Acreage Limitation: Imperial Valley's New Challenge

by

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COMMENT

Acreage Limitation: Imperial Valley's New Challenge

After living in an agricultural empire dependent upon the waters of the Colorado River, one easily accepts the All-American Canal[1] as the lifeline to one of the most productive agricultural areas in existence—the Imperial Valley.[2] Traveling through this area any observer immediately recognizes the importance of this blue waterway to the Imperial Valley. Its aid in the creation of a magnificent patchwork of vegetation, carved out of a burning, barren desert, becomes clearly evident. Extending from the Colorado River across ever-shifting dunes, the Canal has delivered over forty-one trillion gallons of life-giving water into the fertile regions of the Southwest.

Although unknown to many of the Valley's new generation, the pioneers of this area fully realize the importance the Canal has played in this region's history. That history—a large part of the exciting background of California's youngest county—depicts the resourcefulness and persevering spirit of the people in this amazing agricultural land. Throughout the years they have fought floods, crop failures, pestilence and labor problems. At the present they are challenged again by still another problem which brings to the forefront the history of a great struggle—the bringing of controlled and necessary water into this agricultural empire.

THE CHALLENGE

As in most agrarian areas, mechanization in the Imperial Valley has become increasingly essential. In order to justify the cost of this mechanization, in addition to alleviating other agricultural problems, the necessity of large-scale farming operations exists. Of utmost importance is the recognition that this region no longer depicts the era of the small or family farm. It represents, of necessity, the age of the "big farmer."

1. "The main All-American Canal is one of the largest irrigation canals in the United States. The main canal is 80 miles long extending southwesterly from Imperial Dam about 5 miles above Laguna Dam for about 20 miles and turning westward just north of the Mexican border through shifting sand dunes and desert mesa to and across the Imperial Valley." Bureau of Reclamation, United States Department of the Interior, *Report on the Contribution of the All-American Canal System to the Economic Development of the Imperial-Coachella Valleys, California, and to the Nation* 3 (1956) (hereinafter referred to as *Report on All-American Canal*). See generally, NADEAU, THE WATER SEEKERS 171, 177, 195-96, 199, 201, 259, 269, 274-75 (1950).

2. The Imperial Valley, an area of approximately 600,000 acres, lies in the Salton Basin—a region almost entirely below sea level. At this time approximately 530,000 acres are being irrigated by water from the Colorado River received through the All-American Canal. *Report on All-American Canal, supra* note 1, at 1.

Partially caused by a minority of public opposition to this large-scale farming, the United States Department of the Interior revealed on December 31, 1964 that it was reversing a 1933 "informal" ruling made by that Department's Secretary, Ray Lyman Wilbur. In effect, the Solicitor's decision[3] stated that "privately owned" land, receiving water by virtue of the Boulder Canyon Project and All-American Canal, was to be subject to the excess land limitation found in the Federal Reclamation Act.[4]

THE RECLAMATION ACT—ITS NECESSITY AND BACKGROUND

The Federal Reclamation Act of 1902 provided, in part, that no water would be delivered to any lands in excess of 160 acres which belonged to one owner.[5] The acreage limitation, in effect, was an anti-monopoly policy—a protection against speculation in undeveloped land made valuable by reclamation project water. Until 1902 there existed no such reclamation law as we know it today. However, various acts existed which encouraged the settlement of new lands.

In 1862 the Homestead Act[6] was passed which provided that a citizen over twenty-one years of age could, after meeting certain requirements, file for ownership. Owing to natural water supplies, most of these lands could be developed for a small investment. Because public land was becoming more and more scarce, Congress passed the Desert Land Act of 1877[7] to encourage irrigation of arid tracts. Under this Act a husband and wife could obtain 640 acres. Finally, in 1894 the Carey Irrigation Act[8] was passed which provided for a grant of one million acres of public lands to each of the Western states. These lands were to be sold by each state—no more than 160 acres to any one person—for purposes of irrigation and development. In essence, the basic intent behind these acts was to provide for the expanding population—to allow people to move West and settle comfortably on an amount of land which required only a minimum of effort and investment.

