



U.S. Department of Justice

Office of the Solicitor General

Washington, D.C. 20530

April 7, 2023

Honorable Scott S. Harris
Clerk
Supreme Court of the United States
Washington, D.C. 20543

Re: State of Arizona v. Navajo Nation, No. 21-1484
Department of the Interior v. Navajo Nation, No. 22-51

Dear Mr. Harris:

During oral argument in these cases, Justice Alito asked the federal government about “the total amount of water that has been supplied to the Navajo and whether there’s a per capita calculation.” Tr. of Oral Arg. 22; see *id.* at 11, 84-86. Justice Alito further asked whether such information could be provided to the Court. *Id.* at 22. The government respectfully submits this letter in response.

There are many sources of water for the Navajo Reservation (*e.g.*, rivers, tributaries, washes, springs, aquifers), and the government does not monitor how much water the Navajo Nation or its members use or might use from all sources.¹ Thus, after a review of readily available information, the government has determined that it is unable to calculate the Navajo Nation’s total or per capita water use. The government, however, can provide information about (1) the Navajo Nation’s water rights that have been determined (or are in the process of being determined) in general stream adjudications under settlement agreements approved by Congress; and (2) claims made by and for the benefit of the Navajo Nation to water rights in other ongoing general stream adjudications.

¹ The United States has collected some data on the Navajo Nation’s water use for specific purposes. For example, the U.S. Geological Survey has monitored groundwater use in the Black Mesa area of the Navajo and Hopi Reservations since 1971, originally to measure effects of industrial groundwater pumping for a now-discontinued coal slurry pipeline. See U.S. Geological Survey Arizona Water Science Center, *Black Mesa Monitoring Program* (2017), <https://www.usgs.gov/centers/arizona-water-science-center/science/black-mesa-monitoring-program>; U.S. Geological Survey, *Groundwater, Surface-Water, and Water-Chemistry Data, Black Mesa Area, Northeastern Arizona—2016-2018* (2021), <https://pubs.usgs.gov/of/2021/1124/of20211124.pdf>. But the United States has no comprehensive program to monitor water use by the Navajo Nation or its members. The Bureau of Reclamation also collaborated with the Navajo Nation and other members of the Ten Tribes Partnership on a study of tribal water in the Colorado River Basin, but “much of the information [in the study] was provided by the individual Partnership Tribes,” and the federal government did not “endorse[]” “either the Partnership Tribes’ positions or the information contained in th[e] [study] report.” *Colorado River Basin Ten Tribes Partnership Tribal Water Study: Study Report 5-1* (2018), <https://tentribespartnership.org/wp-content/uploads/2019/12/WaterStudy.pdf>.

Congress has approved two settlements addressing the Navajo Nation’s water rights. In the first settlement, approved by Congress in 2009, the Navajo Nation, the United States, and the State of New Mexico agreed to recognize the Navajo Nation’s water rights in the San Juan River Basin in New Mexico. See *Northwestern New Mexico Rural Water Projects Act*, Pub. L. No. 111-11, Tit. X, Subtit. B, § 10701(a)(1), 123 Stat. 1396. Those stipulated water rights were subsequently embodied in two decrees entered in a New Mexico general stream adjudication. See *New Mexico ex rel. State Engineer v. United States*, 425 P.3d 723, 727-728, 738 (N.M. Ct. App. 2018). One decree recognized the Navajo Nation’s right to consumptively use up to 325,670 acre-feet of water per year (including groundwater) from the San Juan River Basin in New Mexico.² A separate decree recognized the Navajo Nation’s additional rights to consumptively use approximately 11,000 acre-feet of water per year from ephemeral tributaries in that Basin.³ (An acre-foot of water is the equivalent of 325,851 gallons.)

