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COMMITTEE

# Arizona Reconsultation Committee Meeting #14

August 24, 2026

# Meeting Logistics Summary

- Roll Call
  - Members will acknowledge their attendance when their name is called.
- ARC Delegates
  - Please raise your hand to request to speak or ask questions.
  - If online, use the Teams “raise hand” feature to request to speak or ask questions.
  - Wait to be recognized before speaking to ensure clear communication.
- Livestream Attendees
  - Electronic comment forms are available at [cap-az.com/ARC](https://cap-az.com/ARC) to submit a comment or question during the meeting.
  - Public submissions will be addressed if time allows.



# Legal Disclaimer

- The Record of Decision for the post-2026 Decision Framework for Colorado River Guidelines issued by the Bureau of Reclamation includes fundamental legal flaws including a failure to comply with the Colorado River Compact and other key elements of the Law of the River.
- This presentation is for preliminary informational purposes only and does not include any formal legal opinion or the adoption of any legal position; nothing contained herein shall operate as, or be construed to be, a waiver or relinquishment of any rights, claims, defenses, remedies, or causes of action, all of which are expressly reserved by members of the Arizona Reconsultation Committee, State of Arizona, Arizona Department of Water Resources, and Central Arizona Water Conservation District.



# ARC Meeting #14 Agenda

- Welcome and Opening Remarks
- Hydrology Update
- Post-2026 NEPA Process
  - Final Environmental Impact Statement
  - Record of Decision
  - Operating Guidelines for 2027 and 2028
  - Basin Reactions
- Operations for 2027
  - August 24-month Study
- Arizona 2027 and 2028 Operations
- Discussion and Questions



