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Imperial Irrigation District

10

11 STATE WATER RESOURCES CONTROL BOARD

12 STATE OF CALIFORNIA

13 IMPERIAL IRRIGATION DISTRICT
14 and SAN DIEGO COUNTY WATER
AUTHORITY,

15
16 Petitioners.

**EXPERT QUALIFICATION AND WRITTEN
TESTIMONY OF RODNEY T. SMITH
IN SUPPORT OF IID-SDCWA JOINT
LONG-TERM TRANSFER PETITION
[PHASE II]**

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1 ("MWD"), does not contain any restrictions on the method of
2 permissible conservation. Therefore, IID could conserve water
3 for the supplemental allocation to CVWD and/or MWD by any means
4 available, including land fallowing.

5 5. IID's Board of Directors has consistently endorsed a
6 policy against land fallowing. The Board's position reflects the
7 concern that reduced agricultural activity would have a
8 significant negative impact on economic activity in Imperial
9 County in terms of both lost income and reduced employment. The
10 IID Board is willing to use conserved water transfers to assist
11 other communities in addressing their pressing water supply needs
12 and to help California live within the state's basic 4.4 million
13 AF annual apportionment of Colorado River water, provided that
14 such agreements strengthen, not diminish, the vitality of the
15 economy in Imperial Valley. Consistent with the Board's long-
16 standing policy against land fallowing, IID specified in the
17 proposed water transfer agreement with SDCWA that land fallowing
18 would not be a permitted method for water conservation under its
19 contracts with participating landowners to conserve water on-
20 farm.¹

21 6. Recently, there has been discussion suggesting that
22 perhaps IID's Board should reconsider its policy against land
23 fallowing. Generally speaking, the debate centers on perceived
24 differences in the environmental consequences of conserving water
25 by methods other than land fallowing, versus land fallowing.
26 Believing that conservation by land fallowing has less

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28 ¹ See Article 14.2 of the IID-SDCWA proposed water transfer
agreement.

1 environmental impacts than conservation by means other than land
2 fallowing, some claim that IID may want to use fallowing as a
3 conservation alternative.

4 7. There are many dimensions to the question of whether
5 IID should change its fallowing policy. This study addresses the
6 economic dimension. What are the economic consequences of
7 fallowing, versus the current proposed transfer? After my review
8 of the subject, I have concluded that the switch to a program
9 based on land fallowing would:

- 10 a) sacrifice a significant economic stimulus to the
11 local economy in the form of the current "no
12 fallowing" proposed agreement with SDCWA; and
13 b) impose a significant economic loss to the local
14 community.

15 8. From an economics perspective, the switch to land
16 fallowing would constitute a loss in local income worth hundreds
17 of millions of dollars over the contemplated term of the proposed
18 IID-SDCWA transfer and the QSA, and a long-term loss of between
19 1,000 and 2,000 jobs.

20 **D. Cropping Practices In The Imperial Valley**

21 9. A meaningful economic analysis of land fallowing must
22 take into account cropping practices in the Imperial Valley:
23 (1) the intensity of farming, and (2) the natural rotation of
24 crops on any specific parcel of land.

25 10. *Intensity of Farming.* Due to its favorable climate and
26 the seniority of IID's water right, Imperial Valley agriculture
27 is a year-round business. Generally speaking, irrigable acreage
28 remains in production other than the time required for temporary

1 idling of land due to good farming practices. However, the
2 intensity of farming varies annually in the Imperial Valley. A
3 common measure of farming intensity in the Imperial Valley
4 involves the amount of acreage "double-cropped" (i.e., a
5 vegetable crop grown in the fall or a field crop in the winter,
6 and a different vegetable crop or sudan grown in the spring).
7 Reflecting this practice, IID staff maintains records on the
8 amount of acreage on which crops are harvested ("gross acres")
9 and the acreage where more than one crop is grown in a year
10 ("double-cropping").

11 11. The prevalence of double-cropping varied considerably
12 in the last decade (see Attachment 1).² During 1990-2000, the
13 share of acreage double-cropped averaged about 18%, reaching a
14 high of 22.9% in the year 1998 and a low of 13.4% in the year
15 1993. The intensity of farming reflects economic conditions in
16 crop markets. Strong market conditions generate more double-
17 cropping due to the increased economic return to farming. Weak
18 market conditions yield less double-cropping due to the reduced
19 economic return to farming.

20 12. The ability to double-crop in the Imperial Valley
21 reflects the pattern of planting and harvesting dates (see
22 Attachment 2). Alfalfa, accounting for the largest acreage in
23 Imperial Valley, is a year-round crop usually grown for a period
24 of three to four years. Double-cropping involves rotations among
25 the other field crops and vegetables where the timing of planting
26 and harvesting are compatible. For example, an onion crop could

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28 ² Share of acres double-cropped = acres double-cropped/net acres,
where net acres = acres harvested - acres double-cropped. Data
provided by staff of Imperial Irrigation District.

1 be planted in October and harvested in May, followed with a sudan
2 crop planted in June and harvested in September. A carrot crop
3 could then be planted in December and harvested the following
4 May. The land could then be temporarily idled after May until
5 alfalfa was planted the following September.

6 13. *Natural Rotation of Crops on A Given Field.* Another
7 important aspect of farming in the Imperial Valley is that all
8 crops are ultimately grown on virtually all lands. In other
9 words, farming on most fields has a seven-year cycle in which
10 alfalfa is grown for three to four years, and then a rotation of
11 vegetable and other field crops are grown for the remainder of
12 the cycle.³ Attachment 3 provides a pro forma of cropping
13 patterns for eight land parcels over a common seven-year period.
14 Parcel A, for example, is finishing its hay cycle in years 1-3.
15 In the middle of year 3, it starts rotating into fall vegetables
16 (lettuce), another field crop (cotton), and subsequently other
17 vegetables (tomatoes) and another field crop (wheat).⁴ After
18 three years of rotating among vegetable and field crops,
19 preparation begins for the next three to four-year cycle of
20 alfalfa hay. In any given year, the other parcels are in
21 different stages of their crop rotation cycle. However, over the
22 long-term, alfalfa hay is grown on each parcel for a portion of

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25 ³ Based on conversations with growers in the Imperial Valley and
26 examination of a sample of cropping histories for a random
sample of parcels assembled by IID staff.

