September 16, 2024

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

Subject: IID Estimates of Diversion – Colorado River 2025

Dear Ms. Gould:

This letter responds to the Bureau of Reclamation's annual request to the Imperial Irrigation District for an estimate of IID's 2025 expected water use and constitutes IID's initial water order for a consumptive use of up to 2,617,800 acre-feet for 2025. While the initial estimate in Table 1 includes the full range of conservation potential under IID's 2024-2026 SCIA, IID will be submitting a revised Water Order after January 1, 2025, after reviewing 2024 year-end water uses and conservation programs, that includes a more refined estimate of 2025 System Conservation Water.

This water order should be considered by Reclamation in the context of the signed Quantification Settlement Agreement and the reservation of legal positions contained in the dismissal of IID v. USA, et al. As historically recognized by Reclamation and the position of many other Colorado River contractors, water orders submitted in advance of the water year are merely estimates of anticipated water use that may require subsequent revision based on many variables, and should not be perceived as a volume limitation on the annual exercise of the water right. Similarly, the exact volume and proposed uses of conserved water cannot be determined or accurately predicted in advance of any water conservation program's startup, final contracting and actual demands. The final calculation of actual conserved water yields is dependent on year-end crop water use, rainfall, and delivery records that are not available prior to the conclusion of the current calendar year. Contracting parameters and conserved water requirements for 2025 are also dependent on Reclamation's or third-party measurement, reporting, and calculation of IID's diversions, return flow credits, and consumptive uses for the current and previous water years. The accuracy and timeliness of these final measurements and Decree Accounting records are a significant factor in IID's estimates, and as such they may necessitate a subsequent revision to this order.

Thus, IID submits this water order for 2025 without limiting IID's water rights. IID acknowledges that the QSA itself provides an annual consumptive use volume limitation. Pursuant to that agreement, IID quantified its Priority 3 consumptive use at a maximum of 3.1 million acre-feet per year during the term of the QSA. IID anticipates (but does not

limit itself except by the terms of the QSA) to a consumptive use need of 2,317,800 to 2,617,800 acre-feet for 2025. This initial range of estimates is intended to address the consumptive use needs for IID in 2025, and certain conservation program contracting assumptions within the parameters identified in IID's proposed Intentionally Created Surplus Plan and 2024–2026 System Conservation Implementation Agreement No. 24-XX-30-W0825. Pursuant to the QSA, and assuming implementation as agreed to by all other parties without material changes or failure, IID's initial water order estimate for 2025 is as follows:

Table 1: IID 2025 Estimated Consumptive Use[1] in Acre-Feet (September 16, 2024)	
Priority 3 Cap	3,100,000
Miscellaneous PPR's	(11,500)
1988 IID/MWD Conservation & Transfer	(105,000)
IID/SDCWA Conservation & Transfer	(200,000)
AAC Lining Project Conservation & Transfer	(67,700)
IID/CVWD Conservation & Transfer	(98,000)
Estimate of Additional Conserved Water [2,3,4,5]	(0-300,000)
2024-2026 System Conservation Implementation Agreement • *IID On-Farm Efficiency Conservation Program System Conservation Water* • *IID Deficit Irrigation Program System Conservation Water* • *IID/SDCWA Conservation & Transfer Program System Conservation Water*	*TBD*
Total IID 2025 Consumptive Use[1] Estimate Range[6]	**2,317,800-2,617,800**
IID 2025 Estimated River Consumptive Use[1] Table in Acre-Feet	
Total IID 2025 Consumptive Use[1] Estimate Range[6]	2,317,800-2,617,800
2025 Estimated Consumptive Use[1] met by LCWSP[7]	(10,000)
Total IID 2025 Consumptive Use[1] Estimate Range[6] at River[7]	**2,307,800-2,607,800**

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

2 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 This range of estimates is intended to address the likely consumptive use needs for IID in 2025, but will change based on circumstances regarding the level of contracting for 2025 conservation programs identified in IID's 2024-2026 System Conservation Implementation Agreement, proposed ICS plan and other water conservation, transfer and/or storage agreements or additional drought protection plans being considered

4 Contracting of any additional conservation programs and a final true-up of all 2025 IID conservation program yields at year-end may require an adjustment to this volume.

5 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 2025 with the appropriate notifications.

6 This range of estimates is intended to address the likely consumptive use needs for IID in 2025, but will change based on circumstances regarding the level of contracting for 2025 conservation programs identified in IID's 2024-2026 System Conservation Implementation Agreement, proposed ICS plan and other water conservation, transfer and/or storage agreements or additional drought protection plans being considered.

7 Reclamation's Yuma Area office has estimated the maximum project yield for 2025 at 10,000 acre-feet. Actual pumped volumes and projections will be updated by Reclamation at year-end.

This 2,307,800–2,607,800 acre-feet estimated range of consumptive use at Imperial Dam (net of return flows) in 2025 will require a larger volume diversion from the Colorado River. Any changes to the actual 2025 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 2025 will require reductions to IID's actual Colorado River diversions and consumptive use accounting volumes at Imperial Dam.

This annual water order estimate is based upon average conditions for rainfall, salinity and likely 2025 cropping patterns, including multiple cropped acreage and normal economic conditions in crop markets. Actual diversions in 2025 will inevitably reflect changed circumstances as they evolve including the final contracting and potential expansion of any 2025 conservation programs, the truing-up of 2025 IID conservation program yields at year-end, improved crop markets and additional water conservation storage or delivery requests not yet authorized by the IID Board of Directors for 2025. This estimate assumes an averaging of values as utilized in 2024 based on the *Accounting Methodology for IID Canal Losses Key Terms of Agreement* dated October 3, 2007 between IID and Reclamation. Should there be any changes to this methodology, it may or may not require further revision to the 2025 water order.

Finally, attached to this water order is Table 2, a monthly breakdown of IID's estimated 2025 water order intended for use by Reclamation's operational staff. These consumptive use estimates are prorated using a historical use monthly proration methodology and are subject to change based on actual water demands and conditions in 2025.

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

Sincerely,

Tina Shields

Tina Shields, P.E.
Water Department Manager

Enclosure

cc: Jaime Asbury, IID
Jeremy Dodds, USBR
Jessica Neuwerth, CRB
Robert Cheng, CVWD
Bill Hasencamp, MWD
Alexi Schnell, SDCWA

Table 2: IID 2025 Estimated Monthly Consumptive Use
(September 16, 2024)

	Historical Proration	Estimated Consumptive Use Range (acre-feet)	
January	**3.68%**	85,358	96,406
February	**5.23%**	121,206	136,894
March	**8.84%**	204,810	231,319
April	**10.71%**	248,206	280,332
May	**12.08%**	280,072	316,322
June	**10.93%**	253,451	286,255
July	**11.13%**	257,957	291,345
August	**8.83%**	204,608	231,091
September	**7.88%**	182,669	206,312
October	**8.80%**	203,905	230,297
November	**6.38%**	147,906	167,050
December	**5.51%**	127,652	144,177
2025 Total	***100.00%***	***2,317,800***	***2,617,800***