

From: Jim Grundstrom <jimghoistbasin@gmail.com>

Sent: Wednesday, April 13, 2022 7:59 PM

To: 'Gulotty, Elle (DNR)' <GulottyE@michigan.gov>; 'Madison, George (DNR)' <MADISONG@michigan.gov>; 'Hanchin, Patrick (DNR)' <HANCHINP@michigan.gov>; 'Clements, Doug (EGLE)' <ClementsD3@michigan.gov>; scott_hicks@fws.gov; 'Kohlhepp, Gary (EGLE)' <KOHLHEPPG@michigan.gov>; 'Bob Stuber' <stuberbob@gmail.com>; 'Gene Mensch' <gmensch@kbic-nsn.gov>; 'Joshua Ball' <jball@uppco.com>; jimghoistbasin@gmail.com

Cc: 'DNR-HMU-FERC' <DNR-HMU-FERC@michigan.gov>; 'Mistak, Jessica (DNR)' <MistakJ@michigan.gov>

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

Good evening to all and thank you Elle for starting these thoughts. It is truly appreciated as I believe we all know that doing the same things over again and hoping for different results seems to be not a very good plan, at least the past two years.

Timing is everything, and I am pleased to share that we did have a Dead River Campers, Inc., board meeting last evening and we had an opportunity to think things over regarding the water in the Hoist Storage Basin, and of course the Silver Lake Storage Basin as they do run pretty much "hand in hand". As Elle pointed out, Dry Year has concluded triggered by summitting 1337 recently, and thus we are back to adhering to the plan as it is still presently unchanged and in place.

With the Hoist as of 19:11 this evening the elevation is 1338.74 (with a wished for stabilized elevation target in May of 1341) and of course rising and a generation rate at 237cfs. Silver Lake is as of the same time, posting an elevation of 1478.93, (striving to summit for the first time in two years at 1485.2) and of course rising with a discharge rate of 25 cfs. Due to target elevation planning in place we are having to already generate at a higher rate than 100cfs at the Hoist, and with Silver Lake just about 6 vertical feet low still also giving more water to the Hoist than what was earlier coming out by at least 10 CFS.

Elle is totally correct with her comments about DRCI's suggestions of trying our suggested plan this summer summitting at or around 1342 in the Hoist and generating downward from there in smaller incremental steps as was sent to many of you all in the last two months. That mailing and email presentation included colored pictures of the past summer around the Hoist and we hope that you all had a chance to read and digest or thoughts.

DRCI also would like to suggest that the engagement target for Dry Year Consultation be raised to a suggested 1340.5, as compared to currently 1339.5. This would hopefully allow for honest and engaging conversations when the elevation begins to drop below the target, with hopes of attempting to slow down the decline in water elevation. Even matching inflows to outflows would conceptually be helpful. We at DRCI are a bit confused on one matter that we would hope to better understand. That is regarding who is determining the process for determining what elevations are being put into place. Elle, it seems pretty clear from your note that started these thoughts, that you believe UPPCO can maybe do some whatever they feel like. However, in many of the communications that Josh has sent out over the last two years asking for input, all we have been able to read surrounds the input from the agencies committing to "stay the course and remain at 100 CFS". The Hoist was destined to drop given little or no rain in the summer.

DRCI is respectfully asking that all the stakeholder agencies that are receiving this string of emails, please consider thinking positively on trying the plan that we are suggesting and allow 1342 elevation to start the decline in the summer months as we are suggesting, and that Dry Year Consultation begin at 1340.5.

Drci does not believe that allowing the Hoist Storage Basin to once again decline deeply below 1341 in the summer months is a good strategy, as it spoils recreation, closes the public launch ramps, exposes large amount of sand and mud to further erosion, and brings significant rock and stump hazards to the surface that most boaters have never before had to worry about.

The DRCI Board would be pleased to host a gathering that would include all the above people receiving this note including UPPCO staff of course. If there is a wish to talk about this coming summer and the water elevations for the Hoist and Silver Lake we are certainly excited to help make it happen.

Very sincerely and with hope for your support and change,

Jim Grundstrom
President DRCI

From: Gulotty, Elle (DNR) <GulottyE@michigan.gov>

Sent: Monday, April 11, 2022 10:30 AM

To: Madison, George (DNR) <MADISONG@michigan.gov>; jimghoistbasin@gmail.com; Hanchin, Patrick (DNR) <HANCHINP@michigan.gov>; Clements, Doug (EGLE) <ClementsD3@michigan.gov>; scott_hicks@fws.gov; Kohlhepp, Gary (EGLE) <KOHLHEPPG@michigan.gov>; Bob Stuber <stuberbob@gmail.com>; 'Gene Mensch' <gmensch@kbic-nsn.gov>

Cc: DNR-HMU-FERC <DNR-HMU-FERC@michigan.gov>; Mistak, Jessica (DNR) <MistakJ@michigan.gov>

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

Elle Gulotty
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From: Joshua Ball <jball@uppc.com>
Sent: Monday, April 11, 2022 9:13 AM
To: Gulotty, Elle (DNR) <GulottyE@michigan.gov>; Clements, Doug (EGLE) <ClementsD3@michigan.gov>; Scott Hicks <scott_hicks@fws.gov>; Gene Mensch <gmensch@kbic-nsn.gov>; jimghoistbasin@gmail.com
Cc: Virgil E. Schlorke; Matthew Annala <mannala@uppc.com>; GenerationAdmin <GenerationAdmin@uppc.com>; Joshua Ball <jball@uppc.com>
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).

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

Regards,

Josh Ball

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