water development, wastewater planning, and supply reliability policies operate cohesively rather than at cross purposes.

For these reasons, continued legislative engagement is recommended to seek statutory alignment, improved data accuracy recognition, implementation flexibility, and legal certainty to ensure statewide conservation objectives can be achieved in a practical and equitable manner for BCVWD and its ratepayers.

Fiscal Impact

Minimal fiscal impact is associated with preparation and transmittal of the advocacy letter. However, failure to secure statutory alignment could result in:

- Increased compliance costs (data acquisition, mapping, enforcement),
- Administrative burden associated with CII implementation,
- Potential litigation exposure under Proposition 218,
- Ratepayer affordability impacts,
- Cost escalation due to compressed timelines.

Legislative clarification may reduce long-term fiscal exposure and litigation risk.

Attachments

Attachment 1 – Draft Legislative Advocacy Letter

Attachment 2 – BCVWD Comment Letter (October 17, 2023)

Attachment 3 – BCVWD Comment Letter (June 4, 2024)

Staff Report prepared by Mark Swanson, Director of Engineering

Attachment 1

DRAFT 1 – Legislative Advocacy Letter

TO:

Senator Rosilicie Ochoa Bogh

Assemblymember Greg Wallis

Governor Newsom

Senate Natural Resources and Water Committee

Assembly Water, Parks and Wildlife Committee

Subject: Request for Legislative Action to Support Practical and Legally Defensible Implementation of State Water Conservation Mandates

Dear [Assembly Member / Senator _____]:

On behalf of the Beaumont-Cherry Valley Water District (BCVWD), we write to request legislative clarification and targeted statutory reforms necessary to ensure that statewide conservation mandates remain legally defensible, fiscally sustainable, and practically achievable. This is in regard to the State Water Resources Control Board's "Making Conservation a California Way of Life" regulations and related Urban Water Use Objective (UWUO) compliance requirements.

BCVWD is a public water agency serving approximately 22,000 connections within the City of Beaumont and the Cherry Valley community in Riverside County. The District remains committed to responsible water stewardship and to achieving statewide conservation objectives. However, the current regulatory framework creates structural tensions between mandated conservation outcomes, constitutional rate-setting constraints, and unfunded compliance obligations. Without legislative clarification, local agencies face increasing legal risks and ratepayer cost exposure while attempting to implement state policy in good faith.

Local Growth and Dataset Limitations

UWUO compliance relies heavily on statewide landscape measurement data derived from 2018 aerial imagery. Since that time, BCVWD has experienced substantial residential and commercial growth. Static baseline datasets do not fully reflect post-2018 development and can distort assigned outdoor water budgets in high-growth communities.

To ensure compliance accuracy, BCVWD has authorized third-party aerial mapping and data management services at local ratepayer expense. Legislative direction requiring State acceptance of updated, technically sound local data would materially improve fairness and compliance precision.

Unfunded Compliance Burdens

These requirements function as de facto unfunded mandates imposed solely on local ratepayers. Absent state funding support or cost-recovery clarity, conservation compliance will increasingly shift financial burdens onto communities least equipped to absorb them.

Conflicting State Policy Objectives

Conservation mandates interact with other state water policies in ways that may unintentionally undermine long-term planning. Indoor efficiency standards reduce wastewater flows, which may reduce recycled water supply available for irrigation and other beneficial uses. At the same time, state policy encourages expanded recycled water utilization.

Greater inter-agency coordination is necessary to ensure conservation, recycled water development, wastewater planning, and supply reliability policies operate cohesively rather than at cross purposes.

Need for Legislative Action to Preserve Practical Conservation Tools

Behavioral research conducted in California and reported by the University of Rochester demonstrates that meaningful water savings—particularly among high-use customers—are often achieved through targeted “harm reduction” strategies rather than purely punitive approaches. These strategies include smart irrigation technology, data-driven outreach, customer segmentation, and tailored incentives that reduce excessive outdoor irrigation while allowing customers to maintain reasonable landscaping. Behavioral and price-based tools must operate together to achieve durable conservation outcomes.

BCVWD supports and intends to pursue these behaviorally informed approaches wherever feasible. However, research and experience also demonstrate that incentives alone are insufficient to ensure compliance with mandatory statewide conservation targets. When facing strict Urban Water Use Objectives and declining efficiency standards, water agencies must retain the ability to apply strong and enforceable pricing signals for excessive or wasteful water use.

The District is concerned that evolving litigation and inconsistent interpretations of Proposition 218 have created uncertainty regarding the legality of tiered and budget-based water rates—particularly where upper tiers are structured to meaningfully discourage excessive use. If agencies are unable to impose significantly higher charges on consumption that materially exceeds assigned water budgets or reasonable use, conservation mandates may become practically unenforceable.

While AB 1827 clarified that peak demand and higher usage levels may be recognized as cost drivers, it did not amend Proposition 218’s constitutional proportionality requirements nor provide explicit authority for conservation-drive rate differentials. Agencies implementing meaningful upper-tier rates remain exposed to litigation risk and inconsistent judicial interpretation.

When conservation mandates are mandatory but enforcement pricing tools are legally uncertain, compliance becomes structurally fragile.

BCVWD respectfully offers the following legislative considerations to ensure conservation mandates remain aligned with lawful implementation tools and ratepayer protection.