27 ⁴ The field size of crops varies due to differences in capital
28 investment and working capital requirements, labor intensity,
management requirements and other factors. Therefore, not all
acres in a parcel are planted in each crop.

1 the time, and other field crops and vegetables are grown for the
2 remainder of the time.

3 **E. Income And Job Losses From Land Fallowing**

4 14. A land fallowing program would conserve water by not
5 growing crops. The direct economic impact of land fallowing
6 would be the farming income lost due to not growing crops.
7 However, there would be two additional economic impacts. First,
8 there would be an "indirect effect" due to the lost income that
9 would have been earned from the sale of goods and services for
10 the growing of crops on fallowed land. Second, there would be an
11 "induced effect" due to the additional economic activity that
12 would be sacrificed from the income losses from the direct and
13 indirect effects from land fallowing. Offsetting these economic
14 losses, of course, would be the economic benefit from the
15 contract payments IID would receive under the proposed transfer
16 agreements with SDCWA and Coachella/MWD.

17 15. The environmental review of IID's proposed water
18 conservation and transfer agreements by CH2M HILL includes a
19 socioeconomic assessment of conservation activity based upon
20 on-farm conservation other than land fallowing, system
21 improvements, and land fallowing.⁵ The socioeconomic assessment
22 in the Draft EIR/EIS estimates the impact on the local economy of
23 the contract payments under the proposed agreements with the
24 SDCWA and Coachella/MWD, and alternative conservation methods

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26 ⁵ See Appendix G, Socioeconomics, in "Imperial Irrigation
27 District Water Conservation and Transfer Project" Draft Habitat
28 Conservation Plan, Draft Environmental Impact
Report/Environmental Impact Statement, State Clearinghouse
No. 99091142, filing date January 18, 2002 (hereinafter cited
as "Socioeconomics").

1 such as on-farm conservation (other than land fallowing), system
2 improvements, and land fallowing. On-farm conservation other
3 than land fallowing uses tailwater recovery systems as
4 "benchmark" technology to represent the economic impact of non-
5 fallowing methods.⁶ System improvements include installing up to
6 14 lateral interceptor systems and constructing up to 26 surface
7 or subsurface seepage recovery systems.⁷ Conservation by land
8 fallowing assumes that crops not grown would reflect the mix of
9 crops grown in years 1987 to 1999.⁸

10 16. A switch in IID's policy to land fallowing would
11 represent a sacrifice of significant economic benefits from a
12 non-fallowing program and the suffering of significant economic
13 losses.⁹ A non-fallowing program based on system improvements and
14 installation of tailwater recovery systems would increase annual
15 personal income in Imperial County by about \$20 to \$25 million
16 ('01\$) per year over the term of the QSA (see Attachment 4).¹⁰ Of
17 this gain, about 75% of the increase in income would be for
18 employee compensation and 25% would be for the income earned by
19 proprietors of businesses in Imperial County. Since a program

20 _____
21 ⁶ *Ibid.*, p. G-6.

22 ⁷ *Ibid.*

23 ⁸ *Ibid.*, at p. G-12 to G-13.

24 ⁹ Estimate of the economic impact of a non-fallowing and
25 fallowing programs based on Proposed Project B and Proposed
26 Project D analyzed in Socio-economics, supra note 4, in the
EIR/EIS. Proposed Project B is based on system improvements
and on farm conservation with tailwater recovery systems.
Proposed Project D is based on land fallowing.

27 ¹⁰ Estimated impact on employee compensation and proprietor's
28 income provided by CH2Mhill, the firm that prepared the
environmental review for Imperial's proposed water conservation
and transfer agreements.

1 based on methods of conservation other than land fallowing
2 requires investments in on-farm conservation and system
3 improvements, a non-fallowing program generates an immediate
4 economic stimulus to the local economy.

5 17. In contrast, a program based on land fallowing would
6 reduce annual personal income in Imperial County. That is, the
7 economic losses from the reduced agricultural activity exceed the
8 economic benefits of the contract payments contemplated under the
9 proposed agreements with the SDCWA and Coachella/MWD. During the
10 first six years when the quantity of water conserved is
11 relatively low, annual personal income losses would be \$5.0
12 million ('01\$). Thereafter, the annual income losses would
13 steadily grow until they reach \$30.0 million ('01\$) as land
14 fallowing expands with the magnitude of IID's delivery
15 obligations under its proposed agreements with the SDCWA and
16 Coachella/MWD. Of these losses, about 60% represents reduced
17 employee compensation and 40% reduced income earned by
18 proprietors of businesses in Imperial County.

19 18. From an economics perspective, the income lost from a
20 switch in IID policy against land fallowing equals the difference
21 between the income losses caused by land fallowing and the
22 positive economic stimulus that would be acquired from funded
23 conservation using methods other than land fallowing. By
24 accepting a fallowing method of conservation, IID would inflict
25 significant loss of income on the local community and forego
26 significant economic stimulus of the local economy.

27 19. The economic loss from the switch to land fallowing is
28 significant and grows over time. For the initial six years, when

1 the scale of land fallowing is relatively small, the annual
2 economic loss from a switch to land fallowing would be \$26
3 million ('01\$). As the scale of land fallowing expanded to meet
4 IID's delivery obligations under the contemplated agreements with
5 the SDCWA and Coachella/MWD, the annual economic losses from land
6 fallowing would approach \$50 million ('01\$).

7 20. The switch to land fallowing would also reduce
8 employment in Imperial County (see Attachment 7).¹¹ Conservation
9 based on non-fallowing methods would create between 700 and 900
10 jobs. In contrast, a program based on land fallowing would
11 eliminate almost 300 jobs by the year 2007 and a total 1,400 jobs
12 long-term. Therefore, a switch to land fallowing would eliminate
13 almost 1,000 jobs short-term and over 2,000 jobs long-term
14 (adding together the effects of fallowing and the effects of
15 losing the benefits of proposed non-fallowing conservation).

