

Allen Matkins Leck Gamble & Mallory LLP

attorneys at law

Allen Matkins

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writer. Mark J. Hattam t. 619 235 1529

file number. I4161-002/SD553881.01 e. mhattam@allenmatkins.com

March 5, 2002

To List of Parties to Exchange Information

Re: Imperial Irrigation District/San Diego County Water Authority Water  
Transfer Hearing

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Gentlemen:

Enclosed is a copy of the Imperial Irrigation District's Notice of Intent to Appear.

Please note that the List of Parties to Exchange Information circulated by the SWRCB staff was in error: The Imperial Irrigation District does not agree to accept electronic service. Although you may transmit materials electronically to the Imperial Irrigation District (c/o [mhattam@allenmatkins.com](mailto:mhattam@allenmatkins.com)), you must also serve any such documentation in paper form. Thank you for your cooperation.

Very truly yours,



Mark J. Hattam

MJH:cas

Enclosure

Division of Water Rights  
State Water Resources Control Board  
PO Box 2000  
Sacramento, CA 95812-2000  
Attn: Andy Fecko

Re: "IID/SDCWA Petition"

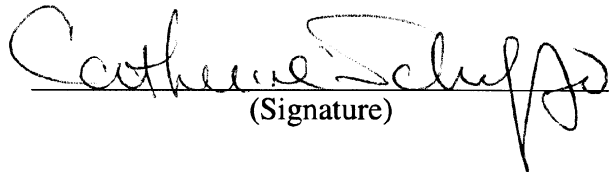
**CERTIFICATE OF SERVICE OF IID NOTICE OF INTENT TO APPEAR**

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 501 West Broadway, Ninth Floor, San Diego, California 92101-3577.

On March 5, 2002, I served IID's Notice of Intent to Appear (copy attached) on the "List of Parties To Exchange Information" (copy attached) by the method indicated (via e-mail or first class mail, postage prepaid).

Executed on March 5, 2002, at San Diego, California.

\_\_\_\_\_  
Catherine A. Schiaffo  
(Type or print name)

  
\_\_\_\_\_  
(Signature)

Allen Matkins Leck Gamble & Mallory LLP

attorneys at law

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Mark J. Hattam

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Enclosure

## NOTICE OF INTENT TO APPEAR

Imperial Irrigation District ("IID"), 333 East Barioni Blvd., Imperial, California 92251, plans to participate in the water right hearing regarding:

Joint Petition of IID and SDCWA for the  
Transfer of Conserved Water under Permit No. 7643

### Scheduled to commence

April 22, 2002

I will be only be making a policy statement:

I intend to participate in:

Phase 1  Phase 2  Both Phase 1 and Phase 2

I agree to accept electronic service:

IID plans to call the following witnesses to testify at the hearing<sup>1</sup>:

NAME	SUBJECT OF PROPOSED TESTIMONY	ESTIMATED LENGTH OF DIRECT TESTIMONY	EXPERT WITNESS YES/NO
Mr. Jesse Silva, General Manager of Imperial Irrigation District. (Phase I)	Overview of IID; IID historical conservation activity, current efficiency, conservation opportunities (system and on-farm), and system review; benefits of transfer to IID region	Forty Minutes	Yes.
Dr. Woldezion Mesghinna and/or Dr. Assad Safadi of Natural Resource Consulting Engineers. (Phase I)	IID historical conservation activity, current efficiency, comparative efficiency, conservation opportunities (system and on-farm), system review, reasonable and beneficial use, and water balance; lack of injury to legal users of water	Two Hours	Yes.

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<sup>1</sup> The addresses of all witness named herein are attached. Though the witnesses are not necessarily listed in the order they will be called, after the name of each witness IID has specified whether it currently anticipates calling the witness in Phase I or II (environmental) of this bifurcated hearing. Also, IID reserves the right to call rebuttal witnesses not listed here.

