



# United States Department of the Interior

BUREAU OF RECLAMATION  
Lower Colorado Regional Office  
P.O. Box 61470  
Boulder City, NV 89006-1470

IN REPLY REFER TO:

LC-4220  
WTR-4.03

SEP 21 2013

CERTIFIED – RETURN RECEIPT REQUESTED

Mr. Kevin E. Kelley  
General Manager  
Imperial Irrigation District  
P.O. Box 937  
Imperial, CA 92251-0937

Subject: Approval of Revised Inadvertent Overrun and Payback Policy (IOPP) Payback Plan for Calendar Year 2013 – Imperial Irrigation District (IID)

Dear Mr. Kelley:

Effective January 1, 2004, the IOPP established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. By letter dated September 20, 2012, IID submitted its Final 2013 Inadvertent Overrun Payback Plan (Plan) describing six extraordinary conservation measures IID proposed to implement to meet its calendar year 2013 payback obligation: use of IID's existing Extraordinary Conservation Intentionally Created Surplus (ICS) credits; exchange of Colorado River water with the Coachella Valley Water District (CVWD) for water banked off-stream and forbearance of consumptive use of an equivalent amount of Colorado River water; delivery system improvements; seepage interception and recovery; fallowing; and on-farm efficiency conservation.

By letter dated May 14, 2013, I approved IID to use and/or implement four of the six proposed payback measures to meet IID's calendar year 2013 payback obligation: IID's existing ICS credits; forbearance of Colorado River water exchanged with CVWD; IID's fallowing program; and IID's seepage interception and recovery system. I did not approve IID to use delivery system improvements and on-farm efficiency conservation measures to meet its 2013 payback obligation, noting that the Bureau of Reclamation would reconsider approval of these measures pending further consultation with IID. Such consultation would provide Reclamation an opportunity to obtain additional information demonstrating how the estimate of conservation yields from these measures will be derived, as well as information describing how Reclamation will be able to monitor implementation and perform verification of these measures.

By letter dated August 5, 2013, IID submitted a Revised 2013 Inadvertent Overrun Payback Plan (Revised Plan) in which IID requested further consideration of its On-Farm Efficiency Conservation Program (OFECP) as an approved extraordinary conservation measure to meet its 2013 payback obligation. IID's Revised Plan contained additional information on the methodology IID will use to estimate conservation yields from measures implemented under the

OFECF. On August 21, 2013, IID staff presented IID's Revised Plan to the Inadvertent Overrun and Payback Technical Committee (IOPTC). The IOPTC reviewed the Revised Plan for technical adequacy and unanimously recommended approval of the OFECF for use in meeting IID's 2013 payback obligation. Taking into consideration the recommendation of the IOPTC, I approve IID to use its OFECF to meet IID's calendar year 2013 payback obligation.

Reclamation notes that, in accordance with Section 2.4 of the IOPP, any conservation achieved from IID's OFECF for which IID seeks credit towards its 2013 IOPP payback obligation must be demonstrated to be in addition to the conservation IID is required to conserve in 2013 to meet its transfer obligations set forth in the Colorado River Water Delivery Agreement (CRWDA). Reclamation understands that IID has accelerated its implementation schedules and conservation targets to meet its IOPP obligations, and appreciates IID's effort to ensure it successfully meets both its CRWDA transfers and its 2013 IOPP payback obligation.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation will work closely with IID staff to arrange and conduct a field verification inspection in the fall of 2013 on a representative sample of the fields enrolled in IID's OFECF. The fields selected under this program will be in addition to those fields selected for inspection under IID's following program.

Reclamation's administration of the IOPP requires that IID submit a report certifying the amount of Colorado River water conserved by implementation of the extraordinary conservation measures in the previous calendar year as defined in the approved Plan. This report must contain appropriate data that demonstrates the conservation yields achieved by each approved measure. Please submit this report, certifying the amount of conservation achieved in calendar year 2013, to Reclamation no later than February 28, 2014.

If you have questions, please contact Mr. Paul Matuska, Water Accounting and Verification Group Manager, at 702-293-8164.

Sincerely,



Terrance J. Fulp, Ph.D.  
Regional Director

cc: Ms. Tanya M. Trujillo  
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