

BCOO-4230
WTR-4.03

OCT 05 2005

Mr. Elston Grubaugh
Interim General Manager
Imperial Irrigation District
P.O. Box 937
Imperial, CA 92251

Subject: Colorado River Water Delivery Agreement (CRWDA) Exhibit "C" Payback for 2004

Dear Mr. Grubaugh:

We have received your letter dated May 13, 2005, requesting that Colorado River water be credited to your outstanding CRWDA Exhibit C payback obligation in calendar year 2004. As required, your request included a revised diversion estimate for calendar year 2004 indicating a decrease in your diversion in an amount equal to the payback request. Exhibit C is a payback schedule for overruns incurred in calendar years 2001 and 2002.

In accordance with the Inadvertent Overrun and Payback Policy (IOPP), the Imperial Irrigation District (IID) prepared an extraordinary water conservation plan that detailed a fallowing program to pay back 18,900 acre-feet of IID's 2001-2002 overrun during calendar year 2004. The Inadvertent Overrun and Payback Technical Committee (IOPTC) reviewed the plan and recommended its adequacy to the Bureau of Reclamation on May 18, 2004.

IID met with Reclamation several times in 2004 to discuss the modification of its extraordinary water conservation plan. On May 13, 2005, IID requested an additional 25,881 acre-feet of early 2001 and 2002 payback, also generated by fallowing and the inclusion of system loss savings. Reclamation determined that a portion of the system loss savings was unjustified. The IOPTC reviewed the modified plan on July 14, 2005, and recommended that the water conservation potential be adjusted for the system losses until the issue is resolved. At IID's request, we are instituting a technical review of our method of determining system losses. After the results of the technical review, if Reclamation determines that a portion of the system losses are justified, methods of calculating payback amounts will be revised to reflect the information developed through the technical review.

The IOPP obligates Reclamation to monitor the implementation of the extraordinary conservation measures contained in payback plans. The IOPTC recommended that Reclamation spot check 5 percent of the fallowed acres to validate that the measures were applied according to the 2004 IID Extraordinary Conservation Plan and its modification. Validation included confirming that the fallowed areas have a history of recent irrigation, verifying that the delivery gates were locked, and verifying that Colorado River water is not being nor has been applied to the fields during the fallowing period.

Of the 17,890 acres fallowed, 12 fields totaling approximately 900 acres were randomly selected to verify the implementation of the conservation measures. Enclosed for your information is the report that validates the implementation of the planned water conservation measures. Reclamation accredits 17,163 acre-feet for the initial extraordinary conservation plan and 23,502 acre-feet for the modified plan to the payback of 2001 and 2002 overruns in calendar year 2004.

If you have any questions, please contact Mr. Steve Jones at 702-293-8186.

Sincerely,



Robert W. Johnson
Regional Director

Enclosure

cc: Mr. Gerald Zimmerman
Executive Director
Colorado River Board of California
770 Fairmont Avenue, Suite 100
Glendale, CA 91203-1035

Mr. Herb R. Guenther
Director
Arizona Department of Water Resources
500 North Third Street
Phoenix, AZ 85004-3903

Mr. James H. Davenport
Chief, Water Division
Colorado River Commission of
Nevada
555 E. Washington Avenue, Suite 3100
Las Vegas, NV 89101

bc: Area Manager, Boulder City, NV
Attention: BCOO-4200, BCOO-4222, BCOO-4622
Area Manager, Yuma, AZ
Attention: YAO-1000

Daily chrono

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IID Fallowing Program Verification

Fall 2004

Five percent of the acreage in the IID fallowing program was checked in the verification program. See IID Payback Plan for detailed information on the program. Program verification notes are attached as Appendix A: Fallowed Field Verification.

Extraordinary conservation implementation is confirmed unconfirmed

Stephen [Signature] 12/1/04
Signed Date

Extraordinary conservation implementation is confirmed unconfirmed

David B. Chitt 12/01/04
Signed Date

Observation: Green growth was viewed on some fields, which was attributed to the drafting of groundwater or localized rainfall (thunderstorms). IID staff indicated that Fallowing Program participants, in accordance with environmental mitigation requirements for potential air quality impacts, were required to implement dust control Best Management Practices (BMPs) when necessary. These BMPs include (but are not limited to) leaving vegetation residue on the field or seeding a cover crop prior to the fallowing start date.