16 **F. Economic Impacts Of A Targeted Fallowing Program**

17 21. Some individuals have expressed the view that a program
18 of land fallowing can target specific crops in order to reduce
19 the economic impacts of land fallowing.¹² From this perspective,
20 a fallowing program would only impact the so-called low-valued,
21 high water-use crops. Under current economic conditions, the
22 most common candidate mentioned for a targeted fallowing program
23 is alfalfa hay.

24 22. Given the long-term nature of the contemplated transfer
25 agreements, any attempt to target crops in a land fallowing

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27 ¹¹ Employment impacts taken from "Socioeconomics," supra note 5,
Table G-7.

28 ¹² Based on conversations with U.S. Bureau of Reclamation, Salton
Sea Authority, and other water agencies.

1 program does not take into account a fundamental fact about
2 agriculture in the Imperial Valley: crop rotation on fields. As
3 discussed above, virtually all crops are grown on all fields.
4 Therefore, any fallowing over the representative seven-year cycle
5 of crop rotation, let alone over a term of up to 75 years, would
6 sacrifice the entire basket of crops that would have otherwise
7 been grown.

8 23. Proponents of targeted fallowing have argued that only
9 alfalfa hay crops would be fallowed, because farmers would rotate
10 which lands they own that they would choose to fallow in any
11 year. For example, suppose that a farmer owned both Parcel A and
12 Parcel B in the pro forma of annual cropping patterns (see
13 Attachment 3). If this were the case, the farmer would fallow
14 Parcel A in year 1, 2, and 7 and would fallow Parcel B in year 4,
15 5, and 6 when he would have otherwise grown alfalfa hay.¹³ Or, if
16 the planned rotation of crops did not "match up" as they do in
17 this example, the farmer could change his crop rotation pattern
18 so that he could target alfalfa hay.

19 24. This argument misses critical points about farming
20 practices and economics. First, alfalfa hay is in the crop
21 rotation in Imperial Valley because, in addition to its economic
22 return, it is also necessary for proper long-term resource
23 management. Vegetables are not grown on a field year in and year
24 out because the land could not sustain its yields.¹⁴ Crop
25

26 ¹³ The rules of the program would determine whether he could
27 fallow Parcel A for a portion of year 6 or fallow Parcel B for
28 a portion of year 3 when he would have been otherwise planting
alfalfa after growing wheat.

¹⁴ Based on conversations with growers in the Imperial Valley.

1 rotation is a necessary element of maintaining the productivity
2 of land in the Imperial Valley. Second, changing crop rotations
3 is not without economic cost. Planned crop rotations reflect
4 economic conditions, investment decisions and risk
5 diversification. Changing crop rotations on land means less
6 profitable rotations, less effective means of risk
7 diversification, and less effective resource management. Without
8 any evidence from the actual experience of a long-term land
9 fallowing program, there is little basis to know whether the
10 economic and resource management considerations identified above
11 would enable a long-term fallowing program to target specific
12 crops. Moreover, even if adjustments in crop rotations can
13 accommodate the targeting of a specific crop, the cost
14 considerations discussed above would have to be considered in a
15 complete economic analysis of the program.

16 25. Whether or not a fallowing program can target alfalfa
17 hay will have a material impact on the economic losses from land
18 fallowing (see Attachment 8). If a fallowing program sacrifices
19 the full crop mix in Imperial Valley (as assumed in the Draft
20 EIR/EIS environmental review), then each 10,000-acre reduction in
21 harvested acres reduces annual employee compensation by \$2.7
22 million ('01\$), and annual proprietor income by \$2.0 million
23 ('01\$), for a total loss of annual local income of \$4.7 million
24 ('01\$). A total of 259 jobs would be lost for each 10,000-acre
25 reduction in harvested acres. In contrast, if the program could
26 successfully target alfalfa hay, the income and job losses would
27 be substantially smaller: lost annual employee compensation would
28 be \$0.6 million ('01\$), annual proprietor income \$1.0 million

1 ('01\$), total annual local income \$1.6 million ('01\$), job losses
2 140 per 10,000-acre reduction in harvested acres. The difference
3 in the economic impacts between a non-targeted and a targeted
4 fallowing program reflect the diversity among crops in their
5 purchases of goods and services needed to grow crops, including
6 their labor intensity.

7 26. Whether a fallowing program can target alfalfa has a
8 material effect on the economic impact of fallowing, but does not
9 change the fundamental conclusions reached above: (1) the
10 economic losses from fallowing exceed the economic benefits from
11 the current contract payments IID would receive under the
12 proposed agreements with the SDCWA and Coachella/MWD, and (2) the
13 shift toward land fallowing would impose a significant economic
14 burden on the local economy. Consider the impact of a switch to
15 land fallowing on annual local income in Imperial County (see
16 Attachment 9).¹⁵ The local income lost from fallowing only
17 alfalfa hay is about 1/4th to 1/5th the income lost from
18 fallowing the mix of all crops. However, the local economy
19 nevertheless sustains annual income losses, starting at \$1.5
20 million ('01\$) and growing to \$6.7 million ('01\$). By
21 sacrificing the significant economic stimulus from the proposed
22 non-fallowing program, the annual income lost from the switch to
23 a land fallowing program remains significant, ranging from \$20
24 million ('01\$) to \$30 million ('01\$).

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27 ¹⁵ Estimates based on an adjustment of the income losses from
28 fallowing reflecting the differences in the impact of fallowing
alfalfa hay versus the entire crop mix. Adjustment based on
the differences in the income multipliers in Attachment 8.

