



United States Department of the Interior

BUREAU OF RECLAMATION
P.O. Box 61470
Boulder City, NV 89006-1470



IN REPLY REFER TO:

LCB-4225
2.2.4.23

VIA ELECTRONIC MAIL ONLY

Jamie Asbury
General Manager
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251-0937

Subject: Approval of Calendar Year (CY) 2025 Colorado River Water Order – Imperial Irrigation District (IID)

Dear Ms. Asbury:

The Bureau of Reclamation has received IID's CY 2025 Colorado River water order. In accordance with Title 43, Code of Federal Regulations Part 417 (Part 417), this letter provides IID with notice of my determination regarding IID's proposed diversion and beneficial use of Colorado River water for CY 2025.

On August 15, 2024, Reclamation released its Colorado River Basin August 2024 24-Month Study,¹ which projects Lake Mead's most probable elevation on January 1, 2025, to be 1,062.32 feet. In its letter dated August 26, 2024, Reclamation announced that, in accordance with the 2007 Interim Guidelines,² Lake Mead and the lower Colorado River will operate in a Tier 1 Shortage Condition in CY 2025. In addition, the 2019 *Lower Basin Drought Contingency Plan Agreement* will also govern the operation of Lake Mead for CY 2025. The CY 2025 lower Colorado River Shortage Condition will not reduce the volume of Colorado River water available to the state of California in CY 2025. Additionally, no Drought Contingency Plan Contributions are required by California in CY 2025.

On August 26, 2024, IID and Reclamation executed System Conservation Implementation Agreement No. 24-XX-30-W0825 (SCIA),³ in which IID agreed to create up to 300,000 AF of System Conservation Water in each of CYs 2024, 2025, and 2026, with a cumulative total for those years not to exceed 700,000 AF of System Conservation Water, which will remain in Lake Mead to benefit system storage. While this water order approval is predicated upon IID's creation

¹ Available at <https://www.usbr.gov/lc/region/g4000/24mo/>.

² Referring to *Colorado River Interim Guidelines for Lower Basin Shortages and the Coordinated Operations for Lake Powell and Lake Mead* dated December 13, 2007.

³ Referring to the *System Conservation Implementation Agreement Between the United States Bureau of Reclamation and the Imperial Irrigation District to Implement the Lower Colorado Conservation and Efficiency Program (LC Conservation Program)*.

of up to 300,000 AF of System Conservation Water in CY 2025, Reclamation recognizes that the actual amount of System Conservation Water created by IID in CY 2025 may be less than this amount and will be based on final accounting records.

The 2003 *Colorado River Water Delivery Agreement* (CRWDA) quantifies certain Colorado River water entitlements within the state of California, including IID’s water entitlement. Based upon a review of IID’s CY 2025 water order, the information gathered during Reclamation’s Part 417 consultation, the terms of the CRWDA, and other pertinent information, I approve IID to consumptively use up to 2,317,800 AF during CY 2025 for use in IID’s service area, of which up to 10,000 AF will be supplied by the Lower Colorado Water Supply Project (LCWSP). This approval results in an estimated diversion of Colorado River water at Imperial Dam of 2,457,288 AF.

The table below provides the factors used to develop IID’s water order approval amount for CY 2025.

Water Budget Factor	Amount (AF)
Priority 3 Consumptive Use Cap	3,100,000
Present Perfected Right Holders and Others ⁴	(11,500)
1988 IID/Metropolitan Water District of Southern California (MWD) Conservation Agreement/1989 Approval Agreement	(105,000)
IID Transfer to the San Diego County Water Authority	(200,000)
All-American Canal (AAC) Lining Project Conserved Water	(67,700)
Intra-Priority Transfer to the Coachella Valley Water District	(98,000)
Additional Conserved Water System Conservation Water – SCIA No. 24-XX-30-W0825 ⁴	up to (300,000)
Total Approved Consumptive Use	2,317,800
IID Consumptive Use supplied by the LCWSP ⁴	(10,000)
Total Approved Consumptive Use at Imperial Dam	2,307,800
Estimated AAC Returns ⁴	149,488
Total Approved Diversion at Imperial Dam	2,457,288

Reclamation notes that IID’s CY 2025 water order identifies other potential uses for IID’s “Additional Conserved Water” including, but not limited to the creation of Extraordinary Conservation Intentionally Created Surplus (EC ICS) for storage in IID’s Lake Mead ICS Account or credited to another contractor pursuant to Section XI.G.3.B.8 of the 2007 Interim Guidelines. Pursuant to Section 3 of the *California Agreement for the Creation and Delivery of Extraordinary Conservation Intentionally Created Surplus*, as amended (California ICS Agreement), the actual amount of EC ICS IID may store in IID’s Lake Mead ICS Account during CY 2025 will be limited such that the end-of-year balance does not exceed 50,000 AF.⁵ Additionally, should IID elect to use Additional Conserved Water to create and credit EC ICS to the ICS Account of another contractor in the state of California through application of Section

⁴ The amount shown is subject to change based on final accounting records.

⁵ Reclamation notes that, based on accounting records as of the end of CY 2023, IID has reached this limit.

XI.G.3.B. 8 of the 2007 Interim Guidelines, IID must first obtain written agreement of the contractor.

Reclamation would like to highlight that, in accordance with the *Inadvertent Overrun and Payback Policy*,⁶ **accumulations of inadvertent overruns are not permitted in CY 2025 and are suspended as long as a Shortage Condition is in effect.** To assist entitlement holders in monitoring their Colorado River water use to ensure they remain within available quantities, Reclamation will project CY 2025 diversions and consumptive use of Colorado River water during CY 2025 and will make these projections available daily on Reclamation's website⁷ beginning in January 2025. Reclamation encourages Colorado River water entitlement holders to use the projections to adjust diversions to remain within their Reclamation-approved annual Colorado River water order.

Thank you for submitting IID's water order for CY 2025. Should you have questions, please contact Jeremy Dodds, Water Accounting and Verification Group Manager, at (702) 293-8164 or jdodds@usbr.gov. Individuals who are deaf, deafblind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunication relay services.

Sincerely,

Jacklynn L. Gould, P.E.
Regional Director

cc: Jessica Neuwerth
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⁶ Available at: <https://www.usbr.gov/lc/region/g4000/IOPP.pdf>.

⁷ Available at: <https://www.usbr.gov/lc/region/g4000/hourly/forecast.pdf>.