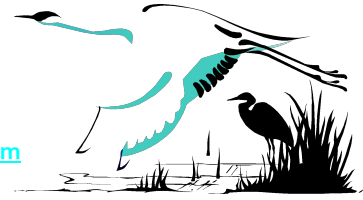


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August 14, 2025

FROM: Tom Dodson & Kaitlyn Dodson-Hamilton, Tom Dodson & Associates
Clay Sorensen & Veva Weamer, West Yost
Lisa Patterson & Daniel Smith, HDR

TO: Mr. Thaxton Van Belle, Director of Water Reclamation
City of Beaumont

Dear Mr. VanBelle,

On behalf of Tom Dodson & Associates (TDA), in partnership with West Yost Associates (West Yost) and HDR (henceforth "Project Team"), I am submitting this amendment to our 2023 Proposal to Provide Consulting Services to Prepare an Adaptive Management and Mitigation Plan (AMMP) for the City of Beaumont (2023 Proposal) to address the evolution of the project in the years since our contract was awarded.

The Project Team has completed Phase I of our work efforts, concluding with the completion of the Phase 1 Report as a deliverable, which was provided to the City earlier this year (January 2025). At the City's request, in February 2025, the Project Team provided a Technical Memorandum (TM or Memo) to assist in evaluating and selecting the reduced discharge scenario to pursue for the Beaumont Wastewater Treatment Plant (WWTP) to Cooper's Creek. The TM described the scope of work for each discharge reduction scenario (one reducing the discharge to 1.7 million gallons per day [MGD] and another exploring a lower reduction in discharge). The TM provided conclusions and recommendations, and roughly outlined the scope of work for the monitoring and modeling necessary to proceed with either scenario. In June of 2025, the City Council directed the Director of Water Reclamation to pursue Scenario 1, which consists of reducing the WWTP discharge to Cooper's Creek to an average of 1.7 MGD.

This amendment to our 2023 Proposal addresses the Phase 2 scope of work necessary to advance implementation of Scenario 1. This amendment also addresses the expanded scope of work related to requirements for Wastewater Change Petition under California Water Code Section 1211 (1211 Permit or Change Petition) that the City must obtain in order to facilitate enable the reduction in order to reduce the current discharge to 1.7 MGD.

The overall goal of Phase 2 is to generate the data required to file a Change Petition with the State Water Resources Control Board (SWRCB) to reduce the WWTP discharge to 1.7 MGD. Based on discussions with the SWRCB in July 2025, the completed application for the Change Petition will require both compliance with the California Environmental Quality Act (CEQA) through a draft Environmental Impact Report (EIR) and the draft AMMP. These substantial updates to our original 2023 scope of work have been precipitated by the above referenced discussions with the SWRCB, and this proposal outlines the updated scope, costs and estimated timelines to generate the necessary information and documentation for the 1211 Change Petition. Based on these discussions with the SWRCB, the major updates to the Phase 2 scope of work from the 2023 Proposal are the timing of the preparation of the AMMP and the necessary CEQA documentation:

- **AMMP.** The 2023 Proposal assumed the AMMP would be drafted in Phase 3. Based on the amount of work completed in Phase 1 and discussions with the SWRCB, the City is in a position to expedite this process and therefore the Project Team plans to complete a draft AMMP in Phase 2 to support the Change Petition process.
- **CEQA.** The proposal assumed that the CEQA document would cover the implementation of the AMMP, but did not address compliance with CEQA for the whole of the actions needed to file a Change Petition with the SWRCB, which includes analyzing the impacts related to reducing the discharge from the City's WWTP to 1.7 MGD, the implementation of the physical projects that would utilize the recycled water over 1.7 MGD, and finally, address the implementation of the AMMP as mitigation to address impacts thereof.

Another integral component of Phase 2 is the initiation and implementation of the Baseline Monitoring Program necessary to characterize existing conditions within the Study Area prior to any reduction in discharge from the WWTP. This Phase 2 scope of work has been refined to incorporate the Baseline Monitoring Program as described in the Phase 1 Report. While the 2023 Proposal originally anticipated a second year of baseline monitoring to occur in Phase 3, adjustments to the schedule and scope now place both the first and second years of baseline monitoring within Phase 2.

As a result of the above noted factors, the scope of Phase 2 has expanded beyond what was outlined in the 2023 Proposal. The need for a Phase 3 scope of work and the scope itself is yet to be determined.

The revised Phase 2 scope of work is broken out into nine tasks and the number convention begins following the tasks completed in Phase 1:

- Task 9. Project Management, Phase 2 Scoping, and Meetings
- Task 10. Initiate and Implement Baseline Monitoring Program
- Task 11. Develop Conceptual Project Mitigations for Biologic Resources
- Task 12. CEQA Checklist Evaluation of 1211 Permit Change of Use, Facilities Proposed

- for Change of Use and AMMP
- Task 13. Prepare the AMMP
- Task 14. Change Petition Support
- Task 15. Prepare Scope of Work and Cost Estimate for Phase 3
- Task 16. As-Needed Support
- Task 17. Stream Gaging

Each task is described in more detail below.

Task 9: Project Management, Phase 2 Scoping, and Meetings

This task includes all meetings, project coordination, and administration required for Phase 2. This includes conducting monthly check-in meetings with the City on project progress; conducting up to four check in meetings with the regulators including the SWRCB, the California Department of Fish and Wildlife (CDFW), and/or United States Fish and Wildlife (USFW); Project Team coordination meetings; and performing routine project management activities (staffing, tracking project schedule and budget, and managing subcontractors). The task also assumes the work performed to prepare the detailed scope of work for Phase 2. We estimate Phase 2 to take place over two and a half years.

