



PLACER COUNTY WATER AGENCY

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November 15, 2007

File No. 101-2

Ms. Victoria Whitney
Chief, Division of Water Rights
SWRCB
P.O. Box 2000
Sacramento, CA 95812

SUBJECT: Request for Extension of Time to Complete Use – Permits 13856 and 13858

Dear Ms. Whitney,

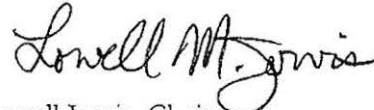
Placer County Water Agency (PCWA) holds water right Permit numbers 13856 and 13858 issued January 10, 1963, for Applications 18085 and 18087 respectively, for irrigation, domestic, recreational, municipal and industrial uses of water from the North Fork American River, Middle Fork American River and select tributaries. Waters are appropriated by direct diversion, diversion to storage and re-diversion, pursuant to the State Water Resources Control Board's (SWRCB's) predecessor, the State Water Rights Board's Decision D-1104 adopted November 21, 1962. Decision 1104 states that full application of water must be made by December 1, 2007.

At this time, PCWA has not fully utilized the water supply entitlements described in these permits. Significant efforts have been made since the permits were issued to maximize wise and efficient use, including partnering with other regional entities to deliver water in Placer and northern Sacramento counties. PCWA, in coordination with local governments, has developed a strategy to serve the planned municipal and industrial growth and development within the Agency's service area. At build-out, this plan will require the full utilization of waters diverted under Permits 13856 and 13858. Therefore, PCWA is requesting an extension of time of 36 years, until the year 2043, to complete all of the necessary facilities and put to beneficial use the water to which it is entitled under these Permits.

As demonstrated in the attached petition and supplement, PCWA has a well defined plan, supported by rigorous data, to make full and efficient use of its water resources by 2043. PCWA looks forward to working with SWRCB staff to complete the time extension process.

A \$1,000 filing fee is enclosed for each of the applications for which PCWA seeks an extension of time. If you have any questions, please contact Janet K. Goldsmith of the law firm of Kronick, Moskovitz, Tiedemann & Girard at (916) 321-4500.

Sincerely,
PLACER COUNTY WATER AGENCY

A handwritten signature in black ink that reads "Lowell M. Jarvis". The signature is written in a cursive style with a large, stylized "L" and "J".

Lowell Jarvis, Chairman
Board of Directors

AF:JW:bb

Enclosures

cc: David Breninger, PCWA General Manager
PCWA Board of Directors
Janet Goldsmith, KMT&G

State of California
State Water Resources Control Board
DIVISION OF WATER RIGHTS
P.O. Box 2000, Sacramento, CA 95812-2000
Info: (916) 341-5300, FAX: (916) 341-5400, Web: <http://www.waterrights.ca.gov>

PETITION FOR EXTENSION OF TIME

PETITIONER'S NAME: PLACER COUNTY WATER AGENCY

Application 18085 and 18087 Permit 13856 and 13858

Water Code section 1396 requires a permittee to exercise due diligence in developing a water supply for beneficial use. The State Water Resources Control Board (SWRCB), 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 SWRCB 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

X The project is not yet complete. I request the SWRCB's consideration of the following petition for an extension of time.

PETITION FOR EXTENSION OF TIME
If START of construction has been delayed

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.

11-20-07
4/10/08
10/20/08
5/6/09

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 completing items 4 through 16. Statements must be restricted to construction or use of water only under this permit.

4. A 36 year extension of time is requested to complete construction work and/or beneficial use of water.
5. How much water has been used? See Supplement.
6. How many acres have been irrigated? See Supplement.
How much acreage remains to be irrigated? See Supplement.
7. How many houses or people have been served water? See Supplement.
8. Extent of past use of water for any other purpose. See Supplement.
Estimated year in which water will be fully used. 2043
9. What construction work has been completed during the last 5 years? See Supplement.

Is construction complete? NO. Percent complete? 75%. Estimated completion date. 2043
(yes/no) (%)

Describe construction work to be completed. See Supplement.

Approximate amount spent on project during last 5 years. \$30 Million

5. Reasons why construction and/or use of water were not completed within time previously allowed. See Supplement.

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?
See Supplement.
15. How much water is being conserved or is it feasible to conserve using these conservation measures?
See Supplement.
16. How much water per capita is used during the maximum 30-day period? See Supplement.

