

[Note: Contact information intentionally removed]

From: Erik Ringelberg
Sent: Friday, April 30, 2021 12:31 PM
To: EKI
Subject: Initial NDGSA Comments on Draft GSP

Hi John,

Our technical staff identified some considerations we wanted to bring to your attention regarding the draft GSP.

In brief, we identified that the proposed Water Levels Sustainability Management Criteria (SMCs) in the document titled: 3b.-Draft-T11-SMCs-03-01-2021, could lead to new significant and undesirable effects on domestic wells, agricultural production wells, Groundwater Dependent Ecosystems (GDEs), and potentially other beneficial uses and users.

The Measurable Objectives (MOs) and Minimum Thresholds (MTs) relies on a limited period of record, and then allows the groundwater elevations to decline well below the 2015 period, and in several cases, sets the MT at declines of approximately 75-50 feet below current levels (75' RMW-16, 50' RMW WL-3, WL-4, WL-5, and WL-11). In contrast, where the groundwater elevations are identified as increasing, the MO and MT are kept well-below the trend line.

Similarly, the domestic well analysis presented on Figure SMC-2 shows what appears to be the significant and undesirable impacts of these proposed MOs and MTs on domestic wells. We were unable to find the analysis of the impacts of these MTs on GDEs, but we assume that within that range above the threshold there would be significant and unreasonable effects by lowering the water table below the deepest rooted phreatophytes.

We would expect to see a reconciliation of the methodological approach that is protective of groundwater conditions consistent with the statues in the next draft of the document. We appreciate the difficulty in developing a GSP in this complex watershed.

Please don't hesitate to reach out if you have any questions.

Thanks,

Erik Ringelberg
NDGSA Administrator

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