

Summary of Proposed Changes to Seattle Stormwater Code and Manual

Summary of Proposed Changes to Seattle Stormwater Code

July 2025 Public Review Draft Stormwater Code

- Added and updated definitions and requirements for clarity and to be consistent with the 2024 Phase I Municipal Separate Storm Sewer System (MS4) Permit and Ecology's 2024 Stormwater Management Manual for Western Washington (SWMMWW).
- Revised utility work and pavement maintenance exemptions to be consistent with 2024 MS4 Permit.
- Revised dates and references to be up to date with most recent MS4 Permit vesting dates.
- Added clarification for application of thresholds and a new definition for Common Plan of Development to be consistent with 2024 MS4 Permit.
- Updated definitions for new and replaced hard surfaces to be consistent with 2024 MS4 Permit.
- Revised Single-family Residential Project definition to mirror current separate Land Use Code update initiative.
- Added "new plus replaced" hard surface to flow control and treatment thresholds for Roadway Projects to be consistent with 2024 MS4 Permit.
- Updated on-site lists to facilitate increase in tree canopy and stormwater management, improve feasibility of bioretention in space-limited urban areas, provide additional BMP options, address temperature increases and atmospheric deposition, and reduce feasibility barriers for certain BMPs.
- Added the requirement that in addition to OSM BMPs, all infiltrating BMPs (e.g., Infiltration Basins) must be used to the maximum extent feasible to meet flow control and water quality treatment requirements.
- Updated Wetland Protection - Method 2 to allowed greater flexibility in matching volume percentages during winter months.
- Revised terminology from "enhanced" to "metals" treatment and updated Metals Treatment thresholds to be consistent with 2024 MS4 Permit.
- Updated Drainage Control Review and Application requirements and thresholds to ensure adequate review of erosion control measures in tight urban environment and be consistent with thresholds requirements in 2024 MS4 Permit.

Stormwater Code

| Stormwater Code, - Title, Purpose, Scope, and Authority Code Section | July 2025 Draft - Initial Response to Comments |
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| General | <p>Comment(s): <u>Contaminants of Emerging Concern (CECs):</u> Add more references, best management practices for 6PPD-q and other Contaminants of Emerging Concern (CECs), including source control, construction activities, and bioretention. Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>Product Pollutants:</u> Limiting product use and addressing pollutant sources, including home use, for: artificial turf, rubberized playground areas, rubberized landscaping mulch Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>Authority:</u> Add references to other requirements and authorities, such as requirements from Washington Department of Fish and Wildlife’s Hydraulic Project Approval and creek regulations; remove references to other requirements and authorities, such as federal. Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>Sanitary Sewer System Limitations:</u> Remove side sewer and sanitary system requirements from Stormwater Code and Manual (V4, 22.805.020.K: Comply with Side Sewer Code - References / requirements related to Side Sewers / sanitary system (BMP 12,) Response: No changes proposed. The references to the sanitary sewer systems limitations are typically applicable to construction and source control stormwater discharges.</p> <p>Comment(s): <u>Best Available Science:</u> Make sure BMPs are consistent with Best Available Science (BAS); use verified methods to protect private property and environmental resources Response: As part of the Stormwater Code and Manual process, Seattle utilized best available science to the extent practical and documents in a BAS Memo as part of the update process.</p> <p>Comment(s): <u>Species Protection:</u> Add impacts from stormwater to salmon and orcas and importance of protecting species and Puget Sound; include temperature thresholds for salmon and orcas. Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>Tree Benefits:</u> Add more information about the benefits of trees; use i-Tree and other tree-related modeling resources; require more tree protection / preservation and maintenance of trees; focus on planting evergreen / coniferous trees Response: Seattle still evaluating comment(s).</p> |

Stormwater Code

| Stormwater Code, - Title, Purpose, Scope, and Authority Code Section | July 2025 Draft - Initial Response to Comments |
|---|--|
| | <p>Comment(s): <u>Beavers</u>: Acknowledge the eco-engineering skills of local beaver population. Response: Seattle acknowledges the eco-engineering skills of beavers here in Seattle and elsewhere but does not think it is applicable to include such acknowledgement in the Stormwater Code and Manual.</p> <p>Comment(s): <u>Monitoring</u>: Monitor city runoff and groundwater tables. Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>PCBs</u>: Support for added PCB requirements. Response: Seattle supports Ecology’s addition of PCB requirements in their Permit and Manual to help protect downstream systems and waterways.</p> <p>Comment(s): <u>Prescriptive Code</u>: Make requirements based on outcomes instead of code being so prescriptive. Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>Housing impacts</u>: Ecology and Seattle should provide a cost-benefit analysis of proposed changes; provide fee-in-lieu / alternative compliance options. Response: Seattle still evaluating comment(s).</p> <p>Comment(s): <u>Water Quality Standards</u>: 22.802.010, 22.803.010, 22.805.010, 22.805.020, 22.807.010 & V2 (&V4?): Violations of water quality standards and property / applicant responsibility Response: Seattle still evaluating comment(s).</p> |

Stormwater Code

| Stormwater Code, 22.800 - Title, Purpose, Scope, and Authority Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|-----------------------------------|--|
| 22.800.010 through 22.800.030 | No edits. | | No comments received. |
| 22.800.040 - Exemptions, adjustments, and exceptions | <ul style="list-style-type: none">Added that utility work associated with a Parcel-Based Project is not exempt under 22.800.040.A.2.a.Revised pavement maintenance associated with a Parcel-Based Project or Roadway Project is not exempt under 22.800.040.A.2.b.Refer 22.801.170.P for changes associated with “Pavement Maintenance Practices”.Add that ADA work associated with exempt activities is also exempt. | Consistency with 2024 MS4 Permit. | <p>Comment(s): Activities Associated with Development: Pavement restoration and utility installation associated with development should still be considered exempt activities.</p> <p>Response: No changes proposed - revisions required per 2024 MS4 Permit, Appendix 1.</p> |
| 22.800.070 - Minimum Requirements for City Agency Projects | Changed dates and references so that they are up to date with the most recent Permit S5.C5 vesting dates. | Consistency with 2024 MS4 Permit. | <p>Comment(s):</p> <p><u>Vesting Dates:</u> Concerns over time limit to vest projects.</p> <p>Response: Error in 7/15/2025 public meeting slide, but code draft is correct. No changes proposed- revisions required per 2024 MS4 Permit. Projects have 10 years to “start construction” when vested under a previous code and manual version.</p> |
| 22.800.080 through 22.800.090 | No edits. | | No comments received. |

Stormwater Code

| Stormwater Code, 22.800 - Title, Purpose, Scope, and Authority Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|---|-----------------------------------|---|
| 22.800.100 - Transition to Revised Stormwater Code | Changed dates and references so that they are up to date with the most recent Permit S5.C5 vesting dates. | Consistency with 2024 MS4 Permit. | Comment(s): <u>Vesting Dates:</u> Concerns over time limit to vest projects. Response: Error in 7/15/2025 public meeting slide, but code draft is correct. No changes proposed- revisions required per 2024 MS4 Permit. Projects have 10 years to “start construction” when vested under a previous code and manual version. |

| Stormwater Code, 22.801 - Definitions Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|---|---------------------|--|
| 22.801.020 - “A” | | | Comment(s): <u>Aquatic Life:</u> Expand definition - add benthic life, wetlands, temperature, species. Response: Seattle relies on WAC 173-201A-200 definition for Aquatic Life. Seattle added “wetlands” to definition. |
| 22.801.040 - “C” | Added “Closely Related Projects” definition | Added for user ease | Comment(s): <u>Closely Related Project:</u> Clarify definition related to interdependency. Response: Seattle still evaluating comment(s). |

Stormwater Code

| Stormwater Code, 22.801 - Definitions Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|---|---|---|
| 22.801.040 - “C” | Added “Common Plan of Development” definition. | Consistency with 2024 MS4 Permit. | Comment(s): <u>Common Plan of Development:</u> Cost, timing, scope, and uncertainty concerns regarding multiple parcels or several capital improvements being aggregated as one project. <u>Housing impacts:</u> Provide a cost-benefit analysis of proposed changes; provide fee-in-lieu / alternative compliance options. Response: Seattle still evaluating comment(s). |
| 22.801.050 - “D” | Added "street improvement permit" to items listed under the "Development" definition. | Made edit to be consistent with implementation and 2024 MS4 Permit. | No comments received. |
| | | | Comment(s): <u>Hard Surfaces:</u> Are there hard (impervious) surface limits for parcels? Response: Seattle does not have land use impervious / hard surface limits. |
| 22.801.090 - “H” | Added new items to "High-use Sites" definition including total trip counts and other petroleum related products in addition to “oil”. | Consistency with 2024 MS4 Permit. | Comment(s): <u>High-Use Sites:</u> 22.801.080.H: The added trip count of 300 total trip ends per day is too low. Response: No changes proposed - revisions required per 2024 MS4 Permit, Appendix 1. |
| 22.801.100 - “I” | Categorized "Infiltration BMP" in the same category as "Infiltration Facility" | Clarification. | No comments received. |

Stormwater Code

| Stormwater Code, 22.801 - Definitions Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|---|--|--|
| 22.801.130 - “L” | <ul style="list-style-type: none"> Revised "Large project" definition by removing thresholds related to conversion of pervious areas and lowering land-disturbing activity threshold to 10,000 sf from one acre to account for potential erosion impacts in a tight urban environment. In the Stormwater Manual, “Large Project” term is only used in relation to when a "Large Project" Construction Stormwater Control plan sheet is required in Volumes 1 & 2. | Updated large project definition to address potential erosion issues and streamline terminology. | <p>Comment(s):</p> <p><u>Large Project:</u> 22.801.130: Why were land conversions removed from definition?</p> <p>Response: The definition of “Large Project” is now only used to determine when a Standard Plan or Comprehensive Plan is required. Land conversion thresholds can still be found within the flow control and water quality treatment requirements - see 22.805.050 and 22.805.060 for thresholds.</p> |
| 22.801.140 - “M” | Updated “Municipal Stormwater NPDES Permit” to not exclude areas outside the City [of Seattle] limits. | Consistency with MS4 Permit. | No comments received. |
| 22.801.150 - “N” | <ul style="list-style-type: none"> Revised “New Hard Surface” definition for consistency with Permit and to clarify reuse of existing an existing hard surface not previously subject to vehicular use. Deleted “New Impervious Surface” definition as already defined as part of “New Hard Surface” definition. | Streamline definitions and consistency with 2024 MS4 Permit. | No comments received. |
| 22.801.170 - “P” | <ul style="list-style-type: none"> Revised “Pavement Maintenance Practices” and moved to definitions from 22.800.040 Exemptions. Moved “Vehicular Use” definition from definition of “Pollution-Generating Impervious Surface” and created new “Vehicular Use” standalone definition. Refer to 22.801.230.V for changes to “Vehicular Use” definition. Deleted “Pollution-Generating Impervious Surface” definition as already defined as part of “Pollution-Generating Hard Surface” definition. | Streamline definitions and consistency with 2024 MS4 Permit. | <p>Comment(s):</p> <p>Pavement Maintenance: 22.801.170.P: Include sidewalk repair / maintenance in definition.</p> <p>Response: Seattle will add clarification, with Ecology approval.</p> |