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

Dated: Nov 15, 2007, at Auburn, California

Howell M. Jarvis
Signature(s)

530. 823. 4860
Telephone No.

Howell M. Jarvis, PCWA, PO Box 6570, Auburn, CA 95604
PLEASE PRINT YOUR NAME AND ADDRESS

NOTE: A \$1,000 filing fee, for each Application listed, made payable to the State Water Resources Control Board must accompany a petition for an extension of time. An \$850 fee made payable to the Department of Fish and Game must accompany all but the first petition for an extension of time.

Supplement to Petition for Extension of Time Permits 13856 and 13858

INTRODUCTION

Placer County Water Agency (PCWA or Agency) holds water right Permits 13856 and 13858 issued by the State Water Rights Board on January 10, 1963, for Applications 18085 and 18087 respectively. These permits allow the diversion, storage, and re-diversion of water for irrigation, domestic, recreational, municipal and industrial use of water from the North Fork American River, Middle Fork American River and select tributaries. The time allowed by State Water Rights Board Decision 1104 to place these waters to beneficial use expires December 1, 2007. PCWA, by way of this petition, is requesting an extension of time of 36 years, until the year 2043, to complete use of Permits 13856 and 13858. This supplement is offered to expand on the questions asked in the State Water Resources Control Board's Petition for Extension of Time form.

BACKGROUND

PCWA Surface Water Supplies

PCWA's water supply sources for the place of use described in Permits 13856 and 13858 consists of water from the American River, which is the source addressed by this extension of time petition, plus water purchased from Pacific Gas and Electric Company (PG&E) from the Yuba and Bear Rivers, and Central Valley Project water from the American River. Water rights and contracts for these supplies are summarized in Table 1.

Table 1. Agency Water Rights and Contract Entitlements		
Water supply	State number or contract number	Maximum use, ac-ft/yr
North Fork American River	A018085, A018087	120,000 ¹
PG&E	Contract w/ PG&E	100,400 ²
Central Valley Project	Contract w/ USBR	35,000 ³
Subtotal		255,400

Notes:

¹ Limitation is by contractual arrangement with the USBR, no direct diversion volumetric limit is expressed in the Agency's water rights

² Excludes a separate 25,000 ac-ft/yr contract supply for Zone 3, which is not within the place of use described in Permits 13856 and 13858.

ac-ft/yr = acre-feet per year

³ Can possibly be increased to 117,000 ac-ft/yr. See text.

American River

Placer County Water Agency (PCWA) holds water right Permit numbers 13856 and 13858 issued January 10, 1963, for Applications 18085 and 18087 respectively, for irrigation, domestic, recreational, and municipal and industrial uses of water from the North and Middle Forks American River and select tributaries. Waters are appropriated by direct diversion, diversion to storage and re-diversion, pursuant to the State Water Resources Control Board's (SWRCB's) Decision D-1104 adopted November 21, 1962.

PCWA completed construction of its Middle Fork American River Project (MFP) in 1967, including a pump station on the North Fork (N.F.) American River and a 3 mile long tunnel under the Auburn ridge, which daylight into the Auburn Ravine near Ophir. These facilities allow PCWA to divert, store, convey and deliver water diverted under Permits 13856 and 13858 to its retail service area. At the time of Permit issuance, PCWA anticipated that it would eventually supply up to 237,000 AFA from the N.F. American River to meet growing agricultural demands in western Placer County, once the Bureau of Reclamation completed the Auburn Dam and diversion by gravity became available. In the absence of an Auburn Dam, PCWA has recently constructed a new American River Pump Station with the current capacity to divert 35,500 acre-feet per year from the N.F. American River.

In addition to delivering water diverted under Permit numbers 13856 and 13858 directly to its retail customers, the Agency has entered into wholesale contracts to provide water to the San Juan Water District (SJWD), the City of Roseville, and the Sacramento Suburban Water District (SSWD). The contracts between the Agency and SJWD provide for a maximum of 25,000 ac-ft annually. SJWD diverts this water at Folsom Lake and uses its own facilities to provide treatment and delivery. The contract between the Agency and the City of Roseville provides for a maximum of 30,000 ac-ft annually. The City of Roseville diverts water at Folsom Lake and also uses its own facilities to provide treatment and delivery.

