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From:	Jim Petersen <petersen.science.writing@gmail.com></petersen.science.writing@gmail.com>
Sent:	Saturday, September 14, 2024 7:39 PM
То:	Public Comment
Subject:	Reg 6 comments from James Petersen

Reg. 6 Comments

September 13, 2024

James C. Petersen

6.301 (B) A losing stream segment is defined as a 2-mile section of stream that loses 30% or more of its flow at a 7Q10 flow or a flow of 1 cubic feet per second (whichever is greater). There is no documentation or clarification about how this determination is made. For example:

(1) How is the 7Q10 value determined?

(2) How is the 30% loss determined? Let's assume for illustration that the 7Q10 is 2 cubic feet per second. The 7Q10 is a statistical value of a streamflow that is expected to occur for 7 consecutive days once every 10 years on average. So it is a relatively rare occurrence. But let's assume that the investigator is lucky enough to be at the discharge location at a time where the streamflow is 2 cubic feet per second. In that case the downstream streamflow would need to be less than 1.4 cubic feet per second for the segment to qualify as a losing stream segment. However, what if at the time of the permitting process, streamflow at the discharge location is consistently 5 to 10 cubic feet per second because the year has been relatively wet? What downstream streamflow value would be used?

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