Stormwater Code

| Stormwater Code, 22.801 - Definitions Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|---|---|
| 22.801.190 - “R” | <ul style="list-style-type: none">Revised definition of “Replaced Hard Surface” definition to clarify existing foundation or subgrade / base course must remain.Deleted “Replaced Impervious Surface” definition as already defined as part of “Replaced Hard Surface” definition. | Streamline definitions and consistency with 2024 MS4 Permit. | No comments received. |
| 22.801.200 - “S” | <ul style="list-style-type: none">Revised “Single-Family Residential Project” definition to align with CB 120993 (OPCD Permanent State Zoning Compliance ORD) and maintain consistency with current 2021 Stormwater Code requirements for Single-Family Residential projects.Revised definition of “Site” to include that a site may included “multiple parcels and / or sections of right-of-way”. | Consistency with Land Use Code update and to maintain status quo for Single-Family Residential project requirements. Revised site definition for consistency with 2024 MS4 Permit. | Comment(s): <u>Single-Family Residential Project:</u> Align definition with Land Use Code and Comprehensive Plan updates for allowance of up to four dwelling units. Response: Seattle still evaluating comment(s). |
| 22.801.230 - “V” | <ul style="list-style-type: none">“Vehicular Use” definition now standalone definition instead of included in “Pollution-Generating Impervious Surface” definition.Added clarifications to “Vehicular Use” related to existing light rail and airports parameters. | Streamline definitions and consistency with 2024 MS4 Permit. | No comments received. |

Stormwater Code

| Stormwater Code, 22.802 - Prohibited and Permissible Discharges Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|--|---|
| 22.802.010 through 22.802.030 | No edits. | | Comment(s): <u>Brominated Water:</u> Add brominated water in addition to chlorine. Response: Seattle has updated the list of prohibited discharges to include bromine and brominated water (22.802.020.A.7 states “ <i>chlorinated/brominated swimming pool or hot tub water</i> ” and 22.802.020.A.8 states “ <i>chlorine/bromine</i> ”) for consistency with the language in Volume 4 BMP 35 (and Ecology SWMMWW BMP S433). |
| 22.802.030 - Permissible Discharges | <ul style="list-style-type: none">Added that routine building washdowns and discharges are allowed but dependent on building age and absence of PCBsClarified that lawn watering and irrigation runoff discharges are only allowed if water use is minimizedClarified that only “non-toxic” tracing dye can be used. | Consistency with 2024 MS4 Permit & SWMMWW. | Comment(s): <u>Emergency Discharges:</u> Add “Permissible Emergency Discharges” for emergency water overflow situations and fire system testing. Response: Seattle still evaluating comment(s). |
| 22.802.040 - Testing for Prohibited Discharges | No edits. | | No comments received. |

| Stormwater Code, 22.803 - Minimum Requirements for All Discharges and All Real Property Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|-------------------|--|
| 22.803.010 through 22.803.020 | No edits. | | No comments received. |
| 22.803.030 - Minimum Requirements for Source Controls for All Real Property | Broadened discharge rule to include more types of dog runs, not just rooftop ones. | Clarification. | No comments received. |

Stormwater Code

| Stormwater Code, 22.803 - Minimum Requirements for All Discharges and All Real Property Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|---|-------------------|--|
| 22.803.040 - Minimum Requirements for Source Controls For Businesses and Public Entities for Specific Activities | No edits. | | Comment(s): <u>Marine Pump Out:</u> Source control for businesses: Add “sewage pump outs” in addition to fueling. Response: Seattle still evaluating comment(s). |

| Stormwater Code, 22.805 - Minimum Requirements for All Projects Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|---|---|--|
| 22.805.010 - General | <ul style="list-style-type: none">Added that in addition to “Closely Related Projects”, thresholds apply to entire “Common Plan of Development”, “Short Plat”, and “Subdivision” when applying thresholds.Clarified that the assumed level of hard surface coverage is based on maximum allowable build-out coverage when applying thresholds. | Consistency with 2024 MS4 permit and clarification. | No comments received. |
| 22.805.020.C - Minimum requirements for all projects | Updated code reference related to minimum requirements for flood-prone areas. | Clarification. | No comments received. |
| 22.805.020.D & H - Minimum requirements for all projects | Instead of referring to "large project" under "Control dewatering" and “Ensure sufficient capacity” sections, added specific thresholds; no substantive changes. | This change was made since the term “large project” is now only used in the Stormwater Manual for construction stormwater controls. | No comments received. |
| 22.805.020.D - Minimum requirements for all projects | Changed on-site BMP to infiltration BMP requiring protection during construction. | Made edits to not limit the type of infiltrating BMP areas requiring protection. | No comments received. |
| 22.805.030 through 22.805.040 | No edits | | No comments received. |

Stormwater Code

| Stormwater Code, 22.805 - Minimum Requirements for All Projects Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| 22.805.050 - Minimum Requirements for Parcel-Based Projects | Revised text to require treatment of discharges from pollution-generating pervious surface areas that flow through a natural or constructed conveyance system from the site. | Consistency with 2024 MS4 Permit. | Comment(s): <u>Treatment Alternative:</u> Clarify that parcel-based projects that already have equivalent level of treatment meet the Stormwater Code requirements for treatment. Response: Seattle still evaluating comment(s). |
| 22.805.060 - Minimum Requirements for Roadway Projects | <ul style="list-style-type: none">• Revised flow control thresholds for discharges to “Wetland” to include “new <u>plus replaced</u>” hard surface.• Revised flow control thresholds for discharges to “Listed Creek Basins” to include “new <u>plus replaced</u>” hard surface.• Revised flow control thresholds for discharges to “Non-Listed Creek Basins” to include “new <u>plus replaced</u>” hard surface.• Revised flow control thresholds for discharges to “Small Lake Basins” to include “new <u>plus replaced</u>” hard surface. | Consistency with 2024 MS4 Permit. | No comments received. |

Stormwater Code

| Stormwater Code, 22.805 - Minimum Requirements for All Projects Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| 22.805.070 - Minimum Requirements for On-Site Stormwater Management- Single-family Residential Projects | <p>Table A - On-site List for Single-family Residential projects was updated with the following:</p> <ul style="list-style-type: none">• Moved RWH systems sized to meet the OSM Performance Standard to Category 1 for more project flexibility• Added that rain gardens and bioretention facilities can include a tree• Added and clarified “Infiltrating with tree”, “Infiltrating without tree”, and “Non-infiltrating with tree” structural bioretention BMPs• Renamed “Single-family Residential Cisterns” to “Residential Cisterns”• Clarified that infiltrating testing is not required for permeable pavement sidewalks or compost amended strips unless to show infeasibility• Clarified that approved BMP equivalents are allowed for permeable pavement facilities and surfaces | Updated to facilitate increase in tree canopy and stormwater management, improve feasibility of bioretention in space-limited urban areas, to provide additional BMP options, and reduce feasibility barriers for certain BMPs. | <p>Comment(s):</p> <p>[Structural] Soil Cell Bioretention: Why is evaluation of soil cells optional?; Do not require soil cell evaluation.</p> <p>Response: Soil Cell Bioretention evaluation / use is an optional Category 2 BMP for the Single-Family Residential On-site List. Use in the city has been limited mainly to the right-of-way but has been added to this project On-site List to facilitate an optional BMP that both mitigates stormwater and provides for more mature and healthy trees. Evaluation for Parcel-Based Projects is not required.</p> |
| 22.805.070 - Minimum Requirements for On-Site Stormwater Management - Trail and Sidewalk Projects | <p>Table B - On-site List for Trail and Sidewalk Projects was updated with the following:</p> <ul style="list-style-type: none">• Added that rain gardens can include a tree• Added that “Infiltrating Structural Bioretention with Tree” can be used as an OSM BMP in Category 2• Clarified that infiltration testing is not required for permeable pavement sidewalks or composted amended strips unless used to demonstrate infeasibility. | Updated to facilitate increase in tree canopy and stormwater management, improve feasibility of bioretention in space-limited urban areas, to provide additional BMP options, and reduce feasibility barriers for certain BMPs. | No comments received. |

Stormwater Code

| Stormwater Code, 22.805 - Minimum Requirements for All Projects Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| 22.805.070 - Minimum Requirements for On-Site Stormwater Management - Parcel-based Projects | <p>Table C - On-site List for Parcel-based Projects was updated with the following:</p> <ul style="list-style-type: none">• Moved RWH sized to meet OSM Performance Standard to Category 1 for more project flexibility• Added that rain gardens and bioretention can include a tree• Added that "Infiltrating Structural Bioretention with Tree" can be used as an OSM BMP in Category 2• Add that "Infiltrating Structural Bioretention without tree" can be used as a Category 3 BMP• Added evaluation of "Vegetated Roofs" for "Projects Discharging to a Designated Receiving Water"• Added "Non-infiltrating Structural Bioretention with Tree" and "Residential Cisterns" as an optional Category 4 BMP• Clarified that infiltration testing is not required for permeable pavement sidewalks or composted amended strips unless proving infeasibility• Clarified in OSM List that approved equivalents (already included in current BMP manual) are allowed for permeable pavement facilities and surfaces. | Updated to remove barriers to meeting both tree and stormwater management requirements, improve feasibility of bioretention in space-limited urban areas, to provide additional BMP options, to address atmospheric deposition and temperature increases associated with roofs, and to reduce feasibility barriers for certain BMPs. | <p>Comment(s):</p> <p>[Structural] Soil Cell Bioretention: Why is evaluation of soil cells optional?; Do not require soil cell evaluation.</p> <p>Response: Soil Cell Bioretention evaluation / use is an optional Category 2 BMP for the Parcel-Based Project On-site List. Use in the city has been limited mainly to the right-of-way but has been added to this project On-site List to facilitate an optional BMP that both mitigates stormwater and provides for more mature and healthy trees. Evaluation for Parcel-Based Projects is not required.</p> |

Stormwater Code

| Stormwater Code, 22.805 - Minimum Requirements for All Projects Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| 22.805.070 - Minimum Requirements for On-Site Stormwater Management - Roadway Projects | <p>Table D - On-site List for Roadway Projects was updated with the following:</p> <ul style="list-style-type: none">Added that rain gardens and bioretention are required to evaluate having a treeAdded that "Infiltrating and Non-Infiltrating Structural Bioretention with Tree" can be used as an OSM BMP.Clarified that infiltration testing is not required for permeable pavement sidewalks or composted amended strips unless proving infeasibility. | <p>Edits were made to promote tree canopy, to improve feasibility of bioretention in space-limited urban areas, to provide additional BMP options, and to reduce feasibility barriers for certain BMPs.</p> | <p>Comment(s): <u>[Structural] Soil Cell Bioretention:</u> Do not require soil cell evaluation.</p> <p>Response: Soil Cell Bioretention evaluation is required as a Category 2 BMP for the Roadway Project On-site List. This BMP has been added to this project On-site List to support the City's initiative to increase Seattle's tree canopy while also mitigating stormwater flow and pollutants from roadways.</p> |
| 22.805.080 - Minimum Requirements for Flow Control | <ul style="list-style-type: none">Added requirement that in addition to OSM BMPs, all infiltrating BMPs (e.g., Infiltration Basins) must be used to the maximum extent feasible to meet flow control requirements.Updated Wetland Protection - Method 2 to allowed greater flexibility in matching volume percentages during winter months.Clarified that discharges "from the project site" must meet the required flow control standard | <p>Infiltration is prioritized over non-infiltration for groundwater recharge and volume runoff reduction.</p> <p>Consistency with 2024 SWMMWW.</p> <p>Clarification.</p> | <p>No comments received.</p> |

