



# IID

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September 9, 2025

Genevieve Johnson, Acting Regional Director  
Bureau of Reclamation  
Lower Colorado Regional Office  
Attention LC00-4200  
P.O. Box 61470  
Boulder City, NV 89006-1470

Dear Ms. Johnson:

**Subject: IID Estimates of Diversion – Colorado River 2026**

This letter responds to the Bureau of Reclamation's annual request to the Imperial Irrigation District for an estimate of IID's 2026 expected water use and constitutes IID's initial water order for a consumptive use of up to 2,612,800 acre-feet for 2026. While the initial estimate in Table 1 includes the full range of conservation potential under IID's 2024 – 2026 System Conservation Implementation Agreement (SCIA) No. 24-XX-30-W0825, IID anticipates submitting a revised operational schedule after January 1, 2026 that includes a more refined estimate of 2026 System Conservation Water (SCW) after a year-end review of its 2025 water uses and conservation programs.

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 the position of many other Colorado River contractors, water orders submitted in advance of the water year are merely estimates of anticipated water use that may require subsequent revision based on many variables, and should not be perceived as a volume limitation on the annual exercise of the water right. Similarly, the exact volume and proposed uses of conserved water cannot be determined or accurately predicted in advance of any water conservation program's startup, final contracting and actual demands. The final calculation of actual conserved water yields is dependent on year-end crop water use, rainfall, and delivery records that are not available prior to the conclusion of the current calendar year. Contracting parameters and conserved water requirements for 2026 are also dependent on Reclamation's or third-party 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 Decree Accounting records are a significant factor in IID's estimates, and as such they may necessitate a subsequent revision to this order.

Thus, IID submits this water order for 2026 without limiting IID's water rights. IID acknowledges that the QSA itself provides an annual consumptive use volume limitation.

Pursuant to that agreement, IID quantified its Priority 3 consumptive use at a maximum of 3.1 million acre-feet per year during the term of the QSA. IID anticipates (but does not limit itself except by the terms of the QSA) to a consumptive use need of 2,420,440 to 2,612,800 acre-feet for 2026. This initial range of estimates is intended to address the consumptive use needs for IID in 2026, and certain conservation program contracting assumptions within the parameters identified in IID’s proposed Intentionally Created Surplus Plan and 2024 – 2026 SCIA, although IID anticipates the 2026 SCW will likely be lower due to increased 2025 SCW yields and the cumulative 2024 – 2026 SCIA payment cap of 700,000 acre-feet. Pursuant to the QSA, and assuming implementation as agreed to by all other parties without material changes or failure, IID’s initial water order estimate for 2026 is as follows:

<b>Table 1: IID 2026 Estimated Consumptive Use<sup>1</sup> in Acre-Feet (September 9, 2025)</b>	
Priority 3 Cap	3,100,000
Miscellaneous PPR's	(11,500)
1988 IID/MWD Conservation & Transfer	(105,000)
IID/SDCWA Conservation & Transfer	(200,000)
AAC Lining Project Conservation & Transfer	(67,700)
IID/CVWD Conservation & Transfer	(103,000)
<i>Estimate of Additional Conserved Water</i> <sup>2,3,4,5</sup>	(0-192,360)
<i>2024-2026 System Conservation Implementation Agreement</i>	<i>TBD</i>
• IID On-Farm Efficiency Conservation Program System Conservation Water	
• IID Deficit Irrigation Program System Conservation Water	
<b>Total IID 2026 Consumptive Use<sup>1</sup> Estimate Range<sup>6</sup></b>	<b>2,420,440-2,612,800</b>
<b>IID 2026 Estimated River Consumptive Use<sup>1</sup> Table in Acre-Feet</b>	
Total IID 2026 Consumptive Use <sup>1</sup> Estimate Range <sup>6</sup>	2,420,440-2,612,800
2026 Estimated Consumptive Use <sup>1</sup> met by LCWSP <sup>7</sup>	(10,000)
<b>Total IID 2026 Consumptive Use<sup>1</sup> Estimate Range<sup>6</sup> at River<sup>7</sup></b>	<b>2,410,440-2,602,800</b>

