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15 Attorneys for Protestant COUNTY OF IMPERIAL

16 STATE OF CALIFORNIA
17 STATE WATER RESOURCES CONTROL BOARD

18 JOINT PETITION OF IMPERIAL IRRIGATION)
19 DISTRICT AND SAN DIEGO WATER)
20 AUTHORITY FOR APPROVAL OF LONG-TERM)
21 TRANSFER OF CONSERVED WATER, ETC.)
22 UNDER PERMIT NO. 7643 (APPLICATION NO.)
23 7482))
24)

25 COUNTY OF IMPERIAL
26 EXHIBIT 3A
27 SUPPLEMENTAL WRITTEN TESTIMONY OF
28 STEVEN E. SPICKARD

1 3. The EIR/EIS identifies a potential job loss of 1,400 due to transfer and conservation by
2 fallowing, even before considering the additional job losses associated with fallowing
3 for IOP impacts, HCP impacts within the IID water service area, and the economic
4 decline of the Salton Sea area. Socioeconomic impacts cannot be fully measured by just
5 the loss of jobs affecting those who were formerly employed. The entire community in
6 Imperial County will bear some increased burden through the governmental costs of
7 providing job training and public assistance payments, and potentially through the costs
8 of dealing with increased crime, domestic stress, and other social problems derived from
9 high unemployment. Mitigation for these impacts could be provided in two ways. To
10 the extent that fallowing is used to free up water for transfer, the effects of increased
11 unemployment could be monitored and mitigated through increased funding for public
12 programs after the fact. As an alternative, water conservation practices that invest in
13 infrastructure could be used to ensure that jobs are not lost in the first place.
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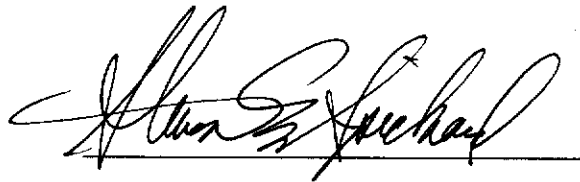
18 4. Any reduction in air quality will have socioeconomic costs as well as environmental
19 costs. The household sector of the economy will suffer costs associated with health
20 problems and costs of mitigating airborne particles in their homes and workplaces. The
21 public sector will suffer reduced revenues from declining property values, and increased
22 costs of public health.
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25 5. To the extent that Imperial County or the other governmental jurisdictions within its
26 borders suffer lower revenues or higher service costs as a result of the water transfer
27 program, compensation for this damage should come from the beneficiaries of the
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1 program. SDCWA is proposing to pay \$250 per acre-foot for the water transferred.
2 Although further analysis would be necessary to estimate the value of water in the San
3 Diego economy, most likely it is worth significantly more than \$250 per acre-foot. The
4 simple ratios presented in the table in Attachment A are indicative of the high value of
5 additional water if made available in the San Diego economy. Water is only one of
6 many inputs to production in San Diego's urban economy, and the point of this exercise
7 is that at \$250 per acre-foot, water is a relatively inexpensive input. If transferring water
8 causes harm to third parties in Imperial County, there should be the ability to charge
9 somewhat more than \$250 per acre-foot for water made available to San Diego.
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15 I declare under penalty of perjury that the foregoing is true and correct. Executed on May
16 13, 2002, at San Francisco, California.
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STEVEN E. SPICKARD

Attachment A

**SIZE OF THE SAN DIEGO COUNTY ECONOMY
RELATED TO WATER CONSUMPTION**

For the Year 2000, Expressed in Constant 2000 Dollars

Total Water Consumption ¹	695,000 Acre-Feet
Real Gross Regional Product ²	\$164,000 per Acre-Foot
Real Personal Income ³	\$127,000 per Acre-Foot
Jobs Supported ⁴	1.8 per Acre-Foot
Population Supported ⁵	4.2 per Acre-Foot

¹San Diego County Water Authority for 2000.

²SANDAG 2020 Regionwide Forecast: \$114 billion in 2000 dollars.

³SANDAG 2020 Regionwide Forecast: \$88 billion in 2000 dollars.

⁴SANDAG 2020 Regionwide Forecast: 1,279,200 civilian employment in 2000.

⁵SANDAG 2020 Regionwide Forecast: 2,911,000 population in 2000.

Source: As noted with Economics Research Associates analysis.

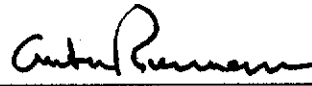
STATE WATER RESOURCES CONTROL BOARD
IID-SDCWA PETITION FOR LONG-TERM WATER TRANSFER

I, Antonio Rossmann, hereby declare as follows:

I am over the age of 18 years and am not a party to the within action. My business address is 380 Hayes Street, Suite One, San Francisco, California 94102.

On 30 April and 1 May 2002, I served **EXHIBIT 4**, on 10 May and 13 May 2002, I served **EXHIBIT 1A** and on 14 May and 15 May 2002, I served **EXHIBIT 3A** by hand delivery to the persons on the attached Imperial Irrigation District Interested Parties list, and by electronic mailing to those persons whose electronic addresses appear on the attached list.

By: _____



Antonio Rossmann

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