

REGION C WATER PLANNING GROUP

Senate Bill One Sixth Round of Regional Water Planning - Texas Water Development Board

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April 8, 2025

Jim Thompson

Chair, North East Texas (Region D) Water Planning Group
c/o Riverbend Water Resources District
228 Texas Avenue, Suite A
New Boston, TX 75570

Dear Mr. Thompson:

The Region C Water Planning Group is aware that Region D has posted an agenda item for its April 9, 2025, meeting related to potential declaration of an “interregional conflict” between our respective regions. As appointed representatives of Region C’s stakeholder interest groups and given our duty to provide for the substantial future water needs of millions of Region C residents, businesses and communities, we are obligated to formally object to Region D’s potential declaration.

We appreciate Region D’s efforts to proactively coordinate up to this point, including during our meetings last September and October. We continue to hope that we can avoid any such conflict and are willing to continue coordination with Region D.

We have heard the concerns expressed by Region D residents and other regional stakeholders. Region C’s water providers and water users continue to make better use of existing water supplies and to explore innovative approaches. This includes our state-leading and nationally regarded emphasis on *water conservation and reuse* – which now accounts for 33% of Region C’s total planned 2080 water supplies, as well as 45% of the new water supplies coming from our Initially Prepared Plan’s (IPP) recommended strategies.

Factoring in all of the water conservation and reuse strategies in the new Region C IPP, North Central Texas’ regionwide municipal water use would fall from 114 gpcd in 2030 to a remarkable 95 gpcd by 2080. It is also noteworthy that, with 26% of the state’s population and 30% of the state’s economic activity today – and even before implementing future conservation and reuse strategies – Region C is responsible for less than 10% of Texas’ annual water use.

Despite all of this, water conservation and reuse will not be enough to meet the needs of 15.1 million future Region C residents, which is why Region C will need to develop additional water supplies, including supplies outside of our region.

The Marvin Nichols Reservoir remains an essential option in our IPP, as do a diverse array of many other water management strategies – over 170 such strategies, in fact. We have also listened to our neighbors in Region D by delaying the planned development of the Marvin Nichols Reservoir as long as possible, until 2060, in Region C’s new IPP.

In the development of the Region C Water Plan, Region C has honored the integrity of Region D's water resources and does not recommend strategies that would conflict with other water providers. There is sufficient water in the Sulphur River Basin to meet Region D's water needs and provide additional supply to Region C. In fact, of the total firm yield of the Marvin Nichols Reservoir, 20 percent is identified to remain in the area (Sulphur River Basin) for local use.

Region C has also conducted its due diligence in evaluating the impacts of the proposed projects on economic, agricultural, and natural resources in Region D. No other single water management strategy in the State Water Plan has been studied with such comprehensiveness. These studies clearly support Region C's position that there are no substantial adverse impacts.

The economic impacts of the Marvin Nichols Reservoir would be largely beneficial, not detrimental, to Region D. The agricultural impacts are relatively limited compared to Region D's overall harvestable timber potential and its widespread farming and ranching activity. The natural resources impacts are also relatively limited and can be largely mitigated – or can be appropriately addressed during the permitting process.

Ultimately, Texas' regional water planning process and the State Water Plan are simply long-term resource planning efforts to identify potential new water supplies for the future growth of Texas. As we understand it, it is not the place of this process to eliminate options. The viability and merits of any particular project will be – and should be – determined during the detailed studies and permitting phases for development.

Because the state and federal government have in place a system that appropriately and adequately addresses the concerns of Region D, Region C strongly feels that the recommended projects in the Region C Water Plan should be allowed to proceed through this normal process.

We request that Region D refrain from asserting an "interregional conflict" and prematurely attempting to deprive Region C of this necessary, reasonable water supply option that will help ensure a better future for all the people, businesses, and communities of Texas.

Sincerely,



Dan Buhman
Chair, Region C Water Planning Group

Cc: Bryan McMath, Executive Administrator, TWDB
Kevin Smith, Region C Project Manager, TWDB
Elizabeth McCoy, Region D Project Manager, TWDB