



Public Works Department
Natural Resources Division
M/S: 2NPW
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December 17, 2010

Becca Conklin, Standards Coordinator
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Surface Water Quality Standards Triennial Review Comments

Dear Ms. Conklin:

The City of Redmond would like to express our appreciation for the opportunity to provide comments on the Department of Ecology's Triennial Review of the State's Surface Water Quality Standards. The City of Redmond would like to provide two comments for consideration.

1. The current WAC 173-201A provides a definition of "waters of the State," which is the basis to determine what the standards apply to. The current definition of "waters of the State" does not mention stormwater specifically. Due to this, people frequently try to apply surface water standards to stormwater. Knowing that the standards are established to protect beneficial uses, it's obviously not appropriate to apply surface water standards to stormwater. We ask that the State explicitly include, or exclude stormwater as "surface waters of the State" in the definitions section, WAC 173.201A-020.
2. In 2007¹, the United States Environmental Protection Agency published a revised criterion document for copper which identified the use and implementation of the Biotic Ligand Model (BLM) as "best available science." We recommend the State consider adopting this same approach to determining the toxicity of contaminants in Washington waters.

¹ United States Environmental Protection Agency Office of Water, Aquatic Life Ambient Freshwater Quality Criteria – Copper. 2007 Revision. EPA-822-R-07-001. February 2007.
http://water.epa.gov/scitech/swguidance/waterquality/standards/current/upload/2009_04_27_criteria_copper_2007_criteria-full.pdf

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Should you have any questions on this matter, please contact me at (425)556-2823.

Sincerely,

A handwritten signature in black ink that reads "Jon C. Spangler". The signature is written in a cursive style with a large initial "J" and "S".

Jon C. Spangler, PE
Natural Resources Manager
City of Redmond