Requested Legislative Actions (see Attachment A)

BCVWD respectfully requests that the Legislature consider actions to preserve the ability of water agencies to comply with conservation mandates using lawful, practical, and behaviorally effective tools. Attachment A to this letter details some legislative considerations, including:

- Explicit statutory authority for budget-based and tiered water rate structures necessary to meet state conservation mandates.
- Authorization for conservation surcharge tools that allow agencies to impose significantly higher charges on excessive or wasteful water use when needed for compliance.
- Legal safe-harbor protections for agencies that adopt tiered rates supported by defensible cost-of-service documentation and compliance necessity.

Conclusion

BCVWD supports statewide conservation objectives and remains committed to achieving compliance in a manner that is responsible and equitable. However, state mandates cannot be implemented successfully if local agencies lack clear authority to recover compliance costs and use effective rate and program tools to influence customer behavior. Conservation targets will require not only technical compliance, but realistic legal and financial frameworks that allow local agencies to act decisively without exposing ratepayers to unnecessary cost or litigation.

We respectfully request your assistance in advancing legislative solutions that align California's conservation mandates with the practical tools needed to implement them effectively. BCVWD would welcome the opportunity to meet with you or your staff and to participate in coordinated regional discussions with neighboring agencies.

Thank you for your attention to this matter and for your continued service to our community.

Sincerely, Board of Directors

Cc: ACWA

Attachment A

Proposed Legislative Actions to Align State Conservation Mandates with Lawful and Practical Implementation Tools

The Beaumont-Cherry Valley Water District respectfully requests that the Legislature consider the following statutory and, if necessary, constitutional reforms to ensure that local water agencies can lawfully and effectively comply with the State Water Resources Control Board's "Making Conservation a California Way of Life" regulations and Urban Water Use Objective (UWUO) requirements.

These actions are intended to preserve conservation effectiveness while ensuring implementation is feasible, equitable, and legally defensible for local agencies and ratepayers.

1. Clarify Recoverable Costs of Conservation Compliance

Enact legislation expressly confirming that costs incurred to achieve compliance with state-mandated water conservation standards—including UWUO reporting, data acquisition, landscape measurement updates, monitoring, enforcement, customer outreach, conservation program implementation, and related administrative activities—constitute legitimate and recoverable costs of water service under Article XIII D of the California Constitution. Such clarification should explicitly recognize regulatory compliance and demand-management activities as legitimate components of water service cost.

2. Express Authorization for Budget-Based and Tiered Rates

Adopt statutory language explicitly authorizing urban water suppliers to implement budget-based and tiered rate structures designed to achieve compliance with state conservation mandates, provided the overall rate structure is reasonably related to the cost of providing service.

Such authorization should clarify that:

- Incremental costs associated with higher and peak water demands may be allocated to higher tiers;
- Assigned water budgets may serve as a lawful basis for differentiated pricing; and
- Rates may reflect the regulatory and infrastructure costs imposed by excessive or wasteful consumption.

Such authority should explicitly acknowledge conservation compliance as a valid cost driver and regulatory obligation.

3. Authorize Conservation Surcharges for Excessive Use

Provide clear statutory authority for water agencies to impose conservation on water use that materially exceeds assigned water budgets when necessary to achieve state-mandated conservation objectives.

Such surcharges should be recognized as legitimate regulatory compliance tools and not limited solely to narrow volumetric cost-of-service interpretations, particularly when applied during mandated conservation periods or demonstrated noncompliance risk.

4. Establish Legal Safe-Harbor Protections

Create statutory safe-harbor protections for water agencies that adopt conservation-related tiered rates and enforcement programs supported by defensible documentation, including:

- A cost-of-service study;
- Recognized allocation methodologies (including peaking and demand factors); and
- Documentation of compliance necessity tied to state mandates.

Such provisions should reduce litigation exposure for agencies acting in good faith to implement state conservation policy and protect ratepayers from excessive legal costs.

5. Align Conservation Mandates with Funding and State Support

Require that future conservation mandates include dedicated funding mechanisms or financial assistance programs sufficient to offset compliance costs, including:

- Reporting and data systems
- Landscape measurement updates
- Enforcement systems
- Customer outreach programs
- Conservation incentive programs
- Water efficiency technologies and equipment

State conservation objectives should not operate as unfunded mandates imposed solely on local ratepayers. Funding mechanisms could include grant programs, compliance reimbursements, or allocation of statewide conservation program funds.

6. Provide Flexible Compliance Timelines for High-Growth Agencies

Establish mechanisms allowing agencies to demonstrate incremental compliance progress over time, particularly where agencies demonstrate good-faith progress toward compliance.

Compliance deadlines should reasonably account for:

- The time required to update landscape measurement and consumption datasets;
- Local growth patterns and land-use changes;
- Infrastructure planning and conservation program implementation cycles; and
- Documented good-faith compliance efforts.

7. Coordinate Overlapping and Conflicting Water Policy Mandates

Direct state agencies to reconcile conservation mandates with related programs, including recycled water targets, wastewater flow assumptions, indoor fixture efficiency reductions, and long-term supply planning requirements, to prevent conflicting compliance requirements and unintended infrastructure impacts.

This coordination is essential to avoid scenarios where one mandate undermines another (for example, reduced indoor use decreasing recycled water supply while other policies require increased recycled water utilization).

8. Establish a Formal Stakeholder Review and Technical Consultation Process

Require periodic consultation between the State Water Resources Control Board and representatives of urban water suppliers to evaluate:

- Technical feasibility
- Cost impacts
- Data methodology assumptions
- Equity impacts to ratepayers
- Practical implementation outcomes

This review should occur before additional efficiency factor reductions are implemented and should include opportunities for public agency participation and technical feedback, including review from small, mid-sized, and high-growth urban water agencies.