1 27. Similarly, the switch to land fallowing would cost the
2 local community jobs (see Attachment 10).¹⁶ The jobs lost from
3 fallowing alfalfa hay are only about 1/3rd of the amount of jobs
4 lost from fallowing the entire crop mix in the Imperial Valley.
5 However, by sacrificing the significant economic stimulus from a
6 non-fallowing program, the jobs lost from the switch to land
7 fallowing remain significant. In the short term, the jobs lost
8 from the switch to fallowing alfalfa only are still about 80% of
9 the jobs lost from the fallowing of the entire crop mix in the
10 Imperial Valley. In the long run, the jobs lost from the switch
11 to fallowing alfalfa only are about 50% of the jobs lost from the
12 fallowing of the entire crop mix.

13 **G. Economic Valuation Of The Switch To Land Fallowing**

14 28. Given the long-term nature of the proposed transfers,
15 the annual income losses from land fallowing would be incurred
16 over many years. To place an economic value on the losses, it is
17 standard practice to calculate the present value of the annual
18 losses over the term of the proposed agreements.

19 29. The interest rate used in the calculation of present
20 value is a critical assumption. The analysis below uses interest
21 rates equal to the interest on 10-year treasury notes (a standard
22 benchmark of long-term interest rates), plus a default risk
23 premium.¹⁷ A default risk premium reflects the fact that the
24 transfer agreements are subject to a risk of early termination.

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26 ¹⁶ Estimates based on an adjustment of the job losses from
27 fallowing reflecting the differences in the impact of fallowing
28 alfalfa hay versus the entire crop mix. Adjustment based on
the differences in the employment multipliers in Attachment 8.

¹⁷ The current interest rate on 10-year treasury notes is 5.27%.

1 I consider the implications of six alternative assumptions about
2 early termination risk: none, and annual probabilities of early
3 termination ranging from 1% to 5%. The assumptions reflect
4 significant risk of early termination (see Attachment 11). The
5 expected duration of the 75-year transfer agreements ranges from
6 20 years to 53 years under the range of early termination risk
7 considered below.

8 30. *Economic Value of Local Income Created by*
9 *Non-Following.* The economic value of income generated by a non-
10 following program is worth hundreds of millions of dollars (see
11 Attachment 12.)¹⁸ If there were no risk of early termination, the
12 economic value of local income generated by a non-following
13 program would exceed \$700 million ('01\$). At a moderate risk of
14 early termination, the economic value exceeds \$400 million
15 ('01\$). The economic value of the income generated by a non-
16 following program would still be almost \$300 million ('01\$) if
17 the risk of early termination were so high that the expected
18 duration of the 75-year agreements were only 20 years.

19 31. *Economic Value of Income Lost from Following.* The
20 economic value of local income lost from land following is also

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23 ¹⁸ Attachment 12 provides the calculation of the present value of
24 the annual local income generated by non-following program
25 (Attachment 4) under alternative interest rates according to
26 the indicated assumption concerning the annual risk of early
27 termination. The interest rate ("i") depends on the interest
28 rate on 10-year treasury notes ("t") and the annual probability
of early termination ("δ") as follows: $i = (t + \delta)/(1 - \delta)$. In
that the estimate of income is in inflation-adjusted dollars
'01\$, the proper interest rate to use is the inflation-
adjusted "real rate of interest." According to the Fisher
equation in corporate finance, $(1+i) = (1+r) \cdot (1+\pi)$, where $r =$
real interest rate and $\pi =$ inflation rate. Calculations assume
that $\pi = 2.5\%$.

1 worth hundreds of millions of dollars (see Attachment 13).¹⁹
2 Generally speaking, the economic value of the income lost from
3 land fallowing under the "all crop" scenario discussed above is
4 about the same magnitude as the income that would be generated by
5 a non-fallowing program. The economic value of the income lost
6 from fallowing only alfalfa is materially less. Nevertheless,
7 even under this most favorable assumption concerning land
8 fallowing, the local community sustains significant economic
9 losses from fallowing.

10 32. Unlike the case of a non-fallowing program that
11 provides a positive economic stimulus to the local community, a
12 fallowing program inflicts losses that would inevitably lead to
13 an out-migration of economic activity from Imperial Valley.
14 Workers who lose their jobs will search for a new job and
15 eventually find alternative employment. Proprietors may exit
16 their current business and relocate elsewhere, either in a new
17 location or line of business, or become an employee of another
18 proprietor. As such adjustments occur, the income losses of
19 individuals, either as employees or proprietors will be
20 "mitigated." However, any such mitigation of the individual
21 losses would not change the fact that the income generated in the
22 local economy of Imperial Valley would be permanently reduced
23 over the term of the transfer agreements.

24
25 ¹⁹ Attachment 13 provides the calculation of the present value of
26 the annual local income lost by land fallowing under two
27 assumptions about the crops fallowed: the "all crop" scenario
28 included in the environmental review of IID's water
conservation and transfer program (Attachment 5) and the
alternative scenario of alfalfa only (Attachment 6). See *supra*
note 18 for discussion of the interest rates used in the
calculation.

1 33. Given that agriculture is the foundation of the local
2 economy in Imperial Valley, the erosion of the economic base due
3 to land fallowing is much like the impact of the closing of a
4 manufacturing plant in a community dependent on a key employer.
5 When a plant closes, former employees migrate. However, they
6 leave in their wake an economically weakened community.

7 34. The income losses from land fallowing are undoubtedly
8 understated by the above discussion. By their very nature, the
9 economic models used to estimate income losses do not, because
10 they cannot, address the prospect that large-scale land fallowing
11 will have an adverse effect on the agricultural support
12 industries, which in turn reduces the economic viability of
13 remaining agriculture. Support industries that lose business
14 from fallowing may be unable to serve as effectively the
15 remaining agricultural operations. As a result, the income of
16 continuing agricultural operations may very well suffer losses.
17 The magnitude and impact on the local economy of such losses have
18 not been addressed here. There is no experience from long-term
19 fallowing programs available to assess this issue. However, the
20 experience of Mendota in the Central Valley is not encouraging,
21 where a loss of agricultural activity seriously reduced the
22 economic viability of the operations that remained.²⁰

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28 ²⁰ See written testimony submitted to this proceeding by Henry E.
Rodegerdts, California Farm Bureau Federation's Natural
Resources and Environmental Division.

