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### **TEXAS: State water plan said lacking in conservation**

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Some 96 percent of the public comments submitted on Texas' state-wide comprehensive water plan point out shortcomings in conservation and fish and wildlife habitat protection, environmental groups say, though they acknowledge any major changes to the plan may still be years away.

The public comment period on "Water for Texas 2002" ended Nov. 12, and environmentalists say they have analyzed the 2,000 comments submitted to the Texas Water Development Board. The public points out two major problems with the \$108 billion plan, which addresses water usage in Texas through 2050, said Susan Kaderka, director of the National Wildlife Federation's Gulf States division. "The regional plan and state water plans did not adequately use water conservation as supply strategy," said Kaderka. The groups consider conservation to be the most environmentally friendly and least expensive supply option, she said. Kaderka also said the plan failed to address in-stream flows and the water needs of fish and wildlife.

"More and more water will be demanded by growing urban areas," added Mary Kelly, executive director of the Texas Center for Policy Studies. "If we don't manage that demand wisely, fish and wildlife resources and rural economies that rely on those resources could be damaged irreparably. That doesn't have to happen if the board will just listen to what the general public is saying."

The groups also said the public disapproved of some of the dams and pipelines for which the plan allots \$17 billion. "As the comments indicate, ordinary Texans understand that what we have now is largely an engineer's wish list of potential projects instead of a comprehensive plan for managing the state's water resources," said Mark MacLeod of Environmental Defense.

In October, NWF released a list of what it called "expensive and inappropriate state water projects," including the \$1.7 billion Marvin Nichols Dam. NWF and other environmental groups say the need for some of these projects could be met by better water conservation.

Carla Daws, spokeswoman for the state water board, said she had no numbers indicating that 96 percent of the public comments were opposed to the plan, though many called for more conservation. "We feel the plan provided appropriate consideration for flows needed for fish and wildlife, conservation was significantly included and the plan protects the natural resources of Texas," said Daws. Based on the comments, TWDB will update the draft of the plan put out for review, she said. Though Daws could not comment on the specific changes being made, she said they were mostly "project-specific."

The water plan appeared to include a great deal of public involvement. After the Texas state legislature authorized creation of the plan in 1997 after indications the state's population will double by 2050, it directed TWDB to implement more public participation and local decision-making. "Water for Texas 2002" includes 16 regional plans.

"We recognize this is a first effort at planning on a regional basis," said Kaderka of NWF. Given that the plan is revised every five years, and a new cycle is beginning, Kaderka said the groups don't expect TWDB to make major changes to the plan until the next set of revisions begins. The groups' main concern is that the larger projects -- like the Marvin Nichols Dam -- aren't started immediately. "What we're saying is we don't want the state to implement the plan before this stuff is fixed," said Kaderka. "Don't fund it until you fix it."

Five of the 16 regional planning groups have already contacted NWF to work on revising local aspects of the plan, according to Kaderka.