In the second settlement, approved by Congress in 2020, the Navajo Nation, the United States, and the State of Utah agreed to recognize the Navajo Nation’s right to consumptively use up to 81,500 acre-feet of water per year from the Colorado River System (including the San Juan River Basin) located within Utah and adjacent to or encompassed within the Navajo Reservation. See *Consolidated Appropriations Act, 2021 (2021 Act)*, Pub. L. No. 116-260, Div. FF, Tit. XI, § 1102(c), (d)(1)(A), 134 Stat. 3226-3227; *Navajo Nation/State of Utah Water Rights Settlement Agreement* § 4.1.1. Those water rights may be used on the Navajo Reservation in the State of Utah only, see *Navajo Nation/State of Utah Water Rights Settlement Agreement* § 4.3, and they remain subject to confirmation and decree by the Utah general stream adjudication court, see *2021 Act* § 1102(g)(1)(E), 134 Stat. 3231; § 1102(b)(5), 134 Stat. 3225 (referencing the general stream adjudication pending in the Seventh Judicial District in and for Grand County, Utah, commonly known as the *Southeastern Colorado River General Adjudication*, Civil No. 810704477).

The Navajo Nation and the United States (for the benefit of the Navajo Nation) have also asserted claims to water in other ongoing general stream adjudications, articulating the Navajo Nation’s and the United States’ separate (though generally complementary) positions on the Navajo Nation’s water rights. One of those ongoing adjudications is a general stream adjudication in Arizona state court of water rights in the Little Colorado River Basin (part of the Lower Colorado River Basin) in Arizona. See *In re the General Adjudication of All Rights to Use Water in the Little Colorado River System*, No. CV 6417 (Ariz. Super. Ct. County of Apache). The table below summarizes claims made by and for the benefit of the Navajo Nation in that adjudication, although those claims have not yet been resolved.⁴

² See Partial Final Judgment & Decree of the Water Rights of the Navajo Nation, *New Mexico ex rel. State Engineer v. United States*, No. CV-75-184 (N.M. Dist. Ct. San Juan County) (Nov. 1, 2013), <https://www.ose.state.nm.us/Legal/settlements/NNWRS/settlements/11-1-2013%20Partial%20Final%20Judgment%20and%20Decree%20of%20the%20Water%20Rights%20of%20the%20N....pdf>.

³ See Supplemental Partial Final Judgment & Decree of the Water Rights of the Navajo Nation, *New Mexico ex rel. State Engineer v. United States*, No. CV-75-184 (N.M. Dist. Ct. San Juan County) (Nov. 1, 2013), <https://www.ose.state.nm.us/Legal/settlements/NNWRS/settlements/2013-11-01%20SUPPLEMENTAL%20PARTIAL%20FINAL%20JUDGMENT%20AND%20DECREE%20OF%20THE%20WATER%20R....pdf>.

⁴ All figures are based on statements filed in the Little Colorado River Adjudication, No. CV 6417-300. See Navajo Nation’s Amended Statement of Claimant – Phase III Claims (Irrigation) (Dec. 1, 2021); Navajo Nation’s Amended Statement of Claimant – Phase II Claims (Cultural, Unique Tribal, Recreational, Fish, Wildlife and Conservation, Mining, and Heavy Industrial/Commercial) (Oct. 7, 2020); Navajo Nation’s First Supplement to Its First Amended Statement of Claimant – Phase I Claims (Stock Ponds, Stock/Wildlife Watering, & DCMI) (July 18, 2019); United

Little Colorado River Basin Adjudication		
Nature of Claim	Amount of Water Claimed by the Navajo Nation (acre-feet per year)	Amount of Water Claimed by the United States for the Benefit of the Navajo Nation (acre-feet per year)
Domestic, commercial, municipal, and industrial (DCMI) (including drinking water)	44,907	42,097
Livestock (grazing)	3,000	3,000
Pond storage (for livestock, DCMI, and irrigation)	15,627	15,557
Cultural/tribal	Use of 645 springs for an unspecified amount of water	United States does not oppose Navajo Nation's claim
Recreation	13,253	United States does not oppose Navajo Nation's claim
Fish, wildlife, and conservation	35,873 (for instream use to protect riparian and fish habitat)	United States does not oppose Navajo Nation's claim
Economic development	30,626 (plus 73,000 for a one-time fill of reservoirs for a hydroelectric project)	17,890
Historically irrigated acres (based on past and present irrigation)	Navajo Nation has adopted United States' claim	36,608 (consumptive use from surface water sources)
Practicably irrigable acres (based on future irrigation potential)	143,000 (surface and groundwater sources) ⁵	5,750 (consumptive use from groundwater sources)

