



SIERRA CLUB

LONE STAR CHAPTER

To: Texas Water Development Board
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Via email

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Re: **Public Comments on the 2027 State Water Plan – Phase I**

Dear Members of the Texas Water Development Board,

Sierra Club Lone Star Chapter, representing more than 21,000 members across Texas, submits the following comments to the Texas Water Development Board (TWDB) in response to the public comment period regarding the Draft 2027 State Water Plan. As the state chapter of the nation's oldest and largest conservation organization, we have long been engaged in water planning and policy issues affecting Texas communities, water resources, and ecosystems.

We are also a member of the Texas Living Waters coalition and support the coalition's comments submitted separately. Our comments below reinforce several of the broader concerns while also providing additional perspectives that reflect the water priorities the Lone Star Chapter has been actively working on across the state. We appreciate the opportunity to provide our input.

We recognize the enormous amount of work and coordination that went into the development of the Draft 2027 State Water Plan, and appreciate the TWDB's efforts to help ensure reliable water supplies for Texans in the decades ahead. We would like to particularly thank the TWDB for creating an interactive online version of the plan, which provides accessible data from every region of the state.

With water conservation and reuse accounting for approximately 43% of the projected strategy supplies by 2080, it's encouraging to see the continued emphasis on these cost-effective and sustainable water management approaches. As our water supplies become more strained and new infrastructure projects become more expensive and complex, we believe that Texas should continue prioritizing the strategies that help reduce demand and make better use of the water that we already have.

We appreciate that the Plan recognizes aquifer depletion and increasing stress on groundwater resources as major drivers of declining water supplies in Texas. We are also encouraged by the inclusion of several legislative recommendations aimed at improving groundwater planning and management, including better guidance for groundwater conservation districts (GCDs), incorporation of drought conditions into groundwater planning, improved groundwater data systems, and development of tools to better evaluate socioeconomic impacts.

However, we believe that several aspects of the Draft Plan deserve closer attention.

Planning around historical drought is no longer enough. While the methodology behind the state water planning process is robust, the planning process still relies on the drought of record from the 1950s. Our concern is that this approach doesn't account for future climate realities. Texas is already experiencing hotter temperatures, more extreme heat, and increasing weather variability that continue to exacerbate water shortages and placing additional stress on our rivers, reservoirs, aquifers, and ecosystems. We believe state water planning should rely more on the best available science, including climate science and future drought projections, as opposed to relying on historical weather patterns.

Heavy reliance on reservoirs raises concerns. According to the Draft 2027 State Water Plan, reliance on surface water supplies continues to dominate water management strategies in Texas, despite the growing impacts of hotter temperatures and changing climate. About 36% of future water supply strategies rely on surface water supplies, much of it associated with existing and future reservoirs. While reservoirs remain an important part of the state's water supply infrastructure, they also experience significant evaporative losses, especially during periods of extreme heat and drought. For example,

TWDB reported that during the 2011 drought Texas reservoirs lost more water to evaporation than the total amount of municipal water statewide.¹ In addition, reservoirs are high-impact projects that flood large areas of productive farmland, forests, wildlife habitat, and sometimes entire rural communities. These potential tradeoffs point back to the importance of investing in strategies that are more sustainable and cost-effective, like conservation, reuse, loss reduction, and aquifer storage and recovery.

A major gap in the Draft 2027 State Water Plan: water demand by data centers isn't included. We're concerned about the missing projections for data center water demand. According to the Houston Advanced Research Center (HARC), data centers in Texas already use an estimated 25 billion gallons of water each year, and that number could increase to as much as 161 billion gallons annually by 2030.² Yet the state water planning process relies on historical reported water use, while data centers are currently not required to report projected water demand or where that water would come from. At the same time, major new data center projects continue to be announced and developed across the state, including in already water stressed regions. Given the rapid pace of this growth and the state's 5-year water planning cycle, waiting until the next planning cycle to address this issue seems shortsighted and could leave communities unprepared for potential water demand increase. Texas can't afford to ignore the growing water demand by data centers and should urgently develop more proactive reporting and demand projection requirements to help regional planning groups, communities, and state agencies better prepare for this rapidly expanding industry.

Texas should plan for water supply and wastewater infrastructure together. As Texas increasingly relies on water use and other strategies that depend on wastewater treatment systems, it becomes more important to consider wastewater infrastructure as part of water planning. We appreciate that the 89th Legislature directed TWDB through SB 7 to study the feasibility of incorporating wastewater planning into the state water planning process and look forward to the result of that study later this year. Moving forward, we strongly encourage the agency to integrate water supply and wastewater planning and infrastructure wherever practical as Texas communities depend on both systems, and planning for them together would provide a more complete picture of future infrastructure needs and funding priorities. With water reuse already such an integral part of the water plan, it only makes sense to look at them holistically.