9. Consider Constitutional Clarification (If Necessary)

If statutory clarification proves insufficient, explore whether narrowly tailored constitutional clarification may be warranted.

Such clarification would ensure that the tools required to achieve conservation targets are legally aligned with the mandates themselves.

Attachment 2



Beaumont-Cherry Valley Water District
560 Magnolia Avenue, Beaumont, CA 92223
www.bcvwd.org

October 17, 2023

Board of Directors

Andy Ramirez
Division 1

Lona Williams
Division 2

Daniel Slawson
Division 3

John Covington
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David Hoffman
Division 5

Ms. Courtney Tyler
Clerk to the Board
STATE WATER RESOURCES CONTROL BOARD
P. O. Box 100
Sacramento, California 95812-2000
Via: commentletters@waterboards.ca.gov

Re: Comment Letter – Proposed Making Conservation a California Way of Life Regulation

Dear Ms. Tyler:

The Beaumont Cherry Valley Water District (BCVWD or District) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the Draft Making Conservation a California Way of Life Regulation (Regulation). This comment letter is intended to provide constructive and comprehensive recommendations to the State Water Board, and we ask for the opportunity to work collaboratively with the State Water Board and other retail water agencies to ensure successful implementation.

The District is an urban supplier located in Riverside County with some watershed lands located in San Bernardino County. The District’s service area is 28 square miles and serves the City of Beaumont and the unincorporated community of Cherry Valley.

The current population served by the District is approximately 64,375, with 21,154 service connections. In Beaumont, 13.5% of the population is 65 years of age and older; in Cherry Valley, 29.6% of the population are over 65 years of age based on the 2020 census, and generally living on fixed incomes. Fifty-five percent of the population in Beaumont is Hispanic or other minority. Portions of the City of Beaumont and Cherry Valley (approximately 10% by population) are classified as a disadvantaged community. The District is expected to double in population by approximately 2045, so water conservation will be a key component in achieving the projected growth. BCVWD recognizes a continued effort toward greater water efficiency is needed for the change in climatic conditions. BCVWD is one of the fastest growing communities in Riverside County and in the State, so implementation of water conservation practices has been critical to ensure adequate water supplies to accommodate the experienced growth. As the community continues to grow and various State regulations become effective, the District would like to express its desire to make the Regulation as flexible as possible allowing all urban water providers the ability to meet or exceed requirements.



BCVWD has compiled its comments related to the proposed regulations and has also included specific comments provided by the Beaumont-Cherry Valley Board of Directors related to how these proposed regulations and their potential impact our District specifically, as well as the State's general water and population management activities. BCVWD's comments set forth in the following two sections:

Section I – District Comments Regarding Proposed Regulations

1. The timelines proposed in the draft Regulation are not reasonable and do not support cost-effective implementation schedules necessary to achieve compliance. Water suppliers need adequate time to analyze existing water use efficiency programs, plan for cost-effective compliance with the standards, objectives, and implement required performance measures, budgets for staff and future water conservation programs, and allow for technological advancements. These timelines could result in unintended impacts, such as disproportionate impacts to disadvantaged communities and restrict water affordability. Modify the proposed timeline to provide an additional five (5) years for all suppliers to budget for, develop and implement cost-effective programs.
2. There have been observed data gaps and inaccuracies in state-provided information, such as within the landscape area measurement (LAM) and the population data shown on the State Water Board website. The LAM data is inconsistent and has been found to be overestimated and underestimated in some data sets. These inconsistencies will have significant impacts on suppliers' outdoor water use standard and overall objective if not refined and/or corrected. The population data shown on the Water Use Objective Exploration Tool does not match data submitted to the DWR in previous reporting. The inaccurate data will most likely result in water use efficiency objectives that are inaccurate and that do not properly provide local flexibility that was intended by the proposed Regulation.
3. Include a "Data Error Adjustment" in the formula to calculate the Urban Water Use Objective. This would be a percentage applied to a supplier's budget for efficient indoor residential water use, efficient outdoor residential water use, and efficient water use on CII landscapes with dedicated irrigation meters. The Data Error Adjustment would recognize the suppliers' historic progress and achieved savings (SB X7-7 based) and acknowledge that data used to develop and evaluate standards has intrinsic errors.
4. Clarify that technical assistance may be offered to the supplier if it does not meet its water use objective because it is unable to obtain the information required for the variances. The Urban Water Use Objective (UWUO) could change if water suppliers obtain variances, but the timeline limits suppliers' ability to collect and submit the data required to obtain the variances. These timelines should be expanded to allow for continued corrections over time.
5. Allow suppliers to provide alternatives to meeting CII mixed-use meters Performance Measure requirements currently proposed and allow suppliers to provide a list and crosswalk of current programs, practices, and rebates to the listed in-lieu



technologies and water management programs. Suppliers should be able to provide a list of current and proposed programs, practices and rebates as an alternative.