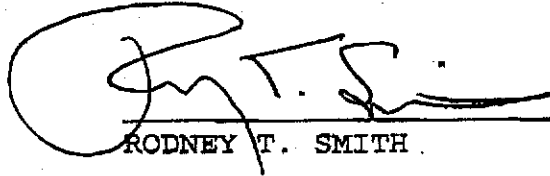
1 H. Conclusion

2 35. IID's Board has consistently advocated a policy against
3 land fallowing precisely because land fallowing inflicts
4 significant losses on the local economy. To that end, IID has
5 developed its proposed transfer to SDCWA on a foundation of non-
6 fallowing so that IID can help meet pressing water supply needs
7 in California, provided that IID's assistance strengthens, not
8 diminishes, the economic vitality of the Imperial Valley. A
9 switch to land fallowing would be a reversal in a long-standing
10 policy with severe economic consequences. The proposed contracts
11 with SDCWA and Coachella/MWD are financially inadequate for land
12 fallowing; fallowing would result in a significant economic loss
13 to the local community. The switch from a positive economic
14 stimulus of non-fallowing to the negative economic impact of
15 fallowing represents a swing of lost income worth hundreds of
16 millions of dollars, and a swing of reduced employment
17 opportunities numbering between 1,000 and 2,000 jobs.

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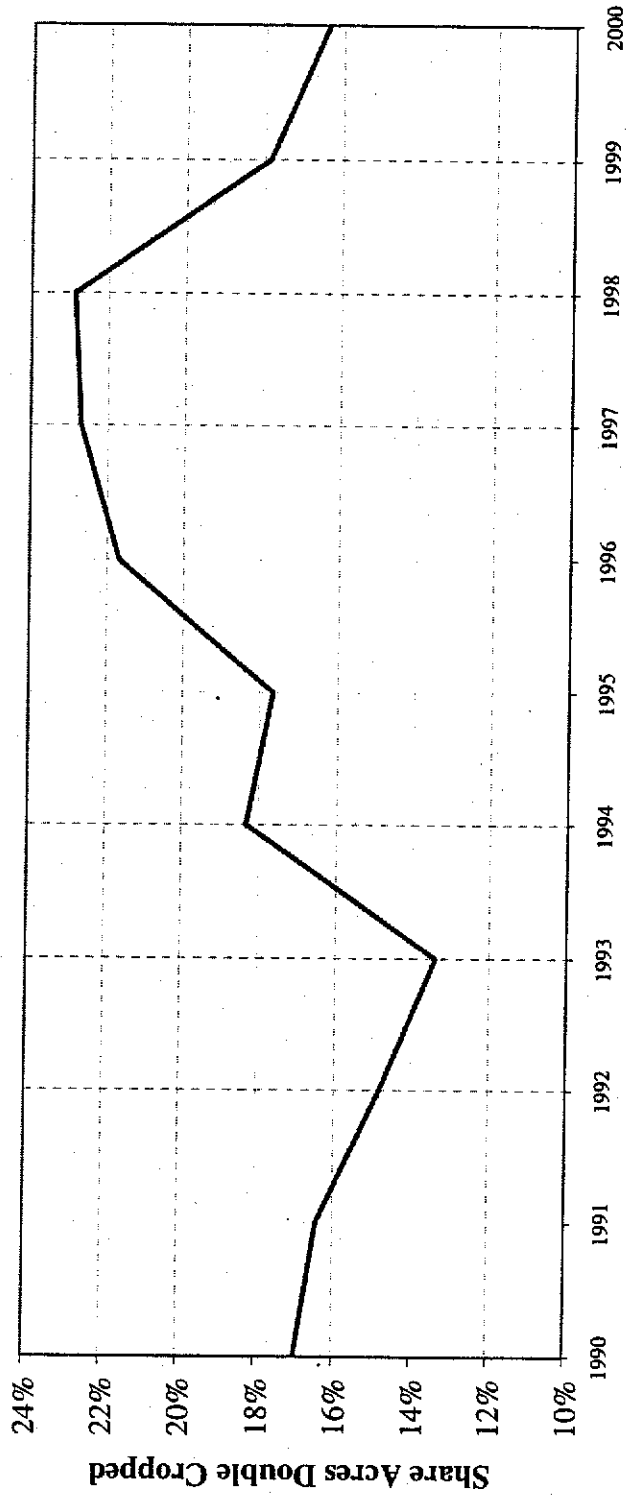
1 I declare under penalty of perjury under the laws of the
2 state of California that the foregoing is true and correct.

3 Executed on April 9, 2002, at Upland, California.

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5 _____
6 RODNEY F. SMITH

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Attachment 1
Double Cropping in Imperial Valley



Source: Data on acreage provided by staff of Imperial Irrigation District

**Attachment 2
Planting and Harvesting Calendar of Selected Crops**

Crop	First Period of Calendar Year						Second Period of Calendar Year					
	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov	Dec
Field												
Alfalfa Hay (Yr 1)												
Alfalfa Hay (Yr 2)												
Alfalfa Hay (Yrs 3-4)												
Cotton												
Sudan												
Sugar Beets												
Wheat												
Vegetables												
Cantaloupe (spring)												
Cantaloupe (fall)												
Carrots												
Leaf Lettuce												
Onions												
Tomatoes												