Appendix A: Fallowed Field Verification



Following Program (FP) No. 27 Canal: Nettle; Gate No. 7; 152.7 Acres;

Contract Price: \$43,061

Comments: Photo No. 12, October 19, 2004; No Crop; Pin Lock; Soils: Silty Clay; Water use history checked from IID records;

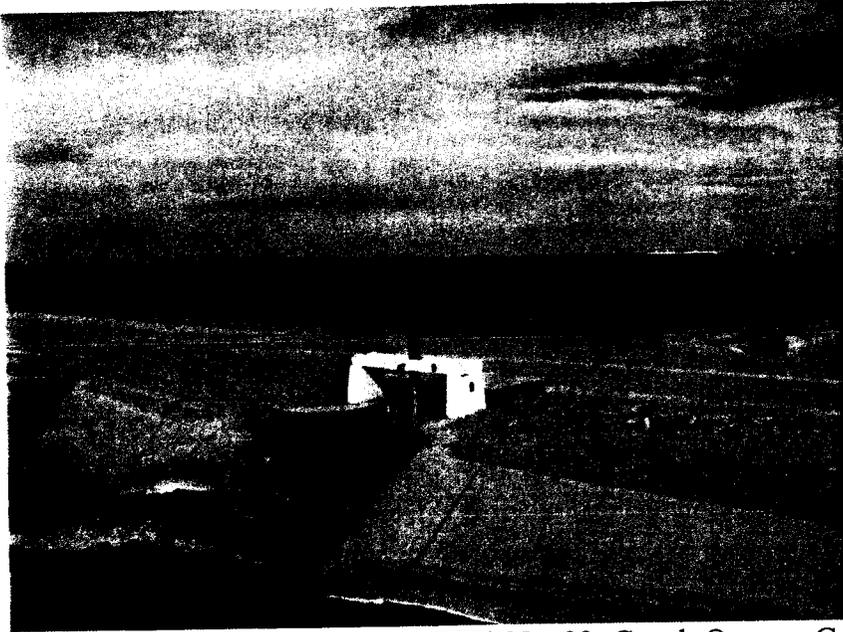
Planned crops: Summer 2004: Bermuda; Fall 2004: Bermuda; Winter 2004: Bermuda; Spring 2005: Bermuda; Summer 2005: Bermuda



FP No. 6; Canal: Standard; Gate No. 5A; 64.7 Acres; Contract price: \$19,022

Comments: Photo No. 11, October 19, 2004; No Crop; Pin Lock; Soils: Clay; Water use history checked from IID records;

Planned crops: Summer 2004: Sugar Beets; Fall 2004: Canola; Winter 2004: Canola; Spring 2005: Canola; Summer 2005: Canola



Emergency Fallowing Program (EFP) No. 22; Canal: Orange; Gate 9; 140 Acres;
Contract price: \$40,800
Comments: Photo No. 10, October 19, 2004; No Crop; Pin Lock; Soils: Clay; Water use
history checked from IID records;
Planned crops: Winter 2003: Alfalfa; Spring 2004: Alfalfa; Summer 2004: Alfalfa; Fall
2004: Alfalfa; Winter 2004: Alfalfa



FP No. 84; Canal: Orchid; Gate No. 11; 73 Acres; Contract price: \$19,710
Comments: Photo No. 9, October 19, 2004; Alfalfa; Pin Lock & Plug in Ditch;
Soils: Clay; Water use history checked from IID records;
Planned crops: Summer 2004: Alfalfa Seed; Fall 2004: Alfalfa Seed; Winter 2004:
Alfalfa Seed; Spring 2005: Alfalfa Seed; Summer 2005: Alfalfa Seed



FP No. 60; Canal: Ash; Gate 61; 144.5 Acres; Contract price: \$38,148

Comments: Photo No. 8, October 19, 2004; Bermuda; Soil Plug in Ditch; Ditch dirty;
Burned off; Still green; No Irrigation Apparent; Soils: Silty Clay; Water use
history checked from IID records;