6. Provide flexibility to suppliers to complete implementation of 100% of CII Performance Measures by removing the prescriptive timeline. This includes CII classifications, CII mixed-use meters and CII Best Management Practices. The prescriptive timeline removes the suppliers' flexibility to achieve broader goals cost-effectively based on their unique CII customers and local conditions.
7. Direct suppliers to implement programs for CII customers at or above the 80th percentile among ALL CII customers, rather than by individual CII Classification. The draft Regulation should also clarify that the initial classification of CII customers is based on existing customers at the time of the adoption of the Regulation. Suppliers must include any new CII customers after completing the initial classification of CII customers.
8. Establish a Landscape Efficiency Factor (LEF) that will support existing and new landscapes. The LEF should reflect a factor that allows for the amount of water necessary to efficiently irrigate both new and existing landscapes. The proposed Regulation would not support existing landscapes as it currently stands. Californians have made significant investments in existing landscape schemes that met then standard landscaping ordinances enacted by Cities and Counties (as well as Homeowners Associations) and these LEFs could have far reaching consequences.
9. Remove non-functional turf provisions from the draft Regulation. Section 974 (e)(1) of the draft Regulation would ban the irrigation of non-functional turf with potable water by July 1st, 2025. This does not concur with AB 1572 (Freidman, 2023) which was approved by the Governor on October 13, 2023. This legislation does not ban the irrigation of non-functional turf for CII customers until January 1, 2028, and homeowner's associations beginning January 1, 2029.
10. Allow suppliers to report either calendar year or fiscal year. Section 975 of the draft Regulation would require urban water supplier reports to be based on conditions of the previous state fiscal year. This is inconsistent with the State Water Board's adopted Water Loss Regulation, which allows reporting on either a fiscal or calendar year. Additionally, the Beaumont-Cherry Valley Water District operates on a calendar year cycle.



Section II – BCVWD Board of Directors Concerns and Comments Regarding Proposed Regulations:

1. The District Board of Directors (Board) is concerned about the State placing a water budget for livestock, agricultural products, orchard areas, and home gardens. The District has been in service for more than 100 years and commenced as an agricultural water supplier to our region.
2. The District Board identifies that the SWRCB should not determine what is considered an “essential” use of water; there are many water uses that have been invested in by District residences which support activities that are close to the heart, such as backyard play space (turf) that many consider essential, especially in times where homeless issues are not adequately addressed in public spaces (e.g. parks, etc. which now have to share space with these issues).
3. Residents have invested in landscapes at their residences and should be able to irrigate their landscape without having to modify landscapes to meet the regulations. The regulations should focus on efficient water use, not forced modification of existing landscaping. The proposed regulations should not target and penalize areas just because they don't meet current regulators' ideas on appropriate landscaping schemes or pallettes.
4. The State of California and the SWRCB should concurrently build, repair or modernize needed state water supply infrastructure (e.g. State Water Project, Delta Conveyance, Sites Reservoir) to maximize water supply in California and get these projects moving forward. It appears that the State continues to impose watering restrictions on the ratepayers just because the State of California and the SWRCB has failed to complete these water supply projects for all California residents.
5. The Board is concerned that the proposed Regulation will result in existing District residents being ultimately burdened with punitive water rates. The Board is also concerned that these rates will tend to affect older developments with landscape themes and pallettes that were appropriate at the time of development.
6. Laws and Ordinances within water suppliers' service boundaries will be affected by these new proposed regulations and will take time to align with the new regulations. For example, within the City of Beaumont, there is an Ordinance that requires homeowners to maintain existing turf in parkways, even if it is public parkway, in large areas of the city.
7. Proposed Regulation will require private developments to remove existing turf without turf conversion grant monies, etc., that should be offered by the implementing bodies enacting these regulations. This will result in unfair economic burdens on specific groups of people.



8. The Board is concerned about how the proposed regulations might impact the community look and feel. For example, the Board identifies that residents move to areas such as the City of Beaumont and Cherry Valley due to the aesthetic quality provided by a more rural environment. The Board is significantly concerned that the proposed regulations will impact the look and feel of the town by mandating the removal of grass and trees as these regulations are implemented. Due to regulations such as this, the landscape and ambiance of California has changed and will continue to change.
9. Removing turf and trees also impacts climate change (less CO₂ being cleaned from the air). This activity will also result in a lowering of the cooling benefits provided by said landscaping and increase adverse effects of climate change.
10. Home resale values and local area businesses may be adversely affected as an unintended consequence, if these restrictions are put into place (e.g., homeowner pool installation and local area pool builders).
11. New, water efficient plumbing fixtures are not functional in terms of overall usage (e.g., lowering the amount of non-potable water reclaimed) and wastewater systems require excessive maintenance due to insufficient flows.
12. This proposed regulation appears to be the result of state legislators and the Governor not wanting to “push back” on environmentalists in lieu of updating and modernizing the state’s water supply systems. For example, water is lost to the ocean each year that could be captured and repurposed with modernized water supply and delivery systems. It appears that SWRCB is considering penalizing homeowners for having turf; instead, fixing water supply and management issues that have been occurring over the last few decades in California.
13. The State of California legislation requiring increased affordable housing continues to mandate construction of new housing units (including additional units in backyards), populations continue to increase with no additional supplies. The Board of Directors is concerned that there is restrictive legislation requiring conservation but the State lack of success with modernizing the state’s water supply and storage systems.



