



CENTRAL ARIZONA PROJECT

P.O. Box 43020  
Phoenix, Arizona 85080

August 5, 2025

Ms. Genevieve Johnson  
Acting Regional Director  
Interior Region 8: Lower Colorado Basin  
United States Bureau of Reclamation  
P.O. Box 61470  
Boulder City, NV 89006

Dear Ms. Johnson,

On September 30, 2024, Central Arizona Water Conservation District (CAWCD) provided Reclamation a preliminary estimate of its planned 2025 diversion of Colorado River water. Since then, CAWCD has received water orders from Central Arizona Project (CAP) contractors and subcontractors and completed its Annual Operating Plan. This letter is to modify this initial estimate based on actual water ordered by CAP customers following completion of CAP's Annual Operating Plan. The CAWCD 2025 Diversion estimate includes a reduction required pursuant to the 2007 Interim Guidelines, contributions to Lake Mead in accordance with the Lower Basin Drought Contingency Plan (LB DCP), system conservation agreements by CAP contractors and subcontractors, CAWCD Intentionally Created Surplus (ICS) release required for mitigation pursuant to the LB DCP, and wheeling of non-project water pursuant to federal wheeling agreements.

CAWCD acknowledges the efforts of Reclamation and water users in the Lower Colorado River Basin to conserve water through participation in Reclamation's Lower Colorado River Basin Conservation and Efficiency Program in 2025. A summary of the conservation agreements and associated reductions considered in the CAWCD diversion estimate are included in the table below.

| 2025 Forbearance and Reductions to CAP Diversion Detail | Agreement #    | Amount (AF) <sup>1</sup> |
|---|----------------|--------------------------|
| Pilot System Conservation Program                       | 15-XX-30-W0587 | 3,201                    |
| Yuma Mesa Irrigation and Drainage District              | 23-XX-30-W0769 | 22,010                   |
| Mohave Valley Irrigation and Drainage District          | 23-XX-30-W0770 | 13,694                   |
| Matador Farms   | 24-XX-30-W0828 | 3,240                    |
| Cathcarts   | 23-XX-30-W0776 | 61                       |
| Cibola Valley Irrigation and Drainage District          | 23-XX-30-W0771 | 2,329                    |
| Hopi Tribe  | 23-XX-30-W0779 | 3,059                    |

**PHYSICAL ADDRESS**

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|   |                |                |
|---|----------------|----------------|
| System Conservation Water – 242 Wellfield                           | 16-XX-30-W0603 | 25,000         |
| <b>Subtotal – Forbearance, On-River</b>                             |                | <b>72,594</b>  |
| System Conservation Water - ASARCO LLC                              | 23-XX-30-W0752 | 21,000         |
| System Conservation Water - Gilbert                                 | 23-XX-30-W0759 | 800            |
| System Conservation Water - Glendale                                | 23-XX-30-W0778 | 4,103          |
| System Conservation Water - Metro Water                             | 23-XX-30-W0757 | 5,000          |
| System Conservation Water - Peoria                                  | 23-XX-30-W0753 | 7,200          |
| System Conservation Water - Phoenix                                 | 23-XX-30-W0754 | 50,000         |
| System Conservation Water - Scottsdale                              | 23-XX-30-W0755 | 5,000          |
| System Conservation Water - Tucson                                  | 23-XX-30-W0756 | 30,000         |
| System Conservation Water - Spanish Trails Water Company            | 23-XX-30-W0801 | 2,400          |
| <b>Subtotal - System Conservation Water, CAP Subcontractors</b>     |                | <b>125,503</b> |
| System Conservation Water - Fort McDowell Yavapai Nation            | 23-XX-30-W0750 | 13,933         |
| System Conservation Water - Gila River Indian Community             | 23-XX-30-W0820 | 115,000        |
| System Conservation Water – San Carlos Apache Tribe                 | 24-XX-30-W0829 | 23,451         |
| <b>Subtotal – System Conservation Water CAP Federal Contractors</b> |                | <b>152,384</b> |
| <b>Total</b>  |                | <b>350,481</b> |

<sup>1</sup> These figures are estimates of program system conservation. Final amounts will be verified according to provisions in each System Conservation Implementation Agreement (SCIA).

In its letter dated September 20, 2024, Reclamation provided an estimate of the Available CAP Supply that could be committed for distribution and delivery to CAP Contractors and Subcontractors in CY 2025. Additionally, the calculated average historical consumptive use of higher priority users of 1,137,646 AF and the calculated P4(i) volume of 70,643 AF was used to develop the estimate for CAP's Colorado River Diversion below. The estimate includes reductions and contributions consistent with Section 2.D.1 of the Interim Guidelines and Section III.B of Exhibit 1 to the LB DCP, for a Tier 1 shortage condition that governs the operation of Lake Mead in 2025. There has been significant conservation in the Lower Basin that has affected CAP's Colorado River Diversion estimate summarized in the table above and included in the Colorado River Diversion Estimate below.