Stormwater Code

| Stormwater Code, 22.805 - Minimum Requirements for All Projects Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| 22.805.090 - Minimum Requirements for Treatment | <ul style="list-style-type: none">Added requirement that in addition to OSM BMPs, all infiltrating BMPs (e.g., Infiltration Basins) must be used to the maximum extent feasible to meet water quality treatment requirements.Revised terminology from “Enhanced” to “Metals” Treatment.Updated Metals Treatment thresholds to lower AADT threshold for roadways and to include roadways that provide on-street parking for commercial and industrial areas and sites that are subject to “industrial activities”. | Infiltration is prioritized over non-infiltration for groundwater recharge and volume runoff reduction.. Consistency with 2024 SWMMWW. | <p>Comment(s): <u>Enhanced vs. Metals Terminology:</u> Why was “Enhanced” Treatment changed to “Metals” Treatment?</p> <p>Response: This change was made for equivalency with Ecology’s Permit changes. This change in terminology does not change the actual targeted pollutants, metals - it is only a change in terminology.</p> <p>Comment(s): <u>Industrial Activities:</u> Remove “site is subject to industrial activities” threshold of for when metals treatment is required.</p> <p>Response: No changes proposed - revisions required per 2024 MS4 Permit, Appendix 1.</p> |

| Stormwater Code, 22.807 - Drainage Control Review and Application Requirements Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|---|-------------------|--|
| 22.807.010 - General | No edits | | No comments received. |

Stormwater Code

| Stormwater Code, 22.807 - Drainage Control Review and Application Requirements Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| 22.807.020 - Drainage Control Review and Application Requirements | <ul style="list-style-type: none">Clarified that removal of a building or structure, regardless of whether the slab or foundation remains, counts toward the area threshold for drainage review and approvalRemoved exemption for drainage review for projects in a City owned right-of-way.Lowered the threshold requiring a Comprehensive Drainage Review to 10,000 square feet of land-disturbing activity.Clarified when a licensed civil engineer must prepare a drainage control plan.Added a reference to Source Controls under the Inspection and Maintenance Schedule submittal requirementsAdded that in addition to “Closely Related Projects”, thresholds apply to entire “Common Plan of Development”, “Short Plat”, and “Subdivision” when applying thresholds. | Clarifications. Revisions to ensure adequate review of erosion control measures in tight urban environment. Consistency with 2024 MS4 Permit. | <p>Comment(s): <u>Source Control Inspection and Maintenance Schedule:</u> Concern about requiring source control schedule at time of drainage review.</p> <p>Response: Source control reference changed from to 22.803.040 (Minimum Requirements for Source Controls For Business and Public Entities for Specific Activities) to 22.805.020.I (Install Source Controls). This is not a new requirement but only adds a reference to the correct source control code section. This section, 22.807.020.3.b, already requires an Inspection and Maintenance schedules for on-site stormwater management, flow control, treatment, and source control. This requirement is typically addressed during plan review / approval through the required Memorandum of Drainage Control (22.807.020.d).</p> <p>Comment(s): <u>Comprehensive Drainage Review Threshold:</u> 22.807.020.A.3 Concern regarding lowering Comprehensive Drainage Review threshold from one acre to 10,000 sf of land disturbing activity; clarify what is meant by “fully-infiltrate all stormwater runoff”.</p> <p>Response: Seattle still evaluating comment(s).</p> |
| 22.807.090 Maintenance and Inspection | No edits. | | No comments received. |

| Stormwater Code, 22.808 - Stormwater Code Enforcement Code Section | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|--|-------------------|---|
| 22.808.010 through 22.808.110 | No edits. | | No comments received. |

Summary of Proposed Changes to Volume 1 (Project Minimum Requirements) of Seattle Stormwater Manual

July 2025 Public Review Draft Stormwater Manual

- Added reference to code language boxes to associated code section (final code language will be added to the final manual).
- Added and updated definitions and criteria for clarity and to be consistent with the 2024 MS4 Permit and SWMMWW.
- Add new section for Common Plan of Development and clarified project threshold areas to be consistent with the 2024 MS4 Permit.
- Added new closely related project criteria to include projects without construction approval in addition to projects under review.
- Added new section describing when underdrain sports fields are considered hard surfaces or pollution-generating pervious surfaces.
- Clarified the distinctions between “new” and “replaced” hard surfaces and provided examples to be consistent with the 2024 MS4 Permit.
- Added general protection guidelines for all wetlands and alternative method for meeting wetland flow control during summer months.
- Clarified drainage and construction plan submittal requirement and thresholds.

| Volume 1 - Overall Changes Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|-----------------------------------|--|
| Various | <ul style="list-style-type: none">• Changed “Enhanced Treatment” to “Metals Treatment” | Consistency with 2024 MS4 Permit. | Comment(s): <u>Enhanced vs. Metals Terminology:</u> Why was “Enhanced” Treatment changed to “Metals” Treatment? Response: See 22.805.090 Stormwater Code response. |

Volume 1 - Project Minimum Requirements

| Volume 1 - Overall Changes Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|----------------------|--|
| Various | <ul style="list-style-type: none">Moved “Utility Project”, “Pavement Maintenance Project”, “Remediation Project”, and “Retrofit Project” from Section 4.5 to Section 2.2Moved “WSDOT Project” from Section 4.6 to 2.2.Moved “Special Circumstances” from Section 4.7 to 2.7.Deleted Section 2.6 “Certain Land-Disturbing Activities” and moved project type information to Section 4.5. | Updated for clarity. | No comments received. |

| Volume 1, Chapter 2 - Determining Minimum Requirements Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.1 - Step 1 - Define the Boundaries of the Project Site | <ul style="list-style-type: none">Refer to SMC 22.805.010.B & D and 22.807.020.D for application of thresholds.Clarified that the project site includes the full area of a subdivision, short plat, common plan of development, or closely related project.Clarified that Stormwater Code requirements will be based on the total cumulative development planned, not just individual projects or phases. | For code changes, see Code Summary of Proposed Changes. Consistency with 2024 MS4 Permit. | No comments received. |
| Section 2.1.1 - Definitions <u>Related to Project Site</u> | <ul style="list-style-type: none">Changed section title name from "Definitions" to "Definitions Related to Project Site.Refer to SMC 22.801.010.D for changes to definition of “Development”. | Clarification. For code changes, see Code Summary of Proposed Changes. | No comments received. |
| Section 2.1.2 - <u>Common Plan of Development</u> | Refer to SMC 22.801.040.C for added definition of “Common Plan of Development”. | For code changes, see Code Summary of Proposed Changes. Consistency with 2024 MS4 Permit. | No comments received. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 2 - Determining Minimum Requirements | | | |
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| Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
| Section 2.1.3 - Closely Related Projects | <ul style="list-style-type: none">Refer to SMC 22.801.040.C for added definition of “Closely Related Projects”.Added new closely related project criteria to include projects without construction approval in addition to projects under review.Clarified other criteria for determining if two or more projects are closely related. | For code changes, see Code Summary of Proposed Changes. Consistency with 2024 MS4 Permit. | No comments received. |
| Section 2.2 - Step 2 - Identify the Type of Project | Updated the list of general classifications of projects. | Clarification. | Comment(s): <u>Multiple Exempt Activities:</u> Clarify that multiple exempt activities (e.g., utility work and pavement maintenance) that are combined into one project are still considered exempt. Response: Seattle still evaluating comment(s). |
| Section 2.2.1 - Single-Family Residential Project | Refer to SMC 22.801.200.S for changes to definition of “Single-Family Residential Project”. | For code changes, see Code Summary of Proposed Changes. | No comments received. |
| Section 2.2.2 - Sidewalk Project | <ul style="list-style-type: none">Clarified the distinction between roadway and sidewalk projects.Clarified when projects updating hard surfaces for ADA compliance are considered a sidewalk or trail project.Figure 2.3 updated - refer to redline figure packet for changes. | Clarification. | Comment(s): <u>Sidewalk vs. Roadway Projects:</u> Clarify what constitutes a roadway project as opposed to a sidewalk project - definition of sidewalk project still includes 10,000 sf “in the roadway”. Response: For a project to be a “sidewalk project”, the definition (22.801.200.S) must be met. In that, the project is “ <i>for the creation of a new sidewalk or replacement of an existing sidewalk</i> ”. Projects with other purposes are not considered “sidewalk projects”. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 2 - Determining Minimum Requirements Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.2.3 - Trail Project | Clarified when trail portions of a project may follow the requirements of Section 4.2 Trail and Sidewalk Projects or when they must meet requirements of Section 4.4 Parcel Based Projects. | Clarification. | No comments received. |
| Section 2.2.5 - Parcel-Based Project | Clarified that utility work associated with a parcel-based project is part of the parcel-based project. | Consistency with 2024 MS4 Permit.. | No comments received. |
| Section 2.2.8 - Utility Projects | <ul style="list-style-type: none">Refer to SMC 22.800.040.A.2.a for changes related to Utility Projects.Clarified the limits of a utility project. | For code changes, see Code Summary of Proposed Changes. Clarification. | Comment(s): <u>Activities Associated with Development:</u> Pavement restoration and utility installation associated with development should still be considered exempt activities. Response: No changes proposed - revisions required per 2024 MS4 Permit, Appendix 1. Comment(s): <u>Utility Master Use Permits:</u> Will drainage review be required for Utility Master Permits (UMPs)? Response: Seattle does not anticipate the drainage review process for UMPs to change because of these Stormwater Code updates. |
| Section 2.2.9 - Pavement Maintenance Projects | <ul style="list-style-type: none">Refer to SMC 22.800.040.A.2.a for changes related to Pavement Maintenance Projects.Refer to SMC 22.801.170.P for new Pavement Maintenance Practices” definition.Clarified the limits of a pavement maintenance project. | For code changes, see Code Summary of Proposed Changes. Clarification. Consistency with 2024 MS4 Permit. | Comment(s): <u>Activities Associated with Development:</u> Pavement restoration and utility installation associated with development should still be considered exempt activities. Response: No changes proposed - revisions required per 2024 MS4 Permit, Appendix 1. |
| Section 2.2.11 - Retrofit Projects | Clarified the limits of a retrofit project. | Clarification. | No comments received. |