Assumptions:

1. Phase 2 is two and a half years in duration
2. Monthly and quarterly meetings will be virtual and up to 1-hour in length

Deliverables:

1. Meeting agendas for the monthly check-in meetings with the City will be sent prior to each meeting, and meeting notes will be sent following each meeting.

Task 10: Initiate and Implement Baseline Monitoring Program

The objective of this task is to perform the Baseline Monitoring Program described in detail in the Phase 1 Report. Baseline monitoring will be performed for about 2 years during Phase 2 and will occur between approximately October 2025 and September 2027. The Baseline Monitoring Program includes the following:

- Groundwater equipment installation activities
- Biologic baseline monitoring activities
- Hydrologic baseline monitoring activities
- Supplemental stream gaging activities (supplemental to grant funded work in Task 17)
- Reporting

Below is a brief description of the Baseline Monitoring Program activities to be completed under Task 10 and described in more detail in the Phase 1 Report.

Subtask 10a. Groundwater equipment installation activities

Installation activities include all activities required to install groundwater level transducers with conductivity sensors at up to 10 wells. This work includes:

- purchasing and preparing equipment,
- canvassing sites and coordinating with well owners for inclusion in the program,
- preparation for all installation activities, and
- installing transducers, and set up of well information in the project database

Assumptions:

1. No permits will be required for installations.
2. Stream gaging installations are included in Task 17.
3. Up to ten groundwater pressure transducers with specific conductivity sensors and direct read cables will be installed where well owners allow access to their wells.

Subtask 10b. Biologic Baseline Monitoring Activities

Biologic baseline monitoring activities includes:

- Collection, processing, QA/QC, and analysis of normalized difference vegetation index (NDVI) data for WY 2024 through WY 2027,
- Performing two annual drone surveys (2026, and 2027), and
- Conducting one ground survey (2027).

Subtask 10c. Hydrologic Baseline Monitoring Activities

Hydrologic baseline monitoring activities encompass the recommended baseline monitoring for groundwater and surface water. This work includes:

- Quarterly site visits to download up to ten groundwater pressure transducers,
- One reference point and thalweg survey with a professional land surveyor,
- Collection and processing of climate data,
- Collection of maximum benefit data from the city's consultant, and
- Processing, qa/qc, and uploading all hydrologic data to hydrodave.

Assumptions:

1. Stream gaging and surface water monitoring is not included in this subtask and are included in Task 17.

Subtask 10d. Stream Gaging Contingency

Task 17 describes the scope of work to install, maintain, and monitor four stream gages using grant funding from DWR. The draft agreement with DWR includes additional task requirements for stakeholder outreach, permitting, and reporting to DWR that were not initially planned for,

and this work is not fully covered by the grant funding. Task 10d covers the cost of the supplemental work that is not grant funded. Task 17 is a standalone task for grant reporting purposes.

Assumptions:

1. Permits may be required for stream gage installation, the extent of which would be defined following Phase 2 initiation. Permitting fees are included here in task 10d.

Subtask 10e. Reporting

We will prepare one Baseline Monitoring Report documenting the baseline monitoring program setup, data collection, analysis, and results. The reporting period will include data from the end of the Phase 1 Report (DATE) through September 2027. This reporting period will cover about two years of data from the Baseline Monitoring Program. This subtask includes the preparation of a Report in draft and final form.

Deliverables:

1. One draft Baseline Monitoring Report will be prepared for the City's review. One round of comments will be incorporated into a final draft.

Task 11: Develop Conceptual Project Mitigations to Biologic Resources

The objective of this task will be to articulate and define potential mitigation actions for biologic resources impacted by the reduction in discharge to Cooper's Creek for inclusion in CEQA and the AMMP. The Project Team will develop conceptual mitigations and descriptions that may be selected as mitigation measures during the implementation of the AMMP.

Assumptions:

1. Mitigation actions/projects only need to be defined at a conceptual level and feasibility analyses are not required.

Deliverables:

1. Deliverables for this task will be incorporated into Tasks 12 and 13.

Task 12: CEQA Checklist Evaluation of 1211 Permit Change of Use, Facilities Proposed for Change of Use, and AMMP

The objective of this task is to prepare a draft Environmental Impact Report (EIR) in compliance with the California Environmental Quality Act (CEQA). The draft EIR is necessary to meet the provisions of the Change Petition, and would cover the facilities necessary to utilize the excess discharge resulting from the proposed reduction in discharge to Cooper's Creek, and finally,

address the AMMP. TDA proposes an approach that we believe will cover the whole of these activities, that can be used in a programmatic manner as the City becomes ready to implement/construct future facilities. Thus, we propose preparation of a “program” EIR (PEIR) that will begin with the preparation of an Initial Study Checklist to eliminate issues that would be less than significant or that are less controversial (such as Mineral Resources, Population and Housing, Recreation, etc.) and follow this effort with the publication of a Notice of Preparation (NOP) announcing preparation of a Focused Program EIR that would address the remaining issues not covered in the Initial Study. This letter contains TDA’s proposal to carry-out the compliance with CEQA through preparation of a Program EIR, and to move the City closer to obtaining its 1211 Permit.

Subtask 12a

Meetings to go over the CEQA Process, Discuss Revisions, and Determine Scope

TDA Staff will be available for progress meetings (up to 20 one hour meetings focused on CEQA) by phone/virtually as needed. This task may be used for conference calls and, where necessary, up to two in-person meetings. TDA will provide optional services to draft necessary presentations or collaborate with VWD staff to draft any required presentations for meetings. This will ensure adequate communication between the Project Team, City Staff, and Legal Team as we work together to prepare a comprehensive CEQA Documentation.