There is also an ongoing general stream adjudication of water rights in the Zuni River Basin in New Mexico, including claims by and for the benefit of the Navajo Nation. See *United States v. A & R Productions*, No. 01-cv-72 (D.N.M.). The Zuni River is a tributary of the Little Colorado River. In that adjudication, the Navajo Nation, as well as the United States for the benefit of the Navajo Nation, have asserted claims to 3,523 acre-feet of water per year.⁶

States' Amended Statement of Claimant on Behalf of the Navajo Nation (Phase III) (Dec. 1, 2021); United States' Amended Statement of Claimant on Behalf of the Navajo Nation (Phase II) (Oct. 7, 2020); United States' Second Amended Statement of Claimant on Behalf of the Navajo Nation (July 30, 2019).

⁵ It is unclear whether the Navajo Nation's claim is stated in terms of amount of depletion (*i.e.*, consumptive use) or amount of diversion.

⁶ This figure is based on statements filed in a subproceeding to the Zuni River adjudication, No. 12-cv-1298 (D.N.M.). See Supplemental Subproceeding Complaint of the Navajo Nation (Apr. 30, 2013); United States' Subproceeding Complaint & Statement of Claims for Water Rights on Behalf of, and for the Benefit of, the Navajo Nation & Navajo Allottees (Dec. 13, 2012). This figure does not include claims to water from impoundments or claims made for the

In addition, there is an ongoing general stream adjudication of water rights in the Rio San Jose in New Mexico, part of the Rio Grande Basin, including claims by and for the benefit of the Navajo Nation. See *New Mexico ex rel. State Engineer v. Kerr McGee Corp.*, Nos. CB 83-190-CV & CB 83-220-CV (N.M. Dist. Ct. County of Cibola). In that adjudication, the Navajo Nation has asserted claims to 111,483 acre-feet of water per year.⁷ The United States for the benefit of the Navajo Nation has asserted claims for the consumptive use of 19,835 acre-feet of water per year.⁸

The foregoing provides only a general overview of present or potential future availability of water for various parts of the Navajo Reservation, and it is not suitable for determining per capita or per household water use by the Navajo Nation and its members for several reasons. First, the Navajo Nation and its members generally do not need adjudicated water rights to use water on the Navajo Reservation, and they are currently using water from certain sources that are not the subject of a water rights decree or an ongoing general stream adjudication. Those sources include, for example, groundwater in the Arizona portion of the Reservation outside the Little Colorado River Basin, the Colorado River mainstream in Arizona in the Upper Colorado River Basin above Lee Ferry,⁹ and groundwater or other sources for the Alamo Chapter of the Navajo Nation in New Mexico.

Second, water rights claims made by and for the benefit of the Navajo Nation remain to be determined in ongoing adjudications, and those claims are not limited to present or historical use, but are based on present and future needs as well. Similarly, not all water rights recognized in the congressionally approved settlements described above have been fully put to use. For example, the Northwestern New Mexico Rural Water Projects Act includes funding for infrastructure that will “provide a long-term sustainable water supply to meet the current and future demands of more than 43 Navajo chapters, the city of Gallup, and the Teepee Junction area of the Jicarilla Apache Nation through the annual delivery of 37,764 acre-feet of water from the San Juan Basin.” Navajo Nation Water Rights Comm’n, *San Juan River New Mexico*, <https://nnwrc.navajo-nsn.gov/Basins/Upper-Basin-Colorado-River/San-Juan-River-New-Mexico> (last visited Apr. 7, 2023); see Tr. of Oral Arg. 11. While construction of the project is expected to continue for several years, some features have been completed and water deliveries have begun. The congressional settlement of the Navajo Nation’s claims in the San Juan River Basin in Utah likewise contemplates significant federal funding for water infrastructure. See Gov’t Br. 10. But under the terms of that settlement, those funds will not become available until the adjudication court enters a decree in accordance with the settlement and other conditions are met. See 2021 Act § 1102(g)(1), 134 Stat. 3231.

benefit of Navajo allottees (*i.e.*, individual members of the Navajo Nation who have been allotted lands within the Zuni River Basin).

