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**Subject: Response Requested: Dead River Dry Year Consultation - 4/11/22 - End of Consultation Period**

Hi folks,

Sorry this is a little informal, I want to bring this to your attention quickly. I hope I didn't miss anybody.

Dry year consultation ending signals to me that if anyone wants to suggest changes to operations we should discuss as a group and with UPPCO ASAP. As usual, we can't direct UPPCO to do anything it doesn't want to do anyway, but the two options I am highlighting are probably something UPPCO would be open to as well.

If folks were to agree on a modification from UPPCO's usual practice for dry springs it should be brought forward now. My expectation is if nothing changes we would see UPPCO running at 200-330 cfs for a few weeks in the spring to get to follow the elevations approved by FERC, and then initiating dry year consultation asking what our preferences might be with respect to the little inflow that we get across the later summer.

I believe DRCI had suggested two items folks may want to discuss (could suggest UPPCO do one, both, or neither, as well as other options you might propose):

- 1) Revising the target at Hoist to hold at a higher elevation (e.g. 1342+? if it reaches that) in the spring for longer and maintaining closer to minimum flows,
- 2) Starting dry year consultations at a higher elevation (e.g. 1340.5?).

I have some concerns about possible effects of attempting (1) to hold Hoist at higher water level/elevations by maintaining closer to minimum flows rather than inflow, including:

- Suggesting modified operations to sustain higher spring HWL would be in addition to other, sometimes overlapping departures from the license. Departures and late modifications tend to separate what is going on on-the-ground from what was agreed to and analyzed in advance. The license isn't very protective, so this is somewhat more of a practical concern.
- Due to my repeated failures to narrow in on what is and isn't possible here, and constraints because of the FERC process/rules, among others, agency comments on this system have been creeping toward "UPPCO can try whatever, just explain to us please what to expect."
- Efforts to hold water longer would be a further departure from a natural hydrograph with likely negative implications ecologically.
- Unexpected issues with direct and indirect impacts of changing water levels, potentially including water quality, aquatic habitat, etc. may occur.

Still, I am open to at least discussing further if folks want to, especially given how disruptive and problematic last year was, and how heavily modified the system is as licensed (status quo being troublesome makes me more open to departures).

Starting the dry year consultation sooner (2) seems like it might be a strong option, if UPPCO and others are willing to do so. Please note, initiating dry year would also mean UPPCO defaults to minimum flows unless otherwise specified.

Note: UPPCO also is giving us advance warning that Silver Lake may be of limited use for what they typically describe as supplemental flows, which may put additional pressure on the system a few months from now.

Please let me know if you would like to discuss further.

Thank you,  
Elle

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**Subject:** Dead River Dry Year Consultation - 4/11/22 - End of Consultation Period

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Good Morning,

Water elevations at both the Silver Lake and Dead River Storage Basins have steadily increased most of the past week with the above freezing temperatures and the rain/snow mix that was received mid-week. Below are the current water levels and outflows across the Dead River:

Silver Lake:	1478.24'	20 cfs
Hoist:	1337.71'	110 cfs

McClure: 1195.80' 110 cfs

To meet the minimum flow requirements of the Silver Lake Storage Basin for April (25cfs or inflow, whichever is less), UPPCO will be adjust the outflows tomorrow to 25 cfs.

**The minimum headwater conditions have been met at both the Silver Lake Storage Basin (1477.0') and the Dead River Storage Basin (1337.0'), thus ending the 2021 dry year consultation period.** Based on current snow water equivalent conditions and the 10/30 day forecasts, data indicates elevations will continue to rise based on spring-like conditions. Moving forward, UPPCO will operate the facilities to best achieve the license required headwater elevation targets.

The current 10 day forecast shows precipitation occurring early in the week (either rain or snow), with temperature above freezing through the forecast timeframe.

(<https://www.accuweather.com/en/us/negaunee/49866/daily-weather-forecast/338745>).

Based on current available data (SWE, 30/90 day forecasts) and 30 year elevation averages, indications are showing the summer target elevations (April through July) at the Silver Lake Storage Basing may not be achieved. Although the target may not be achieved, summer weather plays the biggest roll on sustaining the elevation. The NOAA climate prediction center currently has 40% confidence in above average temperatures and average precipitation for May/June/July  
([https://www.cpc.ncep.noaa.gov/products/predictions/long\\_range/seasonal.php?lead=2](https://www.cpc.ncep.noaa.gov/products/predictions/long_range/seasonal.php?lead=2)).

This is the last planned update due to the 2021 dry year consultation parameters. If you have any questions please let me know.

Regards,

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