

# Seattle Stormwater Manual - Summary of Proposed Changes

This document provides a summary of the proposed changes and response to public comments for the Seattle Stormwater Manual Volumes and Appendices. Refer to the Stormwater Code Table of Changes for the Stormwater Code proposed changes and response to public comments.

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

### **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.

### **January 2026 Public Review Draft Stormwater Manual**

- Revised based on Ecology’s equivalency comments.
- Revised based on public comments.
- Removed Single-family residential project and reorganized sections.
- Moved Common Plan of Development or Sale under Closely Related Projects section
- Moved Closely Related Projects criteria to Stormwater Code.

- Added Green Lake Basin as a Nutrient-critical Receiving Waters to the list of receiving waters and systems in Seattle.
- Clarified elements of projects that require Standard or Comprehensive Drainage Review.
- Added a list of requirements for the drainage report if contamination has been identified.
- Updated alternative method for meeting wetland flow control during summer months based on Ecology equivalency comments.
- Minor terminology revisions throughout.

**March 2026 Public Review Draft Stormwater Manual**

- Revised based on Ecology’s equivalency comments.
- Revised based on public comments.
- Moved Common Plan of Development or Sale to its own section.
- Clarified that there may be potential Exemptions, Adjustments, or Exceptions to the minimum requirements of the Stormwater Code.
- Added Chapter 7 - Exemptions, Adjustments, and Exceptions.
- Minor terminology revisions throughout.

In the draft documents, the following changes will be noted as follows:

Red text: July 2025 proposed changes

Blue text: January 2026 proposed changes

Green text: March 2026 proposed changes

*Volume 1 – Overall Changes*

Volume 1 – Overall Changes Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Various	<ul style="list-style-type: none"> <li>● Changed “Enhanced Treatment” to “Metals Treatment”</li> <li>● Moved “Utility Project”, “Pavement Maintenance Project”, “Remediation Project”, and “Retrofit Project” from Section 4.5 to Section 2.2</li> <li>● Moved “WSDOT Project” from Section 4.6 to 2.2.</li> <li>● Moved “Special Circumstances” from Section 4.7 to 2.7.</li> <li>● Deleted Section 2.6 “Certain Land-Disturbing Activities” and moved project type information to Section 4.5.</li> </ul>	<ul style="list-style-type: none"> <li>● Moved Chapter 7 sections to Section 2.4, Chapter 7 deleted.</li> <li>● Moved Chapter 8 sections to Section 2.8, Chapter 8 deleted.</li> <li>● Updates figure numbering and order.</li> </ul>	<ul style="list-style-type: none"> <li>● Expanded Chapter 7 and Appendices A and J descriptions.</li> <li>● Added a new Chapter 7 for Exemptions, Adjustments, and Exceptions.</li> </ul>	<p>July 2025:</p> <ul style="list-style-type: none"> <li>● Consistency with 2024 MS4 Permit.</li> </ul> <p>January 2026:</p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p>March 2026:</p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.

*Volume 1, Chapter 2 – Determining Minimum Requirements*

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.1 – Step 1 – Define the Boundaries of the Project Site	<ul style="list-style-type: none"> <li>Refer to SMC 22.805.010.B &amp; D and 22.807.020.D for application of thresholds.</li> <li>Clarified that the project site includes the full area of a subdivision, short plat, common plan of development, or closely related project.</li> <li>Clarified that Stormwater Code requirements will be based on the total cumulative development planned, not just individual projects or phases.</li> </ul>	Added reference to SMC, Section 22.805.010 for specific requirements for subdivisions and short plats.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul>	<p><b>Comment(s):</b> Mature trees provide substantial stormwater benefits, including rainfall interception, pollutant filtration, and temperature regulation. The current draft relies largely on minimum state requirements and does not adequately incentivize retention of existing mature trees, despite evidence that they can outperform engineered stormwater systems.</p> <p><b>Response:</b> Seattle agrees that mature trees provide many benefits, including stormwater management. However, changes that prioritize trees in place of Ecology-approved stormwater BMPs must be supported by sufficient documentation and approved by Ecology. Ecology’s MS4 Permit Minimum Requirement #5 addresses flow control and does not currently provide a framework for substituting trees for required BMPs. Seattle’s existing tree credits were approved by Ecology based on the Herrera (2008) study and are included in the <a href="#">2009 Seattle Stormwater Manual</a> (Vol. III, Section 4.4.2 – Tree Planting and Retention). Ecology subsequently incorporated similar tree credits in the <a href="#">2012 Stormwater Management Manual for Western Washington</a> (Appendix III-C). Additional documentation demonstrating the stormwater benefits of trees relative to Ecology-approved BMPs could support consideration of future updates. Seattle welcomes collaboration with researchers, practitioners, and community experts to compile and synthesize best available science on the stormwater benefits of trees to inform potential future updates and Ecology review.</p>

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.1.1 – <u>Definitions Related to Project Site</u>	<ul style="list-style-type: none"> <li>● Changed section title name from "Definitions" to "Definitions Related to Project Site".</li> <li>● Refer to SMC 22.801.010.D for changes to definition of "Development".</li> </ul>	Added reference to SMC 22.801.200 for the definition of "Site".	Added reference to SMC 22.801 and Appendix A for the definition of "development", "hard surface", "project", "project site" and "site".	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.
Section 2.1.2 – Closely Related Projects	<ul style="list-style-type: none"> <li>● Refer to SMC 22.801.040.C for added definition of "Closely Related Projects".</li> <li>● Added new closely related projects criteria to include projects without construction approval in addition to projects under review.</li> <li>● Clarified other criteria for determining if two or more projects are closely related.</li> </ul>	<ul style="list-style-type: none"> <li>● Section number reverted back to 2.1.2.</li> <li>● Moved criteria for closely related projects falling under a single plan to SMC definition for Closely Related Projects.</li> <li>● Refer to SMC 22.801.040.C for revised definition of "Closely Related Projects".</li> </ul>	Deleted section in manual regarding separate applications for one project as proposed combined development as already included in code language.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Moved closely related projects criteria under code authority instead of rule.</li> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p><u>Section 2.1.3 – Common Plan of Development</u></p>	<p>Refer to SMC 22.801.040.C for added definition of “Common Plan of Development”.</p>	<ul style="list-style-type: none"> <li>Deleted Common Plan of Development Section 2.1.2.</li> <li>Added reference to “Common Plan of Development <u>or Sale</u>” to original Section 2.1.2 – Closely Related Projects.</li> <li>Refer to SMC 22.801.040.C for revised definition of “Common Plan of Development <u>or Sale</u>”.</li> </ul>	<p>Separated definitions for Closely Related Projects and Common Plan of Development shown in January 2026 draft and added under Section 2.1.3 – Common Plan of Development or Sale</p> <p>Revised and expanded criteria for “single plan.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Ecology equivalency comments.</li> <li>Revised manual layout since “Common Plan of Development or Sale” now under “Closely Related Projects” definition.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>Public Comment.</li> </ul>	<p><b>Comment(s):</b> Significant concerns about expanding the thresholds that determine when separate undertakings are treated as one “closely related” project. Builders are worried that unrelated or only tangentially related work could be conflated despite operating under separate legal permits, ownership structures, financing, or construction schedules. Request to adopt clarifying language and provide implementation guidance that limits aggregation to truly integrated undertakings, while still maintaining compliance with the City’s MS4 permit obligations. Where discretion exists, MBACKS asks SPU to apply a reasonable and practical approach that recognizes customary phasing, parcelization, and separate permit pathways.</p> <p><b>Response:</b> During equivalency review, Ecology determined that Seattle’s prior use of criteria such as common developer, property owner, or marketing/sales scheme to conclude that projects are <i>not</i> closely related is inconsistent with Ecology’s definition of a Common Plan of Development or Sale and Ecology’s responses to comments on the 2024 MS4 Permit. Ecology directed Seattle to instead consider these factors as indicators when evaluating whether multiple developments may constitute a Common Plan of Development or Sale. Revised and expanded criteria for “single plan” to limit unintended aggregation why meeting Ecology direction.</p>

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Section 2.2 – Step 2 – Identify the Type of Project	Updated the list of general classifications of projects.	<ul style="list-style-type: none"> <li>● Deleted Single-family residential project type.</li> <li>● Moved parcel-based project beginning of project list and updated the list of general classifications of projects.</li> <li>● Added “rail” and “light rail” projects to list of complex projects.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Deleted Single-family residential project type.</li> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul>	<p><b>Comment(s): <u>Multiple Exempt Activities:</u></b> Clarify that multiple exempt activities (e.g., utility work and pavement maintenance) that are combined into one project are still considered exempt.</p> <p><b>Response:</b> The code already exempts exempt activities regardless of whether exempt activities are done together.</p> <p>Added language to a new Section 2.7.2 in Stormwater Manual Volume 1 for projects with multiple types of exempt land disturbing activities (e.g., utility projects, pavement maintenance projects, remediation projects, and retrofit projects)</p> <p><b>Comment(s):</b> Utility facility work that involves the installation of utility housing(s) or structure(s) should be considered part of the utility project and included in the utility facility exemption.</p> <p><b>Response:</b> Adding "utility housings / structures" does not meet Permit definition of "Underground Utility Activities" which specifically only includes: <i>"Underground utility activities include installing, maintaining, and/or upgrading an underground utility. The limits of the exempt surfaces include only the area disturbed by the trench work necessary for the underground utility work (including any over-excavating necessary for the utility trench)."</i></p>

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Section 2.2.1 — <del>Single-Family Residential Project</del> <i>(deleted section title, see below for changes to Parcel-based project section)</i>	Refer to SMC 22.801.200.S for changes to definition of “Single-Family Residential Project”.	Single-family residential project section removed and Parcel-based Project section moved to Section 2.2.1.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• Updated for consistency and alignment with Land Use Code changes.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Deleted Single-family residential project type.</li> <li>• For code changes, see Code Summary of Proposed Changes.</li> </ul>	No comments received.
Section <del>2.2.5</del> 2.2.1— Parcel-Based Project <i>(section moved to beginning of chapter)</i>	Clarified that utility work associated with a parcel-based project is part of the parcel-based project.	<ul style="list-style-type: none"> <li>• Parcel-based Project section moved to 2.2.1.</li> <li>• Expanded list of examples of parcel-based projects to include projects that were previously Single-family residential projects.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• Consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Deleted Single-family residential project type.</li> </ul>	No comments received.