Plant

Harvest

Harvest

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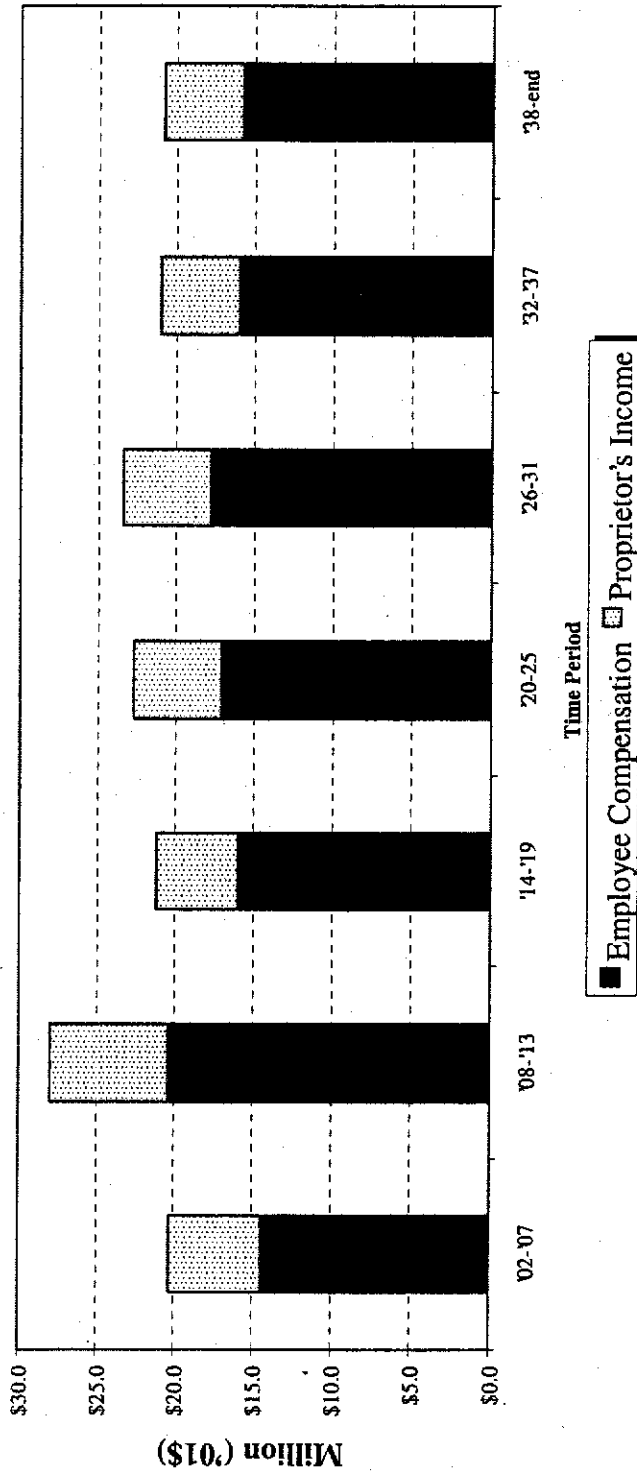
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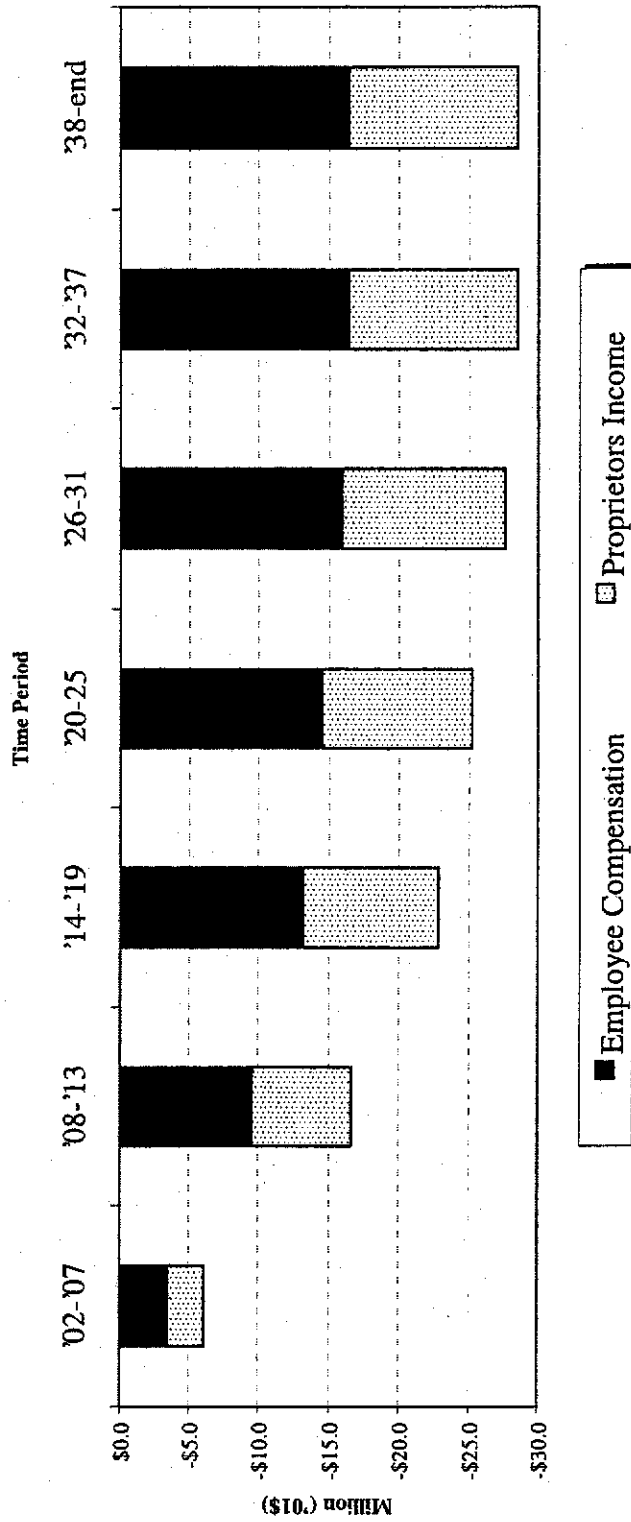
**Attachment 3
Pro Forma Annual Cropping Patterns**