We appreciated the opportunity to present our comments and suggestions for the Making Conservation a California Way of Life proposed Regulation. If you have any questions, call me at 951-845-9581 or email me at Dan.jaggers@bcvwd.org

Sincerely,


Daniel K. Jaggers, General Manager
Beaumont-Cherry Valley Water District


David Hoffman, Board President
Beaumont-Cherry Valley Water District

John Covington, Board Vice President
Beaumont-Cherry Valley Water District

Daniel Slawson, Board Secretary
Beaumont-Cherry Valley Water District


Lona Williams, Board Treasurer
Beaumont-Cherry Valley Water District

Andy Ramirez, Board Member
Beaumont-Cherry Valley Water District



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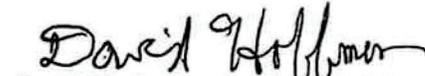
Andy Ramirez, Board Member
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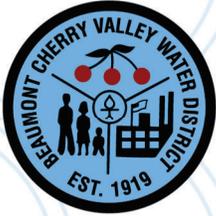
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Andy Ramirez, Board Member
Beaumont-Cherry Valley Water District

Attachment 3



Beaumont-Cherry Valley Water District
560 Magnolia Avenue, Beaumont, CA 92223
www.bcvwd.org

June 4, 2024

Board of Directors

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Lona Williams
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Daniel Slawson
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John Covington
Division 4

David Hoffman
Division 5

Ms. Courtney Tyler
Clerk to the Board
STATE WATER RESOURCES CONTROL BOARD
P. O. Box 100
Sacramento, California 95812-2000
Via: commentletters@waterboards.ca.gov

Re: Comment Letter – Proposed Making Conservation a California Way of Life Regulation (Updated 5/20/2024)

Dear Ms. Tyler:

The Beaumont Cherry Valley Water District (BCVWD or District) appreciates the opportunity to provide comments to the State Water Resources Control Board (State Water Board) on the Draft Making Conservation a California Way of Life Regulation (Regulation). This comment letter is intended to provide constructive and comprehensive recommendations to the State Water Board, and we ask for the opportunity to work collaboratively with the State Water Board and other retail water agencies to ensure successful implementation.

The District is an urban supplier located in Riverside County with some watershed lands located in San Bernardino County. The District’s service area is 28 square miles and serves the City of Beaumont and the unincorporated community of Cherry Valley.

The current population served by the District is approximately 64,375, with 21,542 service connections. In Beaumont, 13.5% of the population is 65 years of age and older; in Cherry Valley, 29.6% of the population are over 65 years of age based on the 2020 census, and generally living on fixed incomes. Fifty-five percent of the population in Beaumont is Hispanic or other minority. Portions of the City of Beaumont and Cherry Valley (approximately 10% by population) are classified as a disadvantaged community. The District is expected to double in population by approximately 2045, so water conservation will be a key component in achieving the projected growth.

BCVWD recognizes a continued effort toward greater water efficiency is needed for the change in climatic conditions. BCVWD is one of the fastest growing communities in Riverside County and in the State, so implementation of water conservation practices has been critical to ensure adequate water supplies to accommodate the experienced growth. As the community continues to grow and various State regulations become effective, the District would like to express its



desire to make the Regulation as flexible as possible allowing all urban water providers the ability to meet or exceed requirements.

BCVWD appreciates the efforts made by the State Water Board and some of the changes made to the proposed regulation. Specifically, the update to the date of compliance for urban water suppliers, the use of 20 percent of the Irrigable Not Irrigated (INI) area for outdoor residential water, and the updates to the dates for applicable standards of outdoor residential water use and for Commercial, Industrial, Institutional (CII) water use with Dedicated Irrigation Meters (DIMs). These updates to the proposed regulation will allow urban water suppliers some ease in meeting the compliance requirements.

BCVWD has compiled its' remaining comments related to the changes to the proposed regulations. BCVWD's comments are as follows:

1. The updates to the draft Regulation state that the square footing of existing residential trees and CII trees shall be described / identified by the supplier(s). This data will be very difficult and / or expensive to obtain. Along with the landscaped areas of CII dedicated irrigation meters, the inclusion of tree canopies will undoubtedly increase costs. The proposed draft Regulation also states that the volume of water associated with the residential and CII trees shall be calculated and updated annually. This will become burdensome on smaller urban water suppliers who do not have the capabilities and resources to update these volumes annually.
2. The timelines proposed in the draft Regulation do not support cost-effective implementation schedules necessary to achieve compliance. The changes to the proposed regulation included requirements for urban water suppliers to prepare a plan to meet the goal of achieving its urban water use objective. This will require additional District resources to write and implement the proposed plan. Water suppliers need adequate time to analyze existing water use efficiency programs, plan for cost-effective compliance with the standards, objectives, and implement required performance measures, budgets for staff and future water conservation programs, and allow for technological advancements. These timelines could result in unintended impacts, such as disproportionate impacts to disadvantaged communities and restrict water affordability. Modify the proposed timeline to provide additional time for all suppliers to budget for, develop and implement cost-effective programs.
3. There have been observed data gaps and inaccuracies in state-provided information, such as within the landscape area measurement (LAM) and the population data shown on the State Water Board website. The LAM data is inconsistent and has been found to be overestimated and underestimated in some data sets. These inconsistencies will have significant impacts on suppliers' outdoor water use standard and overall objective if not refined and/or corrected. The population data shown on the Water Use Objective Exploration Tool does not match data submitted to the DWR in previous reporting. The inaccurate data will most likely result in water use efficiency objectives that are inaccurate and that do not properly provide local flexibility that was intended by the proposed Regulation.
4. Include a "Data Error Adjustment" in the formula to calculate the Urban Water Use Objective. This would be a percentage applied to a supplier's budget for efficient indoor



residential water use, efficient outdoor residential water use, and efficient water use on CII landscapes with dedicated irrigation meters. The Data Error Adjustment would recognize the suppliers' historic progress and achieved savings (SB X7-7 based) and acknowledge that data used to develop and evaluate standards has intrinsic errors.

