

STATE WATER RESOURCES
CONTROL BOARD
10 OCT 19 PM 2:53
DIV. OF WATER RIGHTS
SACRAMENTO

PETITION FOR EXTENSION OF TIME

WATER USERS:

Application 21833 Permit 14853

Water Code section 1396 requires an applicant to exercise due diligence in developing a water supply for beneficial use. The State Water Resources Control Board (State Water Board), in considering requests for extension of time, will review the facts presented to determine whether there is good cause for granting an extension of time to complete the project. Where diligence in completing the project is not fully substantiated, the State Water Board may set the matter for hearing to determine the facts upon which to base formal action relating to the permit. Formal action may involve:

1. Revoking the permit for failure to proceed with due diligence in completing the project.
2. Issuing a license for the amount of water heretofore placed to beneficial use under the terms of the permit.
3. Granting a reasonable extension of time to complete construction work and/or full beneficial use of water.

The time previously allowed in your permit within which to complete construction work and/or use of water has either expired or will expire shortly.

Please check below the action you wish taken on this permit.

- The project has been abandoned and I request revocation of the permit.

Signature
- Full use of water has been made, both as to amount and season, and I request license be issued.

Signature
- The project is not yet complete. I request the State Water Board's consideration of the following petition for an extension of time.

PETITION FOR EXTENSION OF TIME
If **START** of construction has been delayed Not Applicable

Complete items 1, 2, and 3.

1. What has been done since permit was issued toward commencing construction?

2. Estimate date construction work will begin. _____
3. Reasons why construction work was not begun within the time allowed by the permit.

Received
\$1000.00
\$850 DEF

PETITION FOR EXTENSION OF TIME
If construction work is proceeding

If construction work and/or use of water is proceeding but is not complete, an extension of time may be petitioned by completing items 4 through 16. Statements must be restricted to construction or use of water only under this permit.

4. A 20 - year extension of time is requested to complete construction work and/or beneficial use of water. (Must be consistent with the time frame allowed in California Code of Regulations sections 840 through 844)
5. How much water has been used? 200.9 acre-feet/year 0.41 cfs
6. How many acres have been irrigated? _____
7. How many houses or people have been served water? 1,041 connections
8. Extent of past use of water for any other purpose. _____
9. What construction work has been completed during the last extension? Production Wells 4 and 5; NGWC water system
10. Approximate amount spent on project during last extension period. \$ over \$6,000,000 (during 1990-2010)
11. Estimated time in years it will take for construction to be completed. major construction is completed; system upgrades are ongoing.
12. Estimated time in years it will take for water to be fully used. 20 or more
13. Reasons why construction and/or use of water were not completed within time previously allowed. customer demands have not yet reached levels that will require use of full permit amounts.

If the use of water is for municipal (including industrial) and irrigation supplies and is provided or regulated by public agencies and use of the water has commenced, but additional time is needed to reach full use contemplated, the following information must be provided.

14. What water conservation measures are in effect or feasible within the place of use?
NGWC presently is implementing conservation practices described on pp. 6-9 of its Sept. 3, 2010 water supply contingency plan. After approval of this plan by Division of Water Rights, NGWC also will take the water conservation actions described on pp.34-3.
15. How much water is being conserved or is it feasible to conserve using these conservation measures?
_____ acre-feet per annum.-not quantifiable at this time. _____ of this plan. Copies of these pages are attached
16. How much water per capita is used during the maximum 30-day period? 124 gpd.

I (we) declare under penalty of perjury that the above is true and correct to the best of my (our) knowledge and belief.

Dated: October 14, 2010, at Gualala, California

Signature(s)

707-884-3579

Telephone No.

John H. Bower, President, North Gualala Water Co., P.O. Box 1000, Gualala, CA 95445-1000

PLEASE PRINT YOUR NAME AND ADDRESS

NOTE: All petitions must be accompanied by the **filing fee** (see fee schedule at www.waterrights.ca.gov) made payable to the State Water Resources Control Board (State Water Board) and an **\$850 fee** made payable to the Department of Fish and Game must accompany all but the first petition for an extension of time. Separate petitions are required for each water right. Separate State Water Board fees are required if both a change and time extension petition are being filed.

