



IID

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September 6, 2016

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Dr. Terry Fulp, Regional Director
Bureau of Reclamation
Lower Colorado Regional Office
Attention LC00-4200
P.O. Box 61470
Boulder City, NV 89006-1470

Dear Terry:

Subject: IID Revised Estimates of Diversion – Colorado River 2016

This letter should serve as the Imperial Irrigation District's request to reduce its original 2016 consumptive use estimate, submitted to the Bureau of Reclamation on September 15, 2015, by 26,107 acre-feet, due to the expansion of conservation programs and corrected Salton Sea mitigation volume. This revision will result in an available 2016 Colorado River consumptive use supply range of 2,593,693 – 2,643,693 AF (less any consumptive uses supplied by the Lower Colorado Water Supply Project) for IID. Additionally, while IID's approved 2016 Intentionally Created Surplus Plan anticipates the creation of up to 25,000 AF of ICS in Lake Mead, since this plan was approved IID has authorized a 2016-2017 fallowing program that creates up to 45,000 AF of excess fallowing conservation for early Salton Sea mitigation delivery and IID continues to expand its on-farm efficiency conservation program to maximize conservation in 2016.

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.

Also, while IID continues to assess the state of California's commitment to restore the Salton Sea through the implementation of on-the-ground projects for the exposed playa, IID does appreciate federal Salton Sea advocacy efforts and in particular the Department of Interior's recent execution of a memorandum of understanding with the California Natural Resources Agency. This MOU is intended to support and accelerate the state's Salton Sea restoration projects and promote renewable energy opportunities, with a goal of implementing 25,000 acres of habitat and air quality projects at the Sea in the next decade. The satisfaction of these objectives will contribute to the long-term viability of the QSA, and further ongoing Colorado River drought contingency planning discussions.

Of the approximately 95,000 AF of excess conservation anticipated to be created in 2016, IID will pre-deliver approximately 45,000 AF to meet its 2016 and 2017 mitigation delivery obligations and address QSA-related playa exposure as the shoreline recedes. In addition, IID's on-farm efficiency conservation program is expected to conserve the balance of approximately 50,000 AF. These volumes will be in excess of IID's 2016 calendar-year conservation obligations, and will be stored as excess extraordinary conservation with the Metropolitan Water District of Southern California under the expanded terms of 2015 Amendment No.1 to the *California Agreement for the Creation and Delivery of Extraordinary Conservation Intentionally Created Surplus*.

IID Revised 2016 Estimated Consumptive Use¹ Table in Acre-Feet (September 6, 2016)	
Priority 3 Cap	3,100,000
Miscellaneous PPR's	(11,500)
1988 IID/MWD Conservation & Transfer	(105,000)
IID/SDCWA Conservation & Transfer	(100,000)
2016 Salton Sea Mitigation Delivery Requirement ²	(86,107)
AAC Lining Project Conservation & Transfer	(67,700)
IID/CVWD Conservation & Transfer	(41,000)
Estimate of Additional Conserved Water ^{3,4,5}	(45,000-95,000)
<ul style="list-style-type: none"> • 2017 Salton Sea Mitigation Pre-Delivery⁶ = 45,000 AF • Lake Mead ICS/MWD ICS⁷ = 0 – 50,000 AF 	
Total IID Revised 2016 Consumptive Use¹ Estimate Range⁸	2,593,693-2,643,693

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 2016 conservation yields.

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

² Salton Sea mitigation water created from following conservation. The 2016 calendar-year delivery obligation is 130,000 AF; this value is adjusted downward due to an excess mitigation delivery balance of 43,893 AF at the end of 2015. Actual water deliveries will be true-up at year-end.

³ Additional conserved water uses include Intentionally Created Surplus (ICS) in Lake Mead or MWD, inadvertent overrun payback (IOP), early IOP payback on behalf of another Colorado River contractor, groundwater storage, groundwater recharge, storage in or pre-delivery to the Salton Sea, delivery of ICS to meet water transfer obligations, and/or other allowed uses of conserved water.

⁴ The true-up of all 2015-2016, 2016, and 2016-2017 following and efficiency conservation program yields after year-end may require an adjustment to this volume.

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 2016 with the appropriate notifications.

⁶ On April 12, 2016, the IID Board of Directors authorized the pre-delivery of any excess 2016 following conservation to the Salton Sea to meet IID's 2017 mitigation requirement of 150,000 AF.

⁷ IID's conservation programs may contract for an additional estimated 50,000 AF in 2016 that IID intends to store with MWD under the expanded terms of the 2015 Amendment No. 1 to the *California Agreement for the Creation and Delivery of Extraordinary Conservation Intentionally Created Surplus*. Final contracting may increase or decrease this anticipated volume.

⁸ This range of estimates is intended to address the consumptive use needs for IID in 2016, assuming a bookend of circumstances regarding the level of contracting for upcoming following and conservation programs identified in IID's proposed Intentionally Created Surplus plan and water conservation and transfer agreements.

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If you have any questions regarding this revised 2016 estimate, please contact IID's water manager, Tina Shields, at (760) 339-9038 or tshields@iid.com.

Sincerely,



Kevin E. Kelley
General Manager

Enclosure

cc: Mike Pacheco/Tina Shields, IID Water Managers
Merlon Kidwell, IID Watermaster
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