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December 17, 2010

Washington Department of Ecology  
Surface Water Quality Standards  
P.O. Box 47600  
Olympia, WA 98504-7600  
ATTN: Becca Conklin, Standards Coordinator

Re: Surface Water Quality Standards Triennial Review

Dear Ms. Conklin:

I greatly appreciate the opportunity to provide comments on the Department of Ecology's Triennial Review of the State's Surface Water Quality Standards. I support scientifically based and economically sustainable water quality standards that help us maintain and restore the surface waters of the State, including the marine waters of the Puget Sound. With that in mind, I ask that Ecology include a review of Washington's criteria for toxic chemicals in surface water, specifically the freshwater criterion for copper. The environmental and economic benefits resulting from this review will be substantial for our community and the State.

In 2007<sup>1</sup>, the United States Environmental Protection Agency published a revised criterion document for copper which identified the use and implementation of the Biotic Ligand Model as "best available science." I believe our State should also adopt this criterion for the following reasons:

- Application of the Biotic Ligand Model will result in stormwater treatment facilities designed to reduce copper to a realistic level based on the true toxicity of the runoff relative to the receiving body;
- The level of treatment will no longer require dissolved metals to be reduced to levels well below the toxic limits. Therefore, funding available to Phase I/II permittees and Industrial Stormwater permittees will be available to install more facilities for the same cost. In turn, this will likely result in significantly more stormwater being treated for the same amount of funding.
- The geographic impact is very large and will immediately affect the approximately 115 Phase I/II permittees in Western Washington, as well as the several hundred permittees under the Industrial stormwater Permit. This will result in more treatment per dollar spent per acre;

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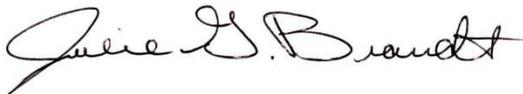
<sup>1</sup> United States Environmental Protection Agency Office of Water, Aquatic Life Ambient Freshwater Quality Criteria – Copper. 2007 Revision. EPA-822-R-07-001. February 2007. [http://water.epa.gov/scitech/swguidance/waterquality/standards/current/upload/2009\\_04\\_27\\_criteria\\_copper\\_2007\\_criteria-full.pdf](http://water.epa.gov/scitech/swguidance/waterquality/standards/current/upload/2009_04_27_criteria_copper_2007_criteria-full.pdf)

- As with all municipal entities, funding is extremely constrained and most do not have the resources to over-treat their stormwater nor do they have the ability to come back and do it again at a later date. Use of appropriate water quality standards is vital to our continuing efforts to clean up the Puget Sound and the fresh waters draining to it.

To assist the Department of Ecology in establishing appropriate BLM methods and standards, I ask the Department to establish a committee of interested parties including state agencies, local municipalities, industry, and subject matter experts in 2011. This committee would discuss how the Biotic Ligand Model can be incorporated into the State of Washington Water Quality Standards.

Thank you for this opportunity to provide comments for the Triennial Review. Should you have any questions on this matter, please contact me at 425-458-6474.

Sincerely,

A handwritten signature in black ink that reads "Julie G. Brandt". The signature is written in a cursive style with a large, stylized initial "J".

Julie G. Brandt, P.E.  
Senior Water Resources Engineer  
Parametrix