| Volume 1, Chapter 2 - Determining Minimum Requirements | | | |
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| Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
| Section 2.3 - Step 3 - Identify the Receiving Water and Downstream Conveyance | Figures 2.7, 2.9, 2.10 and 2.11 updated - refer to redline figure packet for changes. | Clarification. | Comment(s): <u>Creek Designations:</u> Section 2.3: Provide consistent criteria / application for what is considered a creek. Response: Seattle still evaluating comment(s). <u>Capacity-Constrained System:</u> Areas designated as capacity-constrained systems increased significantly. Response: There are no capacity-constrained system area changes proposed. The only change to Figure 2.11 is adding the names of the already existing capacity-constrained areas. |
| Section 2.4 - Perform Site Assessment and Planning | Added contaminated soils or groundwater on or near the site as a site-specific factor to consider. | Clarification. | No comments received. |
| Section 2.5 - Step 5 - Calculating Land-Disturbing Activity and New Plus Replaced Hard Surface | <ul style="list-style-type: none">Refer to SMC 22.801.150.N for changes to “new hard surface” definition.Refer to SMC 22.801.190.R for changes to “replaced hard surface” definition.Clarified when a deck that allows rainwater to pass through is not considered a hard surface and when overlaying existing asphalt or concrete is not considered new or replaced hard surface. | For code changes, see Code Summary of Proposed Changes. Clarification. | No comments received. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 2 - Determining Minimum Requirements | | | |
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| Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
| Section 2.6 - Step 6 - Calculating New Plus Replaced Pollution-Generating Hard Surface | Refer to SMC 22.801.170.P for changes to “pollution-generating hard surface” definition. | For code changes, see Code Summary of Proposed Changes. | Comment(s): <u>Equipment On Rooftops:</u> Will metal equipment (HVAC) count towards pollution-generating hard surface threshold? Response: The criteria for “pollution-generating hard surface” is not proposed to change. Instead, the criteria that was originally included in the definition of “pollution-generating <u>impervious</u> surface” was moved to the definition of “pollution-generating <u>hard</u> surface” since thresholds are based on “ <u>hard</u> surface” not “impervious”. Therefore, there is no change in how HVAC metal equipment is categorized. |
| Section 2.5.1 - Underdrained Sports Fields | Added section describing when underdrain sports fields are considered hard surfaces or pollution-generating pervious surfaces. | Consistency with 2024 MS4 Permit. | No comments received. |
| Section 2.5.2 - The Difference Between "New" and "Replaced" Hard Surfaces | Added new subsection to clarify distinction between "New" and "Replaced" hard surfaces. Provided detailed examples for both structures and non-structure surfaces in redline figures package | Consistency with 2024 MS4 Permit. | No comments received. |
| Section 2.5.3 - Remodels and Reconstruction that Maintain Existing Foundations | <ul style="list-style-type: none">Added new subsection to clarify when a remodel of an existing building or construction on an existing foundation is defined as a “replaced hard surface”.Added new Figures 2.12, 2.13, 2.14, 2.15 to show examples of new, replaced and existing hard surfaces - refer to redline figure packet for changes. | Consistency with 2024 MS4 Permit. | No comments received. |
| Section 2.7 - Step 7 - Determine Which Minimum Requirements Apply | Updated list of other Director’s Rules, Policies and Tips that may have additional or modified requirements. | Clarification. | No comments received. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 3 - Minimum Requirements for All Projects Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|---|---|--|
| Various | Minor terminology revisions and external reference updates. | Clarification. | No comments received. |
| Section 3.1 - Maintaining Natural Drainage Patterns | Added requirement for concentrated discharge locations from project site. | Consistency with 2024 SWMMWW. | No comments received. |
| Section 3.4 - Construction Site Stormwater Pollution Prevention Control | <ul style="list-style-type: none">Refer to SMC 22.805.020.D for changes to “Minimum Requirements for Construction Stormwater Pollution Prevention Plan”.Copied from Volume 2 the 19 elements required for construction site stormwater pollution prevention control. | For code changes, see Code Summary of Proposed Changes. Clarification. | No comments received. |
| Section 3.5 - Protect Wetlands | Added general protection guidelines for all wetlands. | Consistency with 2024 MS4 Permit & SWMMWW. | No comments received. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 4 - Minimum Requirements Based on Project Type Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|---|--|--|
| Chapter 4 overview | Minor terminology revisions. | Clarification. | No comments received. |
| Section 4.3 - Roadway Projects | <ul style="list-style-type: none">Refer to SMC 22.805.060.C.1 for changes to Wetland Flow Control thresholds.Refer to SMC 22.805.060.C.2 for changes to Listed Creek Flow Control thresholds.Refer to SMC 22.805.060.C.3 for changes to Non-Listed Creek Flow Control thresholds.Refer to SMC 22.805.060.C.4 for changes to Small Lake Flow Control thresholds.Refer to SMC 22.805.060.D for changes to Treatment thresholds.Clarified that roadway projects discharging to a capacity-constrained system may need to meet the existing condition standard.Figures 4.1.A - C to be updated in Phase 2 to match code language changes. | For code changes, see Code Summary of Proposed Changes. Clarification and consistency with 2024 MS4 Permit. | Comment(s): <u>Flow control application:</u> When does the Peak Standard apply in addition to other flow control standards. Response: The answer to this comment is project dependent. For example, a project discharging to a ditch in the Thornton Creek basin would be required to provide flow control at both the Peak Standard (due to discharge to the ditch / culvert system) and the Pasture Standard (due to discharge within the creek basin). Conversely, if a project discharges to the combined system, the project would only be required to provide flow control at the Peak Standard. |
| Section 4.4 - Parcel-Based Projects | <ul style="list-style-type: none">Clarified that parcel-based projects discharging to a capacity-constrained system may need to meet the existing condition standardRevised Figure 4.2C to update terminology from “Enhanced” to “Metals” treatment - refer to redline figure packet for changes. | Clarification and consistency with 2024 MS4 Permit. | Comment(s): <u>Flow control application:</u> When does the Peak Standard apply in addition to other flow control standards. Response: See response for Section 4.3 - Roadway Projects. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 5 - Minimum Requirement Standards Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.2.2 - On-site Lists | <ul style="list-style-type: none"> Refer to SMC 22.805.070.D.2 for changes to the On-site List for Single-family Residential Projects. Refer to SMC 22.805.070.D.3 for changes to the On-site List for Trail and Sidewalk Projects. Refer to SMC 22.805.070.D.4 for changes to the On-site List for Parcel-based Projects. Refer to SMC 22.805.070.D.5 for changes to the On-site List for Roadway Projects. | For code changes, see Code Summary of Proposed Changes. | No comments received. |
| Section 5.3 - Flow Control | <ul style="list-style-type: none"> Refer to SMC 22.805.080.B for change to Flow Control requirements. Refer to SMC 22.805.080.B.2-5 for changes to Flow Control in relation to “Project Site”. Clarified that flow control standards are applied to full project site and the full project site should be included in the continuous runoff modeling. Added reference related to sizing guidance for detention BMPs orifice diameter to meet standard release rates. | For code changes, see Code Summary of Proposed Changes. Clarification. | No comments received. |
| Section 5.3.1 - Wetland Protection Standards | <ul style="list-style-type: none"> Refer to SMC 22.805.080.B.1. for changes to Wetland Flow Control requirements. Added clarifying language on how to handle situations where multiple flow control standards apply alongside the Wetland Protection Standard, prioritizing protection of wetland hydroperiods if full compliance with all standards isn’t feasible. Added an alternative method for demonstrating compliance with Method 2 during summer months, using average monthly volumes when pre-project models show zero runoff on some days. | For code changes, see Code Summary of Proposed Changes. Consistency with 2024 MS4 Permit & SWMMWW. | No comments received. |
| Section 5.3.4 - Existing Conditions Standard | Added clarity to existing land cover definition and noted approved permits and engineering plans may be required. | Clarification. | No comments received. |
| Section 5.3.5 - Peak Control Standard | Clarified post development release rates for the peak control standard are based on the full project site and the full project site should be included in the continuous runoff modeling. | Clarification. | No comments received. |
| Section 5.4.1 General Water Quality Treatment Requirements | Refer to SMC 22.805.090.B for change to Water Quality Treatment requirements. | For code changes, see Code Summary of Proposed Changes. | No comments received. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 5 - Minimum Requirement Standards Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|--|---|--|
| Section 5.4.2.3 - Metals Treatment | <ul style="list-style-type: none">Refer to SMC 22.805.090.B.5 for changes to Water Quality Treatment Metals requirements.Added additional commercial site examples where metals treatment may be required | For code changes, see Code Summary of Proposed Changes. Consistency with 2024 MS4 Permit. | No comments received. |
| Section 5.4.2.4 - Basic Treatment | Added that some project sites may need to meet both basic treatment and oil control treatment requirements. | Clarification. | No comments received. |

| Volume 1, Chapter 7 - Site Assessment and Planning Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|---|-------------------|--|
| Section 7.5 - Temporary and Permanent Groundwater Dewatering | Clarified requirements for discharge to the combined sewer system. | Clarification. | No comments received. |
| Section 7.7 - Site Assessment | <ul style="list-style-type: none">Added references for more information on contaminated sites and landfills.Added sources of data to evaluate site suitability.Clarified requirements for contaminated stormwater or groundwater. | Clarification. | Comment(s): <u>Site Assessment:</u> Why does site assessment include criteria for up to 500 feet away, even for small projects? Response: Seattle still evaluating comment(s). |

| Volume 1, Chapter 8 - Drainage Control Review and Application Requirements Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|--|---|--|
| Section 8.1 - Preliminary Drainage Review | Refer to SMC 22.807.020.D for changes to Preliminary Drainage Review requirements. | For code changes, see Code Summary of Proposed Changes. | No comments received. |

Volume 1 - Project Minimum Requirements

| Volume 1, Chapter 8 - Drainage Control Review and Application Requirements | | | |
|--|---|---|--|
| Section Number and Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
| Section 8.2 - Standard Drainage Review | <ul style="list-style-type: none">Refer to SMC 22.807.020.A.2 for changes to Standard Drainage Review requirements.Added clarity to types of projects that require a Standard Drainage Review.Added site plan element of including limits of disturbance. | For code changes, see Code Summary of Proposed Changes. Clarification. | Comment(s): <u>Slab Remaining During Demolition:</u> Do not count remaining slab on grade during demolition as land disturbing activity. Response: The text in Volume 1, Section 8.2 was written incorrectly. Remaining existing slabs are not considered land disturbing activity. Instead, the remaining slab area counts toward plan review thresholds in addition to land disturbing areas and new / replaced hard surfaces. Refer to 22.807.020.A.2.a (Standard Plan Review) for correct wording. Volume 1 will be updated accordingly. |
| Section 8.3 - Comprehensive Drainage Review for Large Projects | <ul style="list-style-type: none">Refer to SMC 22.807.020.A.3 for changes to Comprehensive Drainage Review requirements.Added other qualifying professionals who are allowed to prepare and sign the Comprehensive Construction Stormwater Control and Soil Management Plan. | For code changes, see Code Summary of Proposed Changes. Clarification. | No comments received. |

Summary of Proposed Changes to Volume 2 (Construction Stormwater Control) of the Seattle Stormwater Manual

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|---|--|
| July 2025 Public Review Draft Stormwater Manual | |
| <ul style="list-style-type: none">• Added section to describe new Turbidity and pH monitoring requirements.• Added section to describe upstream analysis evaluation of runoff that enters a construction site.• Changed criteria for Small Projects from 1 acre to less than 10,000 square feet of land-disturbing activities.• Changed criteria for Large projects from 1 acre to 10,000 SF and greater of land-disturbing activities.• Clarified when to use high visibility fencing BMP.• Updated guidance/requirements for sizing filtration systems for groundwater discharges.• Added reference to BMPs with Ecology approved functionally equivalent BMP.• Added considerations for PCBs to BMPs as applicable. | |

| Volume 2 Overall Changes Section Number and Name | July 2025 Draft - Initial Response to Comments |
|--|---|
| | <p>Comment(s): Enforcement: Concerns regarding lack of enforcement / stop work orders for projects not implementing appropriate construction best management practices during demolition including dust suppression in addition to erosion and sediment transport, illicit connections, trash and debris.</p> <p>Response: Seattle still evaluating comment(s).</p> |