North Gualala Water Company

Water Supply Contingency Plan

September 3, 2010

Wagner&Bonsignore
Consulting Civil Engineers, A Corporation

2151 River Plaza Drive, Suite 100
Sacramento, CA 95833
(916) 441-6850

2.5.3 Current Conservation Practices

2.5.3.1 Policy #10-87

A copy of the NGWC's Water Conservation Plan Policy #10-87 is provided in Appendix A of this Plan. The Policy specifies a two-phased approach to reducing water use during low flows in the North Fork Gualala River.

Phase I is triggered when flows in the North Fork are less than 5 cfs, and calls for voluntary conservation measures. Water users are alerted of a Phase I condition by way of public notices published in the local newspaper and direct mailings. The notice may include suggested conservation measures similar to those listed in the following paragraph for Phase II.

Phase II is triggered when flows in the North Fork are less than 4 cfs, and calls for mandatory conservation measures that prohibit the use of water for the following activities:

- from public hydrants except for fire fighting and prevention;
- beyond two days notice after the customer has been advised to repair a leak;
- road construction and dust control;
- washing of sidewalks, pavement, and other hard surfaced areas;
- washing of automobiles and other motor vehicles;
- filling or refilling swimming pools and hot tubs;

In addition, NGWC staff may patrol for identification of waste and non-compliance. Under Phase II conditions, NGWC publishes weekly notices in the local newspaper, and may shut off water services to water users who fail to comply after appropriate notice is given.

2.5.3.2 Other Conservation Measures

The following activities are implemented by NGWC to directly or indirectly reduce waste of water and enhance operational efficiency. In the discussion below reference is made, where appropriate, to applicable best management practices (BMPs) prescribed by the California Urban Water Conservation Council.⁵

Leak Detection and Repair (BMP #3)

As part of a \$4.5 million Safe Drinking Water Bond Act (SDWBA) loan in 1996, the NGWC replaced about 6.81 miles of aging pipeline. The project prioritized removal and replacement of pipelines that were believed to be in the worst condition within the

⁵ *A Guide to Data and Methods for Cost-effectiveness Analysis of Urban Water Conservation Best Management Practices*, California Urban Water Conservation Council, December 2003.

system, and increased the size of certain main lines to meet current fire flow requirements and mitigate low pressure zones. Much of the affected pipe was steel and severely corroded. Almost all of the main line replacement was made with PVC pipe; ductile iron pipe was installed at certain connections to existing pipe remaining in place. NGWC has also replaced almost all of the old galvanized steel service pipelines with Class 200 polyethylene, which has proven to be much less susceptible to breakage and corrosion than the previous steel pipe.

Existing main line systems that were not replaced remain a potential source of leakage. Leak detection is facilitated by daily monitoring of flow meters located at or near the MWTP and the Top of Pacific Woods tanks and automated alarms associated with these meters. A flow meter on the supply pipeline from Elk Prairie is read daily. Main line flow meters within remote distribution system zones are read 3 times a week, and service meters are read monthly. When aberrant service meter data is observed, indicative of a possible leak, NGWC staff investigates and immediately informs the customer of the leak. NGWC may immediately discontinue service in the event of a major leak.

The NGWC maintains a high-flow alarm that alerts an on-call staff person of a possible line break using an automated dial-up system. The high-flow alarm is on a 20-minute delay to allow for false alarms that might be associated with fire flow demand. If high flows are registered for more than 20 minutes the alarm will activate.

The NGWC also works cooperatively with the Gualala Community Services District (GCSD) to identify possible sources of leaks. The GCSD provides sewer service and wastewater treatment for some of the residential areas and all commercial areas within the Town of Gualala. Unusually high sewage lift station operation or sewage treatment plant influent flows during a typical low-flow period can be indicative of an in-house leak or wastage (for example a stuck toilet valve or broken faucet inside a vacant residence). When such incidences are observed the GCSD notifies NGWC.