At this point it must be remembered that these acts only dealt with public lands. As these lands rapidly disappeared Congress realized

3. 71 Interior Dec. 496 (1964).
4. 32 Stat. 388 (1902), 43 U.S.C. § 372 (1964). This Act is now found at 43 U.S.C. §§ 372, 373, 381, 383, 391, 392, 411, 416, 419, 421, 431, 432, 434, 439, 461, 491, 498.
5. 32 Stat. 389 (1902), 43 U.S.C. § 431 (1964). For an early view of reclamation policy see House Committee on Arid Lands, *Report on Reclamation and Arid Lands*, H.R. REP. No. 1468, 57th Cong., 1st Sess. 3 (1902).
6. 12 Stat. 392 (1892), 43 U.S.C. §§ 161-63, 169, 173, 175, 183, 211 (1964).
7. 19 Stat. 377 (1877), 43 U.S.C. §§ 321-23, 325, 327-29 (1952).
8. 28 Stat. 422 (1894), 43 U.S.C. § 641 (1964).

the need for providing the private lands with suitable irrigation. From this recognition stemmed the Reclamation Act of 1902—another step in the development of the West through federal assistance.

"One-Sixty"

With this basic background we must return to a discussion of the excess land or 160 acre provision, and what it means today. This excess land limitation, or anti-monopoly tool, contained in the 1902 Act, was strengthened in 1926 by the Omnibus Adjustment Act,[9] a supplement to the 1902 Act. The basic difference between the 1926 and the 1902 Acts was that an excess landowner under the later act was forbidden to receive project water unless the owner, by contract, gave authorization to the government for the sale of these lands. The 1926 Act expressly provided that "no such excess lands so held shall receive water from any project or division if the owners thereof shall refuse to execute valid recordable contracts for the sale of such lands under terms and conditions satisfactory to the Secretary of the Interior. . . ."[10]

THE PURPOSE

The purpose of this comment is to set forth the bases for non-applicability of the excess land limitation to the privately owned lands of the Imperial Valley. As will be stated below, there seems to be strong legal, historical, moral and economic reasons for non-applicability of the limitation. The author's purpose is not to discuss whether the federal government has the constitutional authority to distribute reclamation project water in accordance with federal law, thereby circumventing the state law. The question concerning section 8 of the Reclamation Act[11] seems to have been definitely decided in favor of federal authority by the United States Supreme Court in

9. 44 Stat. 636 (1926), 43 U.S.C. § 423 (1964).

10. 44 Stat. 650 (1926), 43 U.S.C. § 423(e) (1964). This provision is aimed at land "ownership"—precluding the leasing of excess lands to avoid the limitation. For a comprehensive discussion and development of the "excess land law" see Taylor, *The Excess Land Law: Execution of a Public Policy*, 64 YALE L.J. 477 (1955); Taylor, *Excess Land Law: Calculated Circumvention*, 52 CALIF. L. REV. 978 (1964).

11. "That nothing in this act shall be construed as affecting or intended to affect or to in any way interfere with the laws of any State or Territory relating to the control, appropriation, use, or distribution of water used in irrigation, or in any vested right acquired thereunder, and the Secretary of the Interior, in carrying out the provisions of this act, shall proceed in conformity with such laws. . . ." 32 Stat. 390 (1902), 43 U.S.C. § 383 (1964). For an excellent discussion of federal-state conflict in this area see Sax, *Problems of Federalism in Reclamation Law*, 37 COLO. L. REV. 49 (1964) and Trelease, *Water Rights of Various Levels of Government—States' Rights vs. National Powers*, 19 WYO. L.J. 189 (1965). See also Comment, *Problems in Interbasin Water Transfer*, 1 CALIF. WESTERN L. REV. 136 (1965).

three cases: *Ivanhoe Irrigation District v. McCracken*,[12] *City of Fresno v. California*[13] and *Arizona v. California*.[14]

BOULDER CANYON PROJECT: HISTORICAL BACKGROUND

In deciding whether the excess land limitation should be applied to privately owned land in the Imperial Valley, it must necessarily be considered whether it was the intent of Congress to have the limitations apply. To determine Congress' intent, a brief historical discussion of the Boulder Canyon Project seems warranted.[15]

A year before the passage of the Reclamation Act the lands of the Imperial Valley were being fed by water originating from the Colorado River and traveling through a hand-dug canal—the Alamo —which passed partially through Mexico.[16] Plans for irrigation by a canal such as the Alamo began in 1849 and were exercised in 1892. In 1905-1907 the uncontrolled Colorado River caused great flooding and nearly ruined the farmlands. The determination and vigor of this Valley's inhabitants, in developing the Valley through irrigation, is clearly depicted by the endeavor made in checking the unruly Colorado waterway and the formation of the Imperial Irrigation District. It is sufficient to state at this point that rights to the natural flow of Colorado River water were perfected and vested by the Imperial Irrigation District at an early date.