5. Clarify that technical assistance may be offered to the supplier if it does not meet its water use objective because it is unable to obtain the information required for the variances. The Urban Water Use Objective (UWUO) could change if water suppliers obtain variances, but the changes to the proposed regulation state that the waters associated with variances/temporary provisions must be calculated yearly (and submitted to the State Water Board every five years). This will also expend additional District resources to interpret and calculate this data.
6. Allow suppliers to provide alternatives to meeting CII mixed-use meters Performance Measure requirements currently proposed and allow suppliers to provide a list and crosswalk of current programs, practices, and rebates to the listed in-lieu technologies and water management programs. Suppliers should be able to provide a list of current and proposed programs, practices and rebates as an alternative.
7. Provide flexibility to suppliers to complete implementation of 100% of CII Performance Measures by removing the prescriptive timeline. This includes CII classifications, CII mixed-use meters and CII Best Management Practices. The prescriptive timeline removes the suppliers' flexibility to achieve broader goals cost-effectively based on their unique CII customers and local conditions.
8. Direct suppliers to implement programs for CII customers at or above the 80th percentile among ALL CII customers, rather than by individual CII Classification. The draft Regulation should also clarify that the initial classification of CII customers is based on existing customers at the time of the adoption of the Regulation. Suppliers must include any new CII customers after completing the initial classification of CII customers.
9. Establish a Landscape Efficiency Factor (LEF) that will support existing and new landscapes. The LEF should reflect a factor that allows for the amount of water necessary to efficiently irrigate both new and existing landscapes. The proposed Regulation would not support existing landscapes as it currently stands. Californians have made significant investments in existing landscape schemes that met then standard landscaping ordinances enacted by Cities and Counties (as well as Homeowners Associations) and these LEF's could have far reaching consequences.
10. Remove non-functional turf provisions from the draft Regulation. Section 974 (f)(3) of the draft Regulation would ban the irrigation of non-functional turf with potable water by July 1st, 2025. This does not concur with AB 1572 (Freidman, 2023) which was approved by the Governor on October 13, 2023. This legislation does not ban the irrigation of non-functional turf for CII customers until January 1, 2028, and homeowner's associations beginning January 1, 2029.
11. Allow suppliers to report either calendar year or fiscal year. Section 975 of the draft Regulation would require urban water supplier reports to be based on conditions of



the previous state fiscal year. This is inconsistent with the State Water Board's adopted Water Loss Regulation, which allows reporting on either a fiscal or calendar year. Additionally, the Beaumont-Cherry Valley Water District operates on a calendar year cycle.

We appreciate the opportunity to present our comments and suggestions for the Making Conservation a California Way of Life proposed Regulation. If you have any questions, call me at 951-845-9581 or email me at Dan.jagger@bcvwd.gov

Sincerely,

Daniel K. Jagers, General Manager
Beaumont-Cherry Valley Water District



**Beaumont-Cherry Valley Water District
Special Board Meeting
February 24, 2026**

Item 5

STAFF REPORT

TO: Board of Directors

FROM: Dan Jagers, General Manager

SUBJECT: Nominations for California Special Districts Association Board of Directors, Southern Network Seat C

Staff Recommendation

If desired, one of the following:

- A. Nominate a BCVWD Board member or the general manager to stand for election to the California Special Districts Association (CSDA) Board of Directors
- B. Take no action.

Executive Summary

The CSDA Elections and Bylaws Committee is seeking any interested elected Board member or general manager to stand for election to serve the 2027-2029 term. The CSDA Board of Directors is the governing body responsible for guiding the Association's legislative and member benefit programs. There is a significant time commitment to serve on the CSDA Board, including meetings in Sacramento, service on committees, mandatory attendance at conferences, and completion of the Leadership Academy. The duties and responsibilities of a CSDA Board member are outlined in Attachment 2.

Background

BCVWD is a member of the California Special Districts Association (CSDA), a non-profit organization formed to promote good governance and improved core local services through professional development, advocacy and other services for all types of independent special districts. The CSDA is governed by an 18-member Board of Directors elected from the membership in six geographic networks. BCVWD is part of the Southern Network.

Summary

The incumbent in Southern Network Seat C is Nikki Winslow of the Altadena Library District, who was appointed to the Seat C vacancy in December, 2025. It is not known if she will be seeking election to the 2027 term. BCVWD Director Williams applied for appointment to this vacancy in fall 2025.

In lieu of making a nomination of a BCVWD Board member or general manager, the Board may choose to cast a vote for another candidate in the election scheduled for June.

Should the Board choose to make a nomination, the deadline for submittal of the nomination is April 10, 2026 for placement on the ballot.



Given the current workload of the general manager and the District overall, and the and the potential fiscal impact, staff recommends no nomination at this time.

Fiscal Impact

If a BCVWD Board member or general manager were elected, potentially significant expenses would be incurred to fulfill the duties of the office. The fiscal impact to the District would include registration, travel, accommodations and meals, expenses to / from CSDA conferences and trainings (such as the Leadership Academy), and potential additional expenses incurred that are not reimbursed to the elected Board member by CSDA. Additional unknown incidental expenses and director per diems or staff time will be incurred.

