



Dead River Campers, Inc.

213 Pearl Street

P.O. Box 323

Ishpeming, Michigan 49849

Office Phone: 906-485-1975

Email: drcicampers@gmail.com

www.deadrivercampersinc.com

April 11, 2018

Ms. Elle Gulotty
Resource Analyst
Habitat Management Unit
Michigan Department of Natural Resources
1990 US Highway 41 South
Marquette, MI 49855

RE: Dead River Hydroelectric Project – Requested Planned Deviations of Start of Month Target – Article 402 (P-10855)

Dear Ms. Gulotty:

On behalf of the Dead River Campers, Inc. Board of Directors, representing nearly 400 camper/shareholders on and around the Hoist Storage Basin, we would like to present the following observations related to UPPCO's requested license deviations:

There seems to be three reoccurring issues in your correspondences and we would like to offer our view on them.

Utilizing the Low-Level Outlet to lower the Basin in times of “High Water.” It's the boards opinion that this only be utilized when water cannot be passed through the turbines, or extremely high water which creates an emergency situation. Based on our water power lease agreement with UPPCO, 1346 appears to be the project boundary. Dumping water prematurely floods out areas below to Lake Superior, wastes a valuable resource and causes low water later in the summer, when the recreation season is in peak activity. It is critical to our shareholders that we have target elevation water or slightly higher May 15th – August.

Erosion. Erosion is inevitable during times of high and low water, especially with boat traffic. This board has been presented with few complaints of erosion to date. It should also be noted; the basin was originally designed for and ran at elevations up to

and greater than 1347. This elevation was utilized throughout the 60+ years Cleveland Cliffs Iron Company ran the impoundment. To put it into perspective, an elevation of 1343 is actually four feet lower than the original spill way.

License deviations. With every winter and spring being different, and a static license, we feel there is real value in license deviations. UPPCO has presented sound reasoning for all requested deviations and every one was given board approval. The 1342-1343 deviation of March 2016, that you referenced is a perfect example as this particular deviation was **unanimously** approved. Spring rains cannot be accurately predicted, therefore a deviation to the high side is preferred. Once the water from the spring season and Silver Lake are gone, there is no recovery available to save our summer boating season.

We find it puzzling that this previously seamless process has become so convoluted. If the elected board can be of any assistance, please do not hesitate to contact us.

Sincerely,

Jim Grundstrom
DRCI President