Notwithstanding this estimate, CAWCD intends to divert the balance of Arizona's reduced apportionment not consumed by equal and higher priority entitlement holders in accordance with contract No. 14-06-W-245, as amended and supplemented. CAWCD will also provide Arizona's 192,000 AF of LB DCP contributions through a range of actions consistent with the LB DCP agreements including simultaneous creation of EC-ICS and conversion to DCP-ICS, the conversion of existing EC-ICS to DCP-ICS and through direct reductions in CAP's diversion.

| <b>CAP Colorado River Diversion Estimate</b>   | <b>Amount (AF)</b> |
|--|--------------------|
| Arizona Basic Apportionment  | 2,800,000          |
| Reduction to Arizona Basic Apportionment for Shortage Condition (2007 Guidelines)      | (320,000)          |
| Estimated Consumptive Use by Equal or Higher Priority Entitlement Holders <sup>1</sup> | (1,136,289)        |
| Other Arizona Unauthorized uses <sup>2</sup>   | (1,732)            |
| DCP Contribution <sup>3</sup>  | (192,000)          |
| System Conservation Water, CAP Subcontractors  | (125,503)          |
| System Conservation Water, CAP Federal Contractors                                     | (152,384)          |
| Diversion of Non-Project Mainstream Water <sup>4</sup>                                 | 2,033              |
| Delivery of CAWCD EC-ICS <sup>3</sup>  | 36,055             |
| <b>Total CAWCD planned Colorado River Water Diversion</b>                              | <b>910,180</b>     |

<sup>1</sup> Calculated as the average historical consumptive use of Arizona first, second, and third priority users (1,137,646 AF) + the P4(i) Available Supply (70,643 AF which is the CU equivalent of 113,940 AF diversion) - CAP Subcontractors 3<sup>rd</sup> priority water pursuant to the Salt River Pima Indian Community Water Rights Settlement and the AK-Chin Indian Community Water Rights Settlement Act of 1984 (72,000 AF). This value includes an on-river system conservation volume of 72,594 AF, which CAWCD will forbear diverting.

<sup>2</sup> Three-year averages of consumptive use of unauthorized on-River uses. Unauthorized on-River users currently identified in Reclamation's 2024 Colorado River Accounting and Water Use Report include Cibola Island, ASLD Ott Lease, Martinez Lake cabin sites, South Gila valley/Yuma Mesa-other uses, R. Griffin and Power.

<sup>3</sup> CAP is planning to make the DCP contribution for the state of Arizona of 192,000 AF through the simultaneous creation and conversion of 9,439 AF of EC-ICS to DCP-ICS, the conversion of up to 36,055 AF of existing EC ICS to DCP ICS, and any remaining DCP contribution from a reduction in available diversion volume, in accordance with Section II Lower Basin Drought Contingency Plan (LBDGP) Agreement - Exhibit 1 Lower Basin Drought Contingency Operations (LBOps). Final accounting for DCP contribution and the delivery of EC-ICS will be determined pursuant to the end of year Colorado River Water Available to CAP and any space available to CAWCD within approved ICS accumulation limits and sharing agreements in consultation between CAP and Reclamation.

<sup>4</sup> The amount shown includes Queen Creek's Mainstream Water Entitlement being wheeled through the CAP pursuant to federal wheeling contract 20-XX-30-W0691.

CAWCD will continue to coordinate with Reclamation and modify its water order accordingly as ICS and conservation activities that affect CAP's diversion become known. If there is an excess to the Available CAP Supply to CAWCD after the final accounting, CAWCD requests that ICS deliveries from the CAWCD account be reduced. Should there be an exceedance of diversions to the volume available to CAP, CAWCD requests that Reclamation use up to 40,000 AF of CAP EC-ICS to address any such exceedances. If the final accounting reveals that 40,000 AF of CAWCD ICS is insufficient to accommodate CAWCD's diversion, CAWCD requests that Reclamation consult with CAWCD to identify measures to address such an overrun.

If you have any questions or require additional information, feel free to contact me or Don Crandall at 623-869-2457.

