



United States Department of the Interior

BUREAU OF RECLAMATION
Lower Colorado Regional Office
P.O. Box 61470
Boulder City, NV 89006-1470
MAY 12 2015

IN REPLY REFER TO:
LC-4212
WTR-4.03

CERTIFIED – RETURN RECEIPT REQUESTED

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

Subject: Verification of 2014 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 2014, IID had a payback obligation of 117,391 acre-feet (AF) for overruns IID incurred in 2011 and 2012. In accordance with the IOPP, IID submitted an Inadvertent Overrun Payback Plan for 2014 (Payback Plan) in which IID described the extraordinary conservation measures IID proposed to implement in 2014 to meet its payback obligation. By letter dated September 21, 2013, the Bureau of Reclamation approved IID's Payback Plan.

IID's IOPP certification report, dated February 26, 2015, certified the extraordinary conservation measures implemented by IID in 2014 and the amount of Colorado River water conserved for purposes of meeting IID's 2014 payback obligation. As outlined in IID's IOPP certification report, IID implemented three approved conservation measures in 2014 to meet its IOPP payback obligation: the Main Canal Seepage Interception System (MCSIS), the Following program, and the On-Farm Efficiency Conservation program. IID's IOPP certification report notes that 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 2014 QSA obligations, then to meet IID's 2014 IOPP 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 inspections in 2014 on randomly selected fields accounting for 5 percent of the total acreage enrolled in the Fallowing Program, 5 percent of the project pumps that were operated as part of the MCSIS, and on 2.5 percent of the acreage for which proposals were submitted under its On-Farm Efficiency Conservation program. Reclamation's reports entitled, *Imperial Irrigation District Extraordinary Conservation Verification Report March 2014* and *Imperial Irrigation District Extraordinary Conservation Verification Report October 2014* were previously provided to IID.

The Inadvertent Overrun and Payback Technical Committee (IOPTC) met on April 16, 2015, to review IID's 2014 IOPP certification report and to provide a recommendation regarding the adequacy of the report in demonstrating the achieved payback amount. The IOPTC recommended IID be credited with a total 117,391 AF of payback for calendar year 2014, based on the following program conservation amounts: 1,231 AF from MCSIS, 111,789 AF from its Fallowing program, and 4,371 AF from its On-Farm Efficiency Conservation program.

Taking into consideration the recommendations provided by the members of the IOPTC, Reclamation's field verification, and other information, I verify and make the final determination that IID conserved 117,391 AF of Colorado River water during 2014 as documented in IID's 2014 IOPP certification report, and credit IID with this amount of payback for 2014. Applying the 117,391 AF of payback credit fully extinguishes IID's IOPP payback obligation for its calendar years 2011 and 2012 overruns.

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

Sincerely,



Terrance J. Fulp, Ph.D.
Regional Director

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