



OLYMPIC VIEW WATER & SEWER DISTRICT

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August 11th, 2026

Abbey Stockwell
Municipal Stormwater Senior Planner
Washington State Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

Re: Early input on the 2029 Phase I and Phase II Municipal Stormwater General Permits

Dear Ms. Stockwell:

Thank you for the opportunity to provide early input on the next municipal stormwater permits. Olympic View Water & Sewer District asks Ecology to identify protection of public drinking-water aquifers from stormwater infiltration as a significant issue for the 2029 permit cycle. The District strongly discourages stormwater infiltration within Wellhead Protection Areas, Critical Aquifer Recharge Areas, and other mapped drinking-water source protection areas. If site-specific hydrogeology, contaminant information, or source-water mapping identifies a risk that infiltrated water could affect a public drinking-water source, infiltration should not be allowed.

Our concern is directed primarily to Appendix 1, Minimum Requirement No. 5, of the current municipal stormwater permits and the corresponding infiltration provisions in the 2024 Stormwater Management Manual for Western Washington. Those provisions direct projects to infiltrate, disperse, and retain runoff onsite to the extent feasible. That approach can reduce runoff, support natural hydrology, and protect streams. In some locations, however, the groundwater receiving that infiltration is also a public drinking-water source. Moving a contaminant from surface water into groundwater does not eliminate the environmental impact. It transfers the risk to a resource that may be difficult or impossible to restore.

This concern comes from direct experience. The District's 2023 Watershed Protection Plan identifies the Deer Creek drinking-water source, its contributing area, and the site-specific hydrogeology that makes the aquifer shallow and vulnerable. In one case, underground injection control wells were designed and authorized in the source capture area without the District being notified during design. We learned of the project only after drilling had penetrated the confining layer above the aquifer. We previously described this experience in our November 10, 2023 comments to Ecology on the proposed 2024 permits and manual. Early source-water review and prevention would have been a better outcome for everyone.

District sampling of the stormwater entering those authorized UIC wells detected PFAS. We are not stating that PFAS has been detected in the aquifer. The sampling result is the practical example we ask Ecology to consider: an infiltration facility can be authorized within a drinking-water capture area and

later be shown to receive stormwater containing a persistent contaminant. Conventional stormwater practices may not reliably remove PFAS, and monitoring after the infiltration pathway has been installed does not prevent contamination. If a drinking-water source is affected, the public water system and its customers may ultimately bear the cost of monitoring, treatment, replacement supply, and public communication.

The 2024 manual's classifications of pollution-generating and nonpollution-generating surfaces are also part of our concern. A runoff or drainage source that falls outside a defined pollution-generating category should not automatically be treated as clean or suitable for infiltration. Roof runoff may contain contaminants from roofing and building materials, coatings, atmospheric deposition, or building operations.

Foundation drains, basement sump water, dewatering water, and similar flows may contact building products, contaminated soil or fill, groundwater, or legacy contamination. Where PFAS or another contaminant is known, detected, or reasonably suspected, that water should be treated as pollution-generating for the infiltration decision and should not be infiltrated within a Wellhead Protection Area, Critical Aquifer Recharge Area, or other vulnerable public source-water area, regardless of the default classification.

For these reasons, Olympic View respectfully asks Ecology to:

- 1. Identify drinking-water aquifer protection as a significant issue.** The 2029 permit process should expressly review Appendix 1, Minimum Requirement No. 5, and the corresponding provisions in the Stormwater Management Manual for Western Washington from the perspective of public drinking-water source protection.
- 2. Evaluate and avoid infiltration in source-water protection areas.** Ecology should specifically evaluate infiltration within Wellhead Protection Areas, Critical Aquifer Recharge Areas, and other mapped public drinking-water source protection areas before infiltration is treated as the preferred or feasible BMP. The District strongly discourages infiltration in these areas. If site-specific hydrogeology, contaminant information, or source-water mapping identifies a risk that infiltrated water could affect a public drinking-water source, infiltration should be considered infeasible and should not be allowed. Another stormwater approach should be used.
- 3. Address actual contaminant risk, not only surface classifications.** The 2024 manual's pollution-generating and nonpollution-generating classifications should not replace evaluation of the water itself. Roof runoff, foundation drainage, basement sump water, dewatering water, and other flows should not be presumed clean based solely on a general category. If PFAS or another contaminant is present or reasonably suspected within a Wellhead Protection Area, Critical Aquifer Recharge Area, or other vulnerable public source-water area, infiltration should not be allowed.
- 4. Preserve stronger local protections and involve water purveyors early.** Statewide standards should not prevent more protective local requirements where site-specific hydrogeology and drinking-water vulnerability warrant them. Affected public water systems should receive notice and a meaningful opportunity to provide their wellhead protection mapping, hydrogeologic information, and source-water concerns before an infiltration approach is selected.

5. Coordinate stormwater and drinking-water requirements. Ecology and the Department of Health should work together so that the municipal stormwater permits, the Stormwater Management Manual for Western Washington, and public water system source-protection responsibilities support one another rather than create conflicting expectations.

The District is not asking Ecology to prohibit infiltration statewide or weaken protection of surface water. We are asking Ecology to recognize that infiltration is not universally preferable and that source-water protection must come first within Wellhead Protection Areas and Critical Aquifer Recharge Areas. If there is an identified risk to a public drinking-water source, another stormwater approach should be required. Monitoring after an infiltration pathway is installed is not an adequate substitute for preventing that pathway in the first place.

The 2029 permit process provides an opportunity to address this issue before the same conflict arises at individual development sites. A stormwater practice should not solve a surface-water problem by creating a future groundwater or drinking-water problem. Where a source-water risk is identified, prevention should be the decision, not future monitoring or treatment. We appreciate Ecology considering this practical source-water perspective and look forward to continued coordination.

Sincerely,



Bob Danson

General Manager

Olympic View Water & Sewer District