

**CALIFORNIA ALFALFA & FORAGE ASSOCIATION****36 Grande Vista, Novato, CA 94947****Phone: 415 892-0167 Fax: 415/899-9860****akiess@cmc.net**

Victoria Whitney, Program Manager  
Hearings and Special Projects Section  
Division of Water Rights  
State Water Resources Control Board  
P.O. Box 2000  
Sacramento, California 95812-2000

Re: Transfer of Water (IID and SDCWA) Permit 7643 on Application 7482

Dear Ms. Whitney:

I am writing in response to your draft proposal for a water transfer between the Imperial Irrigation District and the adjoining metropolitan areas.

On behalf of the California Alfalfa and Forage Association I am commenting about the reference on page 78 of the draft (paragraph 7 of Section 6.4) to alfalfa as a "low value crop" in California. We believe it is wrong to specifically name a crop as being "low value" without any economic justification for such a gross generalization.

Our organization has over 450 members statewide. There are over one million acres of alfalfa in the state. Over seven million tons of hay is produced from these acres that in turn feed the 1.6 million cows in the state (the largest dairy state in the nation), several million beef cows, and an abundance of sport and hobby animals, including the zoo animals in the state.

The reason alfalfa is viable in the state is because it is one of the few free market products left in our country. Other crops rely heavily on government subsidies, whereas alfalfa and other forages do not.

Alfalfa is also extremely important as:

1. a protector against soil erosion
2. a crop requiring reduced cultivation
3. a deep root crop, which aids in leaching salts from the water and soil
4. a weed suppressant
5. a low pesticide crop per ton of crop life output
6. a low fertilizer use due to its unique ability to produce its own

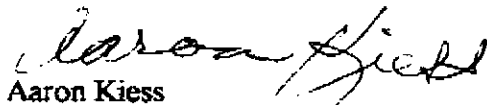
nitrogen

7. a strong component of a sustainable crop rotation for any farmer
8. a wildlife habitat since the increasing population in the state continues to eliminate open space
9. a strong insectart for beneficial bugs
10. the primary crop for pollinating for making the nations honey
11. a very efficient water per ton of crop life output

I am enclosing under separate cover our publication "Alfalfa, Wildlife and the Environment", which provides greater detail and explanation of the importance of this crop. On page 22 there is specific reference to alfalfa as a high value crop.

On behalf of the alfalfa and forage growers in the state we thank you for considering our request to delete the language about alfalfa and add specific details of how you will analyze any crop as being "low value".

Sincerely,



Aaron Kiess  
Executive Director  
California Alfalfa and Forage Association