

August 26, 2024

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

Dear Ms. Gould:

Subject: Imperial Irrigation District Revised Estimates of Colorado River Diversion

- Calendar Year 2024

By this letter, the Imperial Irrigation District requests to revise its September 14, 2023, 2024 Colorado River Diversion estimate to account for 220,000 acre-feet (AF) of System Conservation Water (SCW) to benefit Lake Mead under the *System Conservation Implementation Agreement (SCIA) for Calendar Years 2024 Through 2026 Between the United States Bureau of Reclamation and the Imperial Irrigation District to Implement the Lower Colorado River Basin System Conservation and Efficiency Program (LC Conservation Program)*, No. 24-XX-30-W0825 (2024-2026 SCIA). This agreement will aid California in achieving the goals set out in the Colorado River Board of California's October 5, 2022, letter proposing for California agencies to target the conservation of 400,000 acre-feet per year (AFY) of water in Lake Mead between 2023 and 2026 that subsequently became a part of the Lower Division Proposal adopted in the May 2024 Record of Decision for the Supplement to the 2007 Colorado River Interim Guidelines for Lower Basin Shortages and Coordinated Operations for Lake Powell and Lake Mead.

On August 12, 2024, IID authorized the 2024-2026 SCIA to generate up to 300,000 AFY of conservation through the implementation of three programs including the 1) On-Farm Efficiency Conservation Program (OFECP), 2) Deficit Irrigation Program (DIP) and 3) Farm Unit Fallowing Program (FUFP). In 2024, IID is utilizing two of these conservation programs, the OFECP and the DIP, to create SCW to benefit Lake Mead. IID's initial conservation estimates indicate these two programs will conserve approximately 170,000 AF of conserved water in excess of its current water transfer obligations, and IID is working with the San Diego County Water Authority to leave 50,0000 AF of conserved water generated by IID's OFECP for transfer to SDCWA in Lake Mead instead of it being diverted by the Metropolitan Water District of Southern California for SDCWA. When combined, IID currently estimates that 220,000 acre-feet of conserved water will be designated as SCW pursuant to the 2024-2026 SCIA in 2024 and remain in Lake Mead for the benefit of the Colorado River System.

As a result of this additional conservation attributable to the 2024-2026 SCIA, IID requests a revised consumptive use approval of up to 2,452,800 AF (2,442,800 AF at Imperial Dam, net of return flows) for 2024, this reflects the maximum amount of Colorado River water available to IID with the designation of 220,000 AF of SCW.

IID 2024 Estimated Consumptive Use ¹ Table in Acre-Feet (August 26, 2024)	
Priority 3 Cap	3,100,000
Miscellaneous PPR's	(11,500)
1988 IID/MWD Conservation & Transfer	(105,000)
IID/SDCWA Conservation & Transfer	(150,000)
AAC Lining Project Conservation & Transfer	(67,700)
IID/CVWD Conservation & Transfer	(93,000)
Estimate of Additional Conserved Water 2,3,4	(220,000 – 300,000)
2024-2026 System Conservation Implementation Agreement • ≈ 170,000 AF of SCW • 50,000 AF of SCW from IID/SDCWA Conservation & Transfer	
Total IID 2024 Consumptive Use ¹ Estimate Range ⁵	2,372,800 - 2,452,800
IID 2024 Estimated River Consumptive Use ¹ Table in Acre-Feet	
Total IID 2024 Consumptive Use ¹ Estimate Range ⁷	2,372,800 – 2,452,800
2024 Estimated Consumptive Use ¹ met by LCWSP ⁶	(10,000)
Total IID 2024 Consumptive Use ¹ Estimate Range ⁷ at River ⁸	2,362,800 – 2,442,800

IID's 2,362,800 to 2,442,800 acre-feet of consumptive use at Imperial Dam (net of return flows) will require a larger volume diversion from the Colorado River in 2024. Any changes to the actual 2024 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 2024 will require reductions to IID's actual Colorado River diversions and consumptive use accounting volumes at

Consumptive uses include, but are not limited to, agricultural, municipal, industrial, environmental, mitigation and storage.

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, inadvertent overrun payback (IOP), early IOPP payback on behalf of another Colorado River contractor, 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.

³ Contracting of any additional conservation programs and a final true-up of all 2024 IID conservation program yields at year-end may require an adjustment to this volume.

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 2024 with the appropriate notifications.

This range of estimates is intended to address the likely consumptive use needs for IID in 2024, but could change based on circumstances regarding the level of contracting for 2024 conservation programs identified in IID's proposed ICS plan and other water conservation, transfer and/or storage agreements or additional drought protection plans being considered.

Reclamation's Yuma Area office has estimated the maximum project yield for 2024 at 10,000 acre-feet. Actual pumped volumes and projections will be updated by Reclamation at year-end.

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Imperial Dam. This annual water order estimate is based upon average conditions for rainfall, salinity, and likely 2024 cropping patterns, including multiple cropped acreage and normal economic conditions in crop markets. Actual diversions in 2024 will, of necessity, reflect changed circumstances as they evolve including the final contracting and potential expansion of any 2024 conservation programs, the truing-up of 2024 IID conservation program yields at year-end, aggressive crop markets given current state and regional drought conditions and additional water conservation storage or delivery requests not yet authorized by the IID Board of Directors for 2024.

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

Sincerely,

Tina Shields, P.E.

Water Department Manager

Cc: Jamie L. Asbury, IID Jeremy Dodds, USBR Jessica Neuwerth, CRB Robert Cheng, CVWD Bill Hasencamp, MWD Alexi Schnell, SDCWA