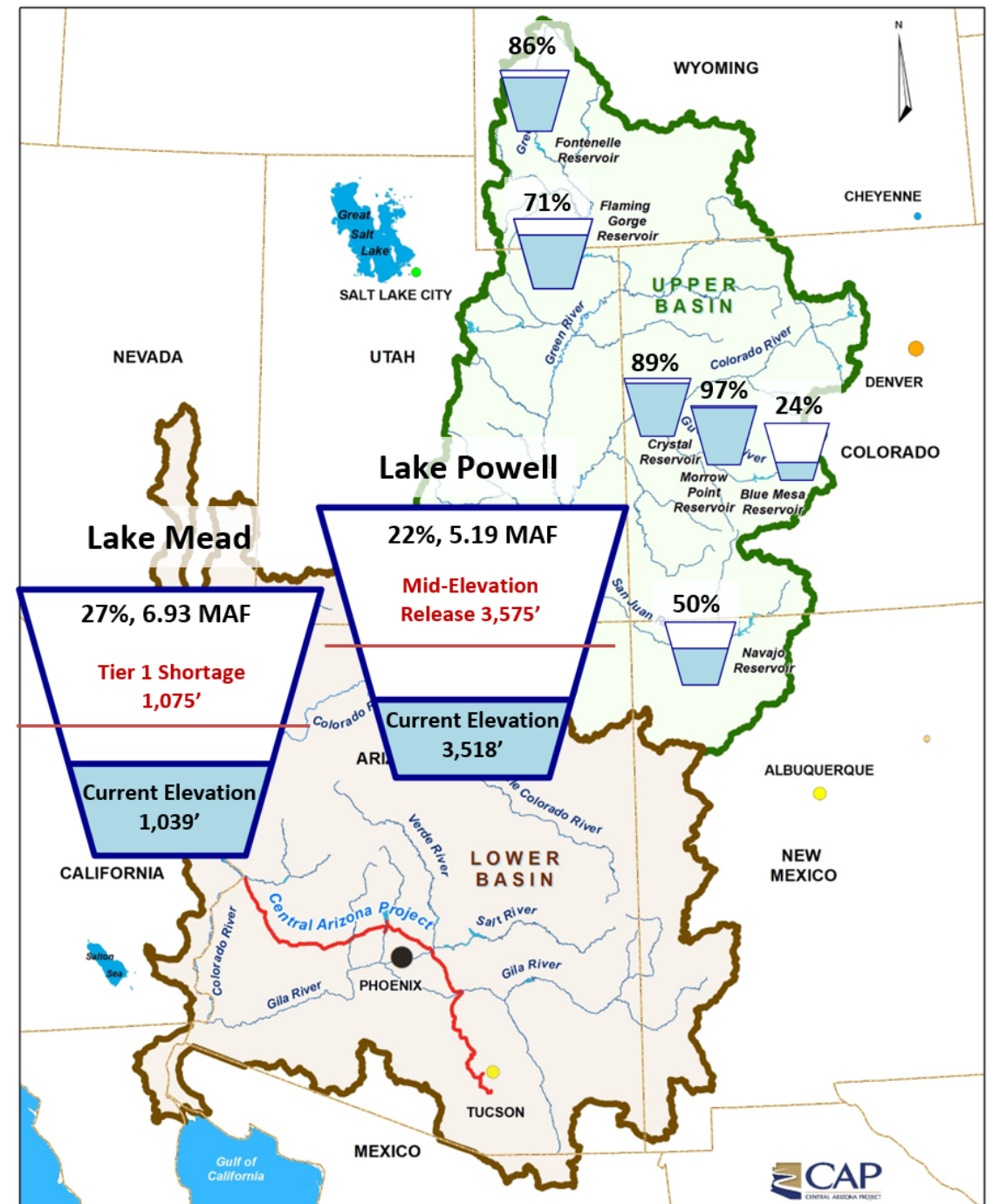
# Hydrology Update



# Colorado River Basin Storage

*As of August 23, 2026*

System Contents: 18.45 MAF (32%)  
Last Year System Contents: 22.26 MAF

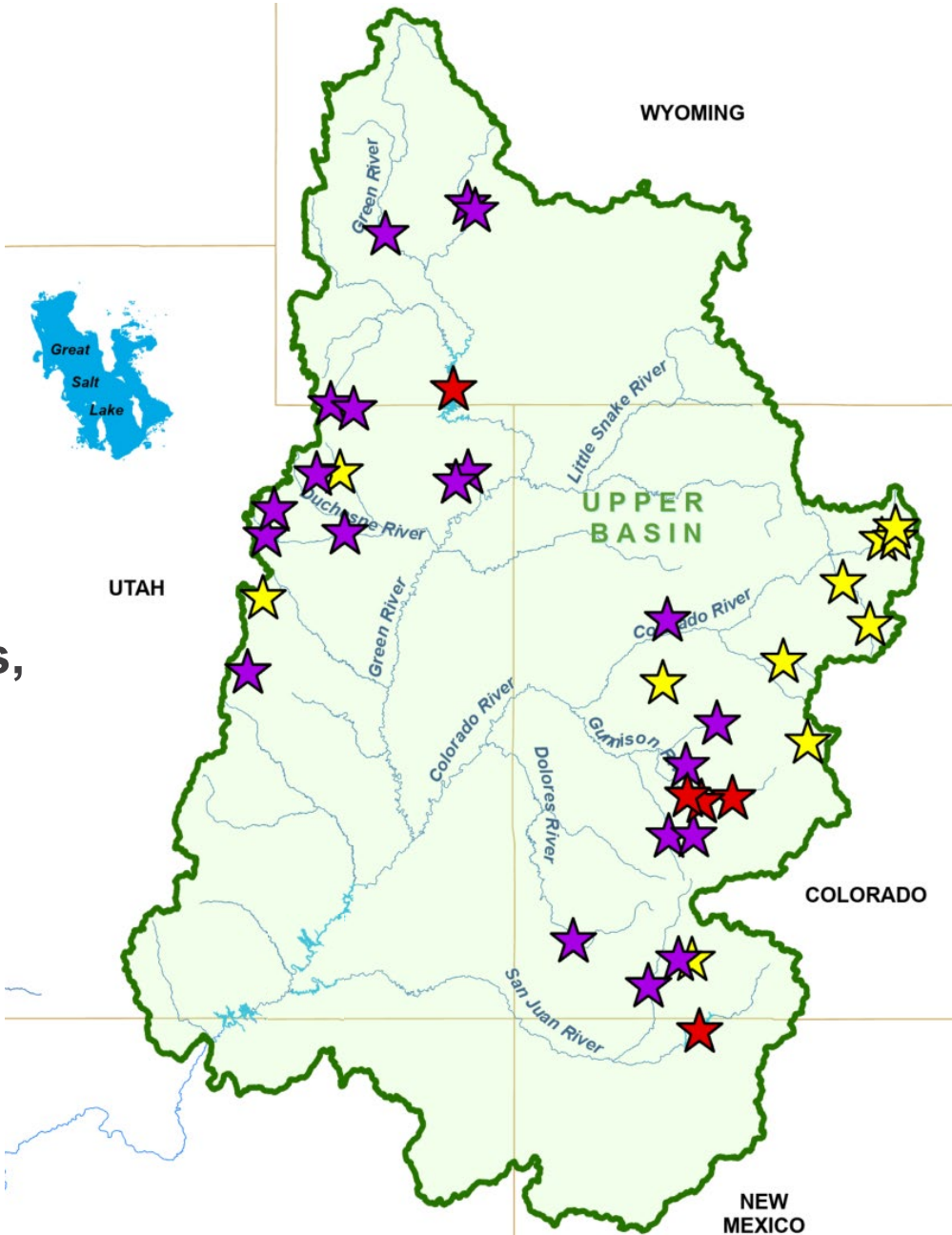


# Upper Basin Reservoirs

As of August 23, 2026

CRSP UIUs, Participating Projects,  
and Other notable reservoirs:

Current contents: 6.17 MAF (60%)



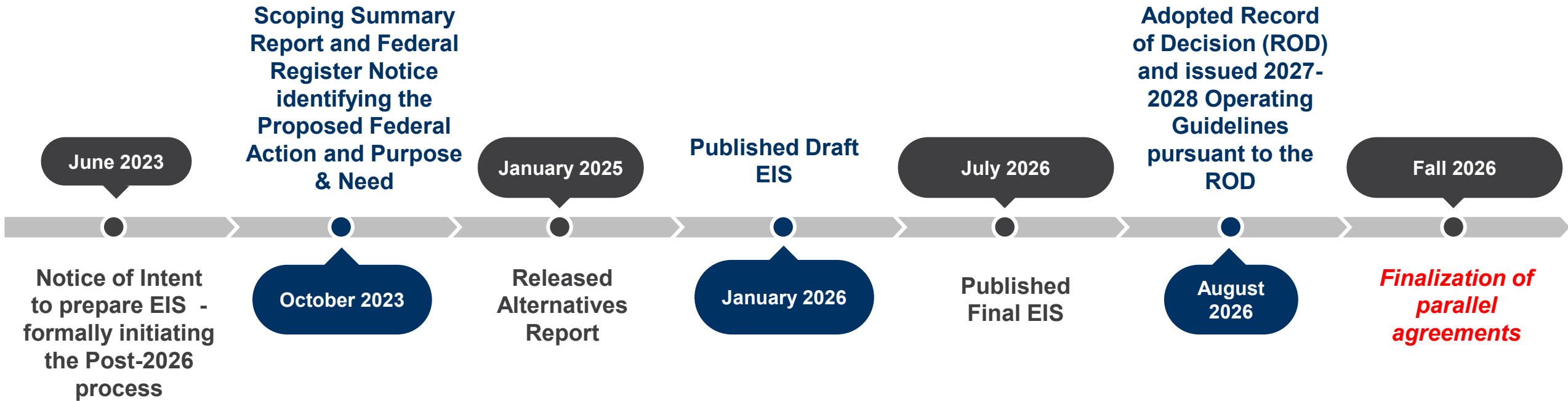
-  CRSP Upper Initial Units (UIU)  
*Excluding Lake Powell*  
**3.58 MAF (60%)**
-  CRSP Participating Projects  
**1.69 MAF (66%)**
-  Other notable reservoirs  
**0.716 MAF (48%)**