Volume 2 - Construction Stormwater Control

| Volume 2, Chapter 1 - Introduction Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|--|--|---|
| Section 1.3 What is Considered "Compliance"? | <ul style="list-style-type: none"> Added section to describe new Turbidity and pH monitoring requirements. Added section to describe upstream analysis evaluation of runoff that enters a construction site. | Provide clarity and ensure meeting surface WQ standards. | <p>Comment(s): <u>Turbidity and pH Monitoring:</u> When is temperature and pH monitoring necessary?; Remove turbidity and pH monitoring benchmarks - not appropriate and redundant with NPDES Construction Stormwater General Permit requirements - use general language instead; Do not require detention ponds [other temporary detention] after demolition.</p> <p>Response: Seattle still evaluating comment(s).</p> |
| Section 1.4 What is Considered "Out of Compliance"? | Added "turbidity or pH that exceeds the benchmark" as criteria for when a discharge is considered out of compliance. | Ensure meeting surface WQ standards. | No comments received. |

| Volume 2, Chapter 2 -Construction Stormwater Control and Soil Management Plan Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|---|---|---|--|
| Section 2.1 Small Project Construction Stormwater Control and Soil Management Plan | <ul style="list-style-type: none"> Changed criteria for Small Projects from 1 acre to less than 10,000 square feet of land-disturbing activities. Changed "construction clearing limits" to "Limits of Disturbance" which include clearing, grading, and other land disturbing activities. Added a "discharge flow rate limit" for construction stormwater, groundwater dewatering and process water discharges. | Revised small project definition so projects with significant land disturbance but very little new or replaced hard surface will require additional scrutiny and provided clarity about what needs to be included in the Construction Stormwater Control and Soil Management Plans. | No comments received. |
| Section 2.2 Large Project Construction Stormwater Control and Soil Management Plan | <ul style="list-style-type: none"> Changed criteria for Large Projects from 1 acre to 10,000 square feet and greater of land-disturbing activities. | Update large project definition so projects with significant land disturbance but very little new or replaced hard surface will require additional scrutiny. | No comments received. |
| Section 2.3 Certified Erosion and Sediment Control Lead | <ul style="list-style-type: none"> Under responsibilities of CESCL, added contact information if turbid or polluted discharge enters the City's MS4 and/or a receiving waterbody. | Provided clarity for CESCEL personnel on who to contact if turbid or polluted discharge enters the City's MS4 and/or a receiving waterbody. | No comments received. |

| Volume 2, Chapter 3 - Selecting Construction Stormwater Controls Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Table 1 Checklist to Select Large Project Construction BMPs | <ul style="list-style-type: none"> Added requirement that high-visibility fencing is required at edges of ECAs and their buffers where disturbance is not allowed. | Provided clarity for when high visibility fencing BMP is required. | No comments received. |

| Volume 2, Chapter 4 - Standards and Specifications for Construction Erosion and Sedimentation Control Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| BMP E1.15: Mulching, Matting, and Compost Blankets | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to mulching. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E1.50: High-Visibility Fence | <ul style="list-style-type: none"> Edited language for clarity. | Added clarity for when to use high visibility fence BMP. | No comments received. |
| BMP E2.10: Stabilized Construction Access | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to stabilized construction access. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E2.15: Tire Wash | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to tire wash. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E2.35: Check Dams | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to Check Dams. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E2.40: Triangular Silt Dike (TSD) | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to TSDs. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E3.10: Filter Fence | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to filter fences. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |

Volume 2 - Construction Stormwater Control

| Volume 2, Chapter 4 - Standards and Specifications for Construction Erosion and Sedimentation Control Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| BMP E3.25: Inlet Protection | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to storm drain inlet Protection. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E3.35: Straw Wattles, Compost Socks, and Compost Berms | <ul style="list-style-type: none"> Added information on technologies that the department of Ecology has approved are functionally equivalent to wattles. | Addressed user comment to add functionally equivalent approved BMPs. | No comments received. |
| BMP E3.60: Construction Stormwater Filtration | <ul style="list-style-type: none"> Added guidance/requirements for how to size filtration systems for groundwater discharges. | Provide clarity on how to account for groundwater discharges that may have a constant flow rate. | No comments received. |

| Volume 2, Chapter 5 - Source Control Practices for Construction Pollutants Other than Sediment Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| BMP C1.25: Demolition of Buildings | <ul style="list-style-type: none"> Added consideration for PCBs and added more guidance/requirements for construction stormwater control for demolition. | Consistency with 2024 SWMMWW. Provide clarity on BMPs to use during and after demolition. | Comment(s): <u>PCBs:</u> Demolition of Buildings: Clarify required method of communication with the City when buildings with PCBs are demolished. Response: Seattle still evaluating comment(s). |
| BMP C1.30: Building Repair, Remodeling, and Construction | <ul style="list-style-type: none"> Added consideration for PCBs . | Consistency with 2024 SWMMWW. | No comments received. |
| BMP C1.40: Temporary Groundwater Dewatering | <ul style="list-style-type: none"> Changed section title from "temporary dewatering" to "temporary groundwater dewatering". | Revised for clarity. | No comments received. |
| BMP C1.40: Temporary Groundwater Dewatering | <ul style="list-style-type: none"> Added reference to Section 4.3.8 BMP E3.60 when going through the stormwater filtration planning considerations for BMP C1.40. | Added for clarity. | No comments received. |

| Volume 2, Chapter 5 - Source Control Practices for Construction Pollutants Other than Sediment Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| BMP C1.45: Solid Waste Handling and Disposal | <ul style="list-style-type: none">Added consideration for PCBs . | Consistency with 2024 SWMMWW. | No comments received. |
| BMP C1.50: Disposal of Asbestos and Polychlorinated Biphenyls (PCBs) | <ul style="list-style-type: none">Added consideration for PCBs . | Consistency with 2024 SWMMWW. | No comments received. |
| BMP C1.56: Concrete Handling | | | <p>Comment(s): <u>Concrete Handling:</u> Do not place concrete during rain events or when rain expected within [X amount of time] following placement.</p> <p>Response: No change. BMP already states that concrete should not be placed during heavy rain events. Adding additional text about prohibiting concrete placement when rain is expected within [X amount of time] following placement is challenging because the amount of time selected would be arbitrary and likely not-enforceable.</p> |

Summary of Proposed Changes to Volume 3 (Project Stormwater Control) of the Seattle Stormwater Manual

July 2025 Public Review Draft Stormwater Manual

- Changed “enhanced treatment” to “metals treatment”.
- Revised site constraints for stormwater dispersion flowpaths near septic system components (Section 3.1).
- Updated site constraint requirements to match new legislation for septic systems and added clarity and flexibility for infiltration facilities (Section 3.2).
- Added a requirement to evaluate all infiltration options, in addition to On-site BMPs, before choosing traditional flow control BMPs (Section 3.4).
- Clarified requirements for small projects with no off-site point of discharge (Section 4.3)
- Added design criteria for using catch basins for presettling (Section 4.4).
- Added clarity and considerations for infiltrating BMPs (Section 4.5).
- Updated tree list and protection and maintenance requirements (Section 5.2).
- Added Light Rail Elevated Guideway Dispersion BMP for equivalency with 2024 SWMMWW to Chapter 5.
- Added HPBSM and polishing layer may be used in infiltrating bioretention to be consistency with 2024 SWMMWW.
- Added clarifications and updated requirements to BMPs in Chapter 5 (as summarized below).
- Changed section name from "Single Family Residential Cistern" to "Residential Cistern" and allow residential cisterns in more residential zones.
- Added new BMPs for infiltrating and non-infiltrating structural soil cell BMPs.

| Volume 3, Chapter 3 - BMP Selection and Sizing Approach Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|--|---|--|
| Section 3.1-Determine Dispersion Feasibility | Revised site constraints for stormwater dispersion flowpaths near septic system components, specifically prohibiting them within 30 feet of drainfields and 10 feet of tanks and distribution boxes. | Updated site constraint requirements to match new legislation for septic systems. | No comments received. |

| Volume 3, Chapter 3 - BMP Selection and Sizing Approach Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 3.2 - Determine Infiltration Feasibility | <ul style="list-style-type: none">Revised site constraints near septic system components, specifically prohibiting them within 30 feet of drainfields and 10 feet of tanks and distribution boxes.Added clarity for minimum required vertical separation and when subsurface investigation is required.Revised minimum infiltration rates for infiltration trenches and permeable pavement surface. | Updated site constraint requirements to match new legislation for septic systems and added clarity and flexibility for infiltration facilities. | Comment(s): <u>Infiltration testing:</u> Allow geotechnical engineer to recommend infiltration rate based on site analysis instead of performing infiltration testing; because of Seattle’s soils, less focus on infiltration BMPs. Response: Seattle has developed a city-wide map delineating areas where infiltration testing is not required based on steep slope, contaminated sites, and other criteria approved by Ecology. Other than the approved criteria, infiltration testing is required per Ecology’s requirements. |
| Section 3.4 - BMP Selection for Flow Control | Added a requirement to evaluate all infiltration options, in addition to On-site BMPs, before choosing traditional flow control BMPs. | Since there are some infiltration BMPs that are not on the OSM BMP list, added requirement to evaluate other infiltration BMPs before selecting traditional detention BMPs. | No comments received. |
| Section 3.5 - BMP Selection for Water Quality Treatment | Changed the phrase "enhanced" treatment to "metals" treatment. | Equivalency with 2024 SWMMWW. | No comments received. |

| Volume 3, Chapter 4 - General Design Requirements Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 4.1 - Sizing Approach | <ul style="list-style-type: none">Added Concentrated Flow Dispersion to Pre-sized Approach table.Added reference and clarity for allowance to size flow control BMPs for less than the total new plus replaced hard surface area when only On-site BMPs are used.Added new and revised procedures for flow control sizing when the minimum 0.5-inch orifice is not feasible. | Added clarity and missing dispersion BMPs. Equivalency with 2024 SWMMWW for flow control sizing when 0.5-inch orifice is not feasible. | No comments received. |
| Section 4.3 - Conveyance and Overflow General Design requirements | <ul style="list-style-type: none">Clarified requirements for small projects with no off-site point of discharge including:Specify this section is only for small projects.Clarify that only the new and replaced hard surfaces must be modeled.Clarified that permeable pavement surfaces and dispersion do not require modeling.Added requirements to identify overland overflows from BMPs and increase capacity of overflow devices to the 100-year recurrence when located within ECA Steep Slope or Landslide Prone areas. | Added clarity and protection for ECA areas. | Comment(s): <u>Building secondary drainage:</u> Allow secondary building to overflow to sidewalk or other visible are due to emergency nature and possible system capacity issues. Response: Seattle still evaluating comment(s). |
| Section 4.4 - Presettling and Pretreatment Requirements | <ul style="list-style-type: none">Added design criteria for using catch basin for presettling. | Added clarity. | No comments received. |

| Volume 3, Chapter 4 - General Design Requirements Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 4.5 - Infiltrating BMPs | <ul style="list-style-type: none">Clarified that 100% infiltration means infiltrating all runoff over the full simulation period, not just during extreme events like the 100-year storm.Added the process for modeling an infiltration BMP to infiltrate up to the 25-year event if no discharge point is available for small sites.Added considerations for infiltrating BMPs for foundation/footing drainage and other subsurface drainage systems. | Added clarity and considerations. | No comments received. |

| Volume 3, Chapter 5 - BMP Design Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.2 - Tree Planting and Retention | <ul style="list-style-type: none">• Changed tree list to Green Factor tree list.• Clarified design criteria for retained trees and newly planted trees.• Added protection standards and a summary of the minimum requirements for tree planting and retention.• Provided specific maintenance requirements to support long-term tree survival after planting. It outlines a clear irrigation schedule, proper mulching technique, and the need to replace failed trees. | Support increased tree canopy and to align with Green Factor requirements. | <p>Comment(s):</p> <p><u>Tree Benefits:</u> Add more information about the benefits of trees; use i-Tree and other tree-related modeling resources; require more tree protection / preservation and maintenance of trees; focus on planting evergreen / coniferous trees; Reference and utilize 2008 Herrera Effects of Trees on Stormwater Runoff study.</p> <p>Response: The area managed values found in Tables 5.2 & 5.3 are based on the 2008 Herrera study and acknowledges the increased benefits of evergreen trees. Seattle continues to rely on Best Available Science and has made improvements to this Section 5.2 to improve preservation and maintenance of trees. Additionally, Seattle has multiple initiatives, codes, and rules to preserve and increase tree canopy in Seattle.</p> |
| Section 5.3.4 - Trench Downspout Dispersion | <ul style="list-style-type: none">• Added criteria for short retaining walls, rockeries and uncovered decks allows in the 10-ft additional setback.• Clarified Continuous Modeling Assumptions. | The criteria is roughly based on the criteria that would require structural/building review of short retaining walls and uncovered decks. If they are short enough that a structural review is not required, then they are allowed in the additional setback beyond the vegetated flowpath. Note: this does not reduce the vegetated flowpath length. | No comments received. |
| Section 5.3.7 - Sidewalk/Trail Compost Amended Strips | Clarified that infiltration testing is not required for this BMP and that this BMP it not for pollution-generating surfaces. | Clarification. | No comments received. |
| Section 5.3.8 - Light Rail Elevated Guideway Dispersion | Added Light Rail Elevated Guideway Dispersion BMP for equivalency with 2024 SWMMWW. | Equivalency with 2024 SWMMWW. | No comments received. |