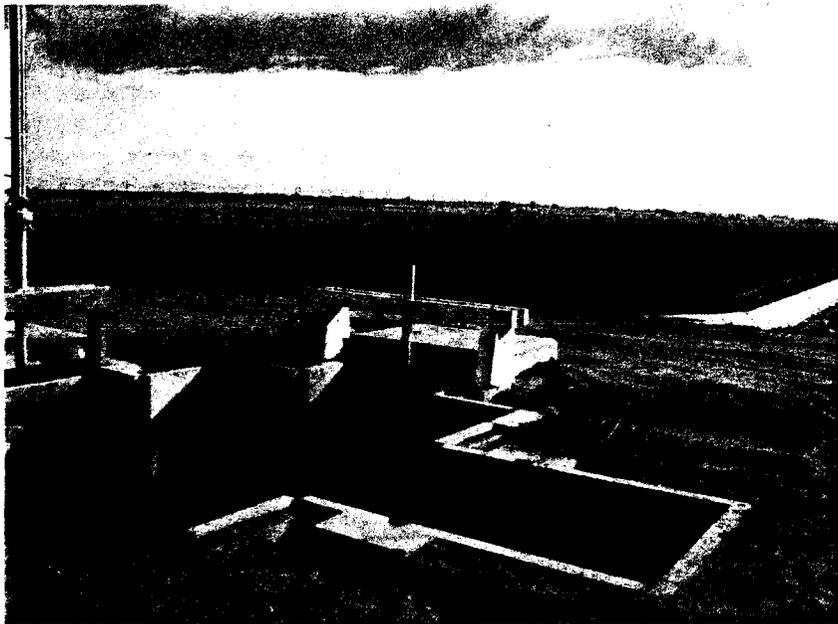
Planned crops: Summer 2004: Bermuda; Fall 2004: Bermuda; Winter 2004: Bermuda;
Spring 2005: Bermuda; Summer 2005: Bermuda



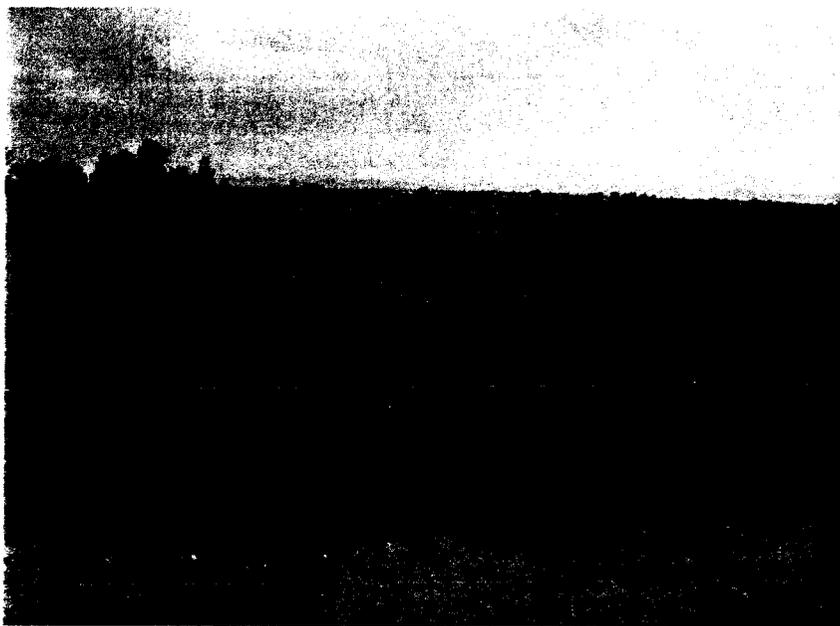
EFP No. 8; Canal: Briar; Gate 4; 82 Acres; Contract price: \$30,684

Comments: Photo No. 7, October 19, 2004; Bermuda; Pin Thru Lock; Soils: Silt loam;
Water use history checked from IID records;

Planned crops: Winter 2003: Bermuda; Spring 2004: Bermuda; Summer 2004: Bermuda;
Fall 2004: Bermuda; Winter 2004: Bermuda



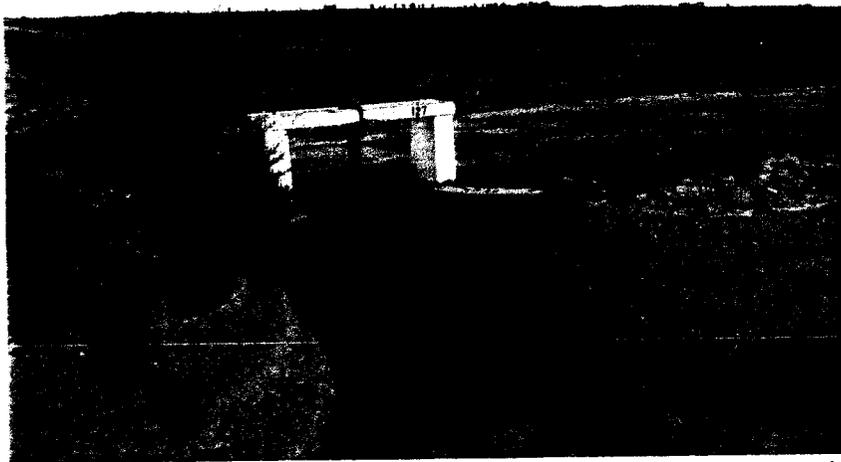
FP No. 42; Canal: Acacia; Gate 94B; 34.5 Acres; Contract price: \$12,420
Comments: Photo No. 6, October 19, 2004; Alfalfa; J-Lock; Soils: Silt Loam; Water use history checked from IID records;
Planned crops: Summer 2004: Alfalfa; Fall 2004: Alfalfa; Winter 2004: Alfalfa; Spring 2005: Alfalfa; Summer 2005: Alfalfa