Project Management and Administration (specific to CEQA)

TDA Staff will coordinate closely with the Project Team to ensure that the EIR and associated technical documents delivered to the City are legally defensible, accurate, and useful to decision makers when considering approval of the project. TDA will be responsible for (1) managing task scheduling and assignment, management of resources, monitoring of costs, and schedule adherence; (2) consultation and coordination with local and state agencies relative to the environmental document and the environmental review process; (3) coordination and communications with City staff to ensure that State and local policies, procedures, and any applicable codes are complied with and, where applicable, are incorporated into the IS/MND; (4) ensuring that the environmental review process and the IS/MND satisfy the statute and guidelines of CEQA’s adopted Environmental Review Guidelines; and (5) representing the consultant team in public meetings and conference calls as requested by the City.

The project management task is based on the duration of the estimated schedule, which is presented below under Proposed Schedule. We assume three hours per month for up to twelve months by the Project Manager, with additional hours dedicated to additional TDA team members. If the schedule or the project is extended for reasons beyond TDA’s control, a contract amendment may be required for additional fees for project management and coordination efforts.

Drafting and Finalizing the Project Description

TDA, in partnership with the Project Team, will develop a comprehensive project description that will be utilized to forecast the potential environmental impacts of the project. The project description will include a detailed summary of the overall project and its potential effects on the environment. Construction and operation scenarios will be compiled in coordination with the Project Team and City staff for this specific recycled water conversion project to allow detailed impact forecasts. Once the project description is completed, a draft will be forwarded to Project Team staff for review and comment. The end product of this effort will be a detailed project description that will be utilized by TDA in the Initial Study, and later the Focused EIR, to forecast environmental effects of implementing the project. This same project description with minor editing will be used as a basis for TDA, on behalf of the City, to write the initial consultation letters pursuant to AB 52. TDA will draft letters to the Tribes who have requested consultation from the City under AB 52, and will include the Project Description and related graphics as attachments to the initial AB 52 consultation letters.

Subtask 12b: Technical Analyses and Modeling

Air Quality, Greenhouse Gas and Energy Impact Analysis

TDA will oversee preparation a technical analysis to evaluate potential air quality and greenhouse gas (GHG) emissions impacts associated with the proposed project. This technical analysis will be prepared by Urban Crossroads. Impacts will be based on the current methodology of the South Coast Air Quality Management District (SCAQMD) for projects within the South Coast Air Basin. Modeling will be conducted using the most current version of California Emissions Estimator Model (CalEEMod) and will be included as an appendix to the environmental document. Model data will be compiled for the following project activities: construction, operation, local significance thresholds, health, and GHG.

TDA will oversee preparation of a technical analysis to evaluate potential energy impacts associated with the proposed project that would meet CEQA requirements. This technical analysis will be prepared by Urban Crossroads.

Phase I Cultural Resources Report

TDA will oversee preparation of a technical analysis to evaluate potential impacts the cultural resources (archaeological and historical resources) along the pipeline alignments. CRM TECH staff are extremely adept at preparing cultural resources reports, and have conducted several studies for similar well development projects. Where applicable, CRM TECH staff will facilitate compliance with compliance with Section 106 of the National Historic Preservation Act. CRM TECH will also conduct a field study of the project area, as well as a records search of the footprint to ultimately compile a Historical/Archaeological Resources Survey Report that will meet CEQA. CRM TECH will also reach out to area tribes to invite them to attend the site survey, as we have found this to be a useful tool in consulting under AB 52.

Biological Resources Report & Jurisdictional Delineation

TDA believes that a biological resources assessment must be developed for this project. While much of the data from the Phase 1 Report can be utilized, this report will be geared towards CEQA compliance, and will also cover the areas that the City identifies for facilities to be installed as part of the project. This is therefore presented as an optional task. TDA will oversee preparation of a technical analysis to evaluate potential impacts the biological resources that may occur near or within the project footprint, which includes each of the well sites and along the pipeline alignment. HDR staff are incredibly familiar with the project area, and have conducted several studies for similar project. Because the project footprint may include areas that have not been completely developed, this assessment is crucial to determining what species may be impacted by the proposed project, and HDR will determine the appropriate treatment of any potential species that may exist within the footprint, in most cases through implementation of mitigation that complies with California Department of Fish and Wildlife standards and requirements. Additionally, as part of the biologist's field assessment, HDR will determine whether any jurisdictional features would be impacted by the proposed project, and if jurisdictional features are determined to be present within the construction footprint, HDR will prepare a Preliminary Jurisdictional Delineation. This is a task for which a fee is provided in this proposal, but is dependent on the determination made as a result of the biological field survey. Additionally, HDR biologists will prepare a Western Riverside MSHCP Consistency Analysis. This does not include conducting any new individual focused species surveys. If necessary because of the MSHCP, additional surveys will be at an additional cost at the recommendation of the biologist.

Refine Hydrological Analysis (Condense Phase I Report, and Expand on Hydrological impacts related to new recycled water use facilities)

While much of the data from the Phase 1 Report can be utilized to support the hydrological impacts that will be analyzed in the Focused EIR, West Yost will work with the Project Team and the City to analyze the potential impacts to water quality, surface water hydrology, and groundwater levels as a result of implementation of the proposed project. The analysis will focus on impacts to surface water and groundwater based on location(s) of the proposed project and articulate the perceived impacts to the parameters described above, if any.