Attachment(s)

1. CSDA Board of Directors Call for Nominations – Seat C
2. CSDA Policy 2.16: Board Commitments & Responsibilities

Staff Report prepared by Lynda Kerney, Executive Assistant



**California Special
Districts Association**

Districts Stronger Together

DATE: February 9, 2026
TO: CSDA Voting Member Presidents and General Managers
FROM: CSDA Elections and Bylaws Committee
SUBJECT: **CSDA BOARD OF DIRECTORS CALL FOR NOMINATIONS
SEAT C**

The Elections and Bylaws Committee is looking for Independent Special District Board Members or their General Managers who are interested in leading the direction of the California Special Districts Association for the 2027 - 2029 term.

The leadership of CSDA is elected from its six geographical networks. Each of the six networks has three seats on the Board with staggered 3-year terms. Candidates must be affiliated with an independent special district that is a CSDA Regular Member in good standing and located within the geographic network that they seek to represent.
(See attached CSDA Network Map)

The CSDA Board of Directors is the governing body responsible for all policy decisions related to CSDA's member services, legislative advocacy, professional development, and other resources for members. The Board of Directors is crucial to the operation of the Association and to the representation of the common interests of all California's special districts before the Legislature and the State Administration. Serving on the Board requires one's interest in the issues confronting special districts statewide.

Commitment and Expectations:

- Attend all Board meetings, usually 4-5 meetings annually, at the CSDA office in Sacramento.
- Participate on at least one committee, meets 3-5 times a year at the CSDA office in Sacramento.
(CSDA reimburses Directors for their related expenses for Board and committee meetings as outlined in Board policy).
- Attend, at minimum, the following CSDA annual events: Special Districts Legislative Days - held in the spring, and the CSDA Annual Conference - held in the fall.
*(CSDA does **not** reimburse expenses for the two conferences even if a Board or committee meeting is held in conjunction with the event)*
- Complete all four modules of CSDA's Special District Leadership Academy within 2 years of being elected.
*(CSDA does **not** reimburse expenses for the Academy classes even if a Board or committee meeting is held in conjunction with the event).*

Nomination Procedures: Any Regular Member district in good standing is eligible to nominate one person, a board member or managerial employee (as defined by that district's Board of Directors), for election to the CSDA Board of Directors. **A copy of the member district's resolution or minute action and Candidate Information Sheet must accompany the nomination. The deadline for receiving nominations is April 10, 2026. Nominations and supporting documentation may be mailed or emailed.**

Mail: 1112 I Street, Suite 200, Sacramento, CA 95814
Fax: 916.442.7889
E-mail: amberp@csda.net

Once received, nominees will receive a candidate's letter. The letter will serve as confirmation that CSDA has received the nomination and will also include campaign guidelines.

CSDA will begin electronic voting on June 9, 2026. All votes must be received through the system no later than 5:00 p.m. July 24, 2026. The successful candidates will be notified no later than July 31, 2026. All selected Board Members will be introduced at the CSDA Annual Conference in Palm Desert, CA in August 2026.

Expiring Terms

(See enclosed map for Network breakdown)

Northern Network	Seat C – Fred Ryness, Director, Burney Water District*
Sierra Network	Seat C – Pete Kampa, General Manager, Groveland Community Services District*
Bay Area Network	Seat C – Antonio Martinez, Director, Contra Costa Water District*
Central Network	Seat C – Curtis Jorritsma, General Manager, Hilmar County Water District*
Coastal Network	Seat C – Vince Ferrante, Director, Moss Landing Harbor District*
Southern Network	Seat C – Nikki Winslow, District Director, Altadena Library District*

(* = Incumbent is running for re-election)

CSDA will be using a web-based online voting system allowing your district to cast your vote easily and securely. *Electronic Ballots will be emailed to the main contact in your district June 9, 2026. All votes must be received through the system no later than 5:00 p.m. July 24, 2026.*

*Districts can opt to cast a paper ballot instead; but you must contact Amber Phelen by e-mail amberp@csda.net **by April 24, 2026** in order to ensure that you will receive a paper ballot on time.*

CSDA will mail paper ballots on June 9, 2026 per district request only.

If you have any questions, please contact Amber Phelen at amberp@csda.net.



**California Special
Districts Association**
Districts Stronger Together

2027-2029 TERM BOARD OF DIRECTORS NOMINATION FORM

Name of Candidate: _____

Title/District: _____

Mailing Address: _____

Network: _____ (see map)

Telephone: _____

(PLEASE BE SURE THE PHONE NUMBER IS ONE WHERE WE CAN REACH THE CANDIDATE)

Fax: _____

E-mail: _____

Return this form, a Board resolution/minute action supporting the candidate, and Candidate Information Sheet by mail or email to:

CSDA
Attn: Amber Phelen
1112 I Street, Suite 200
Sacramento, CA 95814
(877) 924-2732

amberp@csda.net

DEADLINE FOR RECEIVING NOMINATIONS:

April 10, 2026 at 5:00 p.m.



