



July 18, 2025

Mark Evans, Chair, RHWPG
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Via email at info@regionhwater.org

Cc: Philip.Taucer@freese.com

RE: Region H Water Planning Group - 2026 Initially Prepared Plan (IPP)

Dear Chair and Members of the Region H Water Planning Group,

Bayou City Waterkeeper (BCWK) appreciates the opportunity to provide comments on the 2026 Initially Prepared Plan (IPP) for Region H. As an organization advocating for water issues in the Lower Galveston Bay Watershed dedicated to safeguarding the quality of the waters, protecting the vital wetlands and coastal ecosystems, and advocating for equitable access to clean water and resilient infrastructure, we recognize the critical importance of this regional water plan.

I. Introduction

We commend the Region H Water Planning Group for their diligent efforts in developing a plan to address the many complex water challenges facing our region. Our comments aim to support and enhance the IPP by highlighting strategic shifts and targeted investment that will ensure the long-term water security and resilience for all of Region H, such as: prioritizing water conservation and infrastructure repairs, embracing multi-benefit nature-based solutions, and ensuring robust environmental protections for water quality and ecosystems. We aim to support and enhance

II. Foundational Principles for Water Planning in Region H

A. Embrace a holistic and integrated water management approach

The Region H plan must adopt a truly holistic approach to water management, recognizing the intrinsic links between different water systems, water supply, and environmental health. The IPP has a recommendation to work with utilities and planners on One Water management limitations, but it does not specify comprehensive assessment of the different water systems. To fully leverage this, we recommend that the TWDB develop standardized "One Water" assessment frameworks. These frameworks should integrate drinking water,

stormwater, and wastewater planning, to provide a comprehensive view of how water challenges can be addressed and managed across all sectors of Region H.

B. Prioritize Nature-Based Solutions (NBS) for efficient water management

The IPP should incorporate nature-based solutions to build long-term resilience, enhance water quality, support groundwater recharge, and protect vital ecosystems in Region H. These approaches offer holistic benefits that contribute to both water supply reliability and environmental health.

C. Adopt a worst-first prioritization assessment in infrastructure improvements

The plan should adopt a worst-first assessment when prioritizing infrastructure improvements in communities that have been disproportionately impacted by water quality issues and aging water and wastewater infrastructure. This can include criteria for prioritizing projects that demonstrably benefit environmentally-impacted communities, establishing requirements for robust community engagement and input in project design, and dedicated funding thresholds for projects in those areas.

D. Uphold transparency and robust public engagement

Transparency and public engagement are critical for the successful implementation and ongoing adaptation of the regional water plan. The planning group should ensure that all regional stakeholders, including community members, utilities, and local government entities, have meaningful opportunities to provide input and access information that will foster more effective outcomes for the plan.

III. Needs and Water Management Strategies

A. Needs

We recommend that the planning process consider whether the current 'needs' calculations fully reflect the water supply potential of implementing proven, cost-effective conservation strategies before determining demand deficit. When water loss is effectively managed, [the overall demand for new water supplies for the entire region decreases](#), preserving resources and reducing pressure on existing water systems.

B. Conservation: maximizing sustainable and cost-effective water supply

BCWK firmly believes that maximizing all forms of water conservation, alongside water reuse, should be the top priority in the regional water plan. This is one of the most impactful paths to securing our water future without resorting to environmentally damaging and costly new sources. The IPP highlights conservation as “a prime project choice” due to its low cost, scalability, minimal environmental impacts, and ability to avoid much more expensive new infrastructure projects. The IPP itself provides evidence as Municipal Conservation (Water Loss Reduction) is identified as capable of yielding a significant 89,367 acre-feet annually at the cost-effective unit cost of \$761 per acre-foot.

As a major industrial nexus, Region H exhibits substantial water demand from its manufacturing sectors, making their efficiency improvements vital. We are pleased to see industrial conservation included as a recommended strategy, a positive step from the previous plan. By aggressively pursuing water loss reduction, industrial efficiency, and other forms of conservation and reuse, the region can reduce the overall demand for new, often environmentally impactful water sources like large reservoirs, thereby protecting our natural waterways and ecosystems.

BCWK holds a firm belief that we must address comprehensive system repair and optimization before embarking on new, large-scale water supply projects. Addressing our aging infrastructure first ensures efficient use of our current resources, minimizes environmental impact, and provides a more sustainable and resilient base from which to meet the demands of a growing population.

C. Prioritizing water quality and ecosystem health

We commend the recognition of the IPP's focus on important water quality aspects and its reference to impaired waterways. The IPP correctly identifies wastewater discharges and stormwater runoff as significant contributions to waterway pollution. This provides a strong basis for prioritizing Nature-Based Solutions (NBS) and Green Stormwater Infrastructure (GSI) to reduce pollution at its source, and address aging wastewater and stormwater infrastructure. Furthermore, the plan acknowledges that sand mining has led to increased pollution and harmful algae blooms in the San Jacinto River; specific WMS or regulatory recommendations are needed to mitigate these impacts and prioritize the river's ecological health. Concerns also arise with interbasin transfer, which the IPP notes can alter water quality, impact habitats, and introduce invasive species like zebra mussels. We urge robust environmental safeguards and a thorough evaluation of less impactful alternatives.