The contract between the Agency and SSWD provides for a maximum of 29,000 ac-ft annually by 2015 on a build-up schedule. No water is available for SSWD from the American River in dry years. The water contracted to SSWD is diverted at Folsom Lake, wheeled through SJWD's water treatment plant, and then delivered through a cooperative transmission pipeline.

In total, the Agency and its wholesale contractors have the ability to divert up to approximately 120,000 acre-feet annually from the N.F. American River at various points of diversion. This is coincident with the 120,000 acre-foot limitation that the Agency has agreed to abide by in its water supply contract with the US Bureau of Reclamation.

PG&E (Yuba/Bear River System)

The Agency has two water supply contracts with PG&E providing for the purchase of up to 125,400 ac-ft annually from PG&E's rights to water for consumptive purposes from the Yuba and Bear River systems. Of this total, 100,400 acre-feet is available for use within the same place of use

as that described in Permits 13856 and 13858. Delivery of water from PG&E to PCWA within its retail service area is made from points of delivery along PG&E's Drum/Spaulding Hydroelectric System Bear River/Wise/South Canal which crosses west Placer County between Rollins Reservoir on the north east and Folsom Reservoir on the south west.

Central Valley Project

The Agency's original contract with the United States Bureau of Reclamation (USBR) made available a maximum of 117,000 ac-ft of Central Valley Project (CVP) water annually to be available on a build-up schedule which began with 15,000 ac-ft in 1992, building up to the maximum of the 117,000 ac-ft in 2007. The original contract assumed that Auburn Dam would be constructed, and the Agency would be able to take delivery of water via gravity diversion. In the absence of Auburn Dam, the contract was amended in February 2002 to provide for up to 35,000 ac-ft of supply annually, with an option to increase the contract amount if Auburn Dam is built.

Reclaimed Water

The Agency does not operate waste water treatment systems nor does it provide reclaimed water supply. The City of Lincoln and City of Roseville do provide and use recycled water in Placer County, decreasing their need for treated and raw water from the Agency. Indirect reclaimed water is also available from City of Auburn's WWTP, as its effluent is discharged to the Auburn Ravine where it is available to meet agricultural demands during the irrigation season.

PCWA Water Systems

In addition to supplying water on a wholesale basis to San Juan Water District, the City of Roseville and Sacramento Suburban Water District, PCWA operates several water systems delivering treated water to homes and businesses as well as raw water to agricultural customers. Each of these water systems, designated as PCWA Zones, operates within a specific geographic area and with its own water supplies and financial accounting.

PCWA has three primary water systems in Placer County. The eastern water system, designated Zone 4, serves the Martis Valley area near Truckee. The eastern water system relies exclusively on groundwater. The central area water system, designated Zone 3, extends from north of Auburn along the Interstate 80 corridor to the community of Alta. The central water system relies exclusively on PG&E contract supplies from the Yuba & Bear Rivers.

Water diverted under Permits 13856 and 13858 is used only in PCWA's western water system, designated as Zones 1 and 5, which, although financially tracked separately, are operated together as a single integrated retail water system serving most of western Placer County outside of the San Juan and Roseville service areas.

Zone 1 provides treated and raw water service to the communities of Auburn, Bowman, Ophir, Newcastle, Penryn, Loomis, Rocklin, Lincoln, the Dry Creek Community Plan area west of Roseville and portions of Granite Bay. Zone 1 has four water treatment plants, with a combined capacity of 78 million gallons per day, serving about 150,000 residents. The Zone 1 system also includes 117

miles of canals which provide irrigation water to approximately 3,451 customers who irrigate about 15,700 acres.

Zone 5 is exclusively an agricultural area which encompasses about 47,000 acres of west Placer County outside of PCWA Zone 1 and the other water provider service areas. PCWA provides surface water to about 2,000 acres in Zone 5. Most of the irrigated land within Zone 5 is self supplied with groundwater.

Up to 35,500 acre-feet per year can be supplied to Zones 1 and 5 by operating the Agency's new American River Pump Station located on the N.F. of the American River near Auburn. These pumps lift water from the river to the inlet of the Auburn Ravine Tunnel which connects the American River Canyon with Auburn Ravine near the town of Ophir, which flows into Zone 5. Water from the tunnel can also be re-pumped and integrated into PCWA's Zone 1 deliveries. The 100,400 acre-foot PG&E water supply contract is also used to meet both Zone 1 and 5 demands.