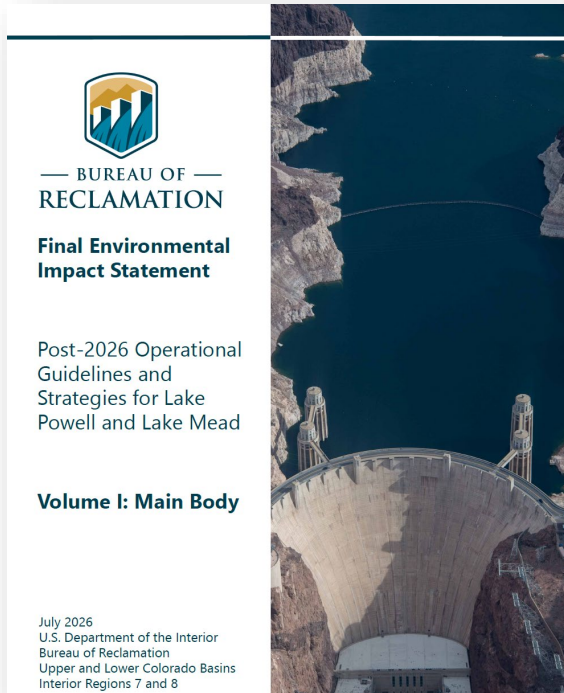
# Post-2026 NEPA Process



# Post-2026 Timeline



# Final Environmental Impact Statement and Record of Decision



- Published on July 31, 2026
- Identified and analyzed the Preferred Alternative



- Published on August 21, 2026
- Adopts the decision framework based on the Preferred Alternative

# Record of Decision (ROD) according to USBR

- Decision comes at a time when:
  - Unprecedented multi-decadal drought persists
  - System storage is at record lows
  - Existing agreements are expiring, new operating criteria must be in place by October 1, 2026
  - Basin-wide consensus on long-term operations has not been reached
- Provides the structure and sideboards within which operating guidelines will be developed, reviewed and periodically updated through 2036 and allows for consensus and voluntary actions
- Designed to accommodate future agreements and supports the Department's commitment to consensus-based operations



# ROD Framework

- The ROD establishes a 10-year decision framework that specifies operational principles, sideboards and a process to adopt new guidelines at 2-year intervals
- USBR Operational Principles
  - Operations should be responsive to hydrology
  - Critical federal infrastructure must be protected through practical and deliberate operations (Lake Powell power pool)
  - Operating guidelines should implement the LROC while also providing directions to address extraordinary circumstances
  - Operating guidelines should prioritize consensus-based recommendations
- Decision process for operational years 2029/2030 begins no later than October 2027



# ROD Framework Sideboards

- Lower Basin Shortage Guidelines
  - Up to 3.0 MAF per year, not including Mexico
  - Allocation based on federal interpretation of applicable law, including the Consolidated Decree. Deviation would occur only if water entitlement holders have reached voluntary arrangements
  - Consultation if projected Lake Mead elevation < 1,010 ft to determine additional reductions in the Lower Basin
- “Coordinated” Reservoir Operations
  - 5.0 MAF to 12.0 MAF releases to provide protection for critical infrastructure at Glen Canyon Dam
  - Consultation if projected Lake Powell elevation < 3,500 ft to determine potential additional actions



# ROD Framework Sideboards (continued)

- Storage and Delivery of Conserved System and Non-system Water
  - Lake Powell storage: up to 3.0 MAF
  - Lake Mead storage: up to 8.0 MAF (support existing ICS, new ICS-type programs, conservation pools and exchange mechanisms)
- Additional Activities Above Lake Powell
  - Potential for “maximum” use of CRSP Upper Initial Units within their respective RODs to release additional water if needed to protect critical infrastructure
  - Voluntary Upper Basin contributions up to 200 KAF/year subject to hydrologic conditions



# ROD Framework

- Sets framework to cut Lower Basin up to 3 MAF using a federal interpretation of “priority”, while ignoring Colorado River Compact obligations
- No Upper Basin reductions and selective, limited, discretionary use of Upper Initial Units (UIUs), ignoring Compact requirements that are reinforced by federal law
- Purports to provide National Environmental Policy Act (NEPA) coverage for those outcomes



# Arizona Reactions

- Arizona objects to the ROD framework because it is inconsistent with the Colorado River Compact and the Law of the River
- Although the FEIS states that “the Department intends to adopt and implement the guidelines in a manner consistent with the Law of the River,” the Department nowhere purports to construe the Law of the River or adhere to its requirements, including the delivery obligations set forth in Article III(c) and (d) of the Colorado River Compact
- Arizona has not agreed to a ROD framework of longer than 2 years
- Significant concerns that Reclamation did not consider alternative ways to protect infrastructure



# Arizona Reactions (continued)

- The Long-Range Operating Criteria (LROC) cannot be modified through the EIS process. The LROC provide that a minimum of 8.23 MAF must be released from Lake Powell annually
- The ROD framework improperly leaves UIU contributions undefined
  - Shortages may not be imposed on the Lower Basin to absorb a deficiency that exists because the Upper Division States have not met their delivery obligations or that releases from the UIUs could remedy
- Arizona does not consent to annual reductions of up to 3.0 MAF that the ROD's operational sideboards authorized in the Lower Basin



# Operating Guidelines

 United States Department of the Interior  
OFFICE OF THE SECRETARY  
Washington, DC 20240

**Operating Guidelines**

**Colorado River Guidelines for Coordinated Operations of Lake Powell  
and Lake Mead  
Operating Years 2027 and 2028**

**August 2026**

**Recommending Official:**

 08-21-2026  
David M. Palumbo Date  
Deputy Commissioner, Operations, Bureau of Reclamation