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Section 2.2.2 – Sidewalk Project	<ul style="list-style-type: none"> <li>Clarified the distinction between roadway and sidewalk projects.</li> <li>Clarified when projects updating hard surfaces for ADA compliance are considered a sidewalk or trail project.</li> <li>Figure 2.3 updated – refer to redline figure packet for changes.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>No new edits.</li> </ul>	<p><b>Comment(s):</b> <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”.</p> <p><b>Response:</b> For a project to be a “sidewalk project”, the definition (22.801.200.S) must be met. In that, the project is “for the creation of a new sidewalk or replacement of an existing sidewalk”. Projects with other purposes are not considered “sidewalk projects”.</p>
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.	Modified trail location in Figure 2.3 – Refer to redline figure packet.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li></li> </ul>	No comments received.
Section <del>2.2.5</del> 2.2.4 - Roadway Projects (section moved)	No edits.	Roadway Projects renumbered to Section 2.2.4	No new edits.	<p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

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Section <del>2.2.8</del> <u>2.2.5</u> – Utility Projects ( <i>section moved</i> )	<ul style="list-style-type: none"> <li>Refer to SMC 22.800.040.A.2.a for changes related to Utility Projects.</li> <li>Clarified the limits of a utility project.</li> </ul>	Utility Projects moved to section 2.2.5. Retrofit projects moved to Section 2.2.8.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul>	<p><b>Comment(s):</b> <u>Activities Associated with Development:</u> Pavement restoration and utility installation associated with development should still be considered exempt activities.</p> <p><b>Response:</b> No changes proposed – revisions required per 2024 MS4 Permit, Appendix 1.</p> <p><b>Comment(s):</b> <u>Utility Master Use Permits:</u> Will drainage review be required for Utility Master Permits (UMPs)?</p> <p><b>Response:</b> Seattle does not anticipate the drainage review process for UMPs to change because of these Stormwater Code updates.</p> <p><b>Comment(s):</b> <u>Multiple Exempt Activities:</u> Clarify that multiple exempt activities combined into one project are exempt.</p> <p><b>Response:</b> Refer to response under Section 2.2 – Step 2.</p>
Section <del>2.2.9</del> <u>2.2.6</u> – Pavement Maintenance Projects ( <i>section moved</i> )	<ul style="list-style-type: none"> <li>Refer to SMC 22.800.040.A.2.a for changes related to Pavement Maintenance Projects.</li> <li>Refer to SMC 22.801.170.P for new Pavement Maintenance Practices” definition.</li> <li>Clarified the limits of a pavement maintenance project.</li> </ul>	Pavement Maintenance Projects renumbered to section 2.2.6.  Added reference to pavement maintenance practices defined in SMC, Section 22.801.040.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>Consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul>	<p><b>Comment(s):</b> <u>Activities Associated with Development:</u> Pavement restoration and utility installation associated with development should still be considered exempt activities.</p> <p><b>Response:</b> No changes proposed – revisions required per 2024 MS4 Permit, Appendix 1.</p> <p><b>Comment(s):</b> <u>Multiple Exempt Activities:</u> Clarify that multiple exempt activities combined into one project are exempt.</p> <p><b>Response:</b> Refer to response under Section 2.2 – Step 2.</p>

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Section <del>2.2.10</del> <u>2.2.7</u> – Remediation Projects ( <i>section moved</i> )	No edits.	Remediation Projects renumbered to Section 2.2.7.	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul>	<b>Comment(s):</b> <u>Multiple Exempt Activities:</u> Clarify that multiple exempt activities combined into one project are exempt.  <b>Response:</b> Refer to response under Section 2.2 – Step 2.
Section <del>2.2.11</del> <u>2.2.8</u> – Retrofit Projects ( <i>section moved</i> )	Clarified the limits of a retrofit project.	<ul style="list-style-type: none"> <li>• Retrofit Projects renumbered to 2.2.8</li> <li>• Added reference to SMC, Subsection 22.800.040.A.2.d.</li> <li>• Added additional clarifications for retrofit projects.</li> </ul>	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul>	<b>Comment(s):</b> #6 does this include tree planting?  <b>Response:</b> Yes, #6 project type is intended to include planting and restoration of forest cover that can reduce the discharge of pollutants and reduce impacts to waters of the state by protecting or restoring hydrologic capacity.  <b>Comment(s):</b> Was section 2.2.11 removed?  <b>Response:</b> July 2025 version of Volume 1 was incorrectly numbered and included Single-family projects – with renumbering, retrofit projects are now under Section 2.2.8.  <b>Comment(s):</b> <u>Multiple Exempt Activities:</u> Clarify that multiple exempt activities combined into one project are exempt.  <b>Response:</b> Refer to response under Section 2.2 – Step 2.
Section <del>2.2.12</del> <u>2.2.9</u> – WSDOT Projects ( <i>section moved</i> )	No edits.	WSDOT Projects renumbered to Section 2.2.9.	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul>	No comments received.

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Section 2.3 – Step 3 – Identify the Receiving Water and Downstream Conveyance	Figures <del>2.7, 2.9, 2.10 and 2.11</del> 2.6, 2.8, 2.9, and 2.10 updated – refer to redline figure packet for changes ( <i>figure numbers updated January 2026</i> ).	<ul style="list-style-type: none"> <li>● Revised list of city contacts.</li> <li>● Added Green Lake Basin as a Nutrient-critical Receiving Waters in Seattle.</li> <li>● Figure 2.5 updated to note Green Lake basin as a nutrient-critical basin and revised Bitter Lake Basin and creek watershed extents- refer to redline figure packet for changes.</li> <li>● Revised wetland receiving water drainage area at Marra Desimore Park for Figure 2.6- refer to redline figure packet for changes.</li> <li>● Figures 2.8 and 2.9 legends updated- refer to redline figure packet for changes.</li> <li>● Figure 2.10 updated to label the Capacity Constrained Areas - refer to redline figure packet for changes.</li> </ul>	Added reference to SMC Chapter 22. 801 definitions for determining basin limits and system types.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> <li>● Green Lake added to the Ecology 2022 Candidate 303(d) list of impaired waterbodies for total phosphorus. (Submitted to EPA April 2025 for approval, awaiting final approval as of January 2026).</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>● Clarification</li> </ul>	<p><b>Comment(s):</b> <u>Creek Designations:</u> Provide consistent criteria / application for what is considered a creek; remove reference to creek typing.</p> <p><b>Response:</b> Agree that the new definition of stream / creek no longer includes stream typing. The clause regarding typing adds clarity to applicants and review staff since in the past some relied on whether a creek was typed.</p> <p><u>Capacity-Constrained System:</u> Areas designated as capacity-constrained systems increased significantly.</p> <p><b>Response:</b> 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.</p> <p><b>Comment(s):</b> <u>Green Lake Basin:</u> Expand the nutrient- critical designation for Green Lake to include the Densmore basin, which contributes significant stormwater and phosphorus loads</p> <p><b>Response:</b> No change. Flows from the Densmore basin enter the control structure at the north end of Green Lake. This structure diverts up to the 2-year flow away from the lake into a system owned and operated by King County. This diverted amount is greater than the required water quality treatment flow (approximately a 6-month frequency).</p>

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<p><del>Chapter 7</del> <u>Section 2.4</u> – <u>Perform Site Assessment and Planning</u> (<i>chapter moved</i>)</p>	<ul style="list-style-type: none"> <li>● Clarified requirements for discharge to the combined sewer system.</li> <li>● Added references for more information on contaminated sites and landfills.</li> <li>● Added sources of data to evaluate site suitability.</li> <li>● Clarified requirements for contaminated stormwater or groundwater.</li> <li>● Added contaminated soils or groundwater on or near the site as a site-specific factor to consider.</li> </ul>	<ul style="list-style-type: none"> <li>● Added a list of resources that must be used to determine if soil or groundwater contamination may be present at the site or within the distance from the site that is required to be evaluated.</li> <li>● Added a list of requirements for the drainage report if contamination has been identified.</li> </ul>	<p>Added tree information and examples of critical area issues to the list of site-specific factors to consider.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	<p><b>Comment(s):</b> Site-specific factors to consider may include, but are not limited to: include tree canopy stormwater services like iTree or WA SW model as per KCD. Critical area issues should include wetlands and stream buffer zones.</p> <p><b>Response:</b> Added location and size of existing trees and their driplines / canopies as a bullet. Added wetlands, streams / riparian corridors, steep slopes, "etc." to critical area issues. Additional study needed for tree stormwater benefits with approval by Ecology needed for any changes to requirements.</p>

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.5 – Step 5 – Calculating Land- Disturbing Activity and New Plus Replaced Hard Surface	<ul style="list-style-type: none"> <li>Refer to SMC 22.801.150.N for changes to “new hard surface” definition.</li> <li>Refer to SMC 22.801.190.R for changes to “replaced hard surface” definition.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Minor terminology revisions.</li> <li>Refer to SMC 22.801.150.N for changes to “new hard surface” definition.</li> <li>Refer to SMC 22.801.190.R for changes to “replaced hard surface” definition.</li> </ul>	<ul style="list-style-type: none"> <li>Added references to SMC, Chapter 22.801 and Appendix A for detailed definitions of key terms.</li> <li>Added a section regarding artificial turf as a non-hard surface.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> Be specific about natural or artificial turf.</p> <p><b>Response:</b> Added description for synthetic Refer to definition of pollution-generating pervious surface which includes: “lawns and landscaped areas, such as golf courses, parks, cemeteries, and sports fields (natural and artificial turf)”.</p> <p><b>Comment(s):</b> Need to include allowance for altering the basecourse or subgrade for repairs to match language in definitions.</p> <p><b>Response:</b> Altering the base course or subgrade for repairs is limited to pothole and square cut patching as defined under pavement maintenance practices and only associated with exempt activities under 22.800.040.A. Pavement maintenance practices associated with parcel based, roadway, and sidewalk/trail projects are not exempt.</p>
Section 2.5.1 – Underdrained Sports Fields	Added section describing when underdrain sports fields are considered hard surfaces or pollution-generating pervious surfaces.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
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	No new edits.	Added clarification for non-structure hard surfaces.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>● Consistency with 2024 MS4 Permit.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <b>March 2026:</b> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.5.3 – Remodels and Reconstruction that Maintain Existing Foundations	<ul style="list-style-type: none"> <li>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”.</li> <li>Added new Figures 2.11, 2.12, 2.13, and 2.14 to show examples of new, replaced and existing hard surfaces – refer to redline figure packet for changes.</li> </ul>	No new edits.	Added new Figure 2.15 and revised figures 2.11 through 2.14 for clarity.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with 2024 MS4 Permit.</li> </ul> <p>Clarification.<b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification</li> </ul>	<p><b>Comment(s):</b> The difference between the conditions in figure 2.11 and 2.13 seems rather arbitrary and is not fully supported by the description in 2.5.3. There is a significant difference in code required mitigation simply based on the construction type of an existing building (i.e. if an existing building has a crawl space or not).</p> <p>I would argue that where there is a SOG, the subgrade is not exposed and therefore, if the SOG remains that it should be neither new nor replaced, i.e. existing. But the language seems to want to capture more remodels, which is fine, but we should be more consistent.</p> <p><b>Response:</b> It is "replaced" if it is removed down to (i.e. exposing the top of) the foundation, even if the slab remains. Figures are revised to clarify.</p> <p><b>Comment(s):</b> Figure 2.13 is insufficient to determine when a project is replaced/new/existing when it has a slab on grade. It suggests that even removing a single shingle would be replaced. What happens if the roof is removed but the walls stay?</p> <p><b>Response:</b> Figure is revised to clarify. It would only be new or replaced if the existing structure is removed down to the "foundation".</p>

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
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.	No new edits.	Added references to SMC, Chapter 22.801 and Appendix A for detailed definitions of key terms.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> <u>Equipment On Rooftops</u>: Will metal equipment (HVAC) count towards pollution- generating hard surface threshold?</p> <p><b>Response:</b> 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.</p>
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.	Added land disturbing activity to examples of special circumstances projects.	Added note that there may be potential Exemptions, Adjustments, or Exceptions to the minimum requirements of the Stormwater Code and a reference to Chapter 7.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> In alignment with Ecology’s SWMMWW Volume 1, Chapter 3.2 Exemptions, the City of Seattle Stormwater Code (Stormwater Code) should explicitly state that multiple types of exemptions can apply to a single project with the whole project consisting of only exempt activities being exempt from the minimum requirements for on-site stormwater management, flow control, and treatment (e.g., pavement maintenance and utility facility work completed under the same project).</p> <p>A new Section 2.7.2 for projects with multiple types of exempt activities should be added to Volume 1.</p> <p><b>Response:</b> Refer to response under Section 2.2 – Step 2.</p>