NAME	SUBJECT OF PROPOSED TESTIMONY	ESTIMATED LENGTH OF DIRECT TESTIMONY	EXPERT WITNESS YES/NO
Professor Barton Thompson, Jr., of Stanford University. (Phase I)	The benefits to the State of California of the proposed IID-San Diego water transfer	Twenty Minutes	Yes.
Mr. James Merchant of Dornbush & Co. (Phase I)	IID farmers' ability to pass on costs of conservation to crop markets	Twenty Minutes	Yes.
Dr. Rodney Smith of Stratecon Inc. (Phase I)	The benefits to the State of California of the proposed IID-San Diego water transfer; the costs of conservation in IID; and the impact of such costs in IID if not funded by an outside source	Forty Minutes	Yes.
Dr. John Eckhardt of CH2M Hill. (Phase II)	No unreasonable impacts on fish, wildlife, or instream; Salton Sea issues	One Hour	Yes.
Ms. Laura Harnish of CH2M Hill (Phase II)	No unreasonable impacts on fish, wildlife, or instream; Salton Sea issues	Twenty Minutes	Yes.

**COPY**

Dated: February 25, 2002

Signature: \_\_\_\_\_

Name: Mark J. Hattam, Esq.	Fax Number: (619) 233-1158
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Allen Matkins Leck Gamble & Mallory LLP	
501 West Broadway, Ninth Floor	E-mail Address: mhattam@allenmatkins.com
San Diego, CA 92101	

## IID WITNESS ADDRESSES

Mr. Jesse P. Silva  
General Manager  
Imperial Irrigation District  
P. O. Box 937  
Imperial, CA 92251

Street address:  
333 East Barioni Blvd.  
Imperial, CA 92251

Dr. Woldezion Mesghinna and/or  
Dr. Assad S. Safadi  
Natural Resources Consulting Engineers, Inc.  
131 Lincoln Avenue, Suite 300  
Fort Collins, CO 80524

Professor Barton H. Thompson, Jr.  
Stanford Law School, Stanford University  
559 Nathan Abbott Way  
Crown Quad, Room 320  
Stanford, CA 94305-8610

Mr. James P. Merchant  
David M. Dornbusch & Company, Inc.  
1736 Stockton Street  
San Francisco, CA 94133

Dr. Rodney T. Smith  
Stratecon Inc.  
2335 West Foothill Blvd., Suite 11  
Upland, CA 91786

Dr. John R. Eckhardt  
CH2M Hill  
100 Iverness Terrace East  
Englewood, CO 80112-5313

Ms. Laura Harnish  
CH2M Hill  
155 Grand Avenue, Suite 1000  
Oakland, CA 94612

**LIST OF PARTIES TO EXCHANGE INFORMATION**  
**Imperial Irrigation District/San Diego County Water Authority**  
**Water Transfer Hearing**

Division of Water Rights  
State Water Resources Control Board  
P.O. Box 2000  
Sacramento, CA 95812-2000  
Attn: Andy Fecko

E-mail: IIDhearing@waterrights.swrcb.ca.gov

Scott S. Slater, Esq.  
Hatch and Parent  
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Rep: San Diego County Water Authority

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Rep: County of Imperial

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3939 Walnut Ave., No. 144  
Carmichael, CA 95608

via U.S. mail

Larry A. Gilbert  
945 E. Worthington Road  
Imperial, CA 92251-9764

via U.S. mail

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Tom Kirk, Executive Director  
Salton Sea Authority  
78-401 Highway 111, Ste "T"  
La Quinta, CA 92253

E-mail Address: [tkirk@saltonsea.gov](mailto:tkirk@saltonsea.gov)

Karen Douglas  
Planning and Conservation League  
926 J Street, Suite 612  
Sacramento, CA 95814

via U.S. mail

Bill Allayaud  
Sierra Club California  
1414 K Street, Suite 500  
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San Diego, CA 92103

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Bill Yeates  
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Rep: National Audubon Society

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