**Approved:**

 August 21<sup>st</sup>, 2026  
Doug Burgum Date  
Secretary of the Interior



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# Operating Guidelines

- Department issued the 2027-2028 Operating Guidelines as the final agency action pursuant to the ROD on August 21, 2026
- Includes criteria for Lake Powell operations and incorporation of limited but undefined use of the Colorado River Storage Project UIUs
- Elements of Lake Mead operations:
  - Reductions to Lower Basin water users
  - Storage and delivery of conserved water (ICS) in Lake Mead
  - Voluntary conservation activities (700+ Plan)
  - Implementation of Federally Managed Water Resources Pool (FMWRP)
  - Reconsultation when Lake Mead is projected to be at 1,010 feet
- In combination with a Lower Basin Agreement, could provide short-term stability for Lower Basin water users



# Operation of Lake Powell

- Step 1 Exhibit Runs - August
  - August 24-Month Study Most Probable Oct 1 Powell elevation determines elevation range, Upper, Middle, or Lower for exhibit run releases
  - Range of release volumes are tested in descending order, first release to maintain 3,510' is selected
- Step 2 Mid-Year adjustments - October-April (monthly)
  - WY release adjustments are made if Powell elevation projection  $< 3,510'$  through March of the next WY, or  $\geq 3,565'$  at the end of the current WY
  - Consultation is triggered if Powell is projected to be  $< 3,500'$  at any point in the water year
  - In the Low Elevation Infrastructure Protection Range, UIU releases could be contemplated when the WY release is  $< 7$  MAF



# Operation of Lake Powell – Releases

| Oct 1 Projected Elevation                                        | Range of Releases | Adjustments                                                                                                                                                                                                                                                                                                                         |
|------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Upper Elevation Range</b><br>≥ 3,565'                         | 7.5 – 8.23+ MAF   | <ul style="list-style-type: none"> <li>If projected Powell elevation ≤ 3,510' adjust downward to <b>minimum</b> of 6.0 MAF</li> <li>If projected Powell elevation ≥ 3,565' adjust upward half of volume &gt; 3,565'</li> </ul>                                                                                                      |
| <b>Mid Elevation Range</b><br>< 3,565' and ≥ 3,540'              | 7.0 – 8.0 MAF     |                                                                                                                                                                                                                                                                                                                                     |
| <b>Low Elevation Infrastructure Protection Range</b><br>< 3,540' | 6.0 – 7.0 MAF     | <ul style="list-style-type: none"> <li>If projected Powell elevation ≤ 3,500' CONSULTATION</li> <li>May include adjustments to the October-April monthly release pattern if needed to maintain a target of 3,510'</li> <li>UIU releases are commensurate 1:1 (up to a maximum of 1 MAF) when Powell release &lt; 7.0 MAF</li> </ul> |
| <b>Extraordinary Circumstances</b><br><3,500                     | > 5 MAF           | <ul style="list-style-type: none"> <li>Consult regarding potential further actions to protect critical infrastructure at Glen Canyon Dam</li> </ul>                                                                                                                                                                                 |



# Proposed Lower Basin Reductions

|                                       | Arizona   | California | Nevada  | Total Lower Division States |
|---------------------------------------|-----------|------------|---------|-----------------------------|
| 2027                                  | 760 KAF   | 440 KAF    | 50 KAF  | 1,250 KAF                   |
| 2028                                  | 760 KAF   | 440 KAF    | 50 KAF  | 1,250 KAF                   |
| Total Reductions 2027-2028            |           |            |         | 2,500 KAF                   |
|                                       |           |            |         |                             |
| Voluntary Conservation 2026-2027-2028 | 300 KAF   | 300 KAF    | 100 KAF | 700 KAF <sup>1</sup>        |
|                                       |           |            |         |                             |
| Total Reductions and Conservation     | 1,820 KAF | 1,180 KAF  | 200 KAF | 3,200 KAF                   |

<sup>1</sup>The Lower Division States anticipate working to a target of a cumulative contribution of 1 MAF if possible.



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# Proposed Lower Basin Reductions (continued)

- If the Lower Division States have not fully executed the necessary implementing agreements, the Secretary shall determine the quantities and apportionment thereof as identified in Section 5.3.A.1, in accordance with applicable law.
- Should the Most Probable projection of any 24-Month Study show Lake Mead falling below 1,010 feet at any time in the subsequent 12-month period, the Secretary shall consult and coordinate with the Basin States and Basin Tribes, and other affected parties as appropriate, to consider potential actions throughout the Basin to respond to and address hydrologic and operational conditions.
- Should the Most Probable projection indicate a likelihood of achieving Lake Mead elevation 1,125 feet or above during 2027 or 2028, the Secretary will consult with the Lower Division States regarding the potential to increase apportionments.



# Intentionally Created Surplus (ICS)

| Entity        | Max Annual Creation (KAF) | Max Cumulative Storage (KAF) | Max Annual Delivery (KAF) | Max Cumulative 2027-2028 Delivery (KAF) |
|---------------|---------------------------|------------------------------|---------------------------|-----------------------------------------|
| Arizona       | 125                       | 1,000                        | 300                       | 800                                     |
| California    | 400                       | 2,000                        | 400                       |                                         |
| Nevada        | 125                       | 800                          | 300                       |                                         |
| Mexico        | 250                       | 1,500                        | N/A*                      | 160                                     |
| <b>Totals</b> | <b>900</b>                | <b>5,300</b>                 | <b>1,160</b>              | <b>960</b>                              |

\*There is an assumed maximum cumulative delivery to Mexico of 160 KAF for 2027- 2028. No annual maximum is specified; the annual delivery is constrained only by the two-year cumulative limit of 160 KAF.