Sincerely,



Brenda Burman, General Manager  
Central Arizona Water Conservation District

c: Tom Buschatzke, ADWR  
Clint Chandler, ADWR  
Kristen Johnson, ADWR  
Alex Smith, USBR  
Darrin Francom, CAP  
Patrick Dent, CAP  
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Brian Buzard, CAP  
Don Crandall, CAP



**CENTRAL ARIZONA PROJECT**

P.O. Box 43020  
Phoenix, Arizona 85080

**September 30, 2024**

Mr. Jeremy Dodds  
Manager, Water Accounting and Verification  
Bureau of Reclamation  
Lower Colorado Regional Office  
LCB-4200  
P.O. Box 61470  
Boulder City, NV 89006-1470

Dear Mr. Dodds,

Following your letter regarding the Estimate of Calendar Year (CY) 2025 Colorado Diversions – Central Arizona Water Conservation District (CAWCD), and in preparation for our upcoming consultation, we have developed an estimate of CAWCD's Colorado River Diversions for your use. The CAWCD 2025 Diversion estimate includes a reduction required pursuant to the 2007 Interim Guidelines, contributions to Lake Mead in accordance with the Lower Basin Drought Contingency Plan (LB DCP), system conservation agreements by Central Arizona Project (CAP) Contractors and Subcontractors, CAWCD Intentionally Created Surplus (ICS) release required for mitigation pursuant to the LB DCP, and wheeling of non-project water pursuant to federal wheeling agreements.

As you know, the August Most Probable 24-Month Study projected the end of calendar year 2024 Lake Mead elevation at 1,062.32 feet. Consistent with Section 2.D.1 of the Interim Guidelines and Section III.B of Exhibit 1 to the LB DCP, a Tier 1 shortage condition will govern the operation of Lake Mead in 2025. Pursuant to the 2007 Guidelines and the LB DCP Agreements there will be a shortage reduction of 320,000 acre-feet (AF) and a DCP contribution of 192,000 AF to Arizona's Basic Apportionment. CAWCD has estimated that 1,152,914 AF will be available for Arizona fourth priority Colorado River water in CY 2025. Notwithstanding this estimate, CAWCD intends to divert the balance of Arizona's reduced apportionment not consumed by equal and higher priority entitlement holders in accordance with contract No. 14-06-W-245, as amended and supplemented. CAWCD will also provide Arizona's 192,000 AF of LB DCP contributions through a range of actions consistent with the LB DCP agreements including simultaneous creation of EC-ICS and conversion to DCP-ICS.

CAWCD acknowledges the efforts of Reclamation and water users in the Lower Colorado River Basin to conserve water through participation in Reclamation's Lower Colorado River Basin Conservation and Efficiency program in 2025. A summary of the conservation agreements and associated reductions considered in the CAWCD diversion estimate are included in the table below.

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| <b>2025 Forbearance and Reductions to CAP Diversion</b>   | <b>Per Letter Agreement #</b> | <b>Amount (AF) <sup>1</sup></b> |
|---|-------------------------------|---------------------------------|
| Yuma Mesa Irrigation and Drainage District -              | 23-XX-30-W0769                | 21,795                          |
| Mohave Valley Irrigation and Drainage District -          | 23-XX-30-W0770                | 13,441                          |
| Gabrych   | 23-XX-30-W0774                | 3,240                           |
| Cathcarts   | 23-XX-30-W0776                | 61                              |
| Cibola Valley Irrigation and Drainage District            | 23-XX-30-W0769                | 2,328                           |
| Hopi Tribe  | 23-XX-30-W0779                | 43,924                          |
| <b><i>Subtotal On-River Forbearance</i></b>               |                               | <b><i>35,548</i></b>            |
| System Conservation Water - ASARCO LLC                    | 23-XX-30-W0752                | 21,000                          |
| System Conservation Water - Gilbert                       | 23-XX-30-W0759                | 1,200                           |
| System Conservation Water - Glendale                      | 23-XX-30-W0778                | 7,000                           |
| System Conservation Water - Metro Water                   | 23-XX-30-W0757                | 5,000                           |
| System Conservation Water - Peoria                        | 23-XX-30-W0753                | 7,200                           |
| System Conservation Water - Phoenix                       | 23-XX-30-W0754                | 50,000                          |
| System Conservation Water - Scottsdale                    | 23-XX-30-W0755                | 5,000                           |
| System Conservation Water - Tucson                        | 23-XX-30-W0756                | 30,000                          |
| System Conservation Water - Spanish Trails Water Company  | 23-XX-30-W0801                | 2,400                           |
| System Conservation Water - Fort McDowell Yavapai Nation  | 23-XX-30-W0750                | 13,933                          |
| System Conservation Water - Gila River Indian Community   | 23-XX-30-W0760                | 125,000                         |
| System Conservation Water - Gila River Indian Community   | 23-XX-30-W0820                | 15,000                          |
| <b><i>Subtotal CAP Water User Forbearance</i></b>         |                               | <b><i>282,733</i></b>           |
| <b><i>Subtotal 2007 Guidelines Reduction</i></b>          |                               | <b><i>320,000</i></b>           |
| <b><i>Subtotal Reduction for CAP DCP Contribution</i></b> |                               | <b><i>192,000</i></b>           |
| <b><i>Total</i></b>                                       |                               | <b><i>838,657</i></b>           |

<sup>1</sup> These figures are estimates of program system conservation. Final amounts will be verified according to provisions in each System Conservation Implementation Agreement (SCIA).