Led by Senator Hiram Johnson and Congressman Phil Swing, the Boulder Canyon Act[17] was passed in 1928. The Project Act provided for the construction of Boulder Dam—now known as Hoover Dam—the purpose of which was to check the uncontrollable Colorado River and to store its water for later release to the Lower Basin states,[18] while protecting the rights of the Upper Basin states.[19] The Act further provided for the construction of the All-American Canal, which was to be used as a lifeline to the arid Imperial and Coachella Valleys.

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12. 357 U.S. 275 (1958). The Court stated: "As we read section 8, it merely requires the United States to comply with state law when, in the construction and operation of a reclamation project, it becomes necessary for it to acquire water rights or vested interests therein. But the acquisition of water rights must not be confused with the operation of federal projects. . . . We read nothing in section 8 that compels the United States to deliver water on conditions imposed by the State. 357 U.S. at 291-92.

13. 372 U.S. 627 (1963).

14. 373 U.S. 546 (1963). For an excellent discussion of this case see Trelease, *Arizona v. California: Allocation of Water Resources to People, States and Nation*, 1963 SUP. CT. REV. 158, 192-93 (1963).

15. For an excellent historical presentation of the Boulder Canyon Project see NADEAU, THE WATER SEEKERS (1950).

16. *Id.* at 143-48.

17. 45 Stat. 1057 (1928), 43 U.S.C. § 617 (1964).

18. Arizona, California, Nevada.

19. Colorado, New Mexico, Utah, Wyoming.

INAPPLICABILITY OF THE ACREAGE LIMITATION TO THE PRIVATELY-OWNED LANDS OF THE IMPERIAL VALLEY

Legislative History

The basic importance of the Project Act in this part of the discussion lies, not in the Act itself, but in the six-year controversy that ensued in the House and Senate before its passage. A reading of the debates relating to the Boulder Canyon Project bills seems to enforce the view that a majority of Congress did not intend to have the excess land provision apply to the privately-owned lands in the Imperial Valley.[20] From February 1926 to May 1928, a controversy existed between the House and Senate as to whether the excess land provision—as applied to private lands—should be specifically included in the Project Act.[21] Senator Johnson and Congressman Swing—spearheads of the Project and of the development of the All-American Canal—introduced bills which specifically excluded the excess land provision.[22] In May 1928, after much debate, the Senate version[23] of the Project bill—without the specific acreage limitation—was finally eccepted by the House and signed into law as the Boulder Canyon Project Act.

In conclusion, a reading of legislative history reveals that it was *not* Congress' intent to apply the excess land limitation, as found in the Reclamation Act, to the privately-owned holdings in the Imperial Valley.[24] This intent is reinforced by the fact that the excess land limitation was specifically applied in the Project Act to public lands, but there was no mention of private land limitation.[25]

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20. H.R. 6044, 66th Cong., 1st Sess. (1919); H.R. 11553, 66th Cong., 2d Sess. (1920); H.R. 11449, 67th Cong., 2d Sess. (1922); H.R. 2903, S. 727, 68th Cong., 1st Sess. (1924); H.R. 6251, S. 1868, H.R. 9826, S. 3331, 69th Cong., 1st Sess. (1926); H.R. 5773, S. 728, 70th Cong., 1st Sess. (1927).

21. *Ibid.*

22. H.R. 11449, 67th Cong., 2d Sess. (1922); H.R. 2903, S. 727, 68th Cong., 1st Sess. (1923); H.R. 9826, S. 3331, 69th Cong., 1st Sess. (1926).

23. S. 728, 70th Cong., 1st Sess. (1927).

24. It should be noted here that there have been a number of reclamation projects specifically exempted by Congress from the excess land law. Some of these are: Truckee Project, 54 Stat. 1219 (1940); Owl Creek Unit, 68 Stat. 890 (1954); Colorado-Big Thompson Project, 52 Stat. 764 (1938), 43 U.S.C. § 386 (1964); Santa Maria Project, 68 Stat. 1190 (1954). Congress raised the limitation to 480 acres because of the objection that 160 acres would not support a family at high altitudes in two projects; San Luis Valley Project, 66 Stat. 282 (1952); Kendrick Project, 71 Stat. 608 (1957). In the Sudskadee Project, 72 Stat. 963 (1958), Congress raised the limitation because of unusually poor land. Congress also waived the limitation in the Washoe Project, 70 Stat. 775 (1956), 43 U.S.C. § 614 (1964).