RESPONSES TO PETITION QUESTIONS

Question 5. How much water has been used?

In the past 5 years, the year of highest total use was 2004, with 60,692 acre-feet put to beneficial use. Of this total, 18,700 acre-feet were transferred to the State of California for use by the Environmental Water Account and 41,992 acre-feet were used within the Agencies permitted place of use. 2004 was also the year of highest use within the Agency's place of use.

Question 6. How many acres have been irrigated?

The estimated total acres of land irrigated with PCWA supplied untreated surface water within the western water system is 17,600. Of this, about 2,000 acres is within Zone 5, the rest is within Zone 1. Water diverted under Permits 13856 and 13858 is integrated into the supply used to meet these and PCWA's western water system treated water demands.

PCWA originally anticipated that it would eventually supply up to 237,000 AFA from the N. F. American River to meet growing agricultural demands in western Placer County, once Reclamation completed the Auburn Dam and diversion by gravity became available. Even in the absence of Auburn Dam, much of the agriculture in western Placer County that was anticipated did develop, but without a gravity supply of surface water, the primary water supply for commercial agriculture is groundwater.

However, over the past 20 years, while agricultural uses have declined slightly, there has been a threefold increase in treated water demands within the area supplied by Permits 13856 and 13858, which includes the Agency's western water system, San Juan Water District and the City of Roseville. Much of the water that is delivered to urban customers is used for outdoor landscaping and small scale agricultural endeavors. Therefore, it is useful to address the total area served by water diverted under Permits 13856 and 13858. This water is distributed for all purposes to a total

of approximately 42,000 acres, which does not include the area served by Sacramento Suburban Water District.

The Agency's Integrated Water Resources Plan estimates that the Agency will serve 95,543 net acres of urban development in its service area at buildout (Scenario 2b), which does not include areas supplied raw water and also excludes Sacramento Suburban Water District.

Question 7. How many houses or people have been served water?

The Agency supplies the Waters diverted under Permits 13856 and 13858 water to serve some or all of the needs of approximately 310,000 people, as of December, 2007. This consists of 50,000 people within the northern portion of Sacramento Suburban Water District and 260,000 people within western Placer County, including the City of Roseville and San Juan Water District.

Question 8. Extent of past use of water for any other purpose.

Water diverted under Permits 13856 and 13858 has been applied to all authorized beneficial uses within the Agency's place of use. In addition, the Agency has made water available for transfer to other entities in times of shortage or high demand. A total of 7 water transfers have been made since the Project's inception, the largest of which amounted to 40,000 acre-feet that was made available to the State of California in 1991. A complete record of the Agency's historical water use can be found in State Water Resources Control Board files.

Question 9. What construction work has been completed during the last extension?

Construction of the MFP began in 1963 and was completed in 1967. The MFP consists of diversion structures on Duncan Creek and on the North and South Forks of Long Canyon Creek. In addition, the MFP includes French Meadows reservoir on the MF American River and Hell Hole Reservoir on the Rubicon River, which have a combined storage capacity of about 340,000 acre-feet. There are also two regulating reservoirs, Interbay, lower on the MF American River, and Ralston Afterbay at the confluence of the MF American and the Rubicon Rivers. The MFP also includes a system of five powerhouses with interconnecting tunnels and penstocks. These facilities provide the storage and conveyance capabilities to transport waters from their high-elevation source to the Agency's authorized points of re-diversion near Auburn, CA and Folsom Reservoir.

At Folsom Reservoir, the Agency's wholesale customers have built and maintained the infrastructure necessary to take delivery of water diverted under the Agency's water rights. This infrastructure is complete and able to fully deliver the water specified by contract.

At the Auburn point of diversion and re-diversion, PCWA completed a 50 cfs capacity pump station (American River Pump Station or ARPS) on the north bank of the N.F. American River near Auburn and a three mile long tunnel to delivery water into its service area in 1968. However, in 1970, the United States Bureau of Reclamation ("Reclamation") took possession of PCWA pump station property under threat of condemnation to make way for the construction of the Auburn Dam. PCWA entered into a contract with Reclamation (the 1970 Land Purchase Agreement) which

made Reclamation responsible for the delivery of up to 50 cfs of MFP water to PCWA in the event it was required prior to the completion of the Auburn Dam.