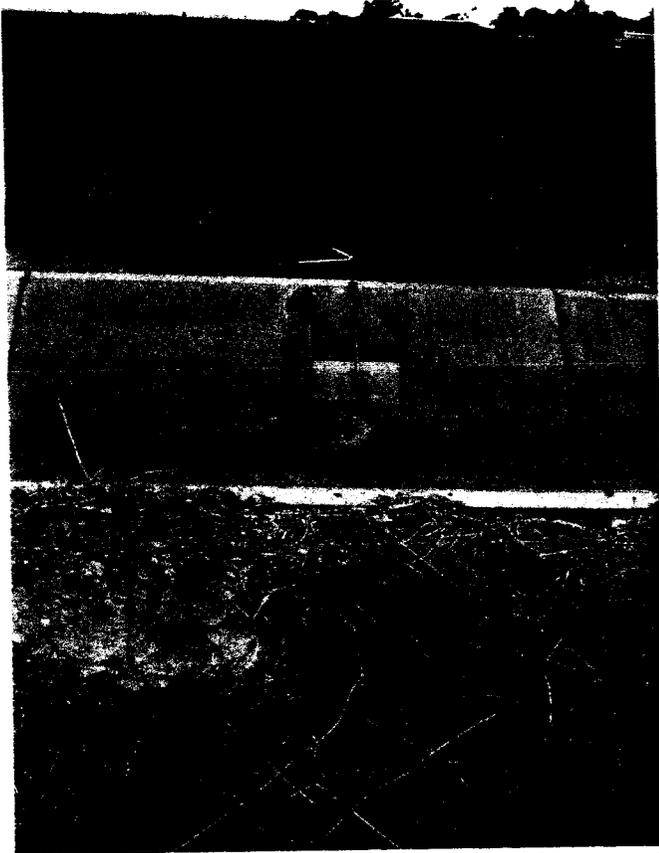
EFP No. 37; Canal: Dogwood; Gate 69C; 27 Acres; Contact price: \$7,250
Comments: Photo No. 5, October 19, 2004; Bermuda; J Lock; loam; Includes Gate for 69C (Picture No 4); Water use history checked from IID records;
Planned crops: Winter 2003: Bermuda; Spring 2004: Bermuda; Summer 2004: Bermuda; Fall 2004: Bermuda; Winter 2004: Bermuda



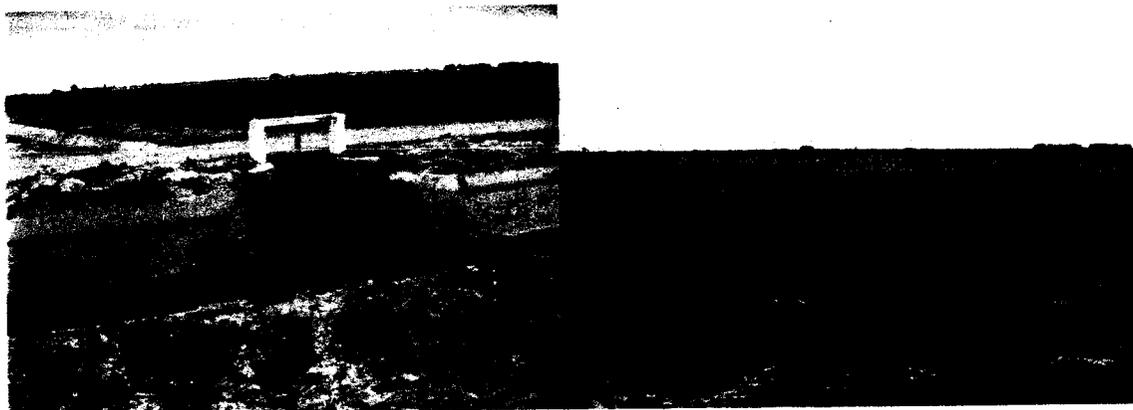
FP No. 112; Canal: Dogwood; Gate 69B; 67.8 Acres; Contact price: \$24,408
Comments: Photo No. 4, October 19, 2004; Sudan; J Lock; loam Soils; Includes Gate for
69C (Picture No 5); Water use history checked from IID records;
Planned crops: Summer 2004: Sudan; Fall 2004: Oats; Winter 2004: Oats; Spring 2005:
Sudan; Summer 2005: Sudan