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# Federally Managed Water Resources Pool (FMWRP)

Establish a Federally Managed Water Resources Pool (FMWRP) in Lake Mead to:

- a) Meet Federal firming or other Federal delivery obligations pursuant to a congressionally authorized Indian Water Rights Settlement
  - b) Provide limited offsetting of Tribal wet water shortages up to 25% of shorted Mainstream Lower Colorado River or Central Arizona Project entitlements for these 2027-2028 Operating Guidelines
- Federal responsibility
  - Composed exclusively of ICS for which the US has acquired the right to delivery, within the Arizona ICS framework described on the previous slide
  - ICS is subject to all ICS rules except that BICS can be transferred/delivered to another state. ICS delivery counts against the state where it's delivered.



# Consultation

- The Secretary shall consult:
  - Before making any substantive modification to the 2027-2028 Operating Guidelines
  - Upon request for modification of the 2027-2028 Operating Guidelines, or upon a request to resolve any claim or controversy arising under the 2027-2028 Operating Guidelines
  - Regarding the creation and administration of ICS
  - If Lake Powell is projected to reach an elevation of  $> 3,665'$  during WY 2027 or 2028, to determine to what extent releases above 8.23 MAF, including the potential for releases consistent with Section 602(a) storage requirement contained in the Colorado River Basin Project Act
  - If Lake Mead is projected  $< 1,010$  feet in the subsequent 12-month period, consider potential actions **throughout the Basin** to respond to and address hydrologic and operational conditions



# Consultation (continued)

The Secretary shall consult with the Basin States in the event of any of the following conditions *when in the Lower Elevation Infrastructure Protection Range*:

- if the volume needed to protect 3,500' at Lake Powell in March of the following year is  $> 2.0$  MAF (Powell release at 6.0 MAF and additional UIU releases of 1 MAF)
- if any Basin State has determined that an insufficient volume is available from the CRSP Upper Initial Units to have equity in Lake Powell release reductions and CRSP Upper Initial Units
- if a Lake Powell release of  $< 6.0$  MAF is required to protect 3,500' in March of the following year
- if the Lake Powell elevation at the end of the water year is projected to be greater than 3,565'



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Colorado River plan spares upper basin states from mandatory cuts, for now

By Shaun Boyd

July 31, 2026 / 8:10 PM MDT / CBS Colorado

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by WyofileAugust 5, 2026

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Utah spared from facing mandatory cuts in feds' Colorado River plan

By Ben Winslow

Posted 8:07 AM, Jul 31, 2026 and last updated 5:06 PM, Jul 31, 2026

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Colorado is spared mandatory cuts under federal Colorado River proposal

By THE ASSOCIATED PRESS July 31, 2026 | updated 2 weeks ago

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# Operations for 2027



# Operational Determinations for 2027

The August 24-Month Study was released on August 21, 2026

## Lake Powell

- Lower Elevation Infrastructure Protection Range
- Initial WY Release: 6 MAF – 7 MAF
- Releases adjusted to maintain 3,510'
- Releases adjusted through April based on changing conditions
- Final WY 2027 release will be determined in April

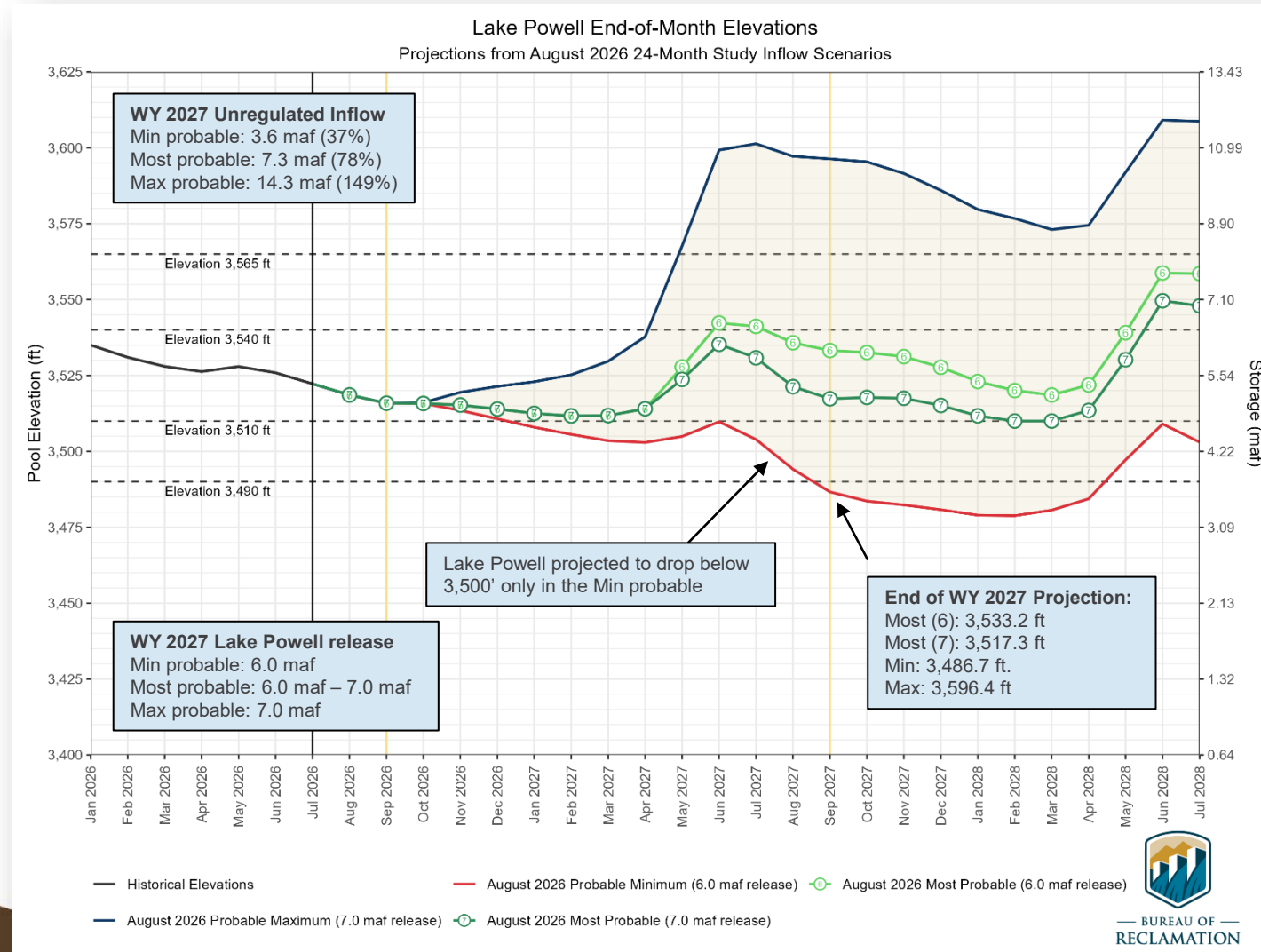
## Lake Mead (requires Lower Basin agreement)