| Volume 3, Chapter 5 - BMP Design Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.4.2 - Infiltrating Trenches | <ul style="list-style-type: none">Added maximum trench vertical depth of aggregate storage reservoir.Reduced the minimum measured infiltration rate to 2 inches/hour from 5 inches/hour.Figures 5.8 and 5.9 updated maximum vertical dimension of storage aggregate - refer to redline figure packet for changes.Figures 5.13 and 5.14 updated notes for clarity - refer to redline figure packet for changes. | Allows flexibility but establishes a difference between (linear) infiltration trenches and drywells to justify the lower infiltration rate. | No comments received. |

| Volume 3, Chapter 5 - BMP Design Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.4.4 - Infiltrating Bioretention | <ul style="list-style-type: none">Removed requirement for using multiple cells when contributing area is over 5,000 square feet.Added that HPBSM and polishing layer may be used.Added requirement to provide multiple flow entrances for bioretention receiving concentrated flows from areas over 20,000 square feet.Revised tables for Presettling Requirements for Bioretention Facilities Owned and Not Owned or Maintained by Phase 1 Municipal Stormwater Permittees.Added minimum length of ponding area shall be 4 feet for bioretention with underdrains (to allow room for underdrain pipe, cleanout and overflow riser pipe installation).Revised the fine compost percentage range and organic matter content range for the bioretention soil mix.Revised minimum requirements for overflow design for freeboard and drain riser pipes.Added infeasibly criteria for vertical walled bioretention that would need to be deeper than 2.5 feet.(alt text for redline edits: line deleted) Revised sizing factor for Peak Control Standard for sloped sides and vertical sides at an average ponding depth of 12 inches. (end of alt text)Added clarifications to Continuous Modeling Assumptions for Infiltration Bioretention. | Update guidance and requirements. Added HPBSM and polishing layer to be consistent with 2024 SWMMWW. | No comments received. Note <i>(alt text for redline edits: words in red text) correction (end of alt text)</i> to original “Draft Proposed Changes”. |

| Volume 3, Chapter 5 - BMP Design Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.4.6 - Permeable Pavement Facilities | <ul style="list-style-type: none"> Clarified that infiltration facilities functionally equivalent to permeable pavement may be used beneath impermeable surfaces or landscaping as an alternative to permeable pavement. Adds maintenance guidance for permeable pavement wearing course. Adds that fracture jointing sand is not allowed under leveling course material. Added clarity for minimum measured subgrade infiltration rate Added new "BMPs Equivalent to Permeable Pavement Facilities" section. Added clarifications for sizing the permeable pavement facility area. | Added clarity. | No comments received. |
| Section 5.4.8 - Infiltration Ponds | Changed term "Infiltration Basins" to "Infiltration Ponds". | Consistency with 2024 SWMMWW. | No comments received. |
| Section 5.4.10 - Infiltrating Structural Soil Cell BMP | <ul style="list-style-type: none"> Added new section for infiltrating structural soil cell BMPs. New Figures 5.23 and 5.24 showing infiltrating structural soil cell BMP - refer to redline figure packet for changes. | Added infiltrating structural soil cells to manual. | No comments received. |
| Section 5.5.2 - Residential Cisterns | <ul style="list-style-type: none"> Changed section name from "Single Family Residential Cistern" to "Residential Cistern". Changed to allow use of Residential Cisterns in more residential zones. | Accommodate the zoning code changes that are based on Washington State House Bill 1110 (middle housing bill). | No comments received. |
| Section 5.6.2 - Permeable Pavement Surfaces | <ul style="list-style-type: none"> Clarified that there is no minimum measured infiltration rate to use permeable pavement for the On-site List Approach. Added requirement that minimum measured infiltration rate must be at least 3 in/hr for BMP to use flow control credits to meet flow control standards unless a Pilot Infiltration Test is used and continuous runoff modeling is done. | Added clarity. | No comments received. |

Volume 3 - Project Stormwater Control

| Volume 3, Chapter 5 - BMP Design Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.7.1 - Detention Ponds | Added a flow control riser section to reference requirements in other sections of the manual. | Added information to support user in designing flow control riser. | No comments received. |
| Section 5.7.2 - Detention Pipes | <ul style="list-style-type: none"> Added "Pipe Materials", "Vents" and "Flow Control Riser/Structure" sections to the Design Criteria to organize the requirements and reference requirements in other sections and figures. Added minimal allowed orifice diameter and minimum width of weir requirements for "Flow Control Riser/Structure". Revised access requirements to reduce spacing of personnel access points and clarify observation/maintenance ports requirements for detention pipes on private property. Added a restriction preventing the use of pre-sized equations for detention pipes in the public right-of-way. Changed the Pre-developed Pasture Standard equation for 36-inch diameter detention pipe (this was included of the 2021 post-issuance clarifications). Figures 5.28 and 5.29 updated for clarity - refer to redline figure packet for changes. | Provided clarity and updated requirements. | No comments received. |
| Section 5.7.3 - Detention Vaults/Chambers | Added flow control riser requirements to reference requirements in other sections of the manual. | Added information to support user in designing flow control riser. | No comments received. |
| Section 5.8.2 - Non-infiltrating Bioretention | <ul style="list-style-type: none"> Table 5.46: Added back 2016 Stormwater Manual pre-sizing factors for non-infiltrating bioretention only for projects with less than 10,000 sf of hard surface required to meet the Peak Flow Control Standard in Capacity-Constrained basins. Sizing is not applicable in Combined Sewer areas (or for projects with hard surface of 10,000 sf or greater). | Provides more BMP flexibility in Capacity-Constrained System areas of the city. | No comments received. |
| Section 5.8.5 - Sand Filters | Added that large sand filters must be designed to treat 95% of total runoff volume for metals or phosphorus treatment. | Added clarity. | No comments received. |

| Volume 3, Chapter 5 - BMP Design Section or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 5.8.10 - Oil/Water Separators | <ul style="list-style-type: none">Clarified parameters for offline separator oil rise rate equation.Added note to Figures 5.35 and 5.36 describing the minimum surface area of forebay - refer to redline figure packet for changes. | Added clarity. | No comments received. |
| Section 5.8.11 - Proprietary and Emerging Water Quality Treatment Technologies | <ul style="list-style-type: none">Revised requirement for sizing proprietary BMPs so mass loading ratio is not required for a BMP that treats un underdrained sports field if drainage passes through a gravel layer before entering the underdrain.Clarified that the mass loading ratio is not required for Filterra systems that are sizes solely for oil control with a treatment rate of 50 in/hr. | Added clarity and reduced sizing requirements. | No comments received. |
| Section 5.8.12 - Non-infiltrating Structural Soil Cell BMP | <ul style="list-style-type: none">Added new Non-Infiltrating Structural Soil Cell BMP section.New Figure 5.37 showing non-infiltrating structural soil cell BMP - refer to redline figure packet for changes. | To increase the available BMPs available and support tree canopy. | No comments received. |

Summary of Proposed Changes to Volume 4 (Source Control) of the Seattle Stormwater Manual

July 2025 Public Review Draft Stormwater Manual

- Added background information about PFAS, pollutants from rubber preservatives (including 6PPD-q), PAHs, and PCBs.
- Updated, clarified, and added required BMP elements and recommended BMPs.
- Updated the following BMPs for consistency with 2024 SWMMWW and/or the 2024 MS4 Permit: Cleaning or Washing (BMP 17), Processing of Treated Wood (BMP 20), Cleaning and Maintenance of Pools, Spas, Hot Tubs, and Fountains (BMP 35), Deicing and Anti-icing Operations for Airports and Streets (BMP 36), and Potable Water Line Flushing, Water Tank Maintenance, and Hydrant Testing (BMP 41).
- Added Light Rail Washing (new BMP 56) for consistency with 2024 SWMMWW.

| Volume 4 (Source Control) | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| General | NA | NA | <p>Comment(s): Requirements vs. Guidance: Remove guidance information, rely only on what is required. Response: Seattle is evaluating how to restructure some BMPs where more guidance and tips have been included.</p> <p>Comment(s): Sanitary sewer system: Remove references to side sewer code and sanitary system requirements: V4, 22.805.020.K: Comply with Side Sewer Code - References / requirements related to Side Sewers / sanitary system (& BMP 12) Response: Seattle still evaluating comment(s).</p> <p>Comment(s): Feasibility: Use of “at all times” or “always” versus “when feasible” Response: This is BMP-specific. Some BMP specifications are required at all times. Where the language relates to a recommended BMP, Seattle will consider removing “at all times”, if/where appropriate.</p> |

Volume 4 - Source Control

| Volume 4 (Source Control) | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|------------------------------|--|----------------------|--|
| General | NA | NA | <p>Comment(s):</p> <p>Marine Operations: Port of Seattle and marine waste pump out and fueling station designation, note in manual; Add requirements for steel boat mooring / shipyards and zinc corrosion reduction; Add black and gray water discharges and pump out information / requirements.</p> <p>Response: Seattle still evaluating comment(s). Blackwater/sewage discharges from vessels in Puget Sound are prohibited, per the Puget Sound No Discharge Zone (WAC 173-228), a program implemented by the Washington State Department of Ecology.</p> <p>Comment(s):</p> <p>Drip pan content disposal: add location / requirements for disposal of drip pans.</p> <p>Response: Used drip pans must be disposed of in accordance with the Seattle Solid Waste Collection Code (SMC, Chapter 21.36) and the state Dangerous Waste Regulations (WAC, Chapter 173-303). Seattle will add a reference to Household Hazardous Waste disposal resources (e.g., Hazardous Waste Items - Utilities seattle.gov) in a number of Volume 4 BMPs where drip pans are mentioned.</p> <p>Pollutants vs. pH: pH is not a pollutant.</p> <p>Response: Seattle will update the “description of pollutants” section in various Volume 4 BMPs to refer to “high acidity or alkalinity”, rather than pH.</p> |

| Volume 4, Chapter 1 - Introduction Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 1.3 - What Pollutants Are Targeted in This Volume? | <ul style="list-style-type: none">Added PFAS, pollutants from rubber preservatives (including 6PPD-q), PAHs, and PCBs. | Added new guidance for toxic organics for consistency with the 2024 SWMMWW. | <p>Comment(s):</p> <p><u>Soaps & Detergents:</u> Concerns about fate and transport, and commercial versus home car washing.</p> <p>Response: No change necessary. The pollutant description is the same for business and home car washing.</p> |

| Volume 4, Chapter 2 - Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”) Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
|--|---|---|--|
| Section 2.1.1 - BMP 1: Eliminate Illicit Connections and Illicit Discharges | <ul style="list-style-type: none">Added clarity as to what is an illicit discharge.Added information on where to find more details (i.e., list of prohibited discharge substances) in the Seattle Stormwater and Side Sewer Codes.Updated the phone numbers of who to contact at Ecology and SPU if an illicit discharge is known to have occurred. | Clarified what constitutes an illicit discharge, outlining appropriate response actions, and providing additional guidance on prevention. | No comments received. |
| Section 2.1.2 - BMP 2: Perform Routine Maintenance | <ul style="list-style-type: none">Added maintenance requirements to the BMPProvided clarity on existing requirements | Clarified requirements per stormwater compliance inspector experience. | Comment(s): Feasibility of access for inspection at all times; how is “Routine Maintenance” supposed to be documented during plan review? Response: Seattle still evaluating comment(s). |
| Section 2.1.3 - BMP 3: Dispose of Fluids and Wastes Properly | <ul style="list-style-type: none">The new text explicitly prohibits discharging wastes into the drainage or sewer system and adds references to Seattle Municipal Code sections and the NPDES permit for legal compliance and proper waste handling.Updated disposal requirements to include solid, dangerous, and industrial wastes, especially emphasizing procedures in non-combined sewer areas.Added a new recommended BMP to reinforce compliance with broader environmental regulations and highlight the risk of penalties from other agencies. | Clarified requirements per stormwater compliance inspector experience. | No comments received. |