EFP No. 54; Canal: Eucalyptus; Gate 127; 33 Acres; Contact price: \$7,000
Comments: Photo No. 1 October 18, 2004; Flat Hay; J-Lock; Water use history checked
from IID records;
Planned crops: Winter 2003: Alfalfa; Spring 2004: Alfalfa; Summer 2004: Alfalfa; Fall
2004: Alfalfa; Winter 2004: Alfalfa



FP No. 72; Canal: Dogwood; Gate 67; 35 Acres; Contract price: \$12,600
Comments: Photo No. 3, October 19, 2004; No Crop; Multi-Tenant Gate @ the field level it is bermed along ditch to limit water delivery; Soils: loam; Water use history checked from IID records;
Planned crops: Summer 2004: Sudan; Fall 2004: Sudan; Winter 2004: Wheat; Spring 2005: Wheat; Summer 2005: Sudan or Bermuda



FP No. 96; Canal: Flax; Gate 20; 40.7 Acres; Contract price: \$14,652
Comments: Photo No. 2 & 2b, October 18, 2004; Bermuda; J-Lock; Clay Soils; Field behind alfalfa fallowed; Water use history checked from IID records;
Planned crops: Summer 2004: Bermuda; Fall 2004: Bermuda; Winter 2004: Bermuda; Spring 2005: Bermuda; Summer 2005: Bermuda

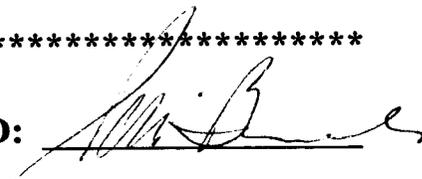
IOP TECHNICAL COMMITTEE
RECOMMENDATION

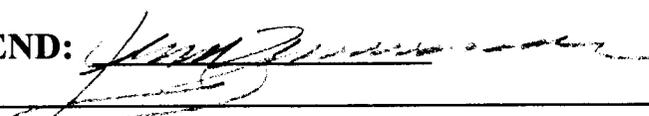
DISTRICT: IID

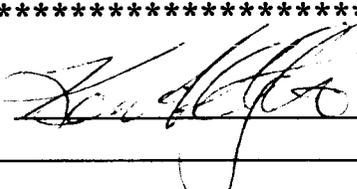
DATE: 5-2-2004

EXTRAORDINARY CONSERVATION PLAN:

Year: 2004
Modification number: 0 (-) LOCKED ISSUE
Identified measure: LAND FALLOWING (3074 AC)
Water conservation potential: 18 600 AF
Procedure to verify: CHECK LOCKED SALES, SPT CHECK

ARIZONA REP. - RECOMMEND: 
UNCLEAR: _____

CALIFORNIA REP. - RECOMMEND: 
UNCLEAR: _____

NEVADA REP. - RECOMMEND: 
UNCLEAR: _____

RECLAMATION REP. - RECOMMEND: _____
UNCLEAR: WATER CONSERVATION POTENTIAL WITH RECLAMATION
LOSS METHOD IS 17,163 AF

IOP TECHNICAL COMMITTEE
RECOMMENDATION

DISTRICT: ITD

DATE: 7-17-05

EXTRAORDINARY CONSERVATION PLAN:

Year: 2004

Modification number: 1

Identified measure: LAND FOLLOWING (LOSSES ISSUE 3,643 AC)

Water conservation potential: 25881 AF

Procedure to verify: CITIZEN LOSSER LATER 53, 2707 CHECK

ARIZONA REP. - RECOMMEND: *[Signature]*

UNCLEAR: _____

CALIFORNIA REP. - RECOMMEND: *[Signature]*

UNCLEAR: _____

NAVADA REP. - RECOMMEND: *[Signature]*

UNCLEAR: Losses

RECLAMATION REP. - RECOMMEND: *[Signature]*

UNCLEAR: WATER CONSERVATION POTENTIAL WITH RECLAMATION

LOSS METHOD IS 23,502 AF