- Water deliveries to the LB will be reduced by 1.25 MAF in CY 2027
- Additional water will be conserved in 2026, 2027, and 2028 (700+ Plan)
- ICS may be created pending completion of forthcoming implementation agreements consistent with the Operating Guidelines
- Water may be delivered for tribal firming or other Federal delivery obligations to Tribes and to provide limited offsetting of Tribal shortages, subject to availability and ICS delivery limitations



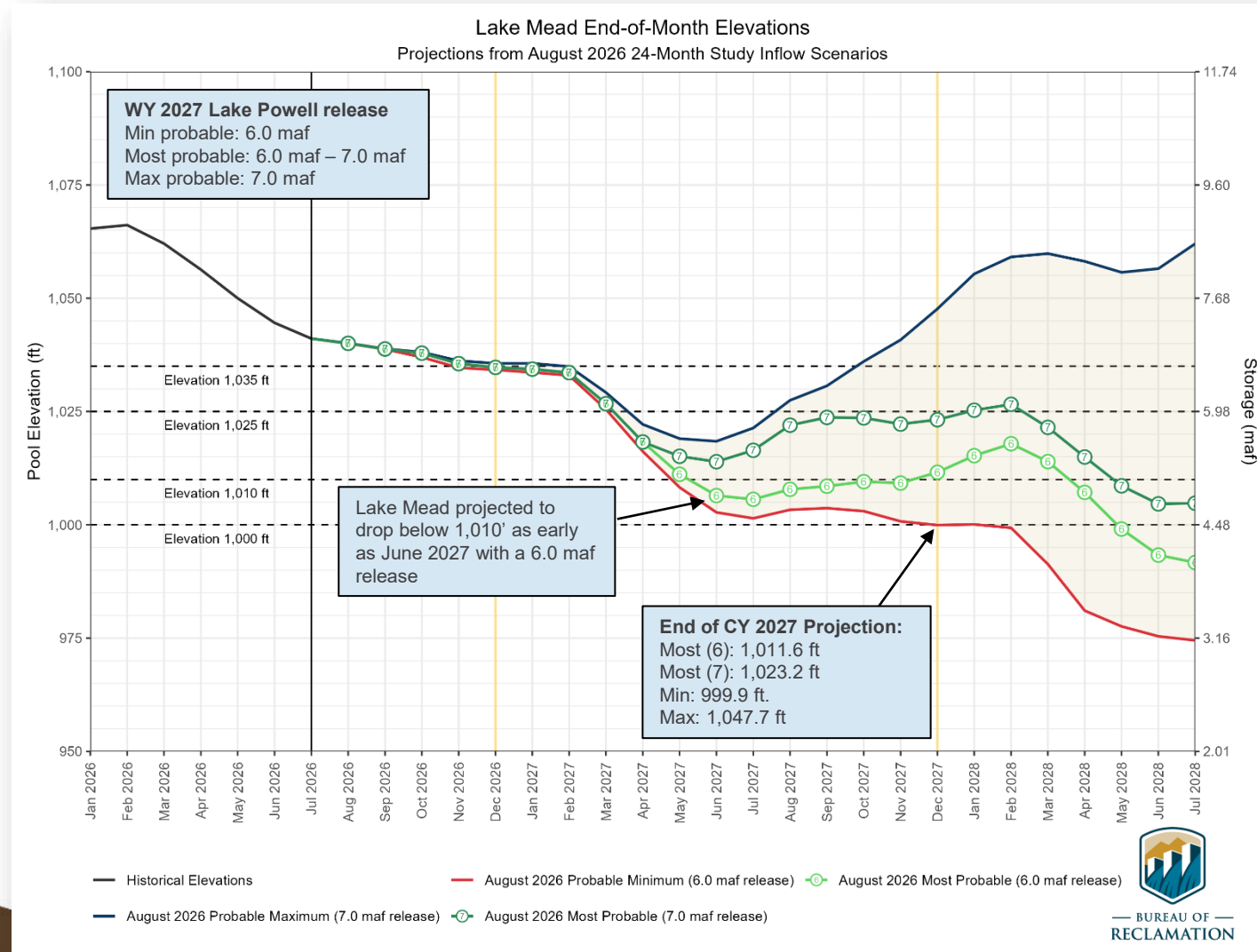
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# August 2026 24-month Study: Lake Powell



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# August 2026 24-month Study: Lake Mead