Noise Impact Analysis

TDA will oversee preparation of a technical analysis to evaluate potential noise and vibration impacts for the construction and operational phases proposed project. Urban Crossroads and TDA will utilize previous experience and knowledge of similar noise environments to characterize the existing conditions for the project area. The ambient noise environment around the project site is expected to be relatively low, based on the residential location of the well development site. Urban Crossroads will conduct 24-hour noise monitoring at the project site to establish noise baseline. Urban Crossroads will assess temporary noise and vibration impacts during project construction activities using industry-standard analysis techniques and using scheduling, equipment mix, hauling, and truck trip information as provided developed in coordination with the City and Project Team. Additionally, construction-related vibration will be

analyzed with respect to the adjacent residences located adjacent to the project footprint. Construction related noise and vibration impacts will be analyzed in terms of the surrounding non-sensitive and sensitive receptors. The findings of the noise and vibration analyses and impact assessment will be provided in the Focused EIR and pertinent calculations and technical information will be provided in an Appendix.

Note that it is possible that comments on the Notice of Preparation/IS/MND may indicate that additional technical studies should be considered as part of the CEQA process to ensure full substantiation of each issue. These topics include but are not limited to Wildfire (Wildfire Protection Plan/Evacuation Plan), Transportation (Vehicle Miles Traveled/Trip Generation), Agricultural Resources (Land Evaluation Site Assessment), Hazards and Hazardous Materials (Phase 1 Environmental Site Assessment) and Geology and Soils (Geotechnical Report). This will be assessed as an addition to our scope of work.

Subtask 12c: Draft Initial Study (ruling out any topics that may be potential significant to focus on in a Focused EIR and Notice of Preparation)

Draft Initial Study

The draft IS/MND will follow the CEQA Guidelines Appendix G Initial Study format and will clearly identify and address all potential issues facing the proposed project. It will be clearly written and will avoid the use of technical jargon, to the extent possible, so that the document is easily understood, whilst meeting all of the requirements set forth in CEQA and the State CEQA Guidelines. The completed draft IS/MND will be submitted to the City and Project Team for initial review and comment. We assume two rounds of review of the draft IS/MND. Modification to the scope of work, budget, and time frame may be necessary if additional reviews are required.

Note that the IS/MND will be utilized in support of the Notice of Preparation (NOP) of the Focused Environmental Impact Report (EIR)

Finalize Initial Study

TDA will edit the IS/MND upon receipt of the comments from the City and Project Team. TDA will reproduce and distribute the public draft IS/MND and NOI to responsible agencies, trustee agencies, and other special interest groups and individuals identified on a distribution list to be developed in consultation with WMWD. It is assumed that TDA will file the NOI with the Riverside County Clerk-Recorder and a Notice of Completion with the State Clearinghouse. TDA will draft a Notice of Availability (NOA), which will provide notice to the public pursuant to CEQA Guidelines Section 15072(b). TDA will provide copies of the draft report and notices to public agencies and interested parties, as required.

Draft Notice of Preparation (NOP)

TDA will prepare a Notice of Preparation (NOP) based on the Project Description prepared to

address the scope and facilities proposed by the project, and will include the Draft Initial Study as part of this posting. The NOP will announce the City's intent to prepare a Focused Program EIR for compliance with CEQA. TDA anticipated expending approximately 10 hours of Project Manager time, in addition to a few hours of other TDA Staff time in preparation of the NOP. The end product of this effort will be a final decision on the scope of the EIR and a set of responses that will identify the concerns of the various member agencies and other interested parties in the Project as a program.

Publish NOP in Newspaper, File NOP with County and State Clearinghouse

TDA will assist the City with noticing the NOP in the newspaper of local circulation, and will file the NOP Notice with both the County and State Clearinghouse. This effort includes drafting the Notice, time expended filing the notice, and the cost of the newspaper notice as a direct cost.

Distribute NOP via Signature Service Priority Mail to up to 30 recipients

TDA will reproduce and distribute notice of the public draft IS/MND and NOP to responsible agencies, trustee agencies, and other special interest groups and individuals identified on a distribution list to be developed in consultation with the Project Team and the City. This shall include Priority Mail Signature Service mailings to up to 30 recipients. Additional recipients will be assessed at an additional direct cost (about \$13 per mailing). This approach allows us to maintain a list of recipients' receipt of the mailings to be maintained as part of the project file in the event an entity claims that it did not receive said mailer. TDA will also email any recipients that the City identifies as part of our efforts.

Accessibility Remediation (making the document accessible per State Clearinghouse Requirements) (Assume up to 500 pages at \$5 pp)

TDA is including Accessibility Compliance as part of our new scope of work because, in order to submit documents to the State Clearinghouse, Accessibility is a newer requirement that must be met. TDA has researched a number of options for Accessibility compliance, and it would appear that outsourcing the documents to experts in this field is the most cost effective approach for meeting this requirement. TDA is presently working from an assumption that the cost per page to make a document accessible (including all technical studies) is an average of 5 dollars per page, with a potential for upwards of 6 dollars per page due to the complexity of the documents we produce (primarily the number of tables used). Thus, TDA is providing a scope of work that assumes that this Initial Study/NOP package will not exceed 500 pages, and the budget allocated to this task reflects this assumption. Additional pages will be charged at cost by the selected PDF remediation team. TDA expects to utilize Allyant for this project.

Hold a Scoping Meeting during 30 day Notice of Preparation Comment Period

A Scoping Meeting is held during the Notice of Preparation circulation as part of preparation of an EIR. TDA has also held community meetings during the public review process for an EIR with the aim of communicating the project impacts to stakeholders and the public, or to obtain comments on the EIR from the public after explaining the project purpose, objectives, and impacts. TDA would work with the City and Project Team to determine the appropriate

audience for the scoping meeting, and would send out notification to these persons or entities via mail, with publication of the notice for the scoping meeting in the local newspaper. TDA will prepare the presentation, provide scoping meeting materials, and would put forth the best of our team address the scale of the scoping meeting necessary to meet the needs of this project. TDA anticipates that up to two members of each Project Team would be available in person or virtually to attend the scoping meeting.