**California Special
Districts Association**
Districts Stronger Together

2027-2029 TERM - CSDA BOARD CANDIDATE INFORMATION SHEET

The following information **MUST** accompany your nomination form and Resolution/minute order:

Name: _____

District/Company: _____

Title: _____

Elected/Appointed/Staff: _____

Length of Service with District: _____

1. Do you have current involvement with CSDA (such as committees, events, workshops, conferences, Governance Academy, etc.):

2. What other state-wide associations have you been involved with? (such as CSAC, ACWA, League, etc.):

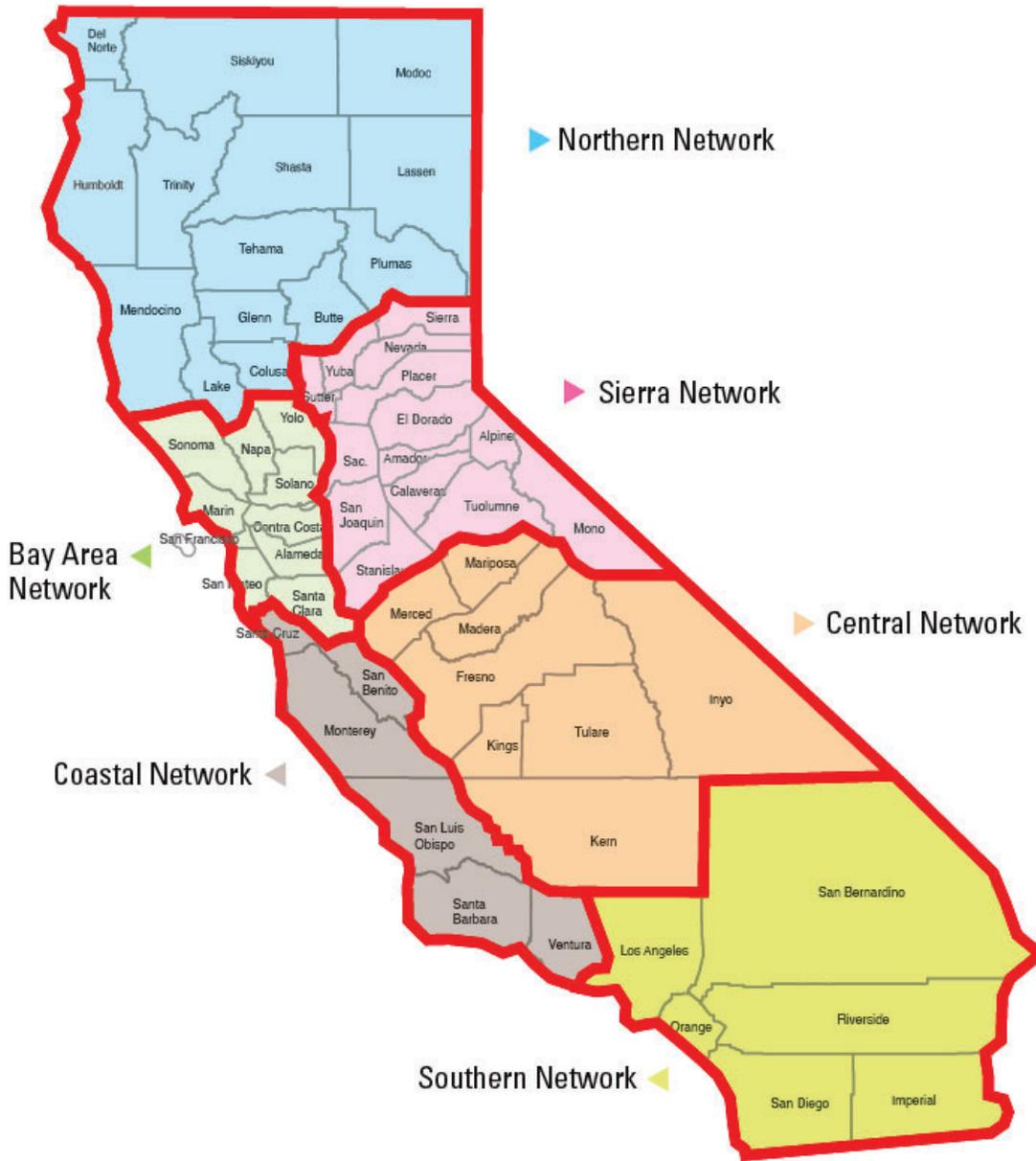
3. List your local government involvement (such as LAFCo, Association of Governments, etc.):

4. List your involvement in civic and/or non-profit organization:

****Candidate Statement – Although it is not required, each candidate is requested to submit a candidate statement of no more than 300 words in length. Any statements received in the CSDA office after the nomination deadlines will not be included with the ballot.**



California Special Districts Association
DISTRICT NETWORKS



2026 Board of Directors by Networks

Northern Network

Greg Orsini, *McKinleyville Community Service District*
 Fred Ryness, *Burney Water District*
 Kevin Phillips, *Paradise Irrigation District*

Sierra Network

Steve Palmer, *Donner Summit Public Utilities District*
 Pete Kampa, *Groveland Community Services District*
 Noelle Mattock, *El Dorado Hills Community Services District*

Bay Area Network

Kathryn Slater-Carter, *San Mateo County Harbor District*
 Ryan Clausnitzer, *Alameda County Mosquito Abatement District*
 Antonio Martinez, *Contra Costa Water District*

Central Network

Curtis Jorritsma, *Hilmar County Water District*
 Patrick Ostly, *North of River Sanitary District*
 Lorenzo Rios, *Clovis Veterans Memorial District*

Coastal Network

Scott Duffield, *Heritage Ranch Community Services District*
 Vincent Ferrante, *Moss Landing Harbor District*
 Elaine Magner, *Pleasant Valley Recreation & Park District*

Southern Network

Don Bartz, *Phelon Pinon Hills Community Services District*
 Jo MacKenzie, *Vista Irrigation District*
 Nikki Winslow, *Altadena Library District*

Last Updated December 2025