| Volume 4, Chapter 2 - Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”) Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.1.4 - BMP 4: Proper Storage of Solid Wastes | <ul style="list-style-type: none">Added new text that strengthens the requirements for Waste Disposal and Storage under BMP 4.Added a detailed list of "solid waste" that falls under the BMP and provides detail about how to manage the waste and storage for specific waste types (e.g., batteries, printing equipment waste, etc.).Expanded text about managing cooking oil waste to clarify and explain the responsibilities of generators (e.g., restaurants) versus container-owners (waste haulers).New Figure 2 providing an example of a labeled used cooking oil tote located on a level surface with a secure lid - refer to redline figure packet for changes. | Clarified requirements per inspector experience and expanded subsection about cooking oil. | <p>Comment(s): Feasibility of weekly inspections; practicality of damaged container replacement timing; prescriptive distance of cooking oil containers to grates / inlets; covering of dumpsters / limiting areas discharging stormwater to the sanitary sewer.</p> <p>Response: Seattle still evaluating comment(s).</p> |
| Section 2.1.5 - BMP 5: Spill Prevention and Cleanup | <ul style="list-style-type: none">Updated spill cleanup and proper disposal procedures.Added section for discharges associated with firefighting activities. | Clarification and strengthening of Spill Prevention and Cleanup BMP per inspector experience. | <p>Comment(s): Prescriptive spill kit distances to fueling / fuel transfer areas; how is “Spill Prevention and Cleanup” supposed to documented during plan review?</p> <p>Response: No changes planned. The quoted 25-ft spill kit distance is necessary to be consistent with BMP S104 in Ecology’s SWMMWW.</p> |

| Volume 4, Chapter 2 - Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”) Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.1.6 - BMP 6: Provide Oversight and Training for Staff | <ul style="list-style-type: none">Clarification and strengthening of Staff training and oversight requirements for BMP6.Added specific instructions for buildings that are suspected or known to contain PCBs. | Updated to include guidance for preventing pollution from PCBs in building materials to support more effective stormwater pollution prevention. | No comments received. |
| Section 2.1.7 - BMP 7: Property Maintenance | <ul style="list-style-type: none">Updated required elements of BMP for businesses and public entities.Added section for recommended BMPs including using environmentally safe solvents and materials and preventative actions. | Clarified requirements per inspector experience. | Comment(s): Quarterly facility sweeping requirements, feasibility, and requirements of other NPDES Permits; prompt pavement restoration requirement; superfluous guidance. Response: No changes necessary. Quarterly sweeping is necessary to be consistent with BMP S102 of Ecology’s SWMMWW. Prompt repair is a recommended BMP in Ecology’s SWMMWW (also S102) and relevant to Seattle. |
| Section 2.1.8 - BMP 8: Constructed Dog Runs | <ul style="list-style-type: none">The terminology in the BMP was revised from “rooftop dog runs” to “constructed dog runs” to ensure broader applicability across all designed or built dog run areas— regardless of location (e.g., rooftop, podium, or at-grade). This change excludes dog runs associated with commercial or business pet facilities, which are regulated separately.New section was added for ground-level dog runs to clarify maintenance expectations and appropriate stormwater management practices for those areas. | Clarified requirements per inspector experience. | Comment(s): Comments related to dog run discharges and plumbing requirements. Response: Seattle still evaluating comment(s). |

| Volume 4, Chapter 2 - Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”) Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.2.1 - BMP 9: Fueling at Dedicated Stations | <ul style="list-style-type: none">Added clarity when an overflow is not allowed.Added language for when dispersants are prohibited.Added when to immediately remove and properly dispose of fuel contaminated soils.Figure 4 updated to replaced "Shutoff valve" with "Automatic Shutoff Valve" - refer to redline figure packet for changes. | Clarified requirements per inspector experience. | Comment(s): Added language regarding sizing for fuel containment not needed. Response: Seattle still evaluating comment(s). |
| Section 2.2.2 - BMP 10: Mobile Fueling of Vehicles and Heavy Equipment | <ul style="list-style-type: none">Minor updates to required elements of BMP including containment measures, spill response procedures, and equipment standards. | Clarified requirements per inspector experience. | No comments received. |
| Section 2.2.3 - BMP 11: In-Water and Over-Water Fueling | <ul style="list-style-type: none">Updated the definition of in-water and over-water fueling stations to remove ambiguity about their classification.Added requirement to immediate report spills to federal and state agencies, along with the relevant contact information. | Clarified requirements per inspector experience. | No comments received. |

| Volume 4, Chapter 2 - Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”) Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.2.4 - BMP 12: Maintenance and Repair of Vehicles and Equipment | <ul style="list-style-type: none">Added text to clarify that mobile maintenance operations are included and that businesses are responsible for spills from customer vehicles, even when parked offsite.Added new requirements for battery storage, vehicle inspections, and frequent monitoring of drains and outdoor areas.Revised text to emphasize spill prevention, dry cleanup methods, proper fluid disposal, and the use of structural controls if operational measures fail to prevent contamination. | Clarified requirements per inspector experience. | Comment(s): Remove references to sanitary sewer requirements Response: See response above, “Volume 4 - General”. |
| Section 2.2.5 - BMP 13: Concrete and Asphalt Mixing and Production | <ul style="list-style-type: none">Clarified that BMP applies specifically to stationary concrete and asphalt construction sites and emphasized the prohibition of discharging process water to streets, drains (stormwater or sanitary/combined systems), or receiving waters. | Clarified requirements per inspector experience. | Comment(s): Keep reference to recycling process water for “pouring and equipment cleaning”. Response: Concrete pouring is addressed in BMP 14. |

| Volume 4, Chapter 2 - Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”) Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 2.2.6 - BMP 14: Concrete Pouring, Concrete/Asphalt Cutting, and Asphalt Application | <ul style="list-style-type: none">Added text stating that concrete and asphalt waste must never be washed into storm drains, receiving waters or sanitary/combined systems.Added specific disposal instructions for slurry and runoff.Clarified that catch basin filter socks are only emergency backups, not a substitute for source control. | Clarified requirements per inspector experience. | <p>Comment(s):</p> <p>Use of “at all times” or “always” versus “when feasible” - see above, “General - Overall”; Concrete Handling: Do not place concrete during rain events.</p> <p>Response: No changes made. Using absorbent materials under equipment likely to spill is essential even when said equipment may not be mobile. Stormwater run-on can transport pollutants that may have dripped underneath large and/or immobile equipment.</p> |
| Section 2.2.7 - BMP 15: Recycling Wrecking Yard, and Scrap Yard Operations | <ul style="list-style-type: none">Expanded list of potential pollutants found at recycling and scrap yards.Added requirement to prevent run-off from property to nearby properties, public right of way or drainage.Added that PCB-contaminated materials cannot be reused and must be segregated and disposed of under EPA’s TSCA rules.Added a new recommended BMP advising facilities to contact the King County Industrial Waste Program if they discharge process water or contaminated stormwater to the sanitary/combined sewer system. | Clarified requirements per inspector experience. | <p>Comment(s):</p> <p>Storing material does not constitute a “recycling, wrecking yard, or scrap yard operation”; How is soil contamination and cleanup addressed?</p> <p>Response:</p> <p>Seattle has removed “store or” from the BMP; however, it’s important to remember that BMPs 1 through 8 always apply. As such, no illicit discharges to the MS4 or Waters of the State are allowed when storing materials onsite. The Washington State Department of Ecology regulates the implementation of the Model Toxics Control Act (MTCA) to address contaminated soil and other media.</p> |
| Section 2.2.8 - BMP 16: Storage of Liquids in Above-ground Tanks | <ul style="list-style-type: none">Clarified what is considered liquid storage tanks. | Clarified requirements per inspector experience. | No comments received. |

| Volume 4, Chapter 3 - Business and Public Entity Best Management Practices for Specific Activities Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 3.1.1 - BMP 17: Cleaning or Washing | <ul style="list-style-type: none">Expanded list of activities requiring BMP.Added guidance to contact the local sewer authority for the potential disposal of washwater to the sanitary sewer.Added requirement to determine if buildings are suspected or confirmed to have PCB-containing materials on their exterior prior to building washdown, and the requirement that washdown water is prohibited from discharging to municipal stormwater systems unless it has been determined that the building does not contain PCBs on its exterior.Added to list of source pollutants.Clarified when stormwater is considered process wastewater.Updated required BMP elements including clarifications of age of built or renovated buildings that allow discharges from routine external washdowns, requirements for dechlorination of potable water entering the drainage system, and requirements for washdowns from graffiti impacted areas and building specific requirements.Updated list of recommended BMPs for graffiti, artificial turf fields and when to consider spot cleaning. | Added new language about washing/cleaning buildings confirmed or suspected of containing PCBs for consistency with the 2024 Phase I MS4 Permit and BMP S431 in the 2024 SWMMWW. Edited/added language to clarify requirements associated with conditionally allowable discharges (e.g., potable water) also for consistency with the Phase I MS4 Permit. Clarified a range of requirements per inspector experience. | <p>Comment(s):</p> <p>Add that buildings built between 1950 and 1980 that are not suspected or known sources of PCBs should be included in “conditionally permissible washing practices”</p> <p>Response: Seattle is continuing to evaluate the comment. For background, Seattle chose to include the building-specific washing language as a separate section in the BMP, not under the conditionally-permissible discharges, because it is specific to commercial, industrial, institutional, and multi-story residential (i.e., all buildings except single-family residential). Owners/operators of those buildings must follow the specific requirements in the building-specific requirements” section. That group of buildings cannot discharge washwater to the MS4 for WOTS unless it has been determined that they do not contain PCBs on their exterior.</p> <p>Comment(s):</p> <p>Impractical to collect wash water associated with pressure washing / cleaning.</p> <p>Response: No changes necessary. The MS4 Permit requires that potable water used for washing practices be dechlorinated prior to discharging to the drainage system. Note that the bullet about collecting washwater applies to graffiti-impacted areas, to prevent paint/chemicals entering the MS4 and downstream waterways.</p> |

| Volume 4, Chapter 3 - Business and Public Entity Best Management Practices for Specific Activities Section Name or BMP Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Section 3.2.1 - BMP 18: Loading and Unloading of Liquid or Solid Material | <ul style="list-style-type: none">Added that BMP is required in areas of transfer to containers or between transport vehicles (rail or highway).Noted that SPCC requirements may apply if transloading oil products over 1,320 gallons in areas that could reach navigable waters. | Clarified requirements per inspector experience. | Comment(s): Include waste pickup and transfer of residential, commercial and public-sector sources from curbside waste collection. Response: No change. BMPs 1, 5, and 6 are particularly relevant (and already applicable) to the collection/transfer vehicles referred to. |
| Section 3.3.2 - BMP 20: Processing of Treated Wood | <ul style="list-style-type: none">Added clarification that wood preservatives are registered with the US EPA and include oil and water-borne preservatives.Added freshly treated wood definition and BMPs to prevent treated wood products entering stormwater. | Consistency with BMP S432 in the 2024 SWMMWW. | No comments received. |
| Section 3.3.3 - BMP 21: Commercial Composting | | | Comment(s): Concern regarding plastic waste in compost available for retail sale; what does “color” mean when describing Description of Pollutants? Response: Minor updates were made to pollutant description. Plastic waste in compost should be addressed through other regulations/requirements. |
| Section 3.3.5 - BMP 23: Painting, Finishing, and Coating Activities | <ul style="list-style-type: none">Added BMP 17 (cleaning and washing) as a required BMP element for preparation and application.Added best practices for working with surfaces suspected or known to contain PCBs.Added recommended BMP for water-based paints. | Consistency with BMP S451 and BMP S420 of the 2024 SWMMWW. | No comments received. |