Since 1990, Reclamation has been installing temporary pumping facilities so that PCWA could access its water rights during peak demand periods and during maintenance outages on its PG&E contract supply system. Beginning in the 2002, due to lack of progress on construction of Auburn Dam, Reclamation and the Agency began joint construction of a permanent American River pump station that would allow the Agency to divert up to 100 cfs from the N.F. American River. The American River Pump Station has recently been completed and will be utilized to serve western Placer County in 2008.

Question 10. Approximate amount spent on project during the last extension period.

The original construction cost of the Middle Fork Project was \$233 million, including debt service. The Agency's share of the recently completed American River Pump Station is approximately \$30 million, with an additional \$40 million contribution from the U.S. Bureau of Reclamation. In addition, the Agency has made large investments in delivery infrastructure since the inception of the project, including canals, treatment and storage facilities and distribution pipelines.

Question 11. Estimated date construction work will be completed.

In 2008 PCWA expects to utilize the recently completed American River Pump Station. This facility has the year-round capability of re-diverting MFP water, at rates up to 100 cfs, into PCWA's western water system. PCWA is a member of the Sacramento Water Forum and, in its Purveyor Specific Agreement, has agreed to attempt to limit its diversion of MFP water for its retail use from the American River to 35,500 acre-feet annually. Because PCWA's future demand for water will exceed this amount, PCWA and other local agencies have been exploring diversion of MFP exchange water from a location on the Sacramento River.

PCWA, the City of Roseville, the City of Sacramento and the Sacramento Suburban Water District are partnering with Reclamation on the Sacramento River Water Reliability (SRWRS) study to identify alternative diversion locations to meet the anticipated water supply demands within their service areas through the year 2030. The tentatively proposed project (the draft EIR is scheduled to be published in late 2007) is a joint diversion facility on the east bank of the Sacramento River just north of the Sacramento Airport, joint treatment and storage facilities and transmission pipelines to each party's service area. The EIR is also analyzing, as one alternative to the Sacramento River diversion, the expansion of PCWA's ARPS to divert an additional 35,000 acre-feet annually.

Construction of either of these two alternatives will allow PCWA to re-divert all of its water right and USBR contract supply entitlements. The estimated date for completion of facilities considered in the SRWRS study is 2020.

Question 12. Estimated year in which water will be fully used.

PCWA recently completed an Integrated Water Resources Plan that concludes that utilizing an integrated approach of surface water, reclaimed water, and groundwater, the Agency is in control of

adequate water supplies to meet the build-out demand of its service area. If population continues to grow at the same average annual growth rate that occurred from 1980 to 2004 (3.9 percent per year), the population in western Placer County would reach build-out in 2030. Using an alternate growth rate of 2% per year, a figure provided by the State of California, Department of Finance, the build-out population of 623,000 would occur in 2051, as shown in Table 2, below.

The Agency is requesting an extension to complete use of water under Permits 13856 and 13858 to 2043. PCWA believes that this will provide adequate time for full build-out to occur as well as to complete the necessary infrastructure to serve that new population.

Table 2: Population of Placer County -
Historical and Projected

Year	Population
1900	15,786
1910	18,237
1920	18,584
1930	24,468
1940	28,108
1950	41,649
1960	56,998
1970	77,306
1980	117,247
1990	172,796
2000	248,399
2003	283,847
2004	296,455
2005	307,653
2006	317,498
2007	324,495
2010	347,543
2015	385,920 ^a
2020	428,535
2025	468,645 ^a
2030	512,509
2050	623,000

Notes:

Does not include Sacramento Suburban Water District.

Sources: 2003-2007: California Department of Finance,
Table E-4 Population Estimates for Cities, Counties, and State
2001-2007, May 1, 2007.

2010, 2020, and 2030: California Department Finance, Population
Projections for California and its Counties 2000-2050, July 2007

Question 13. Reasons why construction and/or use of water were not completed within time previously allowed?

The Agency's need for water diverted under Permits 13856 and 13858 has grown slower than anticipated in 1958 for several reasons: a) The purchase of PGE's water distribution system in

western Placer county, as well as a contract supply of over 100,000 acre-feet to serve the area, b) the delay in construction of the Auburn Dam has impacted the ability to use American River water utilizing inexpensive gravity diversion c) the conversion of agricultural water uses to municipal, industrial and domestic uses has impacted the growth in demand, and d) the implementation of water conservation measures has succeeded in stretching the Agency's supplies.