Shortage reductions to the Arizona fourth priority available Colorado River water has resulted in shortage to CAWCD NIA priority contracts. Pursuant to the Arizona DCP implementation plan, CAWCD has estimated that 20,909 AF of CAWCD ICS will be released for delivery to satisfy these requirements. CAWCD also intends to divert 2,033 AF of Colorado River water for the Town of Queen Creek in accordance with Reclamation wheeling contract 20-XX-30-W0691 with Reclamation's approval of the Town's water order. The table below shows factors considered in developing CAWCD's Colorado River water diversion estimate for CY 2025, but it is anticipated that CAWCD will modify this estimate, following the final development of its Annual Operating Plan, which will incorporate all customer water orders and delivery requirements, conservation activities, and shortage mitigation resource requirements.

| <b>CAP Diversion Estimate Adjustments</b>   | <b>AF of CU for CY 2025</b>  |
|---|------------------------------|
| AZ Fourth Priority Supply   | 1,152,914 <sup>1</sup>       |
| Minus P4(i) Available Supply (CU Equivalent of 113,995 AF)  | (70,680) <sup>2</sup>        |
| Minus Other Use in Arizona  | (1,498) <sup>3</sup>         |
| <b>Equals Fourth Priority Water Available to CAP Contractors and Subcontractors at the CAP Point of Diversion</b> | <b>1,080,736<sup>1</sup></b> |
| Plus P3 Priority Water  | 72,000                       |
| Plus Release of CAWCD ICS for DCP Mitigation  | 30,138                       |
| Plus Wheeled Water  | 2,033                        |
| Minus CAP Service Area System Conservation  | (282,733)                    |
| <b>Equals CAP 2025 Colorado River Diversion</b>   | <b>902,174</b>               |

<sup>1</sup> Fourth priority supply available after 2007 Guidelines Reductions, DCP Contributions, and the average historical consumptive use by Arizona first, second, and third priority users is based on the four highest years of consumptive use during the five-year period from 2018-2022.

<sup>2</sup> The P4(i) pool will receive 9.85% of the Arizona fourth priority Colorado River water available for CY2025, calculated as 164,652 AF divided by the difference between Arizona's 2.8 MAF basic apportionment and the average historical consumptive use by Arizona first, second, and third priority users. The average historical consumptive use by Arizona first, second, and third priority users is based on the four highest years of consumptive use during the five-year period from 2019-2023.

<sup>3</sup> The volume of fourth-priority water available to CAP contractors and subcontractors at the CAP point of diversion does not account for the unauthorized uses that has been occurring on-River. These illegal uses negatively and unlawfully impact the available supply to CAP and the volume shown is subject to change depending on the completion and resolution of Reclamation and ADWR review of consumptive use that may not presently hold an entitlement to the Colorado River water, or which may be outside current parameters.

Listed below are the CAP's monthly Colorado River diversion estimates, to be pumped through the Mark Wilmer (Havasui) Pumping Plant, for calendar year 2025.

| <b>Month</b> | <b>Acre-Feet</b> |
|--------------|------------------|
| January      | 20,210           |
| February     | 30,900           |
| March        | 139,190          |
| April        | 156,370          |
| May          | 161,340          |
| June         | 60,320           |
| July         | 20,120           |
| August       | 20,580           |
| September    | 65,580           |
| October      | 110,850          |
| November     | 74,760           |
| December     | 41,954           |
| <b>Total</b> | <b>902,174</b>   |

CAWCD will continue to coordinate with Reclamation and modify its water order accordingly as ICS and conservation activities that affect CAP's diversion become known. If Arizona's final 2025 use is less than Arizona's apportionment, when accounting for mandatory contributions and other system conservation activities, CAWCD requests the unused volume remain in the Colorado River system storage.

Attached you will find a completed Part 417 Consultation Questionnaire for CY 2025.

If you have any questions or require additional information, feel free to contact me or Don Crandall at 623-869-2457.

Sincerely,



Brenda Burman, General Manager  
Central Arizona Water Conservation District

c: Tom Buschatzke, ADWR  
Clint Chandler, ADWR  
Kristen Johnson, ADWR  
Alex Smith, USBR  
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