

April 28, 2022

Hello MN Public Utilities Commission,

I am writing to you as a whitewater paddler living in Duluth and a professional outdoor educator working for UMD Recreational Sports Outdoor Program. Over the past 38 years I have been involved with many projects on the St. Louis River with an emphasis on recreational paddling activity at Thomson Dam. I manage the UMD Outpost Classroom and public carry-in boat access at that location for MN Power. This is one of several mandated services within their FERC License to run a hydro power operation.

In many ways we are meeting or exceeding the terms spelled out in the FERC License but the extreme flood event of 2012 generated a lot of trauma and a sharp reduction in communication between the hydro operation and the many related stake holders. At one time in the early 1990's the Thomson Hydro operation was commonly referred to as the best example of functional interagency management serving multiple stake holders but over time this dynamic has faded. Communication must be restored in relation to FERC Licensing process because one lingering issue related to the 350 cfs minimum flow is causing ongoing tension. The Thomson Dam repairs after the 2012 flood have resulted in the loss of an estimated 50-70 cfs of leakage flow into the bypass reach below the dam. Paddlers know this due to many years of running the same rapids over solid bedrock. Anger over this loss of flow is growing even though all of the other aspects of the FERC License that support recreational paddling and the emergency action plans are happening. Overall frustration in the paddling community is amplified when the timing and opportunity for public comment related to FERC Re-Licensing is not communicated adequately.

I believe that the duty to inform rests on MN Power and the MN Public Utilities Commission and improvement in communication is absolutely critical. I would also assume that documentation of the relicensing process and public access to the process is required by FERC so it would be much easier to proceed correctly within the prescribed timelines rather than playing catch up. My professional role with the UMD whitewater paddling program and the Thomson Dam public carry-in boat access management will allow me to share information with the paddling community if the information is provided to me.

We have done much better in the past. Leading up to 1995 recreational use of river flow was analyzed in a cooperative manor by the paddlers, DNR, MN Power and others leading to the acknowledgment of recreational flow in very specific ways that are documented in the FERC License. Examples include four weekends of Summer time recreational flow with prescribed flow rates below Thomson dam and a new minimum flow rates of 350 cfs below Thomson (rather than the previous minimum of 20 cfs that was not functional for paddling).

Please include me in future correspondence related to FERC Licensing at Thomson Dam. I think that I can help resolve problems using my past experience and current role at UMD. My contact information is here:

Randall Carlson
UMD Recreational Sports Outdoor Program,
Whitewater Kayak, Canoe, Surfing, SUP & Snow Kiting Coordinator
my pronouns: he/him/his

153F SpHC, 1216 Ordean Court
Duluth, MN 55812
(218) 726-6177 w (218) 726-6767 fax

e-mail: rcarlso6@d.umn.edu
web site: <http://www.umdrsop.org>

You will see many comment submissions stating the following. It's a true statement and a good starting point. I also believe that more knowledge and effort will be needed to reach a solution. "As paddlers, we're requesting an investigation into recalibrating adjusting the minimum flow rate below the dam since the 2012 flood and subsequent repair of the leakage. We are a collective group of paddlers from across the northland that request MN Power's Integrated Resource Plan 2021 Docket #21-33 be modified to accurately reflect the actual outflow below Thompson dam that was agreed upon in the 1995-Federal Energy Regulatory Commission Reports, Volume 75. The agreed upon and recorded flow level of 350 cfs prior to the 2012 flood included dam leakage so the actual flow level being released prior to the 2012 flood was higher than that of the 350cfs readings after the subsequent repair of dam leakage and infrastructure. We request that the accepted 350 cfs be recalibrated to include the leakage that MN Power patched to be added to the 350 cfs that is currently supposed to flow below the Thompson Dam to truly match the agreed upon flow levels."

Thank you for taking time to read my comments. This part of the St. Louis River is a very dynamic location with many federal, state, private and commercial user groups all converging to accomplish their mission. It's not going to be easy to keep everything on track but we have to keep working toward solutions.