Subtask 12d: Draft Focused EIR

Executive Summary, Introduction, and Project Description (Chapters 1-3)

An EIR typically begins with an Executive Summary and an Introduction. The Executive Summary typically summarizes the impacts of implementing the project, and summarizes mitigation measures that support the environmental impact determination. The Executive Summary also summarizes the alternatives to the proposed project. The Introduction discusses the purpose and use of the EIR, and also incorporates comments received during the NOP comment period and directs the reader to where their comments are answered in the document and briefly responds to each comment. In addition to the above, the EIR must discuss alternatives and topical issues such as growth inducement. TDA Staff will draft these chapters, and has included refinement as part of collaboration with the Project Team, Legal Team, and City.

Focused EIR Environmental Topics (expected to be up to 8 of the 21 Initial Study Checklist Topics; excluding Bio & Hydrology)

As the scope of the Focused EIR has not yet been narrowed, TDA anticipates that up to 8 subchapters may be analyzed in the Focused EIR, excluding Biological Resources and Hydrology and Water Quality, which are discussed in more detail below. These 8 topics are likely, though not “surely” to include topics such as Air Quality, Cultural Resources, Energy, Greenhouse Gas, Noise, Tribal Cultural Resources, and Utilities and Service Systems. TDA Staff will draft these chapters, and has included refinement as part of collaboration with the Project Team, Legal Team, and City.

Biological Resources EIR Subchapter

This subchapter shall be evaluated in coordination with HDR as this is their area of expertise. Close attention to impacts to biological resources and mitigation required to minimize impacts to biological resources shall be evaluated herein. TDA Staff will draft this chapter. HDR Staff, in coordination with West Yost and TDA, will work on development of a mitigation measure that outlines the proposed components of the AMMP. This will be utilized as a mitigation measure to address potential impacts from the proposed reduction in discharge by the City as part of this project.

Hydrology & Water Quality EIR Subchapter

This subchapter shall be evaluated in coordination with West Yost as this is their area of expertise. The impacts to surface water and groundwater quality, and surface water flow and

groundwater levels will be articulated along with any mitigation measures to minimize impacts. TDA is including up to 45 hours of our staff time in developing this subchapter. West Yost Staff, in coordination with HDR and TDA, will work on development of a mitigation measure that outlines the proposed components of the AMMP. This will be utilized as a mitigation measure to address potential impacts from the proposed reduction in discharge by the City as part of this project.

Alternatives

TDA will work with the City, Legal, and Project Team to develop Alternatives that shall be evaluated as part of the Alternatives Analysis in the PEIR. TDA Staff will draft this chapter. Input from West Yost and HDR on how the alternatives would cause different or lesser impacts on Biological Resources and Hydrology and Water Quality will be provided. TDA expects that this analysis will evaluate a No Project Alternative and a singular Alternative to the proposed project. Analysis of additional alternatives falls outside of this scope of work and may require an amendment to this cost proposal.

Growth Inducing Topics

TDA will work with the City, Legal, and Project Team to provide an analysis of growth inducing impacts that may result from the proposed project. This analysis will include cumulative impact analyses for each of the topics analyzed in the Focused EIR.

Mitigation Monitoring and Reporting Program

TDA will prepare a Mitigation Monitoring and Reporting Program (MMRP) based on mitigation measures identified in the IS/MND and pursuant to Section 21081.6 of the CEQA Public Resources Code. The MMRP will be defined through working with City staff to identify appropriate monitoring steps/procedures in order to provide a basis for monitoring such measures during and upon project implementation. It will identify the significant impacts that would result from the proposed project; proposed mitigation measures for each impact; the timing at which the measures will need to be conducted; the entity responsible for implementing the mitigation measure; and City or other agency responsible for monitoring the mitigation effort and ensuring its success.

Collaboration with Legal Team and City to refine the Draft EIR (Expect up to 2 rounds of review with modest changes per Legal)

In our experience, collaborating with the City's Legal Team can make the end result of an EIR better, but it can require a good amount of time dedicated to ensuring that the whole team understands the revisions, why such revisions are needed, and revising the document correctly.

Subtask 12e: Final Focused EIR

Compile Final EIR as PDF in two volumes (Volume 1: EIR; Volume 2: Technical Appendices)

TDA will compile two PDF documents that will make up two volumes of the EIR. This effort is

mainly organizational in nature, but as the EIR is a legal document, it requires attention to detail.

Prepare and Publish Notice of Completion and Notice of Availability in Newspaper, File Notices with County and State Clearinghouse

TDA will assist the City with noticing the DEIR through a Notice of Availability (NOA) in the newspaper of local circulation, and will file the NOA and Notice of Completion (NOC) with both the County and State Clearinghouse. This effort includes drafting the Notices, time expended filing the notice, and the cost of the newspaper notice as a direct cost.

Distribute PEIR Notices via Signature Service Priority Mail to up to 30 recipients

TDA will reproduce and distribute notice of the public draft PEIR to responsible agencies, trustee agencies, and other special interest groups and individuals identified on a distribution list to be developed in consultation with the Project Team and the City. This shall include Priority Mail Signature Service mailings to up to 30 recipients. Additional recipients will be assessed at an additional direct cost (about \$13 per mailing). This approach allows us to maintain a list of recipients' receipt of the mailings to be maintained as part of the project file in the event an entity claims that it did not receive said mailer. TDA will also email any recipients that the City identifies as part of our efforts.

