May 29, 2025

Faisal D'Souza
Technical Coordinator
Networking and Information Technology Research and Development (NITRD)
National Science Foundation
2415 Eisenhower Avenue, Alexandria, VA 22314

RE: **Request for Information: Development of a 2025 National Artificial Intelligence Research and Development Strategic Plan Docket ID No. NSF-2025-OGC-0001**

Dear Mr. D'Souza,

We write today on behalf of the Association of California Water Agencies (ACWA) and the Texas Water Association in response to the White House Office of Science and Technology Policy (OSTP) and the National Science Foundation (NSF) NITRD NCO request for information regarding the development of a 2025 National Artificial Intelligence Research and Development Strategic Plan (AI Strategic Plan). Artificial Intelligence (AI) offers many potential societal, strategic, and economic benefits to the nation. These benefits do not occur in a vacuum and AI also presents potential challenges that need to be considered and managed. We write to request that the NSF consider the connection between and AI water supply as part of the AI Strategic Plan.

ACWA is the largest statewide coalition of public water agencies in the country. ACWA's more than 470 member agencies are responsible for delivering about 90 percent of the water to communities, farms, and businesses in California. ACWA represents water management entities in every sector of water supply including municipal and agricultural water, water recycling, water reuse, wastewater management, and stormwater management. For more than a century, ACWA and its members have been working to provide high quality, reliable water supplies in an environmentally sustainable and fiscally responsible manner.

The Texas Water Association (TWA) is a statewide water policy association focusing on water supply and management. TWA's members include river authorities, municipalities, all types of water districts, including flood, irrigation, water supply, and drainage, as well as water users and those that support the water industry. Collectively, TWA members provide water or wastewater services to the vast majority of Texans.

California and Texas are two of the top three states in the nation that are experiencing data center growth. As of May 16, 2025, there are 277 data centers operational in California and 275 data

centers operational in Texas. Additionally, there are more than 100 data centers (35 in California and 69 in Texas) in the planning or construction phase of development[1].
Water and AI are inextricably linked as water is one of the most used media for cooling data center servers. As the number of data centers and AI use have grown over the last decade water use associated with data centers has tripled[2].

Recognizing the important connection between AI and water supply we recommend the AI Strategic Plan consider the following elements:

1.) Include a focus on expanding the understanding of AI's impact on water supplies.
2.) NSF outreach to water providers across the nation to develop a network of water managers in areas that are experiencing data center growth.
3.) Encourage the exploration and adoption of water efficient practices at data centers.

Every community and every industry, from tech to agriculture, relies on water. Meeting future water and technology needs will require comprehensive thoughtful solutions to ensure that our nation retains its position as a technological leader and ensures Americans continue to have access to safe, reliable and affordable supplies of water. Considering the connection between AI and water in the AI Strategic Plan will help ensure both goals can be achieved.

ACWA and TWA thank you for providing the opportunity to comment and for considering the perspective of water providers. If you have any questions or would like to follow up on this matter, please contact ACWA Director of Federal Relations, Ian Lyle, at ianl@acwa.com or (202) 434-4765 or Texas Water Association Executive Director, Stacey Allison Steinbach at ssteinbach@texaswaterassociation.org or (512) 472-7216.

Respectfully,

Marwan Khalifa
Interim Executive Director
Association of California Water Agencies

Stacey Allison Steinbach
Executive Director
Texas Water Association

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[1] Allen, Catherine, Izuaguirre, Rosmery, Hellmuth, Claudine, "AI data centers expected to spike demand for electricity, water", *Politico*, May 21, 2025

[2] "Thirsty for power and water, AI-crunching data centers sprout across the West." Stanford University, April 8, 2025 https://andthewest.stanford.edu/2025/thirsty-for-power-and-water-ai-crunching-data-centers-sprout-across-the-west/