

EAST BAY MUNICIPAL UTILITY DISTRICT

DATE: March 12, 2026

MEMO TO: Board of Directors

THROUGH: Clifford C. Chan, General Manager *CCC*

FROM: Crystal J. Yezman, Manager of Maintenance and Construction *CJY*

SUBJECT: Residential Wells and Backflow Protection

SUMMARY

On July 1, 2024, the California State Water Resources Control Board (SWRCB) adopted the *Cross-Connection Control Policy Handbook (CCCPH)*, which expands existing regulations for cross-connection control. On June 10, 2025, the Board adopted the update to Section 26: Protection of Public Water Supply within the District's Regulations Governing Water Service effective July 1, 2025. The update requires customers with backflow devices to test devices annually and submit test certification to the District. Prior to this update, the District performed these tests for some customers. In 2025, the District began notifying affected customers of the new requirements. This memorandum provides information on the history of the regulations, additional technical background, and recent customer feedback.

DISCUSSION

To address potential cross-connection issues, California requires backflow prevention assemblies (BPAs) whenever a residential property has an identified hazard to public water supply. For the District, the primary concern are wells which are located throughout the service area. The District has 4,766 residential accounts with wells that are required to have BPAs¹. A significant number of wells are located in the San Ramon Valley, San Leandro, San Lorenzo, Richmond, and West Oakland (see attachment). Staff reviewed the new CCCPH requirements and the impact on customers with the Board at the April 8, 2025, December 10, 2024, and October 8, 2024 Planning Committee meetings.

The new regulations define private wells as "high hazards" regardless of whether the well is interconnected to the public water system because the potential exists for a cross-connection between untreated water and the potable water system. Improperly constructed wells may contain nitrates, coliforms, and other contaminants. The District has experienced backflow events from private wells that were inadvertently connected to the public water system and impacted water quality. These connections are typically identified after receiving water quality

¹ Overall, the District tracks about 19,503 accounts with backflow protection devices to document annual testing (most are installed on commercial and industrial properties).

complaints from the public. Staff have been in ongoing conversations with the state on the District's Cross-Connection Control Implementation Plan to minimize the impact of new regulations on customers while protecting public health.

Changes Affecting Residential Well Customers

Three types of BPAs are used for the 4,766 residential properties with on-site wells: 1,846 properties have combination meters with internal check valves; 2,228 properties have double-check (DC) assemblies; and 692 have reduced pressure (RP) devices. The CCCPH requires RP devices for all wells.

Under the prior version of Section 26, the District paid for the installation, maintenance, and annual testing only for residential accounts with DC assemblies. The updated District regulation transferred the cost to these customers to be consistent with customers with other BPAs. An annual test and certification from a qualified contractor costs about \$100.

Homes with combination meters will need to be upgraded to an RP device in the future at the homeowner's expense. The timeframe for requiring these upgrades is pending a decision by the SWRCB. Homes with DC assemblies may keep their devices when proven functional through a third-party test. If the DC assembly fails an annual test, the device must be upgraded to an RP device at the homeowner's expense. Homeowners with new or newly discovered residential wells will be required to install an RP device at their expense.

Installation of an RP device could cost between \$2,000 to \$4,000 for the plumbing components plus additional costs for modifications and restoration of landscaping to accommodate the above-grade plumbing. The District has an additional 3,433 sites from county well records that still need to be inspected to determine if a BPA needs to be installed.

To date, the District has received several inquiries from customers asking why the District changed its regulations. Staff have provided customers with information about the history of the program and the reasons for the change.

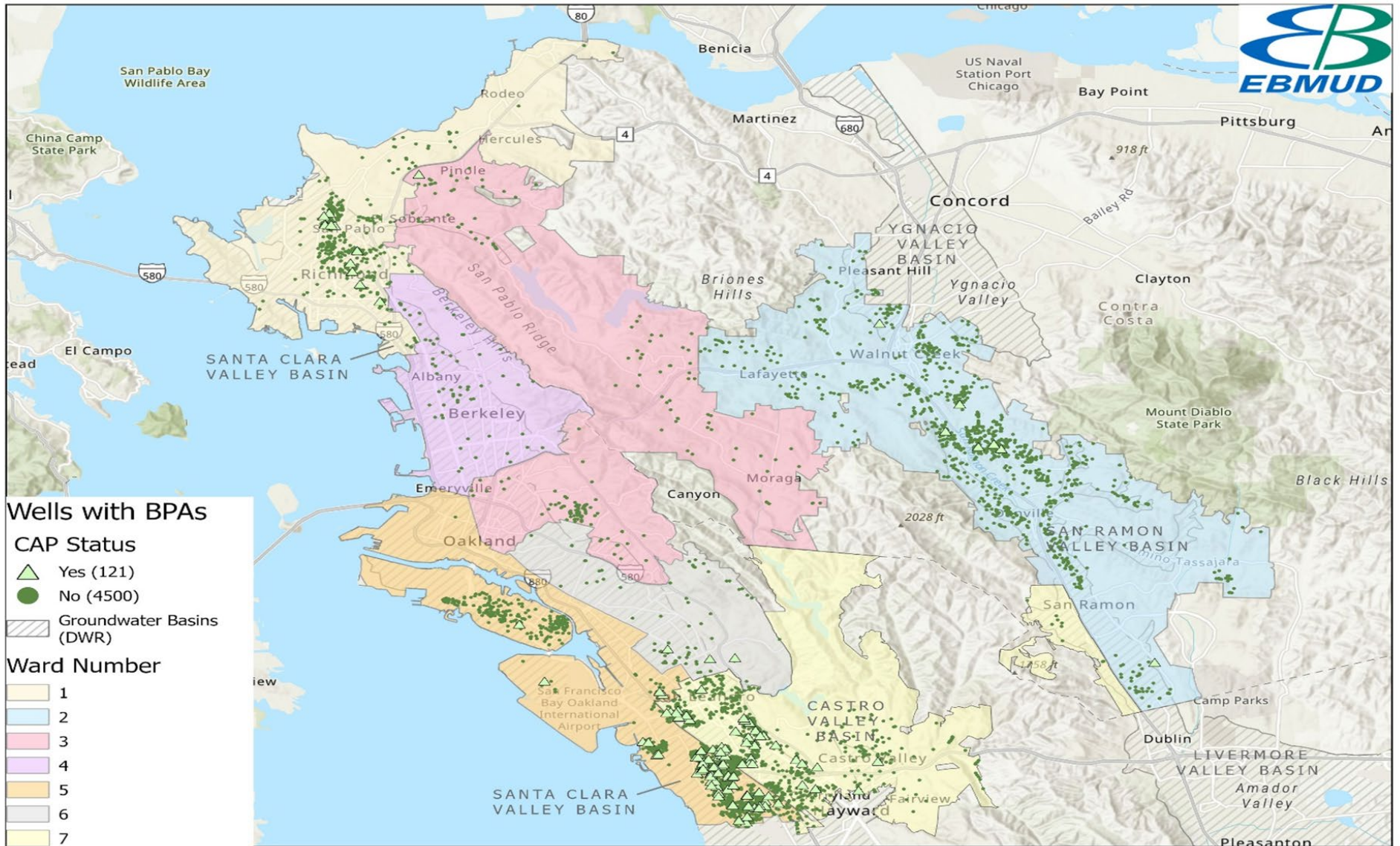
NEXT STEPS

District staff will continue to respond to customer inquiries and will advise the Board, as needed.

CCC:CJY:sd

Attachment: Map of Residential Customer Accounts with Wells by Ward and CAP Status

Map of Residential Customer Accounts with Wells by Ward and CAP Status



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