Accessibility Remediation (making the document accessible per State Clearinghouse Requirements) (Assume up to 2000 Pages at \$5 pp)

TDA is including Accessibility Compliance as part of our new scope of work because, in order to submit documents to the State Clearinghouse, Accessibility is a newer requirement that must be met. TDA is presently working from an assumption that the cost per page to make a document accessible (including all technical studies) is an average of 5 dollars per page, with a potential for upwards of 6 dollars per page due to the complexity of the documents we produce (primarily the number of tables used). Thus, TDA is providing a scope of work that assumes that this Initial Study/NOP package will not exceed 2,000 pages, and the budget allocated to this task reflects this assumption. Additional pages will be charged at cost by the selected PDF remediation team. TDA expects to utilize Allyant for this project.

Option to Hold a Scoping Meeting during 45 day EIR public review period

A Scoping Meeting is not required to be held during the public comment period of the Draft PEIR. TDA has also held community meetings during the public review process for an EIR with the aim of communicating the project impacts to stakeholders and the public, or to obtain comments on the EIR from the public after explaining the project purpose, objectives, and impacts. TDA would work with the City and Project Team to determine the appropriate audience for the scoping meeting, and would send out notification to these persons or entities via mail, with publication of the notice for the scoping meeting in the local newspaper. TDA will prepare the presentation, provide scoping meeting materials, and would put forth the best of our team address the scale of the scoping meeting necessary to meet the needs of this project. TDA anticipates that up to two members of each Project Team would be available in person or virtually to attend the scoping meeting.

Subtask 12f: Findings of Fact and Statement of Overriding Considerations

Prepare Findings of Fact and Statement of Overriding Considerations (FoF and SOOC) (Assume in conjunction with Legal)

An SOOC is prepared when a project has unavoidable significant impacts. When this occurs the lead agency must identify the socioeconomic, technical or logistical reasons that balance the unavoidable significant adverse impacts. TDA will aid the City and Project Team in identifying the overriding considerations, and will aid the Legal team in drafting the Findings of Fact that must be adopted in conjunction with the EIR if any individually or cumulatively significant impacts are identified. Note that the FoF and SOOC are effectively a copy of the determinations made in the EIR, as a result, they can be quite lengthy and require a great deal of effort to compile. If TDA is to prepare the whole of this document without Legal, it will require about 60 hours to prepare the first draft of the document.

Collaboration with Legal Team and City to refine the FoF and SOOC (Expect up to 2 rounds of review with modest changes per Legal)

This task is dedicated to refining the FoF and SOOC in collaboration with the City's Legal Team. The end result will be a final document. TDA is including up to 35 hours of TDA Staff time dedicated to this effort.

Subtask 12g: Finalize Focused EIR

Finalize Focused EIR

TDA will compile two PDF documents that will make up two volumes of the Final PEIR. This effort is mainly organizational in nature, but as the PEIR is a legal document, it requires attention to detail.

Respond to Comments

If any comments are received during the 45-day Draft PEIR public review period, TDA will work with the City and Project Team and Legal to address comments. It is expected that the number of comments received would be no more than 60 discreet comments will be made on the project (more than one comment can be included in one comment letter), and if greater comments on received, our scope of work may need to be amended. Responses can be handled through a memorandum and included in the staff report to the City Council/Planning Commission.

Accessibility Remediation (making the document accessible per State Clearinghouse Requirements) (Assume up to 200 pages at \$5 pp)

TDA is including Accessibility Compliance as part of our new scope of work because, in order to submit documents to the State Clearinghouse, Accessibility is a newer requirement that must be met. TDA is presently working from an assumption that the cost per page to make a document accessible (including all technical studies) is an average of 5 dollars per page, with a potential for upwards of 6 dollars per page due to the complexity of the documents we produce

(primarily the number of tables used). Thus, TDA is providing a scope of work that assumes that this Initial Study/NOP package will not exceed 200 pages, and the budget allocated to this task reflects this assumption. Additional pages will be charged at cost by the selected PDF remediation team. TDA expects to utilize Allyant for this project.

Attend up to two City Public Hearings on Project

TDA will attend public hearings at which the Final PEIR is up for consideration by the Board. TDA may include up to two staff members, in addition to up to two HDR and West Yost staff at these hearings. TDA will present the Final PEIR to the City and has included preparation of a presentation to the City as part of this scope of services. The Project Team will be available to answer questions made by the City and also to respond to any comments made by the public at the hearings.

Prepare and File Notice of Determination

TDA prepare the NOD for the project and will file it with the Riverside County Clerk-Recorder & State Clearinghouse within five days of project approval by the City. This task assumes that TDA will pay the appropriate CDFW filing fees on the City's behalf. TDA has dedicated time to preparing the NOD, as well as filing the NOD with the County and State.

Task 13: Prepare the AMMP

The objective of this task is to prepare the AMMP. Based on the July 2025 meeting with the SWRCB, submission of a draft AMMP alongside CEQA will aid regulators with their review of the Change Petition. We envision a draft AMMP be submitted with the final filing of the change of use petition, which will be reviewed by the regulators (e.g., CDFW and SWRCB) during the Change Petition Review and CEQA process. A final draft will be submitted to the SWRCB addressing comments from the regulators. The AMMP outline, based on the current understanding of the project, is as follows:

1. **Background** – including project description and regulatory requirements, description of the study area and hydrology/habitat, and objectives of the AMMP.
2. **Predicted changes in Cooper's Creek and San Timoteo Creek hydrology and habitat** – this section will summarize any predicted changes in hydrology and habitat based on reductions in discharges at the Beaumont WWTP. Information summarized in the Phase 1 Report as well as any new data from the baseline monitoring program (if available at the time of drafting the AMMP) will be incorporated and used for preparation of this section.
3. **Preliminary metrics for habitat sustainability** – this section will be based on the information in the Phase 1 Report and any refined information developed in Phase 2. This section will also define specific and measurable criteria for determining ecological success of mitigation and to determine if Project impacts are offset.