D. Coastal desalination requires rigorous environmental review and prioritization of less impactful alternatives

While the IPP states that the inclusion of coastal desalination as a surface water development project “does not affect other WMSs and impacts only the salinity levels in the area of discharge” and that “the discharge water will be blended with and diluted by other water before discharge”, BCWK has concerns about the potential for environmental harm, particularly to our coastal ecosystems. Coastal desalination plants draw in vast amounts of seawater, which can lead to the impingement and entrainment of marine organisms, trapping and killing fish larvae, eggs, and other aquatic life vital to the health of our bays and estuaries. The discharge of highly concentrated brine back into coastal waters can increase local salinity levels, deplete oxygen, and introduce harmful chemicals used in the treatment process. [Significantly altering salinity levels or water circulation in the bays and through these passages](#) could harm aquatic life and negatively impact Texas' coastal economy as a result.

Beyond these direct ecological threats, coastal desalination also carries concerns regarding high costs and intensive power demands. The IPP's own figures in Table 5-5 highlight that the GCWA Coastal Desalination project is projected to yield 22,400 acre-feet annually at a unit cost of approximately \$2,207 per acre-foot. This is nearly three times the unit cost of water loss reduction for significantly less volume. We urge the planning group to:

- **Prioritize comprehensive, independent environmental impact assessments for any proposed desalination project**, fully evaluating intake impacts, brine discharge effects on sensitive habitats, and the overall ecological footprint.
- **Require the use of best available technologies** for intakes to minimize harm to marine life, and for brine disposal methods that ensure maximum dispersion and minimal ecological impact, even if these options are more costly.
- **Compare the environmental and economic costs of coastal desalination against less impactful alternative water sources** such as expanded conservation, advanced water reuse, ensuring that desalination is only pursued as a last resort after all other economic and environmental sustainable options have been exhausted.

E. Infrastructure investment: wastewater and stormwater

We advocate for stronger commitments within the plan for wastewater and stormwater infrastructure improvements, recognizing the direct link between aging systems and water quality degradation. This includes leveraging wastewater reuse data for supply-side planning and ensuring broader system resilience. We also urge a shift towards comprehensive stormwater management strategies that focus on alternative solutions like GSI to reduce runoff volume and improve water quality at the source. The IPP should prioritize hybrid projects that can offer multiple benefits. We encourage the planning group to look to local successes, such as the conservation and surface water conversion efforts driven by subsidence planning in the Houston area, and to consider available data on local wastewater reuse projects or water loss mitigation efforts as models for regional replication.

IV. Legislative, Administrative and Funding Recommendations

A. Legislative recommendations

We commend RHWPG's legislative recommendation for expanded funding support for water loss mitigation programs, but should be strengthened further given that water loss represents a substantial cost-effective water management strategy. The plan should also recommend specific legislative targets for water loss reduction. [Current data shows statewide losses averaging 51 gallons per connection per day](#); addressing this could yield supply equivalent to multiple reservoir/"new water" projects.

RHWPG's recommendation on interbasin transfers suggesting Legislature to "remove unnecessary and counterproductive barriers" lacks environmental protection language. [Any](#)

[legislative changes should maintain robust environmental flow protections](#) and comprehensive ecological/environmental impact assessments for proposed transfers.

We strongly support the recommendation for additional bay and estuary program funding. This should be enhanced to specifically prioritize nature-based solutions that provide multiple benefits and are cost-effective compared to traditional gray infrastructure.

The legislative recommendations do not address climate resilience, which might serve as a critical gap given increasing extreme weather events in Texas, including the most recent Texas Hill Country floods, last year's San Jacinto River floods, and the high incidence of flooding across Region H. The plan should recommend legislation requiring climate impact assessments for all water infrastructure investments and prioritizing projects that increase system resilience to extreme weather events.

B. Funding recommendations

We strongly support RHWPG's recommendation to increase SRF program funding and expand coverage for capacity increases. BCWK's analysis and discussions with Region H entities such as the City of Houston have shown current SRF programs often fail to reach disadvantaged communities due to certain eligibility, financing, and/or application requirements. We recommend that SRF expansion incorporates increased grant opportunities for disadvantaged communities and technical assistance for pre- and post-application processes.

The recommendation to provide TA grants for desalination advancements should include environmental impact assessments and protections.

V. BCWK's Key Recommendations for Plan Revisions and Additions

Bayou City Waterkeeper urges the Region H Water Planning Group to incorporate the following key revisions and additions into the 2026 IPP:

- Add specific language that requires the consideration of environmental benefits and negative impacts for all proposed projects and water management strategies.
- Add a dedicated section that details how the plan will address and prioritize projects on a worst-first assessment.
- Add language that outlines how SB7's wastewater planning directives will be integrated into the plan and reshape management planning.
- Develop a robust framework for the evaluation of water loss mitigation and reuse projects as viable and prioritized water management strategies.

V. Conclusion

Bayou City Waterkeeper believes that by adopting a more holistic and environmentally responsible approach through these recommendations, the 2026 Region H Water Plan can secure a sustainable and resilient water future for all its residents and invaluable ecosystems. We look forward to collaborating with the Region H Water Planning Group to achieve the shared vision of ensuring healthy and abundant water systems for many generations.

Thank you for your consideration. Please do not hesitate to contact Guadalupe Fernandez at guadalupe@bayoucitywaterkeeper.org or Usman Mahmood at usman@bayoucitywaterkeeper.org with any questions or concerns.

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