It is worth noting that the provisions of the Colorado-Big Thompson Project, *supra*, stated, "The excess land provision of the Federal Reclamation laws shall not be applicable to lands which on June 16, 1938, had an irrigation water supply from sources other than a Federal reclamation project and which will receive a supplemental supply from the Colorado-Big Thompson project."

25. See 45 Stat. 1063 (1928), 43 U.S.C. § 617(h) (1964).

Boulder Canyon Project Act

In deciding against applicability of the acreage limitation to the Imperial Valley, a reading of the Boulder Canyon Project Act seems to illustrate clearly a recognition of prior vested and perfected rights, as well as the guarantee of water delivery to the Valley—without acreage limitation. Based upon statements made by Allyn Kreps, Attorney for Imperial Resources Associates,[26] before the California State Board of Agriculture,[27] the legal arguments for inapplicability of the excess land limitation to the Imperial Valley are as follows:

1. The Boulder Canyon Project Act provides that no charge is to be made for delivery of water to the Imperial Valley farmlands.[28] This clearly seems to be a recognition of prior vested water rights—rights not to be acquired except through the power of eminent domain.

2. Section 6 of the Project Act[29] provides that Article VIII of the Colorado River Compact,[30] providing for the preservation of existing and vested water rights, is to be incorporated into the Boulder Canyon Project Act. The Act, while specifically approving the Compact, provides that "the dam and reservoir provided for by section 617 of this title shall be used . . . for irrigation and domestic uses and satisfaction of present perfected rights in pursuance of Article VIII of said Colorado River compact. . . ."[31] By specifically incorporating the Compact's provisions, the Project Act acquiesced in the recognition of prior vested rights—as found in the Imperial Valley. This recognition of perfected rights is further substantiated by the fact that the Reclamation Act was aimed primarily at aiding undeveloped and unirrigated lands—lands without existing water rights.

3. Section 8(a)[32] further stipulates that the use of Project water shall "be subject to and controlled by said Colorado River compact in the construction, management, and operation of said reservoirs, canals and other works and the storage, diversion, delivery and use

26. Imperial Resources Associates is a newly formed non-profit corporation consisting of landowners, lease operators, agriculturally-oriented organizations, regular businessmen, and general contributors, organized to oppose the excess land limitation.

27. Address by Allyn Kreps, California State Board of Agriculture, December 13, 1965.

28. 45 Stat. 1057 (1928), 43 U.S.C. § 617 (1964).

29. 45 Stat. 1061 (1928), 43 U.S.C. § 617(e) (1964).

30. This Compact, now ratified by all of the Basin states, is found at 63 Stat. 31 (1949). Article III of the Compact, providing for the allocation between Lower and Upper Basin states, specifically provided that such allocation "shall include all water necessary for the supplying of any rights which may now exist."

31. 45 Stat. 1061 (1928), 43 U.S.C. § 617(e) (1964). See also 45 Stat. 1067 (1928), 43 U.S.C. § 617(l) (1964).

32. 45 Stat. 1062 (1928), 43 U.S.C. § 617(g) (1964).

of water for the generation of power, irrigation, and *other purposes*, anything in this subchapter to the contrary notwithstanding. . . ." (Emphasis added.)

4. Section 9[33] provides for the application of the 160-acre limitation to *public* lands only, which are aided by the Project.

On the basis of the above discussion, then, it seems clear that Congress expressly recognized that perfected and vested rights to the natural flow of Colorado River water existed in the Imperial Valley before the Boulder Canyon Act was passed—without any reference to acreage limitations—by: (1) providing that no charge was to be made for delivery of such water;[34] (2) specifically adopting Article VIII of the Colorado River Compact; (3) subjecting water use to the Colorado River Compact provisions; (4) specifically applying the excess acreage limitation to public lands only, creating a strong presumption of non-inclusion to private lands with existing water rights.