Metering (BMP #4)

All service connections within the NGWC service are metered. Based on rates that went into effect in October 2008, water users are billed a constant base amount for service (based on meter size), and a variable amount based on metered use, with a higher unit rate for usage above a specified threshold amount (see rate schedule in Appendix B of this Plan). NGWC reads meters monthly. If an unusual meter reading is observed, NGWC makes a personal phone call to the customer to alert him or her of a possible problem. Because many customers are absentee owners, a phone call is the most expedient way to reach customers. If necessary, follow-up information is mailed to the customer.

The NGWC has in-house capability to bench-test residential flow meters. Meters that appear to be running slow are pulled, tested, and replaced as necessary. NGWC has a policy of replacing meters after 20 to 25 years in service. Replacement meters for

residences have been Sensus Technologies SR II meters, which have better low-end accuracy than the existing Sensus SR I meters and help to identify and account for small leaks. NGWC has started using Badger meters, which are even more accurate, for meter replacements.

Several large accounts within the downtown Gualala commercial and residential area have separate meters for in-house uses and landscape irrigation. While the primary purpose of the dual meters is to facilitate proper charges for sewer service by the GCSD, the dual meter system allows for tracking of water use for landscape irrigation separate and apart from in-house uses.

Public Information (BMP #7)

The NGWC makes available at its headquarters various brochures and pamphlets pertaining to water conservation. Sample documents are provided in Appendix C of this WSCP. As discussed above, the NGWC implements a phased program for voluntary or mandatory water use reduction. The program includes public notification by way of notices published in the local newspaper and notifications included with monthly bills. Under extraordinary conditions, the NGWC will schedule public meetings to discuss water conservation measures and obtain feedback from water users. The most recent of these meetings was held on January 19, 2009, and included a representative from the California Department of Public Health, Office of Drinking Water.

BMP #8 – School Education Programs

There are no schools within the NGWC service area. Children from the Gualala region attend school in Point Arena located about 15 miles north of Gualala. In lieu of a defined school education program the NGWC distributed brochures describing methods and importance of water conservation at a recent Earth Day event at the Gualala Arts Center, and intends to continue participating in similar local environmental awareness activities in the future.

Conservation Pricing (BMP #11)

In October 2008, NGWC implemented a rate increase and tiered rate schedule. Prior to the October 2008 rate change, all water use for both residential and commercial connections was billed at the same rate of \$3.13 per 100 cubic feet. In February 2010, NGWC implemented another rate increase (see Appendix B). Under the current rates, residential connections and equivalent connections (5/8" x 3/4" meter) pay a tiered rate of \$4.36 per 100 cubic feet for the first 300 cubic feet, and \$5.54 per 100 cubic feet for use in excess of 300 cubic feet per monthly billing cycle. The implementation of the tiered rate structure was a requirement of the California Public Utilities Commission for the purpose of encouraging water conservation. These newer rates represent an increase of 39 percent and 77 percent, respectively, over the pre-October 2008 rates. All other meter sizes currently pay a flat rate of \$5.54 per 100 cubic feet, an increase of 77 percent over the pre-October 2008 rate.

Wasteful Use (BMP #13)

NGWC's meter reading program identifies customers using higher than normal amounts of water. When such an anomaly is identified, the customer is notified of a possible leak or wasteful use problem. California Public Utilities Commission tariffs allow the NGWC to terminate service if such use is unabated after notice is provided.

* * * * *

9.0 ACTION PLAN

The following summarizes actions the NGWC will undertake, and a schedule for implementing these actions, to limit or curtail diversions from the North Fork Gualala River when flows are less than the bypass requirements set forth in Permit 14853.

9.1 Water Conservation Actions

1. Expand conservation triggers – Until proposed new Rule No. 14.1 is approved by the CPUC (see Section 3.3.3), the notifications and actions set forth in NGWC's Policy #10-87 (see Section 2.5.3.1 above) for the dry season bypass will also be implemented for wet season North Fork bypass flows, as follows:

For the period of November 15 to May 31, NGWC will implement Phase I measures each year.

