

ATTACHMENT C

Stapleton Testimony

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13 **BEFORE THE**
14 **STATE WATER RESOURCES CONTROL BOARD**
15 **STATE OF CALIFORNIA**

16 In re Petition of Imperial Irrigation District and) **OUTLINE OF SUPPLEMENTAL EXPERT**
San Diego County Water Authority for) **TESTIMONY OF MAUREEN**
17 Approval of Long-Term Transfer of Conserved) **STAPLETON (FOR REBUTTAL CASE)**
Water and Changes in Point of Diversion, Place)
18 of Use and Purpose of Use Under Permit No.)
7643)
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20 I am Maureen Stapleton, General Manager of the San Diego County Water Authority
21 (SDCWA). My Statement of Qualifications and Written Testimony for Phase I was submitted
22 previously as SDCWA Exhibit 1.

23 **I. INTRODUCTION**

24 I am aware of certain testimony and exhibits offered by various parties to this proceeding in
25 their respective cases in chief and in cross-examination of various witnesses. This testimony is
26 offered in rebuttal to clarify some matters and to provide a context and a foundation for the exhibits
27 filed in connection with this testimony. I will address: (i) the impacts of the Water Conservation and
28 Transfer Program (Project), as defined by the pending Petition in this matter and the draft

1 Environmental Impact Report for the Project (DEIR/DEIS), within San Diego County; (ii) the
2 considerations that guided SDCWA in establishing a price for the conserved water to be transferred
3 to SDCWA by the Imperial Irrigation District (IID) under the Transfer Agreement,¹ and (iii) the
4 relationship between the method of conservation and the ability to obtain permitting from California
5 Department of Fish and Game (DFG) as well as potential socio-economic impacts.

6 **II. INTRA SAN DIEGO COUNTY IMPACTS**

7 **A. The Water Transfer is Not Growth Inducing**

8 Irrespective of how the conservation element of the Project is implemented by IID,
9 SDCWA's efforts to transfer conserved water from IID to SDCWA, if successful, will not be growth
10 inducing. As a resource agency having no land use regulatory power of its own, SDCWA merely
11 provides water facilities and supplies necessary to meet demands first determined by other public
12 agencies having Constitutional and statutory authority to regulate the pace, location, quality and
13 quantity of land development. SDCWA is simply seeking to match its firm water supplies to
14 regional water needs determined according to population growth first established by others. This
15 year, SDCWA has imported from MWD about 600,000 acre-feet of water to meet current demand.
16 Of this amount, we only consider about 320,000 acre-feet to be firm MWD supplies. With the IID
17 water transfer, SDCWA will convert up to 200,000 acre-feet of at risk water to firm supplies. Even
18 though this total amount of firm supply remains less than current usage it provides assurances
19 against the potential for devastating economic and social hardship like happened in the last drought.

20 In November 1988, the voters of San Diego County approved a regional planning and growth
21 control measure. The measure required the County of San Diego and each city in the county to
22 participate in formulating a regional growth management plan. The San Diego Association of
23 Governments (SANDAG) was designated as the regional growth management review board.
24 SANDAG is a joint-powers agency comprised of all the local government agencies that have land
25 use regulatory power in San Diego County. In 1989, the legislature charged SDCWA with
26 providing water sufficient to meet the needs of its member agencies serving the San Diego Region.

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28 ¹ IID Exh. 7: Agreement for Transfer of Conserved Water by and Between Imperial Irrigation District and San Diego
County Water Authority, dated April 29, 1998.