



Trout Unlimited Policy Framework for Responsible Data Center Development

Purpose

Trout Unlimited (TU) recognizes the rapid siting and expansion of data centers pose growing risks to coldwater ecosystems. The buildout and operation of these facilities can strain freshwater resources, increase thermal and hydrologic stress on rivers and aquifers, and drive land conversion that fragments habitats and degrades the health of our waterways.

As legislators, regulators, and communities navigate the rapid growth of this industry, TU offers the following guidance grounded in our longstanding expertise in coldwater fisheries science and watershed conservation. This direction draws from TU's longstanding policies on water, climate, forests, responsible energy development, hydropower, and critical minerals, all of which prioritize avoiding, minimizing, and where necessary, mitigating the impacts of development on rivers and streams.

TU's policy balances national consistency with local flexibility. TU will provide conservation guidance, while state and local chapters apply these principles to their specific contexts. Together, this framework ensures proposed data center siting, design, construction, mitigation, operation and eventual decommissioning proceed in ways that avoid and minimize harm and support TU's advocacy on behalf of trout and salmon waters.

Policy Position and Core Principles

TU's guidance for responsible data center development is grounded in five core principles:

- **Smart siting**

Where data centers currently operate within Priority Waters, TU supports voluntary water stewardship partnerships that measurably benefit impacted watersheds. Where data centers are proposed, TU offers the following guidance for responsible siting and development.

Data centers should avoid headwaters, riparian areas, wetlands, floodplains, groundwater-dependent systems, aquifer recharge zones, and other sensitive coldwater habitats. Development should prioritize brownfields, previously disturbed lands, and sites with existing infrastructure—but only where ecological and hydrologic risks are low. TU may oppose projects that threaten TU's Priority Waters or other high-value coldwater resources.

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In areas with anadromous fish or migratory resident trout species, data center development should not increase regional dependence on federally operated or licensed hydropower. In circumstances where science-based data shows that hydropower dams harm anadromous or other migratory species, the development of data centers should not delay the transition to other renewable forms of energy generation, nor should it change the operation of these facilities in such a way that harms fish recovery efforts.

- **Disclose and mitigate direct and indirect water usage**

Every data center project should quantify and publicly disclose direct withdrawals, consumptive use, source waters, seasonal demand patterns, groundwater dependence, drought exposure, wastewater and blowdown management, and the upstream water burden of the project's electricity demand, including the water embedded in the data center's energy demand. The data center should mitigate the amount of its diverted water use, at a minimum, through enhancements to instream flows in the basin and other water conservation projects.

- **Thermal protection**

For trout, salmon, and other coldwater species, temperature can be as important as flow. Data center projects should model thermal impacts, control discharge temperatures, establish operational triggers during heat and low-flow periods, and demonstrate that they will not worsen temperature conditions in coldwater reaches or create thermal pollution. Siting and development conditions should address thermal impacts through instream flow enhancements or other nature-based solutions to eliminate thermal pollution.

- **Avoid, minimize, and in the last case, mitigate harms**

Data centers should only be developed where they do not compromise the ecological integrity of coldwater systems. TU recommends that developers prioritize low-impact locations and implement design measures that eliminate or substantially reduce harm before turning to mitigation. Compensatory and voluntary mitigation must deliver additional, durable, and measurable improvements to affected communities and coldwater fisheries and other important fish and wildlife habitats.

Offsets to siting harms should replace lost coldwater ecological attributes and values and may include a range of actions such as acquiring open space for the affected community, performing or participating in water conservation activities resulting in instream flow enhancements, investing in significant watershed restoration, or implementing other measures that meaningfully replace lost ecological functions.

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- **Transparency, accountability, and lifecycle responsibility**

TU supports full public disclosure of water use, energy sources, emissions, backup generator use, monitoring results, and adaptive management. Transparency around water and energy use is a necessary first step for data center development to earn public support in the communities where they operate. That transparency includes independent monitoring and audits; public dashboards for water, energy, and emissions data; tracking water replenishment activities; community benefit agreements where appropriate; bonding and financial assurances for decommissioning, site restoration, and associated infrastructure; and lifecycle accountability that extends upstream to the sourcing of critical minerals (where relevant) and downstream to transmission, substations, cooling systems, and other ancillary infrastructure.

Guidance on Community Engagement

Data center projects should meaningfully engage nearby communities in line with the core principles above. Early, transparent, engagement builds trust, establishes social license, and helps ensure projects support the long-term health of affected communities and river systems.

TU state councils and local chapters are encouraged to apply this policy, along with guidance from TU National, when reviewing data center proposals. TU will work proactively with partners, developers, and agencies to advocate for alignment with these principles.

Volunteers should contact national staff, starting with their state policy lead or state/regional director, before taking action related to a data center. If TU state or regional staff aren't available, please reach out to volunteer operations staff.

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