During the period of November 15 to February 29, Phase II measures will be triggered when the flow in the North Fork is 40 cfs and less;

During the period of March 1 to May 31, Phase II measures will be triggered when the flow in the North Fork is 20 cfs and less.

NGWC will implement the new Rule 14.1 after approval by the CPUC.

NGWC may amend these actions after the State Water Board issues a permit on water-right Application 31792. (See Section 7.1 above and Section 9.2.1 below.)

2. Reporting to State Water Board when bypass not met – As requested in a letter from the State Water Board dated December 2, 2009, whenever flows in the North Fork Gualala River fall below the specified minimum bypass flows, NGWC will notify the State Water Board of the actual total diversion amounts from all sources during the time of less-than-minimum bypass flow. Notification will be made via email (at the addresses indicated in the State Water Board's letter) by the Monday following the week (Monday through Sunday) in which sub-minimum bypass flows occur.

3. Encourage voluntary water conservation practices and plumbing/fixture retrofits – NGWC's invoicing system allows for notes and messages to be included on the monthly invoices. Starting in January 2011, NGWC's monthly invoices to its customers will include a customized message offering water conservation tips (such as voluntary plumbing retrofits) and reminders tailored to the season as appropriate. For example, as summer changes to fall, a message will be added that advises customers to check landscape irrigation timers and make adjustments for the cooler weather forthcoming. It is believed that a water conservation message on the invoice itself is more likely to be noticed and read by customers than inserts in the invoice envelopes. NGWC will continue to make printed water savings and conservation information available to the public at its office.

4. Implement a commercial account water conservation inspection program – Starting in January 2011, NGWC will conduct an on-site inspection of at least one large-meter water customer per month to evaluate water usage. NGWC will, within 30 days of conducting an inspection, provide the customer with a summary of findings and recommendations for voluntarily implementation of best management practices. The program will continue until all commercial customers have been inspected. Based on the current number of large-meter connections (22), the program will be completed by October 2012.

5. Actions to reduce unaccounted-for system losses – As discussed in Section 2.5.3.2 herein, the NGWC actively monitors its system to identify possible leaks. As shown on Figure 6, system losses have shown a dramatic decline since peaking in 2001, but have shown an upward trend since 2006. Based on the monitoring that the NGWC performs, NGWC has identified several apparent sources of persistent high-leakage rates that have been prioritized for repair, as follows:

Approximately 2,200 feet of older 4-inch diameter glued-joint PVC mainline located in the Woodside Court area of Zone 4 will be replaced with 8-inch diameter gasketed-joint PVC pipeline (Zone 4 encompasses higher elevations above Anchor Bay and west of Fish Rock Gulch at the northerly end of the NGWC service area).

Numerous older PVC multiple service connections within Zone 3 are suspected of having high leakage rates (Zone 3 encompasses lower elevations at the far northerly end of the NGWC service area including Anchor Bay). These multiple service connections are generally 2-inch diameter PVC pipes that are “saddled” off of main lines and that serve more than two services. Most of the service lines are in the range of 50 to 60 feet long. Many of these service connections are over 30 years old and NGWC has identified deteriorating glued joints as a likely source of leakage. Water flows from the main line through a saddle and corporation stop into the multiple service lines are controlled by valves on the service lines. At each saddle, the stop valves are buried and hence difficult to access. To access and test these multiple service lines for excessive leakage, NGWC has been installing valve boxes at the stops. If pressure testing indicates excessive leakage in a multiple service line, the line is identified for repair or replacement, which could involve making repairs to problematic fittings or replacing the PVC pipes with Class 200 polyethylene tubing. NGWC will have all of these valve boxes installed and this testing completed by the end of 2011.

The viability and scheduling of these repair projects, along with numerous other main line replacement projects needed for fire flow adequacy, is dependent upon receipt of funding, such as through the State Revolving Fund process.