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					<p><b>Comment(s):</b> Add an exemption for redevelopment projects in drainage areas with existing stormwater controls that already meet current standards, consistent with Stormwater Management Manual for Western Washington Volume 1 Chapter 3.3. The manual should also identify a process for requesting a waiver of on-site stormwater management, flow control, and treatment requirements where compliant controls already exist.</p> <p><b>Response:</b> No change to Code.</p> <p>22.800.040.A Exemptions is not appropriate citation as the project is not ""exempt"" from the requirements - instead, the minimum requirements triggered by the project are being met through the existing BMPs if demonstrated and approved by the Director as providing substantially equivalent environmental protection as allowed under 22.800.040.B Adjustments.</p> <p>Existing adjustment code language 22.800.040.B Adjustments and additional clarification added to Volume 1 Ch. 7.</p>

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.8 – Step 8 – Determine Drainage Control Review and <del>Application</del> <u>Submittal</u> Requirements	No edits.	Updated website resource and contact text for SDCI.	Section title changed from “Determine Drainage Control Review and Application Requirements” to “Determine Drainage Control Review and <u>Submittal</u> Requirements”	<p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul>	<p><b>Comment(s):</b> Submittal requirements for drainage plans and documentation contain several potential loopholes. Requirements for preliminary drainage control plans may be deferred for certain types of projects if conditions deemed somewhat subjective are met, which might enable applicants to delay critical environmental review. The standards for feasibility and system adequacy are not rigorously defined, allowing for manipulation.</p> <p><b>Response:</b> The requirements that trigger drainage plans are not subjective and are defined under 22.807.020.A. Drainage review is performed even if deferred to the building permit. Environmental review is a separate review and is not dependent on the Preliminary Drainage Plans. Full drainage review will occur with the building permits in either scenario.</p>
Section <del>8.12</del> <u>8.1</u> – Preliminary Drainage Review ( <i>section moved</i> )	Refer to SMC 22.807.020.D for changes to Preliminary Drainage Review requirements.	Moved from Section 8.1 to Section 2.8.1.	Removed “details” from the list of Preliminary Drainage Review submittal requirements.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>• Typo.</li> </ul>	No comments received.

Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section <del>8.2</del> <u>2.8.2</u> – Standard Drainage Review ( <i>section moved</i> )	<ul style="list-style-type: none"> <li>● Refer to SMC 22.807.020.A.2 for changes to Standard Drainage Review requirements.</li> <li>● Added clarity to types of projects that require a Standard Drainage Review.</li> <li>● Added site plan element of including limits of disturbance.</li> </ul>	<ul style="list-style-type: none"> <li>● Moved from Section 8.2 to Section 2.8.2.</li> <li>● Clarified elements of projects that require Standard Drainage Review. Removed land disturbing threshold related to existing slabs.</li> <li>● Added a reference to SMC, Subsection 22.807.020.A for other scenarios when Standard Drainage Review applies.</li> </ul>	Removed incorrect wording related to existing slab remaining during building demolition.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Public comment.</li> <li>● Clarification.</li> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul>	<p><b>Comment(s):</b> <u>Slab Remaining During Demolition</u>: Do not count remaining slab on grade during demolition as land disturbing activity.</p> <p><b>Response:</b> 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 as a separate criteria 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 updated.</p>
Section <del>8.3</del> <u>2.8.3</u> – Comprehensive Drainage Review for Large Projects ( <i>section moved</i> )	<ul style="list-style-type: none"> <li>● Refer to SMC 22.807.020.A.3 for changes to Comprehensive Drainage Review requirements.</li> <li>● Added other qualifying professionals who are allowed to prepare and sign the Comprehensive Construction Stormwater Control and Soil Management Plan.</li> </ul>	Moved from Section 8.3 to Section 2.8.3.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul>	No comments received.

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Volume 1, Chapter 2 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 8.4 <u>2.8.4</u> Additional Documentation ( <i>section moved</i> )	No new edits	<ul style="list-style-type: none"> <li>Moved from Section 8.4 to Section 2.8.4</li> <li>Added special inspections for contaminated sites to the list of additional documentation that may be required by the Director for adequate evaluation.</li> </ul>	<ul style="list-style-type: none"> <li>Added clarification regarding contaminated sites and disposal facilities under special inspections bullet.</li> <li>Added documentation requirements for 22.800.040.B Adjustments and 22.800.040.B Exceptions.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>No new edits.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

*Volume 1, Chapter 3 – Minimum Requirements for All Projects*

Volume 1, Chapter 3 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Various	Minor terminology revisions and external reference updates.	Minor terminology revisions.	Minor terminology revisions.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
Section 3.1 – Maintaining Natural Drainage Patterns	Added requirement for concentrated discharge locations from project site.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with 2024 SWMMWW.</li> </ul>	No comments received.

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Volume 1, Chapter 3 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 3.4 – Construction Site Stormwater Pollution Prevention Control	<ul style="list-style-type: none"> <li>Refer to SMC 22.805.020.D for changes to “Minimum Requirements for Construction Stormwater Pollution Prevention Plan”.</li> <li>Copied from Volume 2 the 19 elements required for construction site stormwater pollution prevention control.</li> </ul>	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul>	No comments received.
Section 3.5 – Protect Wetlands	Added general protection guidelines for all wetlands.	Clarified what is meant by dispersing runoff into a wetland.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Consistency with 2024 MS4 Permit &amp; SWMMWW.</li> </ul>	No comments received.

*Volume 1, Chapter 4 – Minimum Requirements Based on Project Type*

Volume 1, Chapter 4 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Chapter 4 overview	Minor terminology revisions.	Minor terminology revisions.	Minor terminology revisions	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <b>March 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

Volume 1, Chapter 4 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<del>Section 4.1—Single-family Residential Projects</del>	No edits.	Deleted Single-family residential project type.	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>Deleted Single-family residential project type.</li> </ul>	No comments received.
Section 4.4 <del>4.1</del> – Parcel-Based Projects ( <i>section moved</i> )	<p>Clarified that parcel-based projects discharging to a capacity-constrained system may need to meet the existing condition standard</p> <p>Revised Figure 4.2C 4.1C to update terminology from “Enhanced” to “Metals” treatment – refer to redline figure packet for changes (figure numbers updated January 2026).</p>	<p>Moved Parcel-based Projects to Section 4.1.</p> <p>Revised Figures 4.1C terminology from “Enhanced” to “Metals” treatment – refer to redline figure packet for changes.</p> <p>Moved text regarding flow control from Section 4.1 to 4.1.3. Flow Control</p>	<ul style="list-style-type: none"> <li>Clarified text in 4.1.3 Flow control that roadway projects discharging to a capacity-constrained system will need to meet the existing condition standard if triggered.</li> </ul>	<p><b>July 2025:</b> Clarification and consistency with 2024 MS4 Permit.</p> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>Removed SFR project.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> Clarify who decides the “may” (changed from will) or remove the "may" and revert to original, same 4.4.</p> <p><b>Response:</b> Changed back to "will", but added "if required per"[Section 4.1.3].</p>

Volume 1, Chapter 4 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 4.3 – Roadway Projects	<ul style="list-style-type: none"> <li>Refer to SMC 22.805.060.C. for changes to Flow Control thresholds.</li> <li>Refer to SMC 22.805.060.D for changes to Treatment thresholds.</li> <li>Clarified that roadway projects discharging to a capacity-constrained system may need to meet the existing condition standard.</li> <li>Figures 4.1.A – C to be updated in Phase 2 to match code language changes.</li> </ul>	<ul style="list-style-type: none"> <li>Revised Figures 4.2A, B, C terminology from “Enhanced” to “Metals” treatment, and included new “and replaced” hard surfaces in terminology – refer to redline figure packet for changes.</li> <li>Moved text regarding flow control from Section 4.3 to 4.3.3. Flow Control</li> </ul>	<ul style="list-style-type: none"> <li>Clarified text in 4.3.3 Flow control that roadway projects discharging to a capacity-constrained system will need to meet the existing condition standard if triggered.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification and consistency with 2024 MS4 Permit.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> <u>Flow control application</u>: When does the Peak Standard apply in addition to other flow control standards.</p> <p><b>Response:</b> 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.</p> <p><b>Comment(s):</b> Clarify who decides the “may” (changed from will) or remove the "may" and revert to original, same 4.4.</p> <p><b>Response:</b> Changed back to "will", but added "if required per"[Section 4.3.3]</p>

*Volume 1, Chapter 5 – Minimum Requirement Standards*

Volume 1, Chapter 5 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.2.2 – On-site Lists	<ul style="list-style-type: none"> <li>● Refer to SMC 22.805.070.D.2 for changes to the On-site List for Single-family Residential Projects.</li> <li>● Refer to SMC 22.805.070.D.3 for changes to the On-site List for Trail and Sidewalk Projects.</li> <li>● Refer to SMC 22.805.070.D.4 for changes to the On-site List for Parcel-based Projects.</li> <li>● Refer to SMC 22.805.070.D.5 for changes to the On-site List for Roadway Projects.</li> </ul>	<ul style="list-style-type: none"> <li>● Refer to deleted SMC 22.805.070.D.2 On-site List for Single-family Residential Projects.</li> <li>● Refer to SMC 22.805.070.D.3 for changes to the On-site List for Trail and Sidewalk Projects.</li> <li>● Refer to SMC 22.805.070.D.2 for changes to the On-site List for Parcel-based Projects.</li> <li>● Refer to SMC 22.805.070.D.4 for changes to the On-site List for Roadway Projects.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul>	<p><b>Comment(s):</b> The infeasibility documentation required for avoiding Category 1 BMPs is a checklist or self-justifying narrative without strict documentary standards, enabling circumvention of top-tier requirements</p> <p><b>Response:</b> We require an OSM calculator that requires each surface to be documented for feasibility and only approved infeasibility from Appendix C can be selected if infeasible. The infeasibility criteria from Appendix C are built into the calculator. We do not rely on a self justifying narrative. The BMP is required unless an approved infeasibility criteria applies.</p>

Volume 1, Chapter 5 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.3 – Flow Control	<ul style="list-style-type: none"> <li>● Refer to SMC 22.805.080.B for change to Flow Control requirements.</li> <li>● Refer to SMC 22.805.080.B.2-5 for changes to Flow Control in relation to “Project Site”.</li> <li>● Clarified that flow control standards are applied to full project site and the full project site should be included in the continuous runoff modeling.</li> <li>● Added reference related to sizing guidance for detention BMPs orifice diameter to meet standard release rates.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul>	No comments received.

Volume 1, Chapter 5 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.3.1 – Wetland Protection Standards	<ul style="list-style-type: none"> <li>● Refer to SMC 22.805.080.B.1. for changes to Wetland Flow Control requirements.</li> <li>● 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.</li> <li>● 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.</li> </ul>	<ul style="list-style-type: none"> <li>● Removed alternative method for compliance with Method 2.</li> <li>● Added requirements if the Wetland Protection Standard cannot be fully met due to the implementation of required on-site stormwater management, water quality, or other Flow Control BMPs.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with 2024 MS4 Permit &amp; SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Ecology equivalency comment.</li> <li>● Clarifications added to support wetland protection and modeling.</li> <li>● For code changes, see Code Summary of Proposed Changes.</li> </ul>	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.	No new edits	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.

