

Walsh, Laurie@Waterboards

From: Tory Walker <tory@trwengineering.com>
Sent: Wednesday, November 19, 2014 4:25 PM
To: Walsh, Laurie@Waterboards
Subject: Comment - Tentative Order No. R9-2015-0001, Place ID:658018LWalsh

Laurie,

I appreciate the opportunity to comment on the above referenced tentative order. My comments are brief, but substantive, in that they relate to some important foundational assumptions:

- 1) Hydromodification requirements in the San Diego Region cannot properly be based on one category of stream or channel and treated as either geomorphically “stable” or highly dynamic – there is a wide variety, even within watersheds. This faulty assumption will not lead to good solutions for the streams they are intended to help.
- 2) Flow rate reductions caused by dams artificially reduces channel degradation – the hydromodification impacts from many of these dams means that runoff from PDPs may actually promote a more natural dynamic condition. The failure to recognize this possibility will also lead to solutions that are foundationally flawed.
- 3) All of this points to the need for the permit to accommodate more site-specific flexibility to reflect natural conditions.

Thanks,

Tory Walker, PE, CFM, LEED GA



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