Basing his statements on the above construction of the Boulder Canyon Act, the attorney for Imperial Resources Associates stated:

> By the elementary rules of statutory construction, plus the express language of the Boulder Canyon Project Act, it is clear that Sections 1, 6, 8(a) and 9 combine to preclude the application of the 160-acre limitation to Imperial Valley, because the use of such water was a perfected vested right—without regard to acreage limitation—before the Act was passed, and the compact and Act expressly protect such rights—without regard to acreage limitation—and provide water to fulfill those rights without charge—again without regard to acreage limitation.[35]

In light of the legislative history of the Boulder Canyon Project Act and in reading and construing the Act itself, it seems clear that Congress did not intend to have the 160-acre limitation apply to the privately-owned lands of the Imperial Valley.

Solicitor's Decision

A reading of the decision by the Solicitor of the Department of the Interior[36] reveals that his decision, that the land limitation is now to apply, is based almost entirely on the provision included in section 14 of the Boulder Canyon Project Act, which maintains that

33. 45 Stat. 1063 (1928), 43 U.S.C. § 617(h) (1964).

34. Such a charge by the United States Government, of course, could have been made only if Congress had sought to acquire the water rights by eminent domain—but the Government has never sought to so act.

35. Address by Allyn Kreps, California State Board of Agriculture, December 13, 1965.

36. 71 Interior Dec. 496 (1964).

the Act shall be "deemed a supplement to the reclamation law which said reclamation law shall govern the construction, operation, and management of the works herein authorized, *except as otherwise herein provided.*"[37] (Emphasis added.)

Without the above exception clause the decision is sound. Although section 14 of the Act incorporates the reclamation law, which includes section 46 of the 1926 Act, [38] the Project Act seems to provide that the excess land limitation is not to apply to the Imperial Valley or to any private lands with existing water rights. Because of this, the Solicitor's opinion lacks merit.

Project Funds and Contractual Provisions

It is questionable whether the Boulder Canyon Project was, in the true sense, a reclamation project at all. If not, the application of the excess land law would be precluded. This is based on the fact that reclamation projects are generally built with reclamation funds, which was not the case with the Boulder Canyon Project. The funds used for this project were placed in a "special fund" with provisions for an interest-free repayment over a forty-year period.

As a further argument, the contract between the government and the Imperial Irrigation District, provided for in the Project Act, did not contain any acreage limitation provision.[39] Likewise, a reading of the 1952 supplement to the contract reveals no reference to an excess land limitation.[40] It was further provided that an action was to be initiated immediately in a state court to test the validity of the contract. In that action the California court expressly held that the 160-acre limitation was not applicable to the Imperial Valley.[41] It may be noted at this point that even though the California court opinion is not binding on the federal government, by continuance

37. 45 Stat. 1065 (1928), 43 U.S.C.A. § 617(m) (1964). It is interesting to note that this section of the Boulder Canyon Project Act has been incorrectly stated in the United States Code. The United States Code provides that the Boulder Canyon Project Act shall be a supplement to the reclamation law "except as otherwise *therein* provided." (emphasis added.) This would lead one to believe that the reclamation law is to govern except as might be provided within the reclamation law itself. The true construction is that the reclamation law is to govern except as otherwise provided in the Boulder Canyon Project Act.

38. 44 Stat. 649 (1926), 43 U.S.C. § 423(e) (1964).

39. Contract for Construction of Diversion Dam, Main Canal and for Delivery of Water, dated December 1, 1932. Article 30 of the 1932 contract states that: "*Except as provided by the Boulder Canyon Project Act*, the reclamation law shall govern the construction, operation and maintenance of the works to be constructed hereunder." (Emphasis added.)

40. Contract Amendatory of and Supplemental to All-American Canal Contract of December 1, 1932, dated March 4, 1952.

41. Hewes v. All Persons, Imperial County, California, Superior Court No. 15460 (July 1933).

of the project the government has impliedly acquiesced to the California ruling on the validity of the contract.

Administrative Action: A Mistake?

