



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

MAY 05 2014

CERTIFIED – RETURN RECEIPT REQUESTED

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

Subject: Verification of 2013 Inadvertent Overrun Payback by the Imperial Irrigation District (IID)

Dear Mr. Kelley:

Effective January 1, 2004, the Inadvertent Overrun and Payback Policy (IOPP) established requirements for payback of inadvertent overuse of Colorado River water by users in the Lower Division States. In calendar year 2011, IID incurred an overrun in the amount of 82,662 acre-feet (af) for which payback in the amount of 55,710 af was required in 2013¹. In accordance with the IOPP, IID submitted a Revised Inadvertent Overrun Payback Plan for 2013 (Payback Plan) in which IID described the extraordinary conservation measures IID proposed to implement in 2013 to meet its payback obligation. By letter dated September 21, 2013, the Bureau of Reclamation approved IID's Payback Plan.

By email dated April 2, 2014, IID submitted a report (IOPP certification report) certifying the extraordinary conservation measures implemented by IID in 2013 and the amount of Colorado River water conserved for purposes of meeting IID's 2013 payback obligation. As outlined in IID's IOPP certification report, IID implemented two approved conservation measures to meet its IOPP payback obligation: its Main Canal Seepage Interception System (MCSIS), from which 30,776 af of Colorado River water was conserved in 2013; and its Fallowing Program, from which 242,403 af of Colorado River water was conserved in 2013. As noted in IID's IOPP certification report, the primary objective in implementing these conservation measures was the satisfaction of IID's conservation, transfer, and mitigation obligations under the 2003 Quantification Settlement Agreement and Related Agreements (QSA), although implementation schedules and conservation targets were accelerated and increased to meet IOPP obligations. Colorado River water conserved from these measures was first applied to meet IID's 2013 QSA obligations, then to meet IID's 2013 IOPP payback obligation. For the purpose of meeting its 55,710 af payback obligation, IID utilized conservation from its Fallowing Program.

After meeting its 2013 QSA and IOPP obligations, IID had 35,295 af of additional conservation from its Fallowing Program and 2,052 af of additional conservation from its MCSIS, for a combined total of 37,347 af of additional conservation. IID requested that this additional conservation be applied as early payback towards its 2014 payback obligation.

The IOPP requires that Reclamation monitor implementation of the extraordinary conservation measures outlined in approved payback plans. Reclamation conducted semi-annual independent field verification

¹In accordance with the IOPP, IID was required to pay back a minimum of 62,000 af of its 2011 overrun in 2013. In 2012, IID applied 6,290 af of early payback, which reduced IID's 2013 payback obligation to 55,710 af.

inspections in 2013 on randomly selected fields accounting for five percent of the total acreage enrolled in the Fallowing Program, and on five percent of the project pumps that were operated as part of the MCSIS. The findings of Reclamation's verification inspections are included in the enclosed reports, *Imperial Irrigation District On-Farm Fallowing Program/Main Canal Seepage Interception System Spring 2013 Verification Report* (Enclosure 1) and *Imperial Irrigation District Extraordinary Conservation Verification Report Fall 2013* (Enclosure 2).

The Inadvertent Overrun and Payback Technical Committee (IOPTC) met on April 10, 2014, to review IID's 2013 IOPP certification report and to make a recommendation regarding the adequacy of the report in demonstrating the achieved payback amount. The IOPTC unanimously recommended IID be credited with a total 93,057 af of payback for 2013, (2,052 af from its MCSIS, and 91,005 af from its Fallowing Program). In its recommendation, the IOPTC acknowledged that, of the total payback, 55,710 af be credited towards IID's 2013 payback obligation, and 37,347 af be credited as early payback towards IID's 2014 payback obligation.

Taking into consideration the recommendations provided by the IOPTC members, Reclamation's field verification, and other information, I verify and make the final determination that, for the purpose of meetings its payback obligations under the IOPP, IID conserved 93,057 af of Colorado River water during 2013 as documented in IID's 2013 IOPP certification report, and therefore credit IID with this amount of payback for 2013. Additionally, I approve IID's request that, of this amount, Reclamation apply 55,710 af to IID's 2013 payback obligation and 37,347 af as early payback toward IID's 2014 payback obligation. Applying the 37,347 af of early payback reduces IID's 2014 payback obligation to 117,391 af. Reclamation appreciates IID's effort to provide payback in advance of its established payback schedule.

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

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

Enclosures - 2

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