Appendix H

Proposed Rule No. 14.1 – Water Conservation

RULE No. 14.1

WATER CONSERVATION

During times when flows in the North Fork Gualala River are less than the minimum bypass flow amounts specified in the North Gualala Water Company's water-right Permit 14853 (40 cfs during Nov. 15 through Feb. 29, 20 cfs during March 1 through May 31, and 4 cfs during June 1 through Nov. 14), the water-conservation requirements specified in Section A of this Rule will be in effect.

A. CONSERVATION - NON-ESSENTIAL OR UNAUTHORIZED WATER USE

During times when this Section A is in effect, no customer will use utility-supplied water for any of non-essential or unauthorized uses that are defined here:

1. Use of water from any public hydrant for any purpose besides fire protection or prevention.
2. Use of water for road construction or dust control.
3. Use of water through any connection when the utility has directed the customer in writing to repair a broken or defective plumbing, sprinkler, watering or irrigation system and the customer has failed to make such repairs within 5 days after receipt of such notice.
4. Use of water that results in flooding or runoff in gutters, waterways, patios, driveways, or streets.
5. Use of water for washing aircraft, cars, buses, boats, trailers or other vehicles without using a positive shut-off nozzle on the outlet end of the hose, except that this prohibition will not apply to the washing of vehicles at commercial or fleet vehicle washing facilities that are operated at fixed locations where equipment using water is properly maintained to avoid wasteful use.
6. Use of water through a hose for washing buildings, structures, sidewalks, walkways, driveways, patios, parking lots, tennis courts, or other hard-surfaced areas in a manner which results in excessive run-off or waste.
7. Use of water for watering streets with water trucks, except for initial wash-downs for construction purposes (if street sweeping is not feasible), and except when necessary to protect the health and safety of the public.
8. Use of water for construction purposes, such as consolidation of backfill, dust control, or other uses, unless no other source of water or other method can be used.
9. Use of water for more than minimal landscaping in connection with any new construction.

Issued By _____

Date Filed _____

Advice Letter No. _____

John H. Bower Effective _____

Decision No. _____

President Resolution No. _____

10. Use of water to irrigate outside plants, lawn, landscape, and turf areas more often than every other day, with even numbered addresses being authorized to irrigate such areas only on even numbered days of the month, and with odd numbered addresses being authorized to irrigate such areas on the odd numbered days of the month, except that this provision will not apply to commercial nurseries, golf courses and other water-dependent industries.
11. Use of water for decorative fountains or to fill or top off decorative lakes or ponds, except for decorative fountains, lakes, or ponds that use recycled water.
12. Use of water to fill or refill swimming pools.
13. Service of water by any restaurant to customers except when the customers ask for water.

B. STAGED MANDATORY RATIONING OF WATER USAGE

Before a declaration of mandatory rationing, a utility may request authorization of a Schedule 14.1 – Staged Mandatory Water Conservation and Rationing tariff – via a Tier 2 advice letter. North Gualala Water Company has yet to seek authorization for a Schedule 14.1.

C. APPEAL PROCEDURE

1. Any customer who seeks a variance from any of the provisions of this rule shall notify the utility in writing, explaining in detail the reason for such a variation. The utility shall respond to each such request.
2. Any customer not satisfied with the utility's response may file an appeal with the staff of the Commission. The customer and the utility will be notified of the disposition of such appeal by letter from the Executive Director of the Commission.
3. If the customer disagrees with such disposition, the customer shall have the right to file a formal complaint with the Commission. Except as set forth in this Section C, no person shall have any right or claim in law or in equity against the utility because of, or as a result of, any matter or thing done or threatened to be done pursuant to the provisions of this rule.

D. PUBLICITY

Before the utility implements this rule, it shall provide each customer with a copy of this rule by means of billing inserts or special mailings. In addition, the utility shall provide customers with periodic updates regarding its water supply status and the results of customers' conservation efforts. Updates may be by bill insert, special mailing, poster, flyer, newspaper, television or radio spot/advertisement, community bulletin board, or other appropriate methods.

Issued By _____

Date Filed _____

Advice Letter No. _____

John H. Bower Effective _____

Decision No. _____

President Resolution No. _____