In 1968 PCWA acquired the Lower Placer Water System from PG&E along with a 100,000 AFA contract water supply out of PG&E's water rights on the Yuba and Bear Rivers. At the time of PCWA's acquisition of PG&E's water system, the population of Placer County was about 70,000. The PG&E water system consisted of canals, ditches and pipelines which annually delivered about 67,000 AF for irrigation purposes in an area generally between Bowman (just north of Auburn) and Roseville. PCWA has relied on this source for a great portion of its municipal, industrial and domestic growth because the inexpensive gravity diversion method avoids the need to pump water to the Agency's service area. Had Auburn Dam been constructed, the Agency would have been able to serve a large portion of its service area via gravity diversion instead of pump lift, and MFP water supply would be more fully integrated with the PG&E supply to optimally meet the Agency's western water system demands.

Additionally, the development of western Placer County and the associated water use did not evolve as PCWA had assumed in 1958. While agriculture did develop in western Placer County, because of the relatively high cost of American River water due to the need to pump, most of the agricultural development uses groundwater, or surface water from South Sutter Water District's Camp Far West Reservoir project. In its place, however, has been urban development on a scale few could have envisioned in 1958. Western Placer County is now well within the greater Sacramento Metropolitan Area and much additional growth is planned; urban growth which can easily afford the cost of pumping water from the American River. Today, the population of Placer County is over 375,000 and the total surface water demand within PCWA's Placer County service area is about 156,000 AFA; including northern Sacramento County the total demand is about 171,000 AFA, an increase of about 99,000 AFA since 1968.

The Agency's Integrated Water Resources Plan, along with its Water System Infrastructure Plan and Sacramento River Water Reliability Study lay out an organized plan for serving the growing demands of Western Placer and Northern Sacramento County. Consequently, the Agency believes that it will fully utilize water rights permits 13856 and 13858 by 2043.

Question 14. What water conservation measures are in effect or feasible within the place of use?

The Agency is a member of the California Urban Water Conservation Council and fully implements all of the Council's recommended water conservation best management practices (BMPs). Additionally, as signatory of the Water Forum Agreement, the Agency meets all of the commitments of the Agreement's water conservation element.

Question 15. How much water is being conserved or is it feasible to conserve using these conservation measures? Acre-feet per annum.

PCWA's treated water systems have been fully metered since acquiring its first system from PG&E in 1968, and today PCWA uses an inclining block tiered rate structure. The Agency's wholesale customers have either switched to metered service in the recent past, or have plans to fully meter their systems in the near future. The Agency assumes that its customers currently use approximately 10% less water than they would if PCWA was not implementing the Water Forum and CUWCC water conservation BMP's.

PCWA's Draft Water Conservation Master Plan examines the future efficacy of both the Water Forum Agreement's Conservation Element, as well as the CUWCC's Water Conservation MOU on the Agency's direct retail service area. The results of the analysis indicate that, over the next 30 years, up to an additional 1,100 AF/year can be conserved by implementing both organizations BMP's. These savings are fairly modest in large part due to the Agency's legacy of aggressive conservation measures and the fact that new development within its service area tends to utilize water efficient residential appliances and irrigation infrastructure. Both of these facts lead to a higher baseline against which to judge future conservation efforts, and in fact, the analysis shows a diminishing rate of return on conservation investments after approximately 2013.

Question 16. How much water per capita is used during the 30-day maximum period? gpd.

The per capita water use during the 30-day maximum period within the Agency's Zone 1 retail area in 2004 was 423 gallons per day per capita. This value is for the residential single family customer classification only and is based on the Integrated Water Resources Plan analysis of 571 gallons per day annual water use in 2004 per single family residential customer, 2.7 people per dwelling unit from the 2000 US census data, and a 2.0 maximum month peaking factor.

CONCLUSION

PCWA believes that its request for an extension of 36 years to complete use of water stored and diverted under Permits 13856 and 13858 is reasonable given the factors described in this time extension petition. The Agency looks forward to working with State Water Resources Control Board staff to perform the analysis necessary to document the environmental effects of placing this water to full beneficial use within its service area.