



September 15, 2020

Ms. Suzanne Scott, Chair
Interregional Planning Council
P.O. Box 13231
Austin, Texas 78711-3231

Via email: sbscott@sara-tx.org; Melinda.Smith@twdb.texas.gov

Re: Comments of the Texas Water Supply Partners on the Draft Interregional Planning Council Report to the Texas Water Development Board

Dear Chair Scott:

On behalf of the Texas Water Supply Partners ("TWSP"), I want to thank you, the other 15 members of the Interregional Planning Council ("IPC"), and the Texas Water Development Board ("TWDB"), for your exceptional work during the inaugural meetings of the IPC. You have all dedicated a tremendous amount of time to the IPC process, and your deliberations will result in a report that will benefit state water planning for decades to come. The TWSP appreciate the opportunity to provide comments on the Draft IPC Report ("Draft Report").

The TWSP are a group of like-minded entities who share a commitment to advancing and influencing state policy related to the development of water supplies throughout Texas, including implementation of the Texas State Water Plan. Our partners recognize that clean, affordable, reliable supplies of water are essential to public health, quality of life, and the economic prosperity of our great state. Members of TWSP include: North Texas Municipal Water District, San Jacinto River Authority, Texas Business Leadership Council, and Upper Trinity Regional Water District.

The IPC process confirmed that our nationally-acclaimed state water planning process is working well at the regional level, as designed by the Legislature via passage of Senate Bill 1 ("S.B. 1") in 1997. Within the water planning process, however, there is sometimes a struggle to create strategies that reach beyond the individual 16 regions of the state. As such, interregional projects, and those that benefit the state as a whole, remain limited. In addition, challenges associated with interregional conflicts ("IRCs") persist.



Interregional Conflicts

The IPC deliberated about the definition of an IRC, “who” should resolve IRCs, and how the process of doing so could be improved. The TWSP agree with the IPC’s observation that a statutory definition of an IRC should be considered.

The TWSP recommend that the Legislature provide a definition of an IRC in statute and clear direction and authority to the TWDB with respect to resolving IRCs to enhance the stability and effectiveness of the regional water plans. As long as ambiguities remain with respect to resolving IRCs, our state water planning process will be vulnerable to resolution by the judicial system, which the TWSP would argue should be the venue of last resort.

Interregional/Visionary Projects

The IPC Draft Report notes that “state water planning prior to S.B. 1, attempted to address state water resources...” and that “multi-regional and large-scale projects are not a focus within the existing regional water planning process.” Further, the IPC Draft Report recommends that the TWDB amend their rules to authorize the regional water planning groups to identify long-range, visionary projects that extend beyond the 50-year planning horizon and benefit multiple regions. The TWSP commend the IPC for their commitment to planning beyond the current planning cycle and for considering ways to advance visionary projects that benefit multiple regions or the state as a whole.

Prior to the initiation of regional water planning with the passage of S.B. 1, the TWDB produced many studies that included large-scale, visionary projects serving vast geographic areas of the state. The regional water planning process has proved extremely effective at meeting the water needs of the individual planning regions, but perhaps we have lost some of the statewide perspective that the planning experts at the TWDB provided. The TWSP believe that the best approach for encouraging the identification and development of interregional or statewide projects is through an additional planning process or “module” that supplements the current regional planning process. We believe this new statewide planning module would not in any way replace or interfere with the current regional planning process or impact the current strategies in the plan, but it would instead supplement the current process and allow the planning experts at the TWDB to look beyond the regional process to consider larger-scale projects and potentially longer planning horizons.



Funding of Interregional Planning

Finally, if the IPC is to continue to function in a manner consistent with the inaugural IPC, the TWSP would urge the Texas Legislature to make an appropriation to support the TWDB's facilitation of the IPC process. The members of the IPC and the TWDB invested an extraordinary amount of time and resources in the process and identified a number of areas where additional funding would enhance the work of the IPC and the state water planning process, as a whole. The TWSP wholeheartedly support an investment of general revenue to support these efforts.

We thank you for your balanced leadership as Chair of the IPC, and commend all of the parties for their time, dedication, and vision throughout the IPC process. The TWSP look forward to working closely with the members of the IPC, TWDB, and the Legislature to implement IPC recommendations during the upcoming Legislative Session.

Once again, thank you all for your time and dedication to the future of Texas water and our great state.

Sincerely,

A handwritten signature in blue ink that reads "Heather L. Harward". The signature is fluid and cursive.

Heather L. Harward
Texas Water Supply Partners

cc: The Honorable Lyle Larson, Chair, HNRC
The Honorable Dawn Buckingham, State Senator, District 24
Mr. Jeff Walker, Executive Administrator, TWDB
Ms. Suzanne Schwartz, Facilitator, IPC