4. **AMMP monitoring program** – this section will describe the monitoring program to track the extent/health of the Cooper’s Creek riparian habitat and the factors that could affect it. The monitoring program will consider outcomes of the initial year of baseline monitoring performed pursuant to the *Cooper’s Creek Habitat Characterization and Sustainability Report*. The monitoring program will be designed to compare the monitoring data versus the preliminary metrics for habitat sustainability, which could trigger mitigation measures.
5. **Potential mitigation measures** – this section will provide a list of potential strategies to mitigate adverse impacts to the riparian habitat in the event that such impacts are identified by the monitoring program and attributed to Project implementation. [taken from *Cooper’s Creek Discharge Hydrogeologic and Operational Feasibility Report*]
6. **Annual reporting** – this section will describe the commitment to prepare annual reports that document the monitoring program and data analysis. The AMMP will include an annotated table of contents for the Annual Report.
7. **Process to update the AMMP** – this section will describe the process to revise the AMMP in the future based on the results and conclusions of the monitoring program. Revisions could include modifications to the monitoring program, metrics for habitat sustainability, and need for mitigation actions.

Other sections may be added as needed or as directed by the City. An Administrative Draft AMMP will be provided to the City for review and comment. We will incorporate one round of comments from the City into a Draft AMMP for submission with the Change Petition. A draft final AMMP will be prepared based on comments from the SWRCB and CDFW, including an appendix documenting responses to regulator comments. A final AMMP will be prepared to address one round of comments from the City on the draft final AMMP.

Assumptions:

1. A draft AMMP can be filed prior to the final filing of the Change Petition.
2. The draft AMMP will continue to be reviewed during the Change Petition review and CEQA process.
3. The final draft will include a response to regulator comments as an appendix.

Deliverables:

1. One Administrative draft AMMP to the City
2. One Draft AMMP incorporating City comments to the SWRCB
3. One Draft Final AMMP incorporating SWRCB and CDFW comments to the City
4. One Final AMMP incorporating City comments to the SWRCB

Task 14: Change Petition Support

At the request of the City, the Project Team will assist the water rights attorneys from Somach, Simmons, & Dunn (Somach) with the preparation and submission of the Change Petition.

Subtasks include:

1. Compilation of supporting documentation
2. Preparation of a project description
3. Meetings between Somach and the Project Team

Assumptions:

1. Somach will lead the completion and filing of the Change Petition and the Project Team will support.
2. Meetings are virtual, bi-monthly, and 1-hour in length

Deliverables:

1. Agendas and meeting notes for each meeting
2. Project description for the Change Petition
3. Other as-needed deliverables to support Somach in the submission of the Change Petition

Task 15: Prepare Scope of Work and Cost Estimate for Phase 3

As described above, much of the work scoped to be completed in Phase 2 and Phase 3 are now being proposed to be completed in Phase 2. We have included budget in Phase 2 to assess the status of the overall AMMP project and recommend and prepare a scope and costs to complete the project under Phase 3. We foresee Phase 3 addressing any remaining issues following the final filing of the Change Petition and continued implementation of the monitoring program. At the end of Phase 2, we will prepare a scope of work and cost estimate for project completion in Phase 3.

Assumptions:

1. A total of 99 hours is assumed to prepare the scope and costs for Phase 3.

Deliverables:

1. Letter proposal with scope of work, schedule, and costs.

Task 16: As-Needed Support

Task 16 provides budget for any out-of-scope items requested by the City during Phase 2. It is our understanding that the City would like to approve any utilization of out-of-scope work, so the Project Team will seek approval from the City prior to billing any time to this task.

Assumptions:

1. Any work performed under this task will be approved first by the City.
2. 140 hours are assumed in this task.

Deliverables:

1. To be defined based on the requests.

Optional Inclusion of Task 17: Stream Gaging (DWR Grant Funded)

The City secured a DWR grant to install, manage, and monitor four stream gages in the Cooper's Creek and San Timoteo Creek. These four stream gages are part of the Baseline Monitoring Program described in the Phase I Report. DWR indicated that the work would need to be procured via a request for proposal. Based on this requirement, the Project Team has prepared this scope as an optional task within Phase 2. Task 17 would be fully funded through the DWR grant. Additional technical details are provided in the Phase 1 Report. The scope is as follows:

1. Site selection - this includes working with the City to outreach to private landowners in the vicinity of the proposed locations of each stream gage. West Yost will visit the sites and may move the locations slightly based on based on the observed hydrology and geomorphology and give preference to those with favorable access.
2. Installation of stream gaging equipment - this includes all work necessary to purchase equipment and install/construct each stream gage.
3. Operations and maintenance - this includes routine maintenance, upkeep, and stream gage measurements.
4. Development of rating curves - this includes data compilation and calculations of rating curves at each of the four stream gages. The rating curve will equate the stream stage to estimate stream flow.
5. Reporting - a report will be prepared summarizing the work completed in the above subtasks

Assumptions:

1. Permit fees are included above in Task 10d.
2. A maximum of four stream gages will be installed, maintained, and operated during the Phase 2 period, assuming hydrological and access conditions are met.
3. Based on the addition of scope by the DWR requirements (including the reporting component), a contingency budget to the stream gaging effort was added to Task 10d so Task 17 can be used to exclusively track grant funded activity.
4. Five total flow measurements will occur during Phase 2.

Deliverables:

1. One draft Stream Gage Installation and Surface Water Monitoring Report (as requested by DWR) to the City of Beaumont.
2. One final Stream Gage Installation and Surface Water Monitoring Report incorporating City of Beaumont comments will be submitted to DWR.

Schedule and Cost

We anticipate Phase 2 to be completed by the first quarter of 2028. Baseline monitoring activities and stream gaging activities will begin as soon as the Project Team receives authorization. The other tasks will commence at various times. Phase 2 will foreseeably finish when the Baseline Monitoring Report is submitted or by the final filing of the Change Petition, whichever occurs last.