<sup>1</sup> Consumptive uses include, but are not limited to, agricultural, municipal, industrial, environmental, mitigation and storage.  
<sup>2</sup> Additional conserved water uses include Intentionally Created Surplus (ICS) water storage in Lake Mead, ICS created by IID and credited to another contractor pursuant to Section 3.B.8 of the 2007 Guidelines, groundwater storage, groundwater recharge, storage in the Salton Sea, delivery of ICS to meet water transfer obligations, 2024 – 2026 SCIA, water storage for drought resiliency programs or in conformance with other agreements, and/or other yet-to-be determined purposes.  
<sup>3</sup> This range of estimates is intended to address the likely consumptive use needs for IID in 2026, but will change based on circumstances regarding the level of contracting for 2026 conservation programs identified in IID’s 2024-2026 SCIA, proposed ICS plan and other water conservation, transfer and/or storage agreements or additional drought protection plans being considered  
<sup>4</sup> Contracting of any additional conservation programs and a final true-up of all 2026 IID conservation program yields at year-end may require an adjustment to this volume.  
<sup>5</sup> 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 change in 2026 with the appropriate notifications.  
<sup>6</sup> This range of estimates is intended to address the likely consumptive use needs for IID in 2026, but will change based on circumstances regarding the level of contracting for 2026 conservation programs identified in IID’s 2024-2026 System Conservation Implementation Agreement, proposed ICS plan and other water conservation, transfer and/or storage agreements or additional drought protection plans being considered.  
<sup>7</sup> Reclamation’s Yuma Area office has estimated the maximum project yield for 2026 at 10,000 acre-feet. Actual pumped volumes and projections will be updated by Reclamation at year-end.

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This 2,410,440 – 2,602,800 acre-feet estimated range of consumptive use at Imperial Dam (net of return flows) in 2026 will require a larger volume diversion from the Colorado River. Any changes to the actual 2026 LCWSP pumping will, of necessity, result in changes to IID's actual Colorado River diversion and the associated return flow credit estimate, while the use of any in-lieu flows from the Warren H. Brock Reservoir in 2026 will require reductions to IID's actual Colorado River diversions and consumptive use accounting volumes at Imperial Dam.

This annual water order estimate is based upon average conditions for rainfall, salinity and likely 2026 cropping patterns, including multiple cropped acreage and normal economic conditions in crop markets. Actual diversions in 2026 will inevitably reflect changed circumstances as they evolve including the final contracting and potential expansion of any 2026 conservation programs, the truing-up of 2026 IID conservation program yields at year-end, improved crop markets and additional water conservation storage or delivery requests not yet authorized by the IID Board of Directors for 2026. This estimate assumes an averaging of values as utilized in 2025 based on the *Accounting Methodology for IID Canal Losses Key Terms of Agreement* dated October 3, 2007 between IID and Reclamation. Should there be any changes to this methodology, it may or may not require further revision to the 2026 water order.

Finally, attached to this water order is Table 2, a monthly breakdown of IID's estimated 2026 water order intended for use by Reclamation's operational staff. These consumptive use estimates are prorated using a historical use monthly proration methodology and are subject to change based on actual water demands and conditions in 2026.

If you have any questions regarding these issues, please contact, Dylan Mohamed, at (760) 339-9256 or [djmohamed@iid.com](mailto:djmohamed@iid.com).

Sincerely,



Tina Shields, P.E.  
Water Department Manager

Enclosure

cc: Jaime Asbury, IID  
Kerim Dickson, USBR  
Jessica Neuwerth, CRB  
Robert Cheng, CVWD  
Bill Hasencamp, MWD  
Alexi Schnell, SDCWA

**Table 2: IID 2026 Estimated Monthly Consumptive Use  
(September 9, 2025)**

	<b>Historical Proration</b>	<b>Estimated Consumptive Use Range (acre-feet)</b>	
<b>January</b>	<b>3.62%</b>	<b>87,594</b>	<b>94,555</b>
<b>February</b>	<b>4.63%</b>	<b>112,003</b>	<b>120,904</b>
<b>March</b>	<b>10.43%</b>	<b>252,426</b>	<b>272,487</b>
<b>April</b>	<b>11.51%</b>	<b>278,511</b>	<b>300,645</b>
<b>May</b>	<b>13.13%</b>	<b>317,852</b>	<b>343,112</b>
<b>June</b>	<b>11.68%</b>	<b>282,699</b>	<b>305,166</b>
<b>July</b>	<b>10.49%</b>	<b>253,851</b>	<b>274,025</b>
<b>August</b>	<b>7.36%</b>	<b>178,223</b>	<b>192,386</b>
<b>September</b>	<b>6.27%</b>	<b>151,667</b>	<b>163,720</b>
<b>October</b>	<b>9.40%</b>	<b>227,633</b>	<b>245,724</b>
<b>November</b>	<b>6.53%</b>	<b>158,137</b>	<b>170,705</b>
<b>December</b>	<b>4.95%</b>	<b>119,846</b>	<b>129,371</b>
<b><i>2026 Total</i></b>	<b>100.00%</b>	<b>2,420,440</b>	<b>2,612,800</b>