March 2, 2026

Bureau of Reclamation
Attn: BCOO-1000
P.O. Box 61470
Boulder City, NV 89006

Re: Alliance for Water Efficiency Comments on the Post-2026 Operational Guidelines and Strategies for Lake Powell and Lake Mead – Draft Environmental Impact Statement

Dear Acting Commissioner Cameron:

The Alliance for Water Efficiency (AWE) appreciates the opportunity to comment on Reclamation's Draft Environmental Impact Statement (EIS) for the Post-2026 Operational Guidelines governing Lake Powell and Lake Mead. We encourage Reclamation and the seven basin states to reach an agreement that secures durable, long-term reductions in water use aligned with the declining supplies of the Colorado River Basin (CRB), driven by climate change, aridification, and related pressures.

While the Draft EIS addresses shortage allocation and reservoir operations, it does not sufficiently address how basin-wide water use reductions will be achieved to close the structural deficit and eliminate over-allocation. Below, we outline key federal actions that can help meet this objective.

Prioritize Efficiency and Conservation

Reclamation has indicated that CRB water use may need to decline by as much as one-third in the near term to stabilize operations at Lakes Powell and Mead. Achieving reductions of this magnitude will require aggressive demand management.

There are few viable new supply options in the CRB beyond water recycling, and most supply-side projects are costly and slow to implement. By contrast, water efficiency and conservation programs can generate savings quickly and cost-effectively. It is typically less expensive to save a gallon of water than to develop a new gallon of supply, particularly in the arid west. Scaling up proven efficiency strategies—supported by sustained federal funding—offers one of the fastest and least disruptive pathways to meaningful water savings.

Invest Federal Funding in Demand Management

Since the 1990s, federal support for local water and wastewater infrastructure has shifted largely from grants to low-interest loans, leaving local communities and ratepayers responsible for approximately 95 percent of system costs. The Infrastructure Investment and Jobs Act and the Inflation Reduction Act temporarily strengthened federal support—providing increased WaterSMART funding and more than $4 billion for drought mitigation. These investments delivered measurable water savings across the CRB through conservation, efficiency, and reuse.

However, most of this enhanced funding has not been renewed by Congress.

Communities, farms, and industries across the CRB have invested billions of dollars to build and sustain economic activity in an arid region. Addressing long-term water scarcity will require comparable investment in demand management. Because state and local funding alone will not meet the scale of need, AWE urges the Administration and Congress to commit sustained federal resources to CRB water conservation, efficiency, and reuse strategies.

Do Not Weaken Federal Water Efficiency Standards

Over the past three decades, many metropolitan areas in the CRB have experienced substantial population growth with limited increases, or even decreases, in total water use. This achievement is due in large part to federal efficiency standards for plumbing fixtures and appliances combined with local conservation programs. Nationally, an analysis by Lawrence Berkeley National Laboratory found that in 2024 alone, federal efficiency standards reduced utility bills by $105 billion, saved the typical household $576, and conserved 1.7 trillion gallons of water—roughly 12 percent of total U.S. public water supply withdrawals in 2015.

Unfortunately, the Department of Energy has proposed rolling back efficiency standards for multiple products, and congressional legislation has been introduced that would do the same. These proposals directly conflict with Reclamation's stated goal of reducing CRB water use. As basin communities promote water-efficient products and offer rebates to accelerate adoption, weakening standards would allow high-flow products back into the marketplace and undermine progress. AWE strongly urges the Department of Energy and Congress to preserve existing federal water efficiency standards.

Preserve State Authority to Adopt Stronger Standards

Eighteen states—including California, Colorado, Nevada, and Utah—have adopted water efficiency standards or building codes that exceed federal minimums. Products sold in neighboring CRB states often meet these same standards because of how manufacturers and retailers source products. These standards are typically aligned with WaterSense specifications or California performance requirements. Products meeting these standards save water and are widely available, competitively priced, and proven to perform well.

The Department of Energy, in response to a presidential memo, has indicated they may revise regulations in order to prevent stronger state standards. Potential changes to federal preemption rules could significantly reduce water savings in the CRB and nationwide. State authority has been an essential complement to federal standards, a driver of innovation in the marketplace, and an opportunity for local, tailored solutions. AWE urges the Administration and the Department of Energy to preserve states' ability to adopt and maintain stronger water efficiency requirements.

Sustain Funding for ENERGY STAR and WaterSense

ENERGY STAR and WaterSense are voluntary labeling programs that identify high-efficiency appliances and plumbing products. Manufacturers choose to have products independently certified for efficiency and performance, and tens of thousands of products now carry these labels. These programs have delivered significant water and energy savings across the country, including throughout the CRB, while reducing consumer utility bills.

Both programs have long enjoyed bipartisan congressional support and broad backing from utilities, manufacturers, and industry associations. However, media reports and public statements from the Trump Administration have suggested one or both programs could be weakened or even eliminated. Thankfully, Congress voted to sustain funding for both programs in 2026.

Given their proven record and cost-effectiveness, AWE encourages the Administration and Congress to provide stable, long-term support for ENERGY STAR and WaterSense as integral components of national water and energy policy.

Conclusion

The Post-2026 Guidelines represent a critical opportunity to align Colorado River operations with hydrologic realities. Achieving durable basin stability will require not only new shortage allocation rules, but also a comprehensive federal commitment to reducing water demand through efficiency, conservation, reuse, and sustained programmatic support.

Thank you for considering these comments. We would welcome the opportunity to discuss these recommendations further.

Sincerely,

Ron Burke
President and CEO
Alliance for Water Efficiency