Year	Parcel A	Parcel B	Parcel C	Parcel D	Parcel E	Parcel F	Parcel G	Parcel H
1	Hay	Sugar Beets Lettuce	Carrots Hay Planting	Hay Lettuce	Hay	Tomatoes Wheat	Lettuce Cotton	Sugar Beets
2	Hay	Lettuce Sudan Wheat	Hay	Lettuce Sudan Onions	Hay	Wheat Hay Planting	Tomatoes Wheat	Sugar Beets Carrots
3	Hay Lettuce	Wheat Hay Planting	Hay	Onions Wheat	Lettuce Sudan Onions	Hay	Wheat Sudan Onions	Carrots Wheat
4	Lettuce Cotton	Hay	Hay	Wheat Hay Planting	Onions Sugar Beets	Hay	Onions Carrots	Wheat Sudan Onions
5	Tomatoes Wheat	Hay	Tomatoes Wheat	Hay	Sugar Beets Hay Planting	Hay Lettuce	Carrots Lettuce	Onions
6	Wheat Hay Planting	Hay	Wheat Sugar Beets	Hay	Hay	Lettuce Sudan	Lettuce Sudan	Tomatoes Wheat
7	Hay	Tomatoes Carrots	Sugar Beets Cotton	Hay	Hay	Tomatoes Wheat	Tomatoes Wheat	Wheat Lettuce

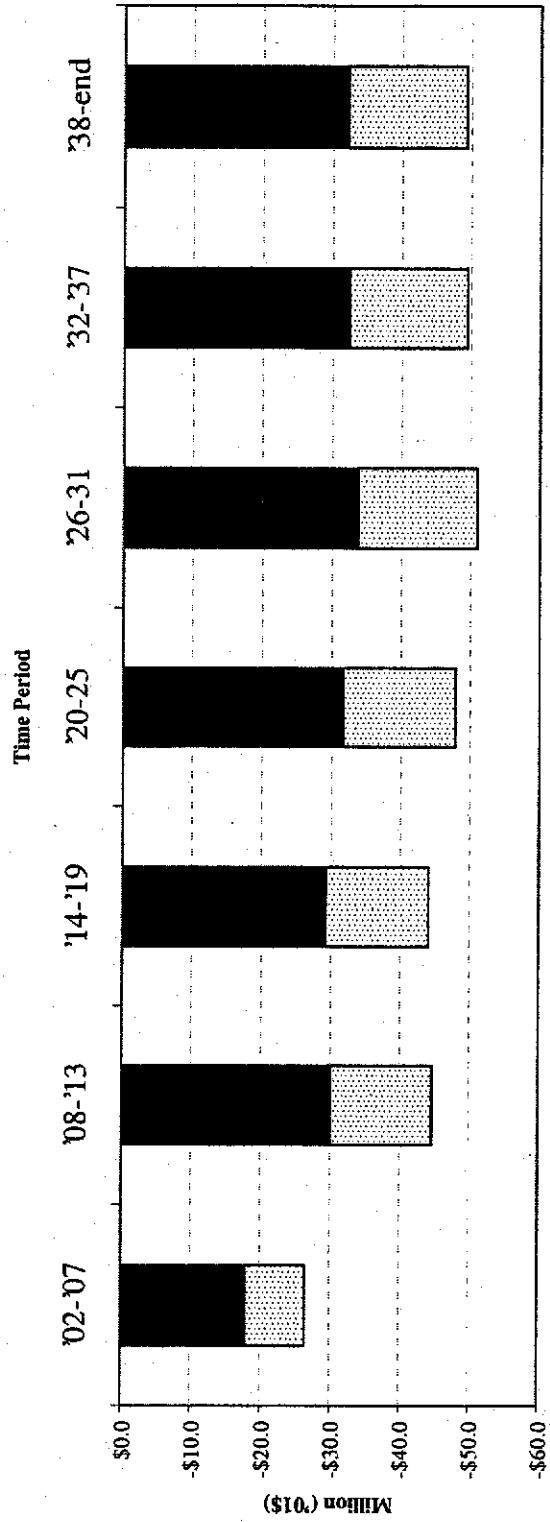
**Attachment 4
Annual Income in Imperial County Created by Non-Following Program**



Attachment 5
Annual Income in Imperial County Lost by Fallowing Program
(Representative Crop Mix)



Attachment 6
Economic Loss from Switch to Fallowing Program
(Representative Crop Mix)



■ Employee Compensation ▨ Proprietors Income

Attachment 7

Jobs Created by Non-Following Conservation and Eliminated by Land Following

<i>Year</i>	<i>No Following</i>	<i>Following</i>	<i>Impact of Following</i>
2002-'07	650	-290	-940
2008-'13	900	-820	-1,720
2014-'19	770	-1,120	-1,890
2020-'25	910	-1,230	-2,140
2026-'31	700	-1,350	-2,050
2032-'37	730	-1,400	-2,130
2038-end	710	-1,400	-2,110

Attachment 8

Economic Impact of Land Fallowing
(per reduction of 10,000 harvested acres)

<i>Crop Sector</i>	<i>Acreage Share</i>	<i>Employee Compensation (mil '01\$)</i>	<i>Proprietor Income (mil '01\$)</i>	<i>Labor Income (mil '01\$)</i>	<i>Jobs (number)</i>
Cotton	1.81%	-\$2.4	-\$1.4	-\$3.8	-160
Food Grains	13.64%	-\$0.5	-\$0.5	-\$1.0	-70
Hay and Pasture	50.65%	-\$0.6	-\$1.0	-\$1.6	-140
Grass Seed	4.84%	-\$0.7	-\$1.2	-\$1.9	-290
Vegetables	21.80%	-\$9.9	-\$5.3	\$-15.2	-680
Sugar Beets	7.27%	-\$1.6	-\$2.1	-\$3.7	-190
Weighted Average		-\$2.7	-\$2.0	-\$4.7	-259

Attachment 9

Comparison of Impacts of Non Fallowing and Fallowing Programs on Annual Local Income
(millions '01\$)