The total cost to complete Phase 2 is \$1,395,559 without the stream gaging task (Task 17), and \$1,503,559 with the stream gaging task. This would supersede the approved Phase 2 Budget of \$589,000 and all future billings against this project will be, depending on whether the City desires to approve the stream gaging task, against a total budget as follows:

Table 1: Total Budget Proposed

	Phase I Budget	New Phase II Budget	Phase III Budget ¹	Total Budget
Without Stream Gaging	\$267,160	\$1,395,559	\$141,000	\$1,803,719
With Stream Gaging	\$267,160	\$1,503,559	\$141,000	\$1,911,719

¹Note that much of the work scoped to be completed in Phase 2 and Phase 3 are now being proposed to be completed in Phase 2; we foresee Phase 3 addressing any remaining issues following the final filing of the Change Petition and continued implementation of the monitoring program

Beaumont will be charged on a time and materials basis not to exceed the Phase 2 total approved by the City. Anything over the approved amount will be requested and approved of by the City in writing.

For comparison purposes, TDA, offers a breakdown of costs that compares the Scope of Work for Phase 2 (Original) and Phase 2 (Proposed) in Tables 2 and 3, below, respectively. As previously stated, the scope of work for the overall task at hand has expanded since our original proposal as described throughout this budget amendment, with the main tasks to be included in Phase 2 henceforth are:

1. Expanded scope of CEQA Analysis (an EIR was not originally forecast to be necessary to be prepared, and an EIR is now being proposed to accommodate looking at the Change Petition, Facilities Proposed for Change of Use and AMMP)
2. Preparation of the full AMMP has been brought forth from Phase 3 to be prepared and addressed in Phase 2
3. The Project Team will be responsible for drafting the Change Petition itself in coordination with the City’s Legal Team
4. Implementation of the Baseline Monitoring Program presented in the TM to address Scenario

Table 1: Phase 2 Original Scope of Work and Costs

<i>Task 9 - Project Management and Meetings</i>	\$45,000.00
<i>Task 10 - Assess the Hydrologic and Operational Capacities from Operating the Discharge Under Current and Future Discharges</i>	\$200,000.00
<i>Task 11 - Identification of Conceptual Project Mitigations to Biologic Resources</i>	\$12,000.00
<i>Task 12 - Assess Engineering Feasibility of Operational Alternatives and Mitigation Actions</i>	\$75,000.00
<i>Task 13 - CEQA Checklist Evaluation of Project Alternatives</i>	\$150,000.00
<i>Task 14 - Prepare Cooper's Creek Discharge Hydrogeologic and Operational Feasibility Report</i>	\$30,000.00
<i>Task 15 - Implement first year of Baseline Monitoring Program</i>	\$40,000.00
<i>Task 16 - Prepare scope of work and cost estimate to prepare the AMMP</i>	\$12,000.00
<i>Phase 2 As Needed Support - Other Additional Work to Support City in Applying for Change Petition and Obtaining AMMP Approval</i>	\$25,000.00
Totals	\$589,000.00
Already Expended as of August 12, 2025	\$115,897(.08)

Table 2: Phase 2 Proposed Scope of Work and Costs

Task 9 - Phase 2 Project Management, Phase 2 Scoping, and Meetings	\$180,613.00
Task 9a - Project Management	\$25,729.00
Task 9b - Recurring Meeting	\$113,522.00
Task 9c - Phase 2 Scoping Activities	\$41,362.00
Task 10 - Baseline Monitoring Program	\$401,801.00
Task 10a - Installation Activities	\$63,484.00
Task 10b - Biologic Baseline Monitoring Activities	\$96,062.00
Task 10c - Hydrologic Baseline Monitoring Activities	\$94,553.00
Task 10d - Stream gaging contingency	\$59,719.00
Task 10e - Reporting of Baseline Monitoring Program	\$87,983.00
Task 11 - Develop Conceptual Project Mitigations to Biologic Resources	\$23,575.00
Task 12 - CEQA Checklist Evaluation	\$449,096.00
Task 12a – Project Oversight	\$59,171.00
Task 12b - Technical Analyses and Modeling	\$115,562.00
Task 12c - Draft Initial Study	\$40,502.00
Task 12d - Draft Focused EIR	\$135,062.00
Task 12e - Final Focused EIR	\$35,016.00
Task 12F – Findings of Fact and Statement of Overriding Consideration	\$14,550.00
Task 12G - Finalize Focused EIR	\$49,203.00
Task 13 - Prepare AMMP	\$124,479.00
Task 14 - Change Petition Support	\$39,682.00
Task 15 - Prepare Scope of Work and Cost Estimate for Phase 3	\$23,866.00
Task 16 - As-Needed Support	\$36,550.00
Optional Task 17 - Stream Gaging	\$108,000.00
Already Expended on Phase 2 as of August 12, 2025	\$115,897.00
	Total without Stream Gaging
	\$1,395,559
	Total with Stream Gaging
	\$1,503,559

Conclusion

TDA appreciates the opportunity to submit this proposal to the City, as the representative of the project team. Kaitlyn Dodson-Hamilton will continue to oversee preparation and carry out all final editing of the document(s) prepared to support the proposed project. The scope of work outlined above will lead to a fully substantiated CEQA environmental determination and submission of the Change Petition for the proposed project over a period beginning in August or September of 2025. Should you have any questions regarding the above amendment to our proposal, please feel free to give me a call.

Sincerely,

A handwritten signature in black ink, appearing to read "Kaitlyn Dodson-Hamilton". The signature is stylized and cursive.

Kaitlyn Dodson-Hamilton, Vice President, TDA