Volume 1, Chapter 5 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
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.	No new edits	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"><li>• Clarification.</li></ul>	No comments received.
Section 5.4 – Water Quality Treatment	No edits.	Clarified in Manual that landscape management plan cannot be used for artificial turf fields (SMC 22.805.090.B) because pesticides and fertilizers are not the associated pollutants of concern	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"><li>• Clarification.</li></ul>	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.	No new edits	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"><li>• For code changes, see Code Summary of Proposed Changes.</li></ul>	No comments received.
Section 5.4.2.2 – Phosphorus Treatment	No edits.	Clarified that Green Lake only nutrient critical receiving water in Seattle	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"><li>• Green Lake added to the Ecology 2022 Candidate 303(d) list of impaired waterbodies for total phosphorus.</li></ul>	No comments received.

Volume 1, Chapter 5 Section Number and Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.4.2.3 – Metals Treatment	<ul style="list-style-type: none"> <li>Refer to SMC 22.805.090.B.5 for changes to Water Quality Treatment Metals requirements.</li> <li>Added additional commercial site examples where metals treatment may be required</li> </ul>	No new edits	Added note regarding crumb rubber sports fields metals treatment requirements.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with 2024 MS4 Permit.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Address metals in crumb rubber.</li> </ul>	<p><b>Comment(s):</b> Sports fields is listed under "Any portion of a project site (e.g., landscaped areas, including sports fields)" but sports fields is not listed in 22.805.090.B.5, provide clarity.</p> <p><b>Response:</b> Clarity that landscape areas, including sport fields (unless crumb rubber) do not require Metals Treatment has been added to manual.</p> <p><b>Comment(s):</b> The definition of Single-family residential projects was removed from 22.801.200. Add a definition for residential in this section or in 22.801.190</p> <p><b>Response:</b> Single-family project bullet point deleted from Basic Treatment requirements. Not adding definition of residential.</p>
Section 5.4.2.4 – Basic Treatment	Added that some project sites may need to meet both basic treatment and oil control treatment requirements.	No new edits. Refer to SMC 22.801.030.B for existing definition of "Basic Treatment Receiving Water".	<ul style="list-style-type: none"> <li>Removed single-family residential projects note regarding phosphorous control.</li> <li>"Basic Treatment Receiving Water" text to code box.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> <li>For code changes, see Code Summary of Proposed Changes.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> <li>Editing.</li> </ul>	No comments received.

*Volume 1, Chapter 6 – Alternative Compliance*

<b>Volume 1, Chapter 6</b>					
<b>Section Number and Name</b>	<b>July 2025 Public Review Draft Proposed Change</b>	<b>January 2026 Public Review Draft Proposed Change</b>	<b>March 2026 Public Review Draft Proposed Change</b>	<b>Driver for Change</b>	<b>Response to Public Comment</b>
Alternative Compliance	No edits.	No edits.	No edits.	NA	No comments received.

*Volume 1, Chapter 7 – Exemptions, Adjustments, and Exceptions*

<b>Volume 1, Chapter 7</b>					
<b>Section Number and Name</b>	<b>July 2025 Public Review Draft Proposed Change</b>	<b>January 2026 Public Review Draft Proposed Change</b>	<b>March 2026 Public Review Draft Proposed Change</b>	<b>Driver for Change</b>	<b>Response to Public Comment</b>
Chapter 7 – Exemptions, Adjustments, and Exceptions	NA	NA	Added Chapter 7, Exemptions, Adjustments, and Exceptions	<b>March 2026:</b> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	No comments received.

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

### **July 2025 Public Review Draft Stormwater Manual**

- 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.

### **January 2026 Public Review Draft Stormwater Manual**

- Added new Temporary Flow Control During Construction BMP section.
- Added Section 5.2 Monitoring Practices and moved pH and turbidity monitoring to fall within Section.
- Revised pH and turbidity monitoring requirements so clear only required for certain large projects.
- Clarified requirements for calculating sediment trap peak flow rates.
- Added clarification for drain cover requirements during the work day.
- Minor terminology revisions throughout.

### **March 2026 Public Review Draft Stormwater Manual**

- Moved Checklists to Select Small and Large Project Construction BMPs to Attachment 1
- Adjusted new turbidity monitoring requirements
- Added information and plan requirements for PCBs in Demolition of Buildings section.

In the draft documents, the following changes will be noted as follows:

Red text: July 2025 proposed changes

Blue text: January 2026 proposed changes

Green text: March 2026 proposed changes

*Volume 2 – Overall Changes*

<b>Volume 2 Overall Changes Section Number and Name</b>	<b>July 2025 Draft – Initial Response to Comments</b>
	<p><b>Comment(s):</b> 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><b>Response:</b> Seattle still evaluating comment(s).</p>

*Volume 2, Chapter 1 – Introduction*

Volume 2, Chapter 1 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 1.3 What is Considered “Compliance”?	<ul style="list-style-type: none"> <li>Added section to describe new Turbidity and pH monitoring requirements.</li> <li>Added section to describe upstream analysis evaluation of runoff that enters a construction site.</li> </ul>	Moved Turbidity and pH monitoring to chapter 5.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Provide clarity and ensure meeting surface WQ standards.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Reorganized for clarity.</li> </ul>	No comments received.
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.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Ensure meeting surface WQ standards.</li> </ul>	No comments received.

*Volume 2, Chapter 2 – Construction Stormwater Control and Soil Management Plan*

Volume 2, Chapter 2 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.1 Small Project Construction Stormwater Control and Soil Management Plan	<ul style="list-style-type: none"> <li>● Changed criteria for Small Projects from 1 acre to less than 10,000 square feet of land-disturbing activities.</li> <li>● Changed "construction clearing limits" to "Limits of Disturbance" which include clearing, grading, and other land disturbing activities.</li> <li>● Added a "discharge flow rate limit" for construction stormwater, groundwater dewatering and process water discharges.</li> </ul>	Added a reference to SPU Design Standards and Guidelines Appendix 18B Temporary Discharges for allowable discharge rates.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● 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.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.
Section 2.2 Large Project Construction Stormwater Control and Soil Management Plan	Changed criteria for Large Projects from 1 acre to 10,000 square feet and greater of land-disturbing activities.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Update large project definition so projects with significant land disturbance but very little new or replaced hard surface will require additional scrutiny.</li> </ul>	No comments received.

Volume 2 – Construction Stormwater Control

Volume 2, Chapter 2 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.3 Certified Erosion and Sediment Control Lead	Under responsibilities of CESCL, added contact information if turbid or polluted discharge enters the City's MS4 and/or a receiving waterbody.	Changed required duration of CESCL certification from 3 years to the full duration of the project.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• Provided clarity for CESCL personnel on who to contact if turbid or polluted discharge enters the City's MS4 and/or a receiving waterbody.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul>	No comments received.

*Volume 2, Chapter 3 – Selecting Construction Stormwater Controls*

Volume 2, Chapter 3 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Table 1 Checklist to Select Small Project Construction BMPs	No new edits.	No new edits.	Moved Small Project Checklists to Attachment 1 of Volume 2.	<p><b>March 2026:</b></p> <p>Improve flow of document.</p>	No comments received.
Table 1 Checklist to Select Large Project Construction BMPs	Added requirement that high- visibility fencing is required at edges of ECAs and their buffers where disturbance is not allowed.	No new edits.	Moved Large Project Checklists to Attachment 1 of Volume 2.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• Provided clarity for when high visibility fencing BMP is required.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>• Improve flow of document.</li> </ul>	No comments received.

*Volume 2, Chapter 4 – Standards and Specifications for Construction Erosion and Sedimentation Control*

Volume 2, Chapter 4 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Chapter 4 – Standards and Specifications for Construction Erosion, Sediment, and Flow Control Practices	No edits.	Rename section title to include Flow Control Practices to reflect the added Flow Control & Dewatering Practices to the chapter.	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"><li>Updated to reflect newly added Flow Control &amp; Dewatering practices to chapter.</li></ul>	No comments received.
BMP E1.15: Mulching, Matting, and Compost Blankets	Added information on technologies that the department of Ecology has approved are functionally equivalent to mulching.	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"><li>Public comment.</li></ul>	No comments received.
BMP E1.50: High-Visibility Fence	Edited language for clarity.	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"><li>Added clarity for when to use high visibility fence BMP.</li></ul>	No comments received.
BMP E2.10: Stabilized Construction Access	Added information on technologies that the department of Ecology has approved are functionally equivalent to stabilized construction access.	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"><li>Public comment.</li></ul>	No comments received.
BMP E2.15: Tire Wash	Added information on technologies that the department of Ecology has approved are functionally equivalent to tire wash.	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"><li>Public comment.</li></ul>	No comments received.

Volume 2 – Construction Stormwater Control

Volume 2, Chapter 4 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
BMP E2.35: Check Dams	Added information on technologies that the department of Ecology has approved are functionally equivalent to Check Dams.	No new edits.	No new edits.	<b>July 2025:</b> ● Public comment.	No comments received.
BMP E2.40: Triangular Silt Dike (TSD)	Added information on technologies that the department of Ecology has approved are functionally equivalent to TSDs.	No new edits.	No new edits.	<b>July 2025:</b> ● Public comment.	No comments received.
BMP E3.10: Filter Fence	Added information on technologies that the department of Ecology has approved are functionally equivalent to filter fences.	No new edits.	No new edits.	<b>July 2025:</b> ● Public comment.	No comments received.
BMP E3.25: Inlet Protection	Added information on technologies that the department of Ecology has approved are functionally equivalent to storm drain inlet Protection.	No new edits.	No new edits.	<b>July 2025:</b> ● Public comment.	No comments received.
BMP E3.35: Straw Wattles, Compost Socks, and Compost Berms	Added information on technologies that the department of Ecology has approved are functionally equivalent to wattles.	No new edits.	No new edits.	<b>July 2025:</b> ● Public comment.	No comments received.

Volume 2 – Construction Stormwater Control

Volume 2, Chapter 4 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
BMP E3.40: Sediment Trap	No edits.	<ul style="list-style-type: none"> <li>Added examples of situations where the project size or downstream conditions require using the 10-year peak volumetric flow rate for the Single Event Hydrograph Method.</li> <li>Added to calculate the peak flow rate, the land use cover used must represent the conditions during construction that result in the most runoff.</li> </ul>	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>Clarification and additional guidance.</li> </ul>	No comments received.
BMP E3.50: Portable Sediment Tank	No edits.	Added text specifying requirements of holding drainage onsite and trucking it offsite to dispose at a different location and requirements if the stored water contains contaminants.	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>New guidance/requirements.</li> </ul>	No comments received.
BMP E3.60: Construction Stormwater Filtration	Added guidance/requirements for how to size filtration systems for groundwater discharges.	Added a reference to Section 4.4.1 BMP E4.10 Temporary Flow Control During Construction for sizing for listed creek basins and non-listed creek basins during construction.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Provide clarity on how to account for groundwater discharges that may have a constant flow rate.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

Volume 2, Chapter 4 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
BMP E4.10: Temporary Flow Control During Construction	No edits.	Added new Temporary Flow Control During Construction BMP section to address when projects must provide flow control BMPs during construction to detain stormwater runoff and dewatering flow before it leaves the construction site.	Added specifications to use continuous runoff model for sediment control BMP sizing.	<p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification to the code requirement (22.805.020.D) to require flow control during construction if necessary to protect downstream properties and receiving waters.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
BMP <del>C1.40</del> E4.20: Temporary Groundwater Dewatering ( <i>moved from Chapter 5 to Chapter 4</i> )	<ul style="list-style-type: none"> <li>Changed section title from "temporary dewatering" to "temporary <u>groundwater</u> dewatering".</li> <li>Added reference to Section 4.3.8 BMP E3.60 when going through the stormwater filtration planning considerations for BMP C1.40.</li> </ul>	Changed BMP number from C1.40 to E4.20, moved to Chapter 4.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Revised for clarity.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Revised for clarity.</li> </ul>	No comments received.