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| Section 3.3.6 - BMP 24: Commercial Printing Operations | <ul style="list-style-type: none">Added PCBs to list of pollutants.Clarified that waste printing equipment must not be stored outdoors. | Expanded list of potential pollutants and BMPs for storing materials to better address potential inadvertently-generated PCBs as a source of pollutants to stormwater. | No comments received. |
| Section 3.4.1 - BMP 26: Storage of Leachable Erodible Materials | <ul style="list-style-type: none">Added required BMP element to raise solid material off the ground.Updated required BMP elements for stockpiles of materials. | Clarified requirements per inspector experience aimed at more effective stormwater pollution prevention from this type of activity. | No comments received. |
| Section 3.4.3 - BMP 28: Portable Container Storage | <ul style="list-style-type: none">Clarified responsible parties must comply with state Dangerous Waste Regulations.Specifies what kind of containers to use for liquid storage.Updated a series of BMPs listed previously as recommended in the 2019 Manual version, related to outside storage and secondary containment, to be required BMPs. | Clarified requirements per inspector experience. | Comment(s): Feasibility of requiring secondary containment at all times. Response: Seattle still evaluating comment(s). |

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| Section 3.6.1 - BMP 32: Commercial Animal Care and Handling | <ul style="list-style-type: none">• Updated types of businesses and agencies BMP applies to.• Added reference to Seattle and King County Public Health's Pet Business Program for requirements in addition to Seattle's Stormwater Code.• Updated required BMP elements including checking Seattle and King County Health regarding required maintenance, new connections to sanitary or combined sewer require City side sewer permits, requirements for covered and uncovered outside animal keeping areas, discharge requirements for washing and disinfecting outside animal handling areas, requirements for stockpiling manure.• Updated recommended BMPs for disinfecting outside surface areas. | Expanded and clarified requirements, based on inspector experience, to promote more effective pollution prevention from this activity. Edits also made to align with Public Health requirements and avoid impacts to surface water and/or groundwater. | <p>Comment(s): Where is source control for dog parks included?</p> <p>Response: Seattle still evaluating comment(s).</p> |

| <p>Volume 4, Chapter 3 - Business and Public Entity Best Management Practices for Specific Activities</p> <p>Section Name or BMP Name</p> | <p>July 2025 Public Review Draft Proposed Change</p> | <p>Driver for Change</p> | <p>July 2025 Draft - Initial Response to Comments</p> |
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| <p>Section 3.6.4 - BMP 35: Cleaning and Maintenance of Pools, Spas, Hot Tubs, and Fountains</p> | <ul style="list-style-type: none"> Specified that owners and operators of water recreation facilities must also comply with State and local Public Health agency rules in addition to this manual's BMP. Clarified that discharge to a drainage system to be dechlorinated/debrominated to a "total residual concentration" of 0.1 ppm. Added additional items that the discharge water needs to be free of: sodium chloride, cleaning chemicals (which include but not limited to copper-based algaecides), suds, cleaning wastes. Added recommended BMP to maintain proper chloride levels, water filtration, and circulation to minimize need to drain structures. | <p>Updated for consistency with BMP S433 of the 2024 SWMMWW and the conditionally allowable discharge language in the 2024 Phase I Permit.</p> | <p>Comment(s):</p> <p>This BMP only applies to commercial and public Pools, Spas, Hot Tubs, and Fountains - what about residential applications?</p> <p>Response: No change necessary. BMP 1 and BMP 3 are relevant to all real property, including residential properties, and are designed to prevent discharges of chlorinated/brominated water to the drainage system or surface water bodies (unless conditionally permissible).</p> |
| <p>Section 3.6.5 - BMP 36: Deicing and Anti-icing Operations for Airports and Streets</p> | <ul style="list-style-type: none"> Added airport taxiways and ramp/gate areas to list of areas where BMP applies. Clarified that the relevant NPDES permit is the Industrial Stormwater General Permit. Emphasized that chemicals must not enter the drainage conveyance system. | <p>Clarified requirements per inspector experience and for consistency with language in BMP S405 of the 2024 SWMMWW.</p> | <p>No comments received.</p> |
| <p>Section 3.6.6 - BMP 37: Maintenance and Management of Roof and Building Drains Roofs/Building Surfaces at Industrial and Commercial Buildings</p> | <ul style="list-style-type: none"> Revised name of BMP. Minor clarification of likely sources of PCBs. Updated required BMP elements to not allow washing roofs or sides of buildings unless the external materials surfaces have been determined to be without PCB-containing materials in accordance with Ecology guidance. | <p>Clarified applicability to all building surfaces, rather than just the drains from buildings and for consistency with PCB requirements in BMP S424 of the 2024 SWMMWW.</p> | <p>No comments received.</p> |

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| Section 3.6.8 - BMP 39: Maintenance of Public and Private Utility Corridors and Facilities | <ul style="list-style-type: none"> Updated required BMP elements for work occurring in a vault with contaminants present and BMPs for preventing erosion of access roads or bare ground. | Clarified requirements per inspector experience. | No comments received. |
| Section 3.6.9 - BMP 40: Maintenance of Roadside Ditches | <ul style="list-style-type: none"> Clarified that ditches owned or operated by a state, city, town, county or other public body that is designed or used for conveying stormwater are included in the definition of MS4. | Clarified requirements per inspector experience and to support better management of stormwater flow in ditch and culvert systems. | No comments received. |
| Section 3.6.10 - BMP 41: Potable Water Line Flushing, Water Tank Maintenance, and Hydrant Testing | <ul style="list-style-type: none"> Updated required BMP elements that would allow potable water sources discharged to drainage systems. | Updated for consistency with the conditionally allowable discharge language in the 2024 SWMMWW. | No comments received. |
| Section 3.6.17 - BMP 48: Goose Waste | | | Comment(s): Rename to “Waterfowl Waste”. Response: No change. Seattle is referencing the Ecology language to be equivalent to BMP S452 in the SWMMWW. |
| Section 3.6.23 - BMP 54: Streets and Highways | <ul style="list-style-type: none"> Clarified what is considered a street. | Clarified definition and requirements per inspector experience to support compliance with the Manual's requirements. | No comments received. |
| Section 3.6.25 - BMP 56: Light Rail Washing | <ul style="list-style-type: none"> Added new BMP that references S453 and S454 BMPs in the 2024 SWMMWW. | Added new BMP for equivalency with 2024 SWMMWW. | Comment(s): Include “Railway Washing” in addition to “Light Rail Washing”. Response: No change. Seattle is referencing the exact Ecology language to be equivalent to BMPs S453/454 in the SWMMWW. |

Summary of Proposed Changes to Appendices of the Seattle Stormwater Manual

| Appendix Name | July 2025 Public Review Draft Proposed Change | Driver for Change | July 2025 Draft - Initial Response to Comments |
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| Appendix A - Definitions | Placeholder page only. Refer to SMC, Chapter 22.801 to review definitions. | NA | No comments received. |
| Appendix B - Additional Submittal Requirements | <ul style="list-style-type: none">Clarified how to calculate new plus replaced hard surface for a Subdivision or Short Plat when the Seattle Zoning Code does not include a maximum lot coverage (of structures) and when existing improvements are proposed to be retained.Added and clarified conditions under which a separate Preliminary Drainage Control Plan is not required with the MUP submittal for a lot boundary adjustment.Added a Modified LBA Drainage Adequacy Note #1 required for the recorded LBA plat if the lots are already fully developed and the existing buildings and improvements remain but the adjust lots does not have a public piped storm drain for potential mainline extensions if there is development in the future. | <p>Only neighborhood residential and residential small lot zoning in Seattle have maximum lot coverage so other types of development in other zones will need to provide a site plan showing full build-out of all phases. For existing improvements that are to remain, the stormwater code does not require flow control, water quality , or on-site stormwater management for existing hard surfaces to remain.</p> <p>Clarification to align with language from the Seattle Land Use Code. The additional condition accounts for lot boundary adjustments that are not for the purpose of a planned development.</p> <p>Clarification to align with language from the Seattle Land Use Code.</p> | No comments received. |

Appendices

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| Appendix C - On-site Stormwater Management Infeasibility Criteria | <ul style="list-style-type: none">Revised the allowable distance of dispersion flowpath areas to septic system drainfields, reserve areas, and septic sewage tanks and distribution boxes.Added criteria that would make an infiltration BMP infeasible, specifically if it would threaten an existing or proposed structure.Changed infiltration trench infeasibility criteria of underlying soil infiltration rate to less than 2 inches/hour.Added depth to the bottom of ponding infeasibility criteria for infiltrating and non-infiltrating bioretention facilities.Added onsite list infeasibility criteria for Infiltrating and Non-infiltrating Structural Soil Cells. | Updated infeasibility criteria based on revisions to state law for septic systems. Infiltration facilities that may threaten buildings, based on a determination by a licensed professional, are not desired. Updated infeasibility criteria for infiltration trenches. See revision to Volume 3, Section 3.2 for additional information. This change is to prevent the BMP from being too deep, which could be a fall hazard and difficult to maintain. Added infiltrating and non-infiltrating structural soil cells to Volume 3. | Comment(s): <u>Clear language:</u> Provide clear language throughout, especially for “All BMPs”. Tree protection: Provide more clarity related to tree protection. Response: Seattle still evaluating comment(s). |
| Appendix D - Subsurface Characterization and Infiltration Testing for Infiltration Facilities | No change from 2021 Manual. | NA | Comment(s): <u>Infiltration testing:</u> Allow geotechnical engineer to recommend infiltration rate based on site analysis instead of performing infiltration testing. Response: See response to Section 3.2 of Volume 3. |
| Appendix E - Additional Stormwater Design Requirements | <ul style="list-style-type: none">Changed name of Appendix from "Additional Design Requirements and Plant Lists" to "Additional Stormwater Design Requirements".Specified that the minimum allowable weir length is 0.5 inches. | Moved plant list to Appendix K. Clarification. | No comments received. |

Appendices

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| Appendix F - Hydrologic Analysis and Design | <ul style="list-style-type: none">Changed the land cover type from "wetland" to "Saturated or Wetland".Updated the step-by-step procedures for using different versions of MGSFlood when evaluating on-site BMP performance standards. | Added saturated soils to wetland row in table since wetlands can be modeled as saturated soils. Newer versions of MGSFlood have an automatic feature for this purpose. Older versions require a different technique. | No comments received. |
| Appendix G - Stormwater Control Operations and Maintenance Requirements | No change from 2021 Manual. | NA | No comments received. |
| Appendix H - Financial Feasibility Documentation for Vegetated Roofs and Rainwater Harvesting | No change from 2021 Manual. | NA | No comments received. |
| Appendix I - Landscape Management Plans and Integrated Pest Management Plans | No change from 2021 Manual. | NA | No comments received. |
| Appendix J - Contaminated Sites | To be developed in Phase 2. | NA | No comments received. |
| Appendix K - Plant and Tree Lists | Moved Plant Lists from Appendix E to new Appendix K; Tree Lists to be developed in Phase 2. | NA | No comments received. |