On February 24, 1933, Secretary of the Interior Ray Lyman Wilbur sent a letter to the Imperial Irrigation District in regard to the applicability of the acreage limitation to the privately-owned lands of the Imperial Valley.[42] The Secretary expressed that it was the practice of the Bureau of Reclamation to specifically include in their contracts the acreage limitation if they wished it to apply. Recognizing that the practice was not followed in the District contract, he further stated: "upon careful consideration the view was reached that this limitation does not apply to the lands now cultivated and having a present water right"[43]—the situation existing in the Imperial Valley at that time. The Secretary also stated that previous reclamation projects had recognized "vested rights in single ownership in excess of 160 acres and . . . [were delivering] the water necessary to satisfy such rights through works constructed by and at the expense of the government."[44] The same view was further expressed and clarified on March 1, 1933 in a letter by the Assistant Commissioner of Reclamation, Porter W. Dent.[45] This has seemingly been the recognized view until the present.

A Final Consideration

> Law must be stable, and yet it cannot stand still.
>
> —*Roscoe Pound*[46]

Diverging from the legal and historical discussion for a moment, a reversal of Secretary Wilbur's opinion on the grounds that he was "mistaken" seems to be against all that is right in our system of justice. It is the purpose of this part of the comment to express the view that, morally and economically, there does not seem to be a valid basis for applying the 160-acre limitation to the Imperial Val-

42. Letter From Secretary of Interior to Imperial Irrigation District, February 24, 1933.

43. *Ibid.* See also 34 L.D. 351 (1906); 40 L.D. 116 (1911).

44. *Ibid.*

45. Letter From Assistant Commissioner of Reclamation, Porter W. Dent, to Richard J. Coffey, March 1, 1933. See also Letter From Secretary of Interior Krug to H. C. Herman, April 27, 1948, and Letter From Elmer F. Bennett (Solicitor, Dept. of Interior) to the Hon. J. Lee Rankin, February 5, 1958. Solicitor Bennett stated in his letter that "the United States acting through the then Secretary of the Interior accepted the contract on having been confirmed and acting thereon provided to initiate construction of the All-American Canal and engage upon a variety of transactions in reliance upon the validity of the contract. There must surely arise a point of time, again I believe long since past, when the contract in keeping with the terms of Article 41 became binding upon the United States and the District. To treat otherwise at this late date could have far-reaching effect." Quoted in 71 Interior Dec. at 550.

46. POUND, INTERPRETATIONS OF LEGAL HISTORY 1 (1922).

ley. The farmers in this area have built an inland agricultural empire on the belief that the excess land limitation was not to apply to the privately-owned farmlands in the Imperial Valley. To destroy this belief at such a late date would seem to be unfair and unreasonable.

As was stated at the beginning of this comment, the cost of expensive machinery and agricultural improvements have created the age of the "big farmer." Because of the particular types of crops which are suitable to be grown in this area, the only economical way in which one may prosper is through increased acreage and production. Studies have shown that the high cost of machinery alone makes it extremely impractical for use on a mere 160 acres.[47] If the Solicitor's decision to limit land should stand, there is no doubt that this now fertile region could easily return to the wasteland it once was.

We must not lose sight of the fact that the reasons and philosophy behind the settlement of our public and private lands—the distribution of wealth and the encouragement of land improvement and conservation—created and led our nation into an era of agricultural excellence. That philosophy cannot be discounted. But we must not lose sight of the purpose of any policy, statute or law. A law must necessarily seek fairness and justice, and in our system of justice we must always hope that the demands of social and economic utility will, if an existing rule of law or statute is outdated or unfair, triumph in the end. In short, whenever rules are inconsistent with the ends to be served, they must be altered and revised. So it is with the reclamation policy today—no matter how excellent it has been in the past.

Recently, for various reasons, Mexican nationals have not been allowed to work in the farms as they once did. To make up for the loss of labor the desire has been expressed that farmers employ more domestic workers and fully utilize technological advancements, which, of course, means higher costs. It must be recognized that such a policy is inconsistent with the excess land law. All of this, aided by past reclamation policies, has caused the decline of the small farm.

The Imperial Valley depicts this great evolution of agriculture. Except as applied to unirrigated, undeveloped areas, the 160-acre limitation is outdated—without modification it has no place today in the type of modern agriculture represented in the Imperial Valley.

*John P. Carter**

47. Robert W. Long, addressing the California State Board of Agriculture on December 13, 1965, presented impressive economic reasons why 160-acre unit farming is highly impractical. See also STUDY BY UNIVERSITY OF CALIFORNIA, COST-SIZE RELATIONSHIPS FOR CASH CROP FARMS IN IMPERIAL VALLEY, CALIFORNIA (1962).

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