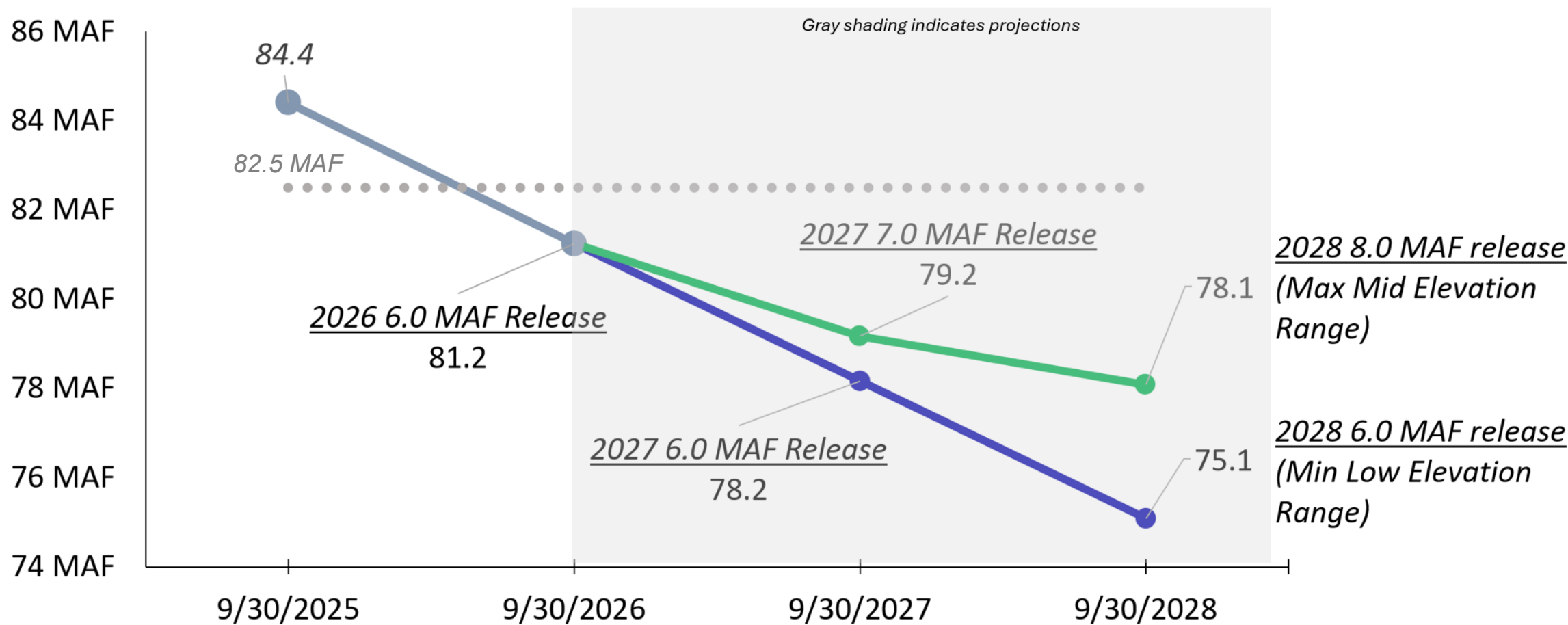
# Mead Impacts

- If Winter 2026-2027 hydrology is poor, there is a risk of less than 6.0 MAF in WY 2027 to protect infrastructure
- Winter 2026-2027 hydrology will drive operations for WY 2028
- If WY 2028 is in a lower tier, initial modeling indicates a likely chance Mead will fall  $< 1,010'$ , triggering consultation for additional actions
- With a 6.0 MAF release in WY 26 & WY 27, by July 2028:
  - Lake Mead could lose ~2.9 MAF in storage while Lake Powell gains ~2.5 MAF
  - Lake Mead could lose ~40 ft in elevation while Lake Powell increases by ~ 49 ft



# Compact Compliance

10 Yr Aggregate: Lees Ferry Gage + Paria (MAF)



82.5 MAF (gray dotted line) is shown as a general reference point and does not represent a legal position.

# UIU Operations Agreement



# Upper Initial Unit Operations

- The Operating Guidelines indicate once Powell releases are less than 7 MAF, there is commensurate action for additional releases from UIUs up to 1 MAF
- Draft UIU agreement between the US and UB States
  - Upper Basin and the United States are the Parties, with language there would be a joint defense against any third-party claims
  - Unenforceable by anyone who is not a Party
  - Lower Division State participation is consultation only, and only “as the Parties deem appropriate”
  - Timeline of decision making and recovery are undefined and problematic
  - The Parties agree full recovery of storage at the CRSPA Initial Units is required before any drought operation can be considered complete
  - “...does not, and will not be construed to, violate the Colorado River Compact, Upper Colorado River Basin Compact, Colorado River Storage Project Act, Colorado River Basin Project Act, the San Juan-Chama Project Act (P.L. 87-483).”