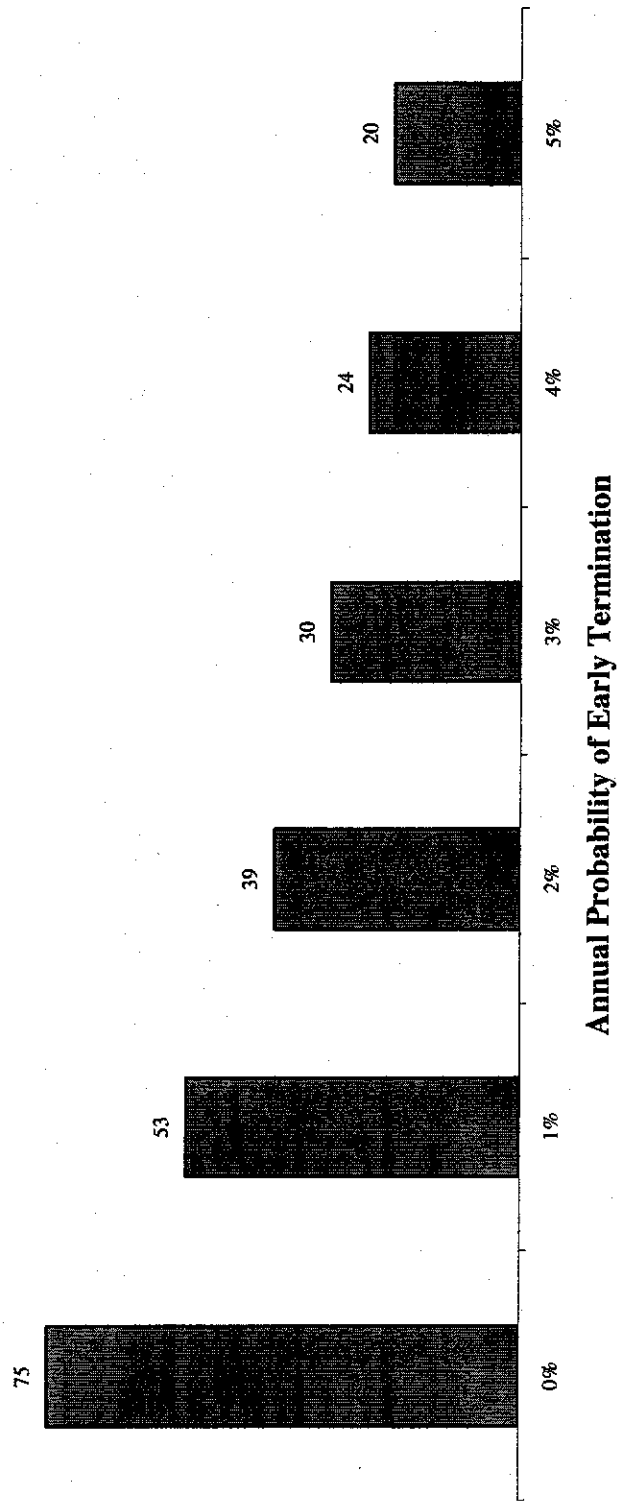
Period	Local Income Created by	Local Income Lost by Fallowing		Income Lost from Switch to Fallowing	
	Non Fallowing	All Crops	Alfalfa Only	All Crops	Alfalfa Only
2002-07	\$20.3	-\$6.1	-\$1.5	-\$26.4	-\$21.8
2008-13	\$28.0	-\$16.6	-\$3.9	-\$44.6	-\$31.8
2014-19	\$21.2	-\$22.8	-\$5.4	-\$44.0	-\$26.6
2020-25	\$22.7	-\$25.2	-\$5.9	-\$47.9	-\$28.6
2026-31	\$23.4	-\$27.6	-\$6.5	-\$51.0	-\$29.9
2032-37	\$21.0	-\$28.5	-\$6.7	-\$49.5	-\$27.7
2038-end	\$20.8	-\$28.5	-\$6.7	-\$49.3	-\$27.5

Attachment 10

Comparison of Job Impacts of Non Following and Land Following Programs

Period	Jobs Created by	Jobs Lost by Following		Jobs Lost from Switch to Following	
	Non Following	All Crops	Alfalfa Only	All Crops	Alfalfa Only
2002-07	650	-290	-86	-940	-736
2008-13	900	-820	-256	-1,720	-1,156
2014-19	770	-1,120	-352	-1,890	-1,122
2020-25	910	-1,230	-378	-2,140	-1,288
2026-31	700	-1,350	-420	-2,050	-1,120
2032-37	730	-1,400	-440	-2,130	-1,170
2038-end	710	-1,400	-440	-2,110	-1,150

Attachment 11
Expected Duration of Transfer Agreements by Risk of Early Termination



Attachment 12

**Present Value of Income Generated by Non Following Program
(millions '01\$)**

<i>Annual Risk of Early Termination</i>	<i>Expected Duration (years)</i>	<i>Employee Compensation</i>	<i>Proprietor Income</i>	<i>Total Local Income</i>
0%	75	\$531.1	\$181.7	\$712.8
1%	53	\$416.6	\$144.6	\$561.2
2%	39	\$337.0	\$118.6	\$455.6
3%	30	\$279.7	\$99.7	\$379.4
4%	24	\$237.2	\$85.6	\$322.7
5%	20	\$204.4	\$74.6	\$279.0

Attachment 13

Present Value of Income Losses from Land Fallowing

<i>Annual Risk of Early Termination</i>	<i>Expected Duration (years)</i>	<i>All Crops Fallowed</i>			<i>Alfalfa Only Fallowed</i>		
		<i>Employee Compensation</i>	<i>Proprietor Income</i>	<i>Total Local Income</i>	<i>Employee Compensation</i>	<i>Proprietor Income</i>	<i>Total Local Income</i>
0%	75	-\$402.2	-\$295.8	-\$698.0	-\$54.1	-\$109.9	-\$164.0
1%	53	-\$296.4	-\$217.9	-\$514.2	-\$40.0	-\$80.9	-\$120.9
2%	39	-\$225.1	-\$165.4	-\$390.5	-\$30.5	-\$61.4	-\$91.9
3%	30	-\$175.6	-\$129.0	-\$304.6	-\$23.8	-\$47.9	-\$71.7
4%	24	-\$140.4	-\$103.1	-\$243.4	-\$19.1	-\$38.3	-\$57.3
5%	20	-\$114.3	-\$83.9	-\$198.2	-\$15.6	-\$31.1	-\$46.7