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May 30, 2014

Dr. Terry Fulp, Regional Director
Bureau of Reclamation
Lower Colorado Regional Office
Attn BC00-4200
P.O. Box 61470
Boulder City, NV 89006-1470

Dear Terry:

**Subject: IID Revised Estimates of 2014 Colorado River Diversion
(Ref. BCOO-4226/WTR 4.03)**

This letter should serve as the Imperial Irrigation District's request to increase its original 2014 estimate of diversions, submitted to the Bureau of Reclamation on October 19, 2013, by 37,347 acre-feet. This increase is due to the creation of a like amount of additional conservation in 2013 that was credited toward IID's 2014 payback obligation, as verified and approved by Reclamation in its May 5, 2014 letter to IID and documented in the final 2013 Decree accounting published on May 15, 2014. This increase will result in an available 2014 Colorado River consumptive use supply range of 2,552,409 - 2,577,409 AF, based on IID's approved 2014 Intentionally Created Surplus Plan that anticipates the creation of up to 25,000 AF of ICS.

This water order should be considered by Reclamation in the context of the signed Quantification Settlement Agreement and the reservation of legal positions contained in the dismissal of IID v. USA, et al. As historically recognized by Reclamation, and consistent with the position of other Colorado River contractors, water orders submitted in advance of the full water year are merely estimates of anticipated water use that will need adjustment based on a variety of factors impacting such use during the year.

Additionally, IID's conservation program contracting parameters and yield determinations are dependent on Reclamation's measurement, reporting and calculation of IID's diversions, return flow credits and consumptive uses for the current and previous water years. The accuracy and timeliness of these final measurements and accounting records are significant variables that will require subsequent revision, even after year-end, and this revised estimate should not be considered a volume limitation for purposes of IID's annual consumptive use or diversion calculations.

IID 2014 Revised Estimated Consumptive Use¹ Table in Acre-Feet (May 29, 2014 revised)	
Priority 3 Cap	3,100,000
Miscellaneous PPR's	(11,500)
1988 IID/MWD Agreement ²	(105,000)
IID/SDCWA Transfer	(100,000)
Salton Sea Mitigation	(90,000)
AAC Lining	(67,700)
IID/CVWD Transfer	(31,000)
Estimate of Additional Conserved Water ^{3,4}	(117,391 –142,391)
• 2014 Payback = 117,391 AF	
• 2014 ICS or additional conservation = up to 25,000 AF ⁵	
Total IID 2014 Revised Consumptive Use¹ Estimate Range⁶	2,552,409-2,577,409

As noted earlier, IID will submit subsequent revisions to this water order as the year progresses and based on final contracting, data analyses and the completion of year-end calculations and true-ups to account for final 2014 conservation yields. IID also requests that, at year-end, if any excess conservation is created from 2014 following and efficiency-based conservation programs, it be credited toward IID's 2015 conservation obligations.

If you have any questions regarding this revised 2014 estimate, please contact Tina Shields at 760-339-9038.

Sincerely,



Kevin E. Kelley
 General Manager

¹ Consumptive uses include agricultural, municipal, industrial, environmental, environmental mitigation uses and storage purposes.

² In 2007 (by agreement between IID and MWD), the annual conservation yield of the 1988 IID/MWD agreement was fixed at 105,000 AF provided the Project 18 (Tailwater Return Systems) component of the IID/MWD agreement is at full operation; otherwise, the 3,500-AF conservation yield attributable to Project 18 can be reduced. Final 2014 conservation values for Project 18 have not yet been determined.

³ Additional conserved water uses include Intentionally Created Surplus (ICS), Inadvertent Overrun Payback Policy requirements, payback on behalf of another Colorado River contractor, groundwater storage, groundwater recharge, storage in the Salton Sea, delivery of ICS to meet water transfer obligations and/or other allowed uses of conserved water. The final 2013 volume should be credited toward the payback requirements associated with IID's 2011 and 2012 overruns.

⁴ Final contracting of IID's 2013 on-farm efficiency and fallowing programs, and a true-up of all conservation program yields at year-end, will require an adjustment to this estimated volume. A range of estimates is provided only for operational planning purposes.

⁵ Pursuant to Section 3.B.9 of the Interim Guidelines for the Operation of Lake Powell and Lake Mead, IID's estimated volume of ICS water may decrease in 2014 with the appropriate notifications.

⁶ This range of estimates is intended to address the consumptive use demands for IID in 2014 assuming a bookend of circumstances regarding the level of contracting for upcoming fallowing and conservation programs identified in IID's ICS and payback plans.