⁷ See Initial Statement of Claimant the Navajo Nation (Feb. 16, 1987). It is unclear whether the Navajo Nation’s claim is stated in terms of amount of depletion (*i.e.*, consumptive use) or amount of diversion.

⁸ See United States’ Revised Hydrographic Survey of Lands of the Acoma Pueblo, Laguna Pueblo, Navajo Nation and Navajo Allottees (Oct. 31, 2001); United States’ Statement of Water Claims for Acoma and Laguna Pueblos, Canoncito Navajo Reservation, Ramah Navajo Area, and Navajo Nation (Jan. 15, 1987). The amount claimed by the United States includes claims for the benefit of allottees.

⁹ See Bureau of Reclamation, U.S. Dep’t of the Interior, *Bureau of Reclamation Completes Project at Glen Canyon Dam to Protect Local Water Supply During Extremely Low Lake Levels* (Jan. 12, 2023), <https://www.usbr.gov/newsroom/news-release/4405>.

Third, the Navajo Nation’s adjudicated water rights do not (and water rights to be adjudicated will not) guarantee that the subject water will be available for use in priority to the full extent of the determined right. Many of the water rights and claims described above are junior in priority to, or share priority with, at least some rights and claims of other users, including non-Indian users and other Indian tribes. For example, in the congressional settlement of the Navajo Nation’s claims in the San Juan River Basin in New Mexico, the Navajo Nation agreed, in exchange for water supply from federal projects and other commitments from the United States, that specified federal reserved rights would not be exercised according to their reservation date, but instead in accordance with the priority date associated with the named projects.¹⁰ Whenever flows in an adjudicated source are insufficient to meet the declared rights of all users, the Navajo Nation’s rights are subject to potential curtailment in accordance with the relevant priority date. In addition, some of the water rights described above are subject to restrictions on where the water may be used. See, e.g., Northwestern New Mexico Rural Water Projects Act § 10603(c), 123 Stat. 1384-1386 (placing conditions on the use of Navajo-Gallup Water Supply Project water in Arizona); Navajo Nation/State of Utah Water Rights Settlement Agreement § 4.3 (allowing water rights to be used only on the Navajo Reservation in Utah).

Fourth and finally, per capita or per household water use is generally calculated by dividing the total domestic and municipal water supply by either the total population or the total number of households.¹¹ The numerator in that calculation generally does not include agricultural, industrial, or commercial water use.¹² The above summary includes some information on claims for domestic and municipal water use, but as explained above, the claims are not comprehensive of all relevant water sources and do not necessarily reflect present use.

I would appreciate your distributing this letter to the Members of the Court.

Sincerely,

/s/ Elizabeth B. Prelogar

Elizabeth B. Prelogar
Solicitor General

cc: See Attached Service List

¹⁰ See Partial Final Judgment & Decree of the Water Rights of the Navajo Nation, *supra* note 2, at 7-17.

¹¹ The Navajo Reservation has a population of approximately 170,000. See, e.g., U.S. Census Bureau, *My Tribal Area*, <https://www.census.gov/tribal/?st=04&aianihh=2430> (last visited Apr. 7, 2023) (estimating a population of 169,688 with a margin of error of $\pm 2,942$ on “Navajo Nation Reservation and Off-Reservation Trust Land, AZ—NM—UT,” based on 2017-2021 American Community Survey 5-Year Estimates); Navajo Division of Health Navajo Epidemiology Center, *Navajo Population Profile 2010 U.S. Census* 13 (2013), <https://nec.navajo-nsn.gov/Portals/0/Reports/NN2010PopulationProfile.pdf> (“The 2010 U.S. Census enumerated 173,667 people living on the Navajo Nation including all races.”); Navajo Nation Division of Community Development, *Navajo Nation Wind*, <https://navajoprofile.wind.enavajo.org/NavajoNation> (last visited Apr. 7, 2023) (reporting the population of each of 110 chapters of the Navajo Reservation).

¹² See, e.g., U.S. Environmental Protection Agency, *How We Use Water*, <https://www.epa.gov/watersense/how-we-use-water> (last visited Apr. 7, 2023) (estimating domestic water use in the United States from “Public Supply” and “Self-Supplied Domestic” (*i.e.*, private wells) to be 13% of total annual water use).

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