¹ *Evaporative Losses from Major Reservoirs in Texas*. Technical Note 21-01, Texas Water Development Board, 2021 https://www.twdb.texas.gov/publications/reports/technical_notes/doc/TechnicalNote21-01.pdf

² *Thirsty Data and the Lone Star State: The Impact of Data Center Growth on Texas' Water Supply*. Margaret Cook, Houston Advanced Research Center, 2026 <https://harcresearch.org/wp-content/uploads/2026/01/Thirsty-Data-Water-Use-and-The-Projected-Data-Center-Boom-in-Texas.pdf>

The state planning methodology may overlook potential water savings from renewable energy and trends in power generation. Thermal power generation remains a major water user in the state. According to a recently published report, thermal power plants in Texas – including coal, gas, and two nuclear plants – have consumed roughly 100 billion gallons of water every year since at least 2015.³ Compared to renewable energy sources such as wind and solar, traditional steam-electric power plants require significantly larger volumes of water for cooling. While the current planning methodology generally assumes relatively stable water demand from steam-electric power generation through 2080, coal plant retirements and renewable energy expansion could create opportunities for significant future water savings. We believe these potential water savings deserve more consideration as we plan our future water supplies. TWDB should also work with TCEQ to determine where water rights currently utilized or reserved by these thermal power plants might be able to be utilized for other water needs, as well as environmental flows.

Texas must be strategic as it prioritizes public dollars for water solutions. The estimated cost of recommended projects and strategies in the Draft 2027 State Water Plan has more than doubled since the previous plan, reaching \$174 billion. At that price tag, Texas needs to be more strategic about where and how it uses public funding. As major new state funding unlocked by Proposition 4 begins supporting implementation of the Plan in 2029, we believe the state should continue prioritizing cost-effective and sustainable approaches like water conservation, water reuse, water loss reduction, and aquifer storage and recovery before moving toward increasingly expensive infrastructure projects (e.g., seawater desalination or statewide conveyance). It's important that Texas makes sure public dollars are funding projects that are necessary, sustainable, and beneficial for all Texans. Additionally, as implementation of the Plan moves forward, Texas should continue prioritizing funding for communities that still lack adequate water and wastewater infrastructure. Initiatives like the Economically Distressed Areas Program (EDAP) remain an important tool for helping ensure that all Texans have access to safe and reliable water service.

For water decisions to benefit all Texans, public participation in state water planning should be more accessible for all. One of the unique strengths of Texas water planning is that it is designed to incorporate local perspectives through regional planning groups and public participation. Because the decisions made through this process affect communities across the state, we believe TWDB should continue finding ways to make participation in water planning easier and more accessible for all Texans. This includes

³ *Watts Wasting Texas Water*. Lindsay Mader & Noah Ver Beek, Sierra Club, 2026
https://www.sierraclub.org/sites/default/files/2026-05/texaswaterreport_final.pdf

providing materials in plain language, expanding outreach efforts, and creating more opportunities for Spanish-speaking communities to engage. Texas is home to 7.8 million residents who speak Spanish at home⁴, and many historically underserved communities most affected by water infrastructure challenges are located in predominantly Spanish-speaking areas. Expanding outreach and engagement opportunities in Spanish would help ensure that a broader range of Texans can participate in decisions that affect their water access and availability. We also encourage TWDB to explore opportunities to use the statewide water awareness campaign to create more opportunities for Spanish-speaking Texans to better understand how water planning works and how they can engage in the process.

Development of seawater desalination in Texas shouldn't outpace policy and science.

Regional water plans that informed the Draft 2027 State Water Plan identified 8 seawater desalination projects with an estimated cost of \$11.2 billion, nearly four times the cost of 7 seawater desalination projects included in the 2022 State Water Plan. While we understand why interest in seawater desalination is growing in Texas, this strategy remains expensive and raises numerous questions about energy use, marine ecosystems, and impacts on coastal communities. Texas has already recognized some of these concerns through previous seawater desalination discussions and a Texas-specific study following the passage of HB 2031 (84th Legislature), which identified environmentally protective intake and discharge practices, including siting infrastructure at least 3 miles offshore to reduce impacts on coastal ecosystems.⁵ However, these recommendations have proven expensive to implement, and no proposed seawater desalination project has followed them to date. At the same time, Texas still lacks water quality standards for salinity to protect bays and estuaries from concentrated brine discharges. We believe Texas should prioritize addressing these policy gaps to make sure that the state's efforts to address water deficit don't come at the expense of Texas coastal communities, ecosystems and the economies that depend on them. Until then, Texas should continue prioritizing water management approaches that make better use of existing water supplies (e.g., water conservation, reuse, loss reduction).

We appreciate the opportunity to provide our comments on the Draft 2027 State Water Plan and look forward to continued collaboration with TWDB on Texas water planning.

⁴ Census Bureau Estimates 1 in 3 Texans Speak a Language Other Than English at Home. KXAN, 2023. <https://www.kxan.com/news/texas/census-bureau-estimates-1-in-3-texans-speak-a-language-other-than-english-at-home/>

⁵ Texas Parks and Wildlife Department (TPWD) & Texas General Land Office (GLO). September 2018. *Marine Seawater Desalination Diversion and Discharge Zones Study*. Prepared pursuant to HB 2031, 84th Texas Legislature. <https://tpwd.texas.gov/publications/pwdpubs/media/hb2031dz.pdf>