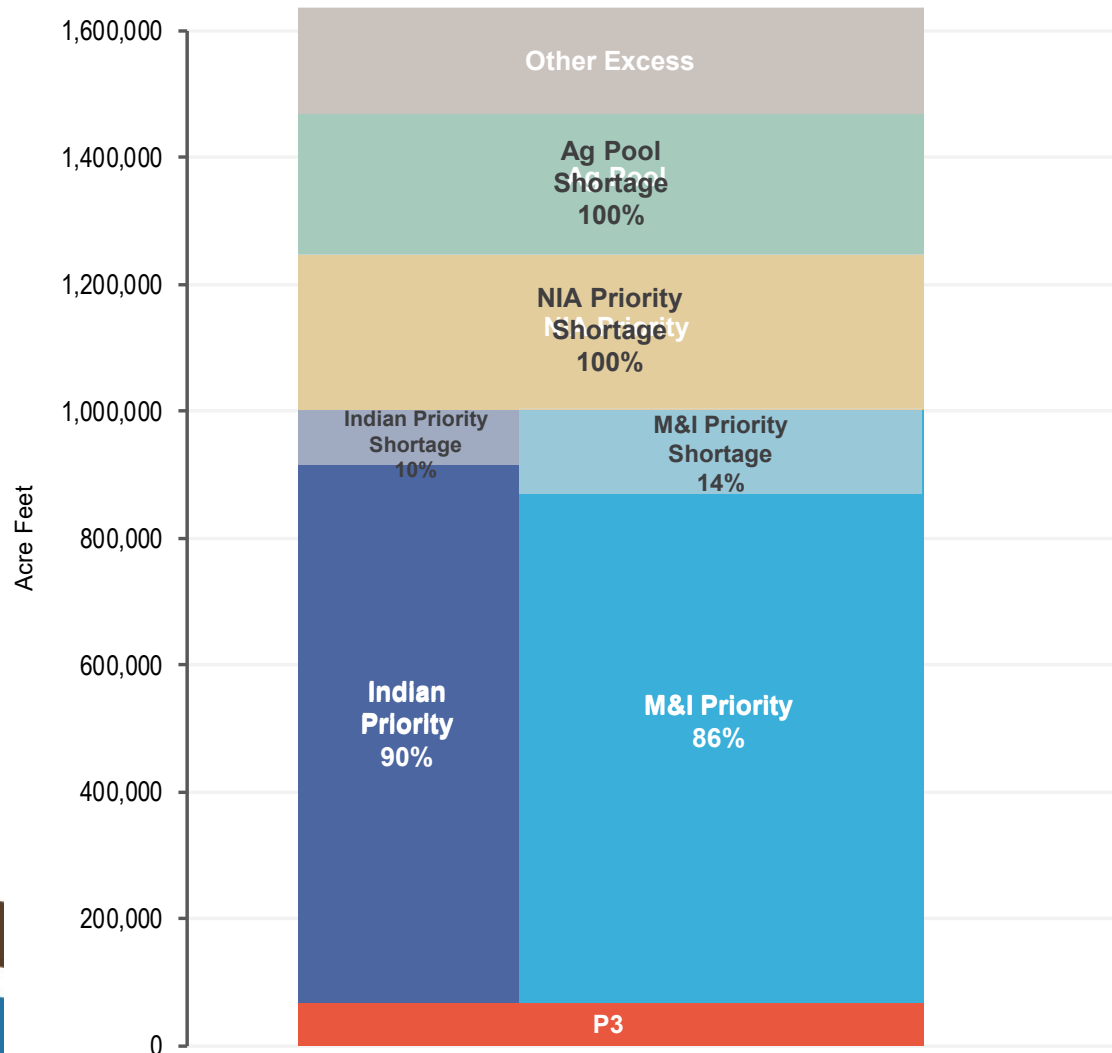


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# Arizona 2027 and 2028 Operations



# Impact of Lower Basin Reductions in 2027/2028



- 760 KAF reduction to Arizona's Colorado River supply
- CAP is working to identify additional resources to reduce impacts
  - 20 KAFY from Yuma wells and 40 KAFY from Lake Pleasant
  - Portion to On-River P4 TBD
- The estimated cut to M&I Priority is 14% and Indian Priority is 10%



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# 700+ Plan

- Lower Basin commitment to additional conservation is termed the 700+ plan
- Arizona has committed to 300 KAF of the 700 KAF Lower Basin commitment, which is referenced as the 300+ plan
- CAWCD Board approved (July 2026) several Bucket 1A SCIAs for CAP Participating Subcontractors that will count towards the 300+ plan
- Several Arizona on-river contractors are participating towards the 300+ plan
- Concurrently, the Arizona Water Banking Authority policy will incentivize M&I Subcontractor participation in 2027 and 2028



# 2026 AWBA Commission Approved Policies

- Distribution of LTSCs for Firming CAP M&I Subcontractors (2026-01)
  - 1-year extension of the 2019 DCP Firming Policy (through 2027)
  - Based on water orders for 2027
  - Contingent upon Lower Basin agreement to share reductions
- Distribution of LTSCs for Participation in the 700+ Plan (2026-03)
  - Will provide LTSCs for system conservation contributed to the 700+ plan (1:1)
  - CAP M&I Subcontractors are eligible
  - Ad valorem tax credits only
  - No LTSC distribution for monetarily compensated conservation
  - Will require uncompensated system conservation agreements
  - Effective through December 31, 2028



# P4 Shortage Sharing

- USBR has been implementing the 2006 ADWR Director's Shortage Sharing Recommendation, which provides methods to calculate the "Fourth Priority Mainstream Shortage Reduced Water Supply", and is expected to continue to do so
- If current use of on-River P4 is **less** than the Fourth Priority Mainstream Shortage Reduced Water Supply, there is no shortage reduction to P4 mainstream contractors and shortages fall exclusively on CAWCD
  - Condition existed 2020 through 2026
- If current use of on-River P4 is **more** than the Fourth Priority Mainstream Shortage Reduced Water Supply, part of the reductions fall on P4 on-River water users
  - Will occur with a reduction of 760 KAF to Arizona
- USBR and ADWR will be engaging with on-River P4 contractors for further discussion



# AZ ICS Process

|                         |                                                                                                           |
|-------------------------|-----------------------------------------------------------------------------------------------------------|
| August 17 (Mon)         | ADWR Webinar                                                                                              |
| August 24 (Mon) COB     | Draft Exhibits must be submitted to ADWR                                                                  |
| August 28 (Fri)         | Draft Intra-Arizona Framework and Draft Exhibits posted to ADWR website.<br>Public Comment Period begins. |
| First week of September | ADWR will host a Webinar                                                                                  |
| September 4 (Fri)       | Public Comment Period Closes. All Public Comments must be submitted in writing.                           |
| September 15 (Tues)     | Final revisions made to ICS exhibits                                                                      |
| Late-September          | ADWR and Arizona Contractors jointly propose ICS exhibits to parties in California and Nevada             |



# Next Steps

- Lower Basin/US agreement to implement reduction-sharing and ICS
- AZ legislative authorization of the Lower Basin agreement
- AZ ICS framework agreement
- Signing of Minute 334 (Mexico/US)
- Other intra-state implementing agreements
  - CAWCD/US
  - Tribe(s)/US
  - And others



# Discussion/Questions





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