*Volume 2, Chapter 5 – Source Control & Monitoring Practices for Construction Pollutants Other than Sediment*

Volume 2, Chapter 5 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Chapter 5 Source Control & Monitoring Practices for Construction Pollutants Other than Sediment	No edits.	Revised title to reflect monitoring added to Chapter 5 (previously included in Chapter 1 in July 2025 draft)	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
BMP C1.25: Demolition of Buildings	Added consideration for PCBs and added more guidance / requirements for construction stormwater control for demolition.	<ul style="list-style-type: none"> <li>Added clarification for drain cover requirements during the work day.</li> <li>Added clarification for stabilizing contaminated soils.</li> </ul>	<ul style="list-style-type: none"> <li>Added PCB-specific considerations related to age and material of building.</li> <li>Added demolition guidance and required disclosure when PCB is present.</li> </ul>	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Consistency with 2024 SWMMWW. Provide clarity on BMPs to use during and after demolition.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul> <b>March 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> <li>Public comment.</li> </ul>	<b>Comment(s):</b> <u>PCBs</u> : Demolition of Buildings: Clarify required method of communication with the City when buildings with PCBs are demolished.  <b>Response:</b> Parties planning demolition activities should also refer to Federal and State waste disposal regulations applicable to PCBs. Inform the City Permitting group of the presence of PCB-containing building materials prior to its beginning demolition by contacting the assigned SDCI inspector of demolition activities via email.

Volume 2, Chapter 5 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
BMP C1.30: Building Repair, Remodeling, and Construction	Added consideration for PCBs.	Added clarification for drain cover requirements during the work day.	<ul style="list-style-type: none"> <li>● Added PCB-specific considerations related to age and material of building.</li> <li>● Added guidance for PCB assessment during project planning phase.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	<p><b>Comment(s):</b> Include contaminants of emerging concern (CEC).</p> <p><b>Response:</b> More detailed CEC information, including PCBs, is included in Volume 4.</p>
BMP C1.45: Solid Waste Handling and Disposal	Added consideration for PCBs .	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with 2024 SWMMWW.</li> </ul>	No comments received.
BMP C1.50: Disposal of Asbestos and Polychlorinated Biphenyls (PCBs)	Added consideration for PCBs .	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with 2024 SWMMWW.</li> </ul>	No comments received.

Volume 2, Chapter 5 – Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.2 - Monitoring Process	No edits.	<ul style="list-style-type: none"> <li>● Added new Section 5.2 Monitoring Practices and moved the Turbidity and pH monitoring from Section 1.3 to Section 5.2.</li> <li>● Added language to clarify when monitoring is required.</li> <li>● Added reference to Sections 5.1.10 and 5.1.11 for additional concrete handling and washout area requirements.</li> </ul>	<ul style="list-style-type: none"> <li>● Added clarifications to turbidity monitoring practices and adjusted required sampling timing per recommendations in public comments.</li> </ul>	<p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Ecology equivalency comments.</li> <li>● Reorganized for clarity.</li> <li>● Clarifications.</li> <li>● Public comment.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Public comment.</li> </ul>	<p><b>Comment(s):</b> Add clarity what constitutes a rain event and depth of rain threshold that would require additional sampling. Clarify difference between “concentrated discharge and “discharge”.</p> <p><b>Response:</b> Updated text to clarify when to sample.</p> <p><b>Comment(s):</b> Ensure pH requirements are consistent between the Seattle Stormwater Manual, the Construction Stormwater General Permit, and the Industrial Stormwater General Permit.</p> <p><b>Response:</b> The pH benchmarks are consistent with 2026 Ecology Construction Stormwater General permit. Thresholds under the Industrial Permits are out of the scope of the Stormwater Manual.</p>

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

### **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.

### **January 2026 Public Review Draft Stormwater Manual**

- Renamed the “Seattle Design Precipitation Time Series” to “Seattle Extended Precipitation Time Series (SEPTS-99)”.
- Changed “structural soil cell BMP” name to “soil cell bioretention”.
- For phosphorus treatment, added requirement of Infiltrating Bioretention (without underdrain) with default BSM be more than ¼ mile from phosphorus limited water bodies unless using the options HPBSM and polishing layer.
- Added Green Lake as the only nutrient-critical receiving water determined to be impaired due to phosphorus contributed by stormwater.
- Updated with latest approved tree references and information.
- Added 2-inch ponding depth for infiltrating bioretention with vertical sides.
- Updated non-infiltrating bioretention sizing factors.
- Updated list of approved proprietary and emerging water quality treatment technology and Mass Loading Ratio applicability.

- Revised new infiltrating and non-infiltrating soil cell bioretention sections since July 2025 draft for clarity and for consistency with other BMP requirements, layout, and formatting.
- Minor terminology revisions throughout.

**March 2026 Public Review Draft Stormwater Manual**

- Added Table 4.2. Sand Media Specification.
- Updated and expanded tree information in Tree Planting and Retention and Infiltrating Bioretention sections.
- Revised new infiltrating and non-infiltrating soil cell bioretention sections for clarity.
- Minor terminology revisions throughout.

In the draft documents, the following changes will be noted as follows:

Red text: July 2025 proposed changes

Blue text: January 2026 proposed changes

Green text: March 2026 proposed changes

*Volume 3, Chapter 3 – BMP Selection and Sizing Approach*

Volume 3, Chapter 3 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.5 – Infiltration BMPs	No edits	<ul style="list-style-type: none"> <li>● Added infiltrating soil cell bioretention to the table of BMPs described in this volume.</li> </ul>	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>● Added infiltrating soil cell bioretention to manual.</li> </ul>	No comments received.

Volume 3, Chapter 3 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.9 – non-infiltrating BMPs	No edits.	<ul style="list-style-type: none"> <li>● Moved table of City approved proprietary and emerging water quality treatment technologies to Section 5.8.11.</li> <li>● Added non-infiltrating soil cell bioretention to the table of BMPs described in this volume.</li> </ul>	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>● Ecology equivalency comments.</li> <li>● Reorganized for clarity.</li> <li>● Added non-infiltrating soil cell bioretention to manual.</li> </ul>	No comments received.
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.	No new edits	Added dispersion within steep slope or landslide-prone areas may be allowed if slope stability analysis is performed by geotechnical professional determining dispersion is feasible.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>● Updated site constraint requirements to match new legislation for septic systems.</li> </ul> <b>March 2026:</b> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	No comments received.

Volume 3, Chapter 3 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 3.2 – Determine Infiltration Feasibility	<ul style="list-style-type: none"> <li>Revised site constraints near septic system components, specifically prohibiting them within 30 feet of drainfields and 10 feet of tanks and distribution boxes.</li> <li>Added clarity for minimum required vertical separation and when subsurface investigation is required.</li> <li>Revised minimum infiltration rates for infiltration trenches and permeable pavement surface.</li> </ul>	<ul style="list-style-type: none"> <li>Added Infiltrating Soil Cell Bioretention without underdrain and Infiltrating Soil Cell Bioretention with underdrain values to Table 3.3 Minimum Measured Infiltration Rates.</li> <li>Clarified minimum measured infiltration rates for permeable pavement surfaces and facilities.</li> </ul>	Clarified that slope stability analysis must be completed by a <u>geotechnical</u> engineer.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Updated site constraint requirements to match new legislation for septic systems and added clarity and flexibility for infiltration facilities.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Added infiltrating and non-infiltrating soil cell bioretention to manual.</li> <li>Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> <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.</p> <p><b>Response:</b> 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.</p>
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.	Added Infiltrating Soil Cell Bioretention without underdrain, Infiltrating Soil Cell Bioretention with underdrain, and Non-infiltrating Soil Cell Bioretention to Table 3.4 Flow Control BMPs and Applicable Standards.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Added infiltrating and non-infiltrating soil cell bioretention to manual.</li> </ul>	<p><b>Comment(s):</b> Table 3.4: use iTree or WA SW Model as per KCD, and SPU 2008 Herrera SW Report to accurately reflect stormwater services of trees.</p> <p><b>Response:</b> Tree credits are based on Herrera 2008 study and matches Ecology SWMMWW. See general response to comments under Stormwater Code table of changes.</p>

Volume 3, Chapter 3 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 3.5 – BMP Selection for Water Quality Treatment	Changed the phrase "enhanced" treatment to "metals" treatment.	<ul style="list-style-type: none"> <li>For phosphorus treatment, added requirement of Infiltrating Bioretention (without underdrain) with default BSM be more than ¼ mile from phosphorus limited water bodies unless using the options HPBSM and polishing layer.</li> <li>Figure 3.2 updated terminology from “enhanced” to “metals” – refer to redline figure package.</li> </ul>	Added Green Lake as a nutrient-critical receiving water determined to be impaired due to phosphorus contributed by stormwater.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Equivalency with 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Ecology equivalency comments.</li> <li>Clarification.</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>Green Lake added to the Ecology 2022 Candidate 303(d) list of impaired waterbodies for total phosphorus.</li> </ul>	No comments received.

*Volume 3, Chapter 4 – General Design Requirements*

Volume 3, Chapter 4 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 4.1 – Sizing Approach	<ul style="list-style-type: none"> <li>Added Concentrated Flow Dispersion to Pre-sized Approach table.</li> <li>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.</li> <li>Added new and revised procedures for flow control sizing when the minimum 0.5-inch orifice is not feasible.</li> </ul>	<ul style="list-style-type: none"> <li>Added Infiltrating Soil Cell Bioretention and Non-infiltrating Soil Cell Bioretention to the list of BMPs included in the Pre-sized Approach.</li> <li>Renamed the “Seattle Design Precipitation Time Series” (aka Seattle 158-year, 5-minute series) to “Seattle Extended Precipitation Time Series (SEPTS-99)” or approved equivalent.</li> <li>Revised Minimum Orifice Diameter Alternative Sizing Step 4 to specify increasing the orifice diameter to the minimum size (0.5 inch) on the construction plans if the modeling results in an orifice size less than 0.5 inch.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added clarity and missing dispersion BMPs. Equivalency with 2024 SWMMWW for flow control sizing when 0.5-inch orifice is not feasible.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Added infiltrating and non-infiltrating soil cell bioretention to manual.</li> <li>To clarify that current 158-year, 5-minute series includes historical data through 1999.</li> <li>Clarification.</li> </ul>	No comments received.
Section 4.2 – Bypass, Flow-Through, and Off-Site Flow General Design Requirements	No edits.	Clarified flows are “offsite” in Scenario 2 – Flow-Through a Flow Control BMP.	No new edits.	<p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

Volume 3, Chapter 4 – Section 3 or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 4.3 – Conveyance and Overflow General Design requirements</p>	<ul style="list-style-type: none"> <li>● Clarified requirements for small projects with no off-site point of discharge including:                             <ul style="list-style-type: none"> <li>○ Specify this section is only for small projects.</li> <li>○ Clarify that only the new and replaced hard surfaces must be modeled.</li> <li>○ Clarified that permeable pavement surfaces and dispersion do not require modeling.</li> </ul> </li> <li>● 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.</li> </ul>	<p>No new edits.</p>	<ul style="list-style-type: none"> <li>● Clarified infiltration testing and subsurface investigation requirements for Small Projects with no off-site point of discharge..</li> <li>● Added that drywells may be sized by a licensed civil engineer in lieu of using sizing found in Appendix E..</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Added clarity and protection for ECA areas.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification</li> </ul>	<p><b>Comment(s):</b> <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.</p> <p><b>Response:</b> Outside of scope of stormwater manual.</p>

Volume 3, Chapter 4 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 4.4 – Presettling and Pretreatment Requirements	Added design criteria for using catch basin for presettling.	<ul style="list-style-type: none"> <li>● Added Infiltrating Soil Cell Bioretention and Non-infiltrating Soil Cell Bioretention to Table 4.1 Presettling and Pretreatment Requirements.</li> <li>● Added that at the time the Manual was developed, Green Lake was the only nutrient-critical receiving water determined to be impaired due to phosphorus contributed by stormwater.</li> <li>● Added design criteria for using catch basins or other devices for presettling and pretreatment.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Added clarity.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Added infiltrating and non-infiltrating soil cell bioretention to manual.</li> <li>● Green Lake added to the Ecology 2022 Candidate 303(d) list of impaired waterbodies for total phosphorus.</li> <li>● Clarification.</li> </ul>	No comments received.

Volume 3, Chapter 4 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 4.5 – Infiltrating BMPs</p>	<ul style="list-style-type: none"> <li>● Clarified that 100% infiltration means infiltrating all runoff over the full simulation period, not just during extreme events like the 100-year storm.</li> <li>● 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.</li> <li>● Added considerations for infiltrating BMPs for foundation/footing drainage and other subsurface drainage systems.</li> </ul>	<p>Clarified bioretention drawdown time requirements for water quality design treatment volume.</p>	<ul style="list-style-type: none"> <li>● Added that infiltrating bioretention is not permitted within 1/4 mile of nutrient-critical receiving waters if the underlying soil does not meet the soil requirements outlined in <i>Section 4.5.2</i> unless HPBSM and a polishing layer are used.</li> <li>● Clarified that surfaces designed to be equivalent to permeable pavement surfaces may include natural or artificial turf sports fields.</li> <li>● Added that a 12 inch water quality treatment course shall be included between the subbase and the storage reservoir for permeable pavement or equivalent BMPs when metals treatment is required.</li> <li>● Added Table 4.2. sand media material specification for use when site soils do not meet the soil suitability requirements for water quality treatment.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Added clarity and considerations.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification based on existing requirements.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications and matching Ecology requirements.</li> </ul>	<p>No comments received.</p>

*Volume 3, Chapter 5 – BMP Design*

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 5.2 – Tree Planting and Retention and Planting (<i>section title changed</i>)</p>	<ul style="list-style-type: none"> <li>● Changed tree list to Green Factor tree list.</li> <li>● Clarified design criteria for retained trees and newly planted trees.</li> <li>● Added protection standards and a summary of the minimum requirements for tree planting and retention.</li> <li>● 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.</li> <li>● Table 5.1 “Minimum Soil Volume for Trees in Planters.” moved from 5.2.5.1 Retained Trees to 5.2.5.2 New Planted Trees.</li> </ul>	<ul style="list-style-type: none"> <li>● Expanded Tree Species section to include height and ROW requirements.</li> <li>● Added reference to SDOT Approved Street Tree List for approved tree species for the right-of-way in.</li> <li>● Updated tree size, tree spacing, and soil width, depth and volume requirements.</li> <li>● Added Small/Constrained Site trees to Table 5.1 Minimum Soil Requirements for Trees in Planters.</li> </ul>	<ul style="list-style-type: none"> <li>● Moved general tree setback recommendations to a subsection under design criteria.</li> <li>● Added that existing trees do not have a minimum spacing from other trees.</li> <li>● Updated tree species’ height and canopy measurements required to qualify for on-site stormwater or flow control management.</li> <li>● Added alternative tree spacing approval for parcels if the intent is to establish a grove.</li> <li>● Revised tree species requirements for trees used for On-site Stormwater Management and Flow Control requirements to be based on mature tree canopy and height.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Support increased tree canopy and to align with Green Factor requirements.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Ecology equivalency comments.</li> <li>● Updated with latest approved tree references and information.</li> <li>● Public Comment.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Added flexibility.</li> <li>● Clarifications.</li> <li>● Public comment.</li> </ul>	<p><b>Comment(s):</b> <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 - 20% seems low for retained mature trees based on this work.</p> <p><b>Response:</b> Title of section changed to start with Tree Retention. The area managed values found in Tables 5.2 &amp; 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> <p><b>Comment(s):</b> Remove spacing minimums between trees.</p>

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					<p><b>Response:</b> Spacing is based on tree obtaining full size without competition from other trees. Added language regarding tree spacing to allow approval of alternate spacing per landscape architect or horticulturalist design and maintenance plan.</p> <p><b>Comment(s):</b> Require an arborist report for all construction permits.</p> <p><b>Response:</b> The city relies on 25.11 Tree Protection and other provisions regarding tree protection. Not all construction projects require arborist reports.</p>
Section 5.3.4 – Trench Downspout Dispersion	<ul style="list-style-type: none"> <li>Added criteria for short retaining walls, rockeries and uncovered decks allows in the 10-ft additional setback.</li> <li>Clarified Continuous Modeling Assumptions.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul>	No comments received.

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.3.7 – Sidewalk/Trail Compost Amended Strips	Clarified that infiltration testing is not required for this BMP and that this BMP is not for pollution-generating surfaces.	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
Section 5.3.8 – Light Rail Elevated Guideway Dispersion	Added Light Rail Elevated Guideway Dispersion BMP for equivalency with 2024 SWMMWW.	No new edits.	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Equivalency with 2024 SWMMWW.</li> </ul>	No comments received.
Section 5.4.2 – Infiltrating Trenches	<ul style="list-style-type: none"> <li>Added maximum trench vertical depth of aggregate storage reservoir.</li> <li>Reduced the minimum measured infiltration rate to 2 inches/hour from 5 inches/hour.</li> <li>Figures 5.8 and 5.9 updated maximum vertical dimension of storage aggregate – refer to redline figure packet for changes.</li> </ul>	<ul style="list-style-type: none"> <li>Added requirements for trenches with perforated or slotted pipe.</li> <li>Figures 5.8 and 5.9 modified notes for clarity– refer to redline figure packet for changes.</li> </ul>	No new edits.	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Allows flexibility but establishes a difference between (linear) infiltration trenches and drywells to justify the lower infiltration rate.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>Ecology equivalency comments.</li> <li>Clarification.</li> </ul>	No comments received.
Section 5.4.4 – Infiltrating Bioretention	<ul style="list-style-type: none"> <li>Removed requirement for using multiple cells when contributing area is over 5,000 square feet.</li> <li>Added that HPBSM and polishing layer may be used.</li> <li>Added requirement to provide multiple flow entrances for bioretention receiving concentrated flows from areas over 20,000 square feet.</li> </ul>	<ul style="list-style-type: none"> <li>Added clarity for phosphorus considerations if using HPBSM and polishing layer.</li> <li>Added vertical sides bioretention facilities construction material requirements.</li> <li>Added description of when weirs can be used</li> </ul>	<ul style="list-style-type: none"> <li>Added location, setback, spacing, and planting area requirements for trees in bioretention.</li> <li>Term vegetation expanded to include both plants and trees.</li> <li>Revised width requirement for gravel reservoir to match</li> </ul>	<b>July 2025:</b> <ul style="list-style-type: none"> <li>Update guidance and requirements. Added HPBSM and polishing layer to be consistent with 2024 SWMMWW.</li> </ul> <b>January 2026:</b> <ul style="list-style-type: none"> <li>Ecology equivalency comments.</li> </ul>	<b>Comment(s):</b> Require trees in all BMP applications. <b>Response:</b> For private development, the city relies on the tree planting and retention requirements found in the Land Use and ECA codes. The addition of trees to the OSM Lists is to clarify / acknowledge that trees can be used within bioretention (if the correct species are utilized)

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	<ul style="list-style-type: none"> <li>Revised tables for Presettling Requirements for Bioretention Facilities Owned and Not Owned or Maintained by Phase 1 Municipal Stormwater Permittees.</li> <li>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).</li> <li>Revised the fine compost percentage range and organic matter content range for the bioretention soil mix.</li> <li>Revised minimum requirements for overflow design for freeboard and drain riser pipes.</li> <li>Added infeasibility criteria for vertical walled bioretention that would need to be deeper than 2.5 feet.</li> <li>Added clarifications to Continuous Modeling Assumptions for Infiltration Bioretention.</li> </ul> <p>Figures 5.13 and 5.14 updated notes for clarity – refer to redline figure packet for changes.</p>	<ul style="list-style-type: none"> <li>for ponding area bottom slopes.</li> <li>Added reference to handrail requirements for vertical sided bioretention.</li> <li>Added option for using alternative structures instead of an inspection chamber for a Flow Restrictor.</li> <li>Figures 5.11, 5.12, 5.13, and 5.14 updates notes for clarity – refer to redline figure packet for changes.</li> <li>Added Figure 5.16 Example of Infiltrating Bioretention Facility with Tree and Side Slopes (without Underdrain) – refer to redline figure packet for changes.</li> <li>Added Planter Box Material section.</li> </ul>	<ul style="list-style-type: none"> <li>required bottom width of infiltrating bioretention.</li> <li>For new figure with tree and other figure changes, see Stormwater Manual Figure Revisions packet.</li> </ul>	<ul style="list-style-type: none"> <li>Address BMP longevity concerns.</li> <li>Public comment.</li> <li>Provide options to increase tree canopy.</li> <li>Clarifications.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications.</li> <li>Consistency with 2024 SWMMWW and pre-sized modeling assumptions.</li> </ul>	<p>as there was confusion under 2021 Code / Manual. Therefore, language stating that trees can be planted within bioretention.</p>

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		<ul style="list-style-type: none"> <li>Added 2-inch ponding depth values to Table 5.21 On-site List Sizing for Infiltrating Bioretention with and without Underdrains and Table 5.22 Pre-sized Sizing Factors and Equations for Infiltrating Bioretention Without Underdrains.</li> </ul>			
Section 5.4.5 – Rain Gardens	No edits.	Figures 5.17 updated notes for clarity – refer to redline figure packet for changes.	No new edits.	<b>January 2026:</b> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<b>Comment(s):</b> Require trees in all BMP applications. <b>Response:</b> See response under Section 5.4.4 – Infiltrating Bioretention

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Section 5.4.6 – Permeable Pavement Facilities	<ul style="list-style-type: none"> <li>● Clarified that infiltration facilities functionally equivalent to permeable pavement may be used beneath impermeable surfaces or landscaping as an alternative to permeable pavement.</li> <li>● Adds maintenance guidance for permeable pavement wearing course.</li> <li>● Adds that fracture jointing sand is not allowed under leveling course material.</li> <li>● Added clarity for minimum measured subgrade infiltration rate</li> <li>● Added new "BMPs Equivalent to Permeable Pavement Facilities" section.</li> <li>● Added clarifications for sizing the permeable pavement facility area.</li> </ul>	<ul style="list-style-type: none"> <li>● Added clarification for how run-on should be directed to facility in a distributed manner.</li> <li>● Added clarity for using sizing factors or equations to meet performance standards.</li> <li>● Added clarification for length and width setting based on run-on ratios when using continuous simulation hydrologic modeling to size permeable pavement.</li> </ul>	<ul style="list-style-type: none"> <li>● Revised figure to show scarification requirements of subgrade.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Added clarity.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Ecology equivalency comments.</li> <li>● Clarification.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications.</li> </ul>	<p><b>Comment(s):</b> Allow non-manufactured choker coarse like pea gravel rather than introducing additional geotextiles into environment.</p> <p><b>Response:</b> Pea gravel would not be an appropriate choker course, but the City will consider possible clarification to 2031 Manual that allows a choker course in lieu of a geotextile when required. Additional considerations would be needed to determine the appropriate aggregate to use.</p>
Section 5.4.8 – Infiltration Ponds	Changed term "Infiltration Basins" to "Infiltration Ponds".	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with 2024 SWMMWW.</li> </ul>	No comments received.

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Section 5.4.9 – Infiltration Chambers/Vaults	No new edits.	No new edits.	Added cylindrical shape to list of example layouts.	March 2026: <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> Pipe systems designed to provide temporary storage and discharge via infiltration into the subsurface via perforations or other features should be included in this section.</p> <p><b>Response:</b> "cylindrical" added to list</p>
Section 5.4.10 – <u>Infiltrating Structural Soil Cell Bioretention</u> (changed name from July 2025)	<ul style="list-style-type: none"> <li>Added new section for infiltrating structural soil cell BMPs.</li> <li>New Figures 5.23 and 5.24 5.24 and 5.25 showing infiltrating structural soil cell BMP – refer to redline figure packet for changes (figure numbers updated January 2026).</li> </ul>	<ul style="list-style-type: none"> <li>Changed name from “infiltrating structural soil cell BMP” to “infiltrating soil cell bioretention”.</li> <li>Revised section for clarity and for consistency with other BMP requirements, layout, and formatting.</li> <li>Updated Figures 5.24, 5.25, 5.26, and 27 showing infiltrating soil cell bioretention – refer to in redline figure packet for changes.</li> </ul>	<ul style="list-style-type: none"> <li>Added Underdrains and Geotextile to the list of elements different from infiltrating bioretention.</li> <li>Updated subgrade section.</li> <li>Added underdrain (if required) and geotextile sections.</li> <li>Updated liner section as liners are not required for infiltrating soil cell bioretention.</li> <li>Expanded tree requirements.</li> <li>Added a note to Hardscapes section regarding permeable pavement over soil cell bioretention.</li> <li>Added backfill requirements adjacent to soil cells must meet manufacturer design requirements.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added infiltrating structural soil cells to manual.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications.</li> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> Add clarity if BMP can be used with no plants or trees.</p> <p><b>Response:</b> Updated Section 5.4.10.5 to clarify when trees are required in the soil cell bioretention BMP. This BMP does not require the use of plants.</p> <p><b>Comment(s):</b> Clarify whether double counting on overlapping areas will be permitted.</p> <p><b>Response:</b> Added clarification.</p>

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
			<ul style="list-style-type: none"> <li>Added note that soil cell bioretention cell bottom area is 10% larger than bioretention cell bottom area to account for the soil cell modules to Tables 5.30, 5.31, and 5.32.</li> <li>Updated Figures 5.24 and 5.26 minimum mineral aggregate and subgrade scarification requirements.</li> <li>Revised Figures 5.25 and 5.27 for clarity.</li> <li>Refer to redline figure packet for figure changes.</li> </ul>		<p><b>Comment(s):</b> Need new utility offset and penetration requirements.</p> <p><b>Response:</b> SDOT to address in new Streets Illustrated. Will leave the specifics of penetrations up to manufacturers recommendations other than what is already required for bioretention liners.</p> <p><b>Comment(s):</b> Require trees in all BMP applications.</p> <p><b>Response:</b> Seattle added "soil cells" as a new BMP in manual. The new BMP is to support improved tree canopy along with stormwater management. Trees are not always feasible, but stormwater management is still desired. Since new BMP, Seattle not requiring evaluation of "soil cells" for private parcels at this time.</p>
Section 5.5.2 – Residential Cisterns	<ul style="list-style-type: none"> <li>Changed section name from "Single Family Residential Cistern" to "Residential Cistern".</li> <li>Changed to allow use of Residential Cisterns in more residential zones.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Accommodate the zoning code changes that are based on Washington State House Bill 1110 (middle housing bill).</li> </ul>	No comments received.

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.6.2 – Permeable Pavement Surfaces	<ul style="list-style-type: none"> <li>Clarified that there is no minimum measured infiltration rate to use permeable pavement for the On-site List Approach.</li> <li>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.</li> </ul>	No new edits.	<ul style="list-style-type: none"> <li>Revised figure to show 4” of scarification in subgrade.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added clarity.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Correction.</li> </ul>	No comments received.
Section 5.7.1 – Detention Ponds	Added a flow control riser section to reference requirements in other sections of the manual.	No new edits.	Updated flow control riser section to clarify the minimum allowed orifice diameter is 0.5 inches, and the minimum allowed weir width is 0.25 inches.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added information to support user in designing flow control riser.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	Revised weir width based on comment.

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 5.7.2 – Detention Pipes</p>	<ul style="list-style-type: none"> <li>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.</li> <li>Added minimal allowed orifice diameter and minimum width of weir requirements for "Flow Control Riser/Structure".</li> <li>Revised access requirements to reduce spacing of personnel access points and clarify observation/maintenance ports requirements for detention pipes on private property.</li> <li>Added a restriction preventing the use of pre-sized equations for detention pipes in the public right-of-way.</li> <li>Changed the Pre-developed Pasture Standard equation for 36-inch diameter detention pipe (this was included of the 2021 post-issuance clarifications).</li> <li>Figures <del>5.28</del> <u>5.31</u> and <del>5.29</del> <u>5.32</u> updated for clarity – refer to redline figure packet for changes. <i>(Figure number updated in January 2026)</i></li> </ul>	<ul style="list-style-type: none"> <li>Added clarity for maintenance hole structure.</li> <li>Figures 5.31 and 5.32 updated for clarity – refer to redline figure packet for changes.</li> </ul>	<p>No new edits.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Provided clarity and updated requirements.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification and providing flexibility of design.</li> </ul>	<p><b>Comment(s):</b> Consider 0.5 inches for minimum orifice diameter and 0.25-inches for minimum weir width.</p> <p><b>Response:</b> Min. weir length reduced to 0.25 inch in Appendix E (will be updated in this section in final manual).</p>

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 5.7.3 – Detention Vaults/Chambers	<ul style="list-style-type: none"> <li>Added flow control riser requirements to reference requirements in other sections of the manual.</li> <li>Removed requirement for removable lids for vaults that are less than 10 feet wide.</li> <li>Figure <del>5.34</del> 5.36 updated to clarify forebay requirements - refer to redline figure packet for changes. <i>(Figure number updated in January 2026)</i></li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added information to support user in designing flow control riser.</li> <li>Clarified requirements in figure.</li> </ul>	No comments received.
Section 5.8.2 – Non-infiltrating Bioretention	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).	<ul style="list-style-type: none"> <li>Added exception for underdrain routed to nutrient-critical receiving water if using optional HPBSM and polishing layer.</li> <li>Added vertical sides of bioretention facilities construction material options.</li> <li>Removed special instructions for bioretention soil mix.</li> </ul>	Added note to Table 5.50 that Peak Control Standard sizing factors are not applicable when project discharges to a combined sewer or its basin.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Provides more BMP flexibility in Capacity-Constrained System areas of the city.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications.</li> <li>Updated on-site list sizing factors to optimize the peak flow reduction using non-infiltrating bioretention to better reduce impacts from hard surfaces and to mitigate increasing flow control thresholds from 2,000 sf to 5,000 sf.</li> </ul>	No comments received.

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
		<ul style="list-style-type: none"> <li>● Added 2-inch ponding depth for vertical sides to Table 5.45 On-site List Sizing for Non-infiltrating Bioretention.</li> <li>● Updated sizing factors in Table 5.45. On-site List.</li> <li>● In Table 5.46. Pre-sized Sizing Factors and Equations, sizing factors for peak control standard for capacity constrained area shown as either “NA” or as percentage – to be determined based on other factors.</li> <li>● Added Water Quality Treatment facility design requirements to filter 91 percent of the total runoff volume through the bioretention soil.</li> <li>● Figures 5.34 and 5.35 modified notes for clarity – refer to redline figure packet for changes.</li> </ul>		<ul style="list-style-type: none"> <li>● Added use of non-infiltrating bioretention for flow control in capacity-constrained system areas to account for increase in On-site List non-infiltrating bioretention sizing factors.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications.</li> </ul>	

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
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 footnote to Applicability table that large sand filters are required to be sized to 95% of runoff volume to meet metals and phosphorus treatment requirement.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Ecology SWMMWW consistency.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
Section 5.8.10 – Oil/Water Separators	<ul style="list-style-type: none"> <li>Clarified parameters for offline separator oil rise rate equation.</li> <li>Added note to Figures 5.35 and 5.36 5.38 and 5.39 describing the minimum surface area of forebay – refer to redline figure packet for changes (figure numbers updated January 2026).</li> </ul>	Figures 5.38 and 5.39 updated for clarity – refer to redline figure packet for changes.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added clarity.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
Section 5.8.11 – Proprietary and Emerging Water Quality Treatment Technologies	<ul style="list-style-type: none"> <li>Revised requirement for sizing proprietary BMPs so mass loading ratio is not required for a BMP that treats an underdrained sports field if drainage passes through a gravel layer before entering the underdrain.</li> <li>Clarified that the mass loading ratio is not required for Filterra systems that are sized solely for oil control with a treatment rate of 50 in/hr.</li> </ul>	<ul style="list-style-type: none"> <li>Updated the definitions of GULD, CULD, and PULD devices.</li> <li>Updated approved proprietary technologies to include those with GULD designation and have undergone the NJCAT lab testing protocols. The Mass Loading Ratios included under the BMP sizing section can be applied to technologies listed in the table based on BMP System Type.</li> </ul>	In addition to basic treatment, added that the adjustments of the water quality design flow rate using the mass loading ratios applies to metals and phosphorous treatment.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added clarity and reduced sizing requirements.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Ecology equivalency comments.</li> <li>Clarified the proprietary technologies approved for use in Seattle.</li> <li>Clarifications.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> Update MLR approach using Ecology’s TAPE data instead of NJCAT laboratory testing data.</p> <p><b>Response:</b> As of November 2024, TAPE requires field longevity testing at up to three locations; however, the data will not be available until February 2028. The data currently included in the GULDs are not sufficient to serve as the basis for the mass loading ratio (MLR). Existing TAPE field testing has occurred under varying conditions depending on the technology. While NJCAT silica sand loading does not perfectly</p>

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
		<ul style="list-style-type: none"> <li>● Updated site considerations to reflect approved proprietary technologies.</li> <li>● Clarified that the filtration component of the proprietary technologies should be sized as off-line facilities.</li> <li>● Clarified that either the offline or downstream of detention Water Quality flowrates should be used for sizing.</li> <li>● Edited Step 3 to be “Select the size of facility or number of cartridges”.</li> </ul>			<p>replicate stormwater sediment, it provides a consistent loading and testing protocol across technologies, allowing for an apples-to-apples comparison. Seattle will revisit the MLR calculations once the TAPE longevity testing is complete.</p> <p><b>Comment(s):</b> Revise footnote of Table 5.8.11.6 to add clarity that Filterra systems sized for oil control treatment flow rate of 50 in/hr will also meet basic and metals treatment.</p> <p><b>Response:</b> Updated text to provide clarity.</p>

Volume 3, Chapter 5 – Section or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 5.8.12 – Non-infiltrating <del>Structural Soil Cell BMP</del> <del>Soil Cell Bioretention</del> <i>(changed name)</i></p>	<ul style="list-style-type: none"> <li>Added new Non-Infiltrating Structural Soil Cell BMP section.</li> <li>New Figure 5.37 5.40 showing non-infiltrating structural soil cell BMP – refer to redline figure packet for changes (figure numbers updated January 2026).</li> </ul>	<ul style="list-style-type: none"> <li>Changed name from “infiltrating structural soil cell BMP” to “infiltrating soil cell bioretention”.</li> <li>Revised section for clarity and for consistency with other BMP requirements, layout, and formatting.</li> <li>Updated Figures 5.40 and 5.41 showing non-infiltrating soil cell bioretention – refer to redline figure packet for changes.</li> </ul>	<ul style="list-style-type: none"> <li>Added Subgrade, Underdrain, Geotextile and Liners section.</li> <li>Added note that soil cell bioretention cell bottom area is 10% larger than bioretention cell bottom area to account for the soil cell modules to Tables 5.55 and 5.56.</li> <li>Updated Figure 5.40 underdrain filter material requirements and added clarity.</li> <li>Revised Figure 5.41 for clarity.</li> <li>Refer to redline figure packet for figure changes</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>To increase the available BMPs available and support tree canopy.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Changed name of soil cell bioretention.</li> </ul> <p>Clarifications.<b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications.</li> </ul>	<p><b>Comment(s):</b> Require trees in all BMP applications.</p> <p><b>Response:</b> See response under Section 5.4.10 – <u>Infiltrating Soil Cell Bioretention</u></p>

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

### **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.

### **January 2026 Public Review Draft Stormwater Manual**

- Updated, re-ordered, clarified, and/or added required BMP elements and recommended BMPs.
- Updated and restructured Proper Storage of Solid Wastes (BMP 4), including explicit requirements when dumpster areas are not plumbed to the sanitary sewer, and when storing used cooking oil
- Added some “additional information” sections below required and/or recommended BMP elements, to support more effective BMP implementation. These are informational only.
- Clarified why certain discharges should not enter the drainage system, receiving waters, or groundwater.
- Provided more recommended BMP options for cleaning or washing of graffiti, artificial turf and athletic surfaces, permeable pavement, and dechlorination.
- Minor terminology revisions throughout.

### **March 2026 Public Review Draft Stormwater Manual**

- Updated, clarified, and added required BMP elements and recommended BMPs.
- Refined PCB information regarding training, assessments, prevention BMPs, and washing guidelines.
- Minor terminology revisions throughout.

In the draft documents, the following changes will be noted as follows:

Red text: July 2025 proposed changes

Blue text: January 2026 proposed changes

Green text: March 2026 proposed changes

*Volume 4, General Comments*

Volume 4 (Source Control)	Response to Public Comments
General	<p><b>Comment(s):</b> Requirements vs. Guidance: Remove guidance information, rely only on what is required.</p> <p><b>Response:</b> In an effort to support better BMP implementation, Seattle created a new “additional information” section below some required and/or recommended BMPs, in order to share more guidance and tips.</p> <p><b>Comment(s):</b> 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 (&amp; BMP 12)</p> <p><b>Response:</b> Volume 4 BMPs 1 through 16 apply to all areas of the City, including combined sewer system areas.</p> <p><b>Comment(s):</b> Feasibility: Use of “at all times” or “always” versus “when feasible”</p> <p><b>Response:</b> 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)	Response to Public Comments
General	<p><b>Comment(s):</b>                      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><b>Response:</b> The impacts of boat mooring and shipyards may be best addressed by other Permits regulated by the Washington State Department of Ecology. 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><b>Comment(s):</b>                      Drip pan content disposal: add location / requirements for disposal of drip pans.</p> <p><b>Response:</b> 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><b>Comment(s):</b>                      Pollutants vs. pH: pH is not a pollutant.</p> <p><b>Response:</b> Seattle updated the “description of pollutants” section in various Volume 4 BMPs to refer to “high acidity or alkalinity”, rather than pH.</p> <p><b>Comment (s):</b>                      Add contaminants of emerging concern.</p> <p><b>Response:</b>                      More chemical group-specific information, including PCBs <b>and 6PPD-q</b>, is included in Volume 4.</p>

*Volume 4, Chapter 1 – Introduction*

Volume 4, Chapter 1 Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 1.3 – What Pollutants Are Targeted in This Volume?	Added PFAS, pollutants from rubber preservatives (including 6PPD-q), PAHs, and PCBs.	<ul style="list-style-type: none"> <li>Added pH as a measure of potential pollution to the descriptions of typical pollutants.</li> <li>Minor editorial changes</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added new guidance for toxic organics for consistency with the 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>pH can be used as an indicator of pollution.</li> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> <u>Soaps &amp; Detergents</u>: Concerns about fate and transport, and commercial versus home car washing.</p> <p><b>Response:</b> No change necessary. The pollutant description is the same for business and home car washing.</p>
Section 1.6 – Getting Started	No edits	No new edits	No new edits	NA	<p><b>Comment(s):</b> Add statement regarding businesses operations/activities already been put in place that will be “grandfathered” in and not require the new structural and treatment BMP requirements.</p> <p><b>Response:</b> The City will not make explicit statements about "grandfathering". If an operation causes a violation of water quality standards, the City must be able to require action to prevent future discharges.</p>

*Volume 4, Chapter 2 – Best Management Practices for All Real Property (updated from 2016 Stormwater Manual title: “Citywide BMPs”)*

Volume 4, Chapter 2 Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.1.1 – BMP 1: Eliminate Illicit Connections and Illicit Discharges	<ul style="list-style-type: none"> <li>● Added clarity as to what is an illicit discharge.</li> <li>● Added information on where to find more details (i.e., list of prohibited discharge substances) in the Seattle Stormwater and Side Sewer Codes.</li> <li>● Updated the phone numbers of who to contact at Ecology and SPU if an illicit discharge is known to have occurred.</li> </ul>	<ul style="list-style-type: none"> <li>● Clarified what constitutes an illicit discharge, including that chlorinated/brominated water as a type of illicit discharge</li> <li>● Minor editorial changes</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarified what constitutes an illicit discharge, outlining appropriate response actions, and providing additional guidance on prevention.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Public comment.</li> <li>● Clarification.</li> </ul>	No comments received.
Section 2.1.2 – BMP 2: Perform Routine Maintenance	<ul style="list-style-type: none"> <li>● Added maintenance requirements to the BMP.</li> <li>● Provided clarity on existing requirements.</li> </ul>	<ul style="list-style-type: none"> <li>● Reorganized and moved required maintenance-related BMPs to BMP recommendations.</li> <li>● Provided clarity on existing requirements, BMP recommendations, and additional (helpful) information.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarified requirements per stormwater compliance inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Public comment.</li> <li>● Ecology equivalency comment.</li> </ul>	<p><b>Comment(s):</b> Feasibility of access for inspection at all times; how is “Routine Maintenance” supposed to be documented during plan review?</p> <p><b>Response:</b> Access necessary for inspection and maintenance. Can be documented as part of Memorandum of Drainage Control required during plan review.</p>

Volume 4, Chapter 2 Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 2.1.3 – BMP 3: Dispose of Fluids and Wastes Properly	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Updated disposal requirements to include solid, dangerous, and industrial wastes, especially emphasizing procedures in non-combined sewer areas.</li> <li>• Added a new recommended BMP to reinforce compliance with broader environmental regulations and highlight the risk of penalties from other agencies.</li> </ul>	Provided examples of street waste solids.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• Clarified requirements per stormwater compliance inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Clarification.</li> </ul>	No comments received.
Section 2.1.4 – BMP 4: Proper Storage of Solid Wastes	<ul style="list-style-type: none"> <li>• Added new text that strengthens the requirements for Waste Disposal and Storage under BMP 4.</li> <li>• 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.,</li> </ul>	<ul style="list-style-type: none"> <li>• Added that requirements also apply to empty containers previously used to store solid waste.</li> <li>• Added text to explain related BMPs, permits and Municipal Code definitions.</li> <li>• Reorganized and further defined suitable containers and lids, inspection and</li> </ul>	<ul style="list-style-type: none"> <li>• Added an empty container section to the required elements explaining storage requirements.</li> <li>• Added recommended BMPs regarding replacement container communication with</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>• Clarified requirements per inspector experience and expanded subsection about cooking oil.</li> <li>• Clarifications</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>• Public comment.</li> <li>• Ecology equivalency comment.</li> </ul>	<p><b>Comment(s):</b> 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><b>Response:</b> Seattle revised BMP language as necessary to address comments..</p>

Volume 4, Chapter 2 Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
	<p>batteries, printing equipment waste, etc.).</p> <ul style="list-style-type: none"> <li>Expanded text about managing cooking oil waste to clarify and explain the responsibilities of generators (e.g., restaurants) versus container-owners (waste haulers).</li> <li>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.</li> </ul>	<p>maintenance, illicit discharges, siting, and requirements for used cooking oil.</p> <ul style="list-style-type: none"> <li>Updated minimum distance from which a used cooking oil container may be situated from a grated metal lid/cover (from 10 ft to 5 ft).</li> <li>Provided details in requirements for dumpster areas if they are not plumbed to the sanitary sewer, including ability for City departments to require additional source controls if BMPs are not effective.</li> <li>Removed requirement for additional roof/canopy when dumpsters are plumbed to sanitary sewer (if less than 200 sq ft).</li> <li>Removed requirement for spill containment area around trash compactor when uncovered (allowed if under 200 sq ft).</li> <li>Expanded text in recommended BMPs and additional information sections.</li> </ul>	<p>waste hauler and indoor cooking oil storage.</p>	<ul style="list-style-type: none"> <li>Practicality and space limitations, for example:</li> <li>Recognizing that existing dumpster areas are often not plumbed to the sanitary sewer, more explicit instructions are provided for dumpster areas that drain to stormwater to help prevent polluted discharges to the stormwater drainage system.</li> <li>Since lids are always required when waste is not actively being added to a dumpster, an additional roof/canopy over a dumpster area plumbed to the sanitary sewer (less than 200 sq ft) is not necessary. (Roof/canopy is still necessary when it's over 200 sq ft, to direct water to stormwater drainage system).</li> <li>Some concern that an uncovered spill containment area around a trash compactor may fill up quickly during rain and spill over, potentially causing pollutants to migrate to other areas.</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> Clarify that only certain BMPs apply to empty containers. Add an “Empty Containers” header listing applicable BMPs (similar to Used Cooking Oil) and remove scattered references elsewhere to avoid implying the entire BMP applies.</p> <p><b>Response:</b> Updated text related to what the BMP applies to, as suggested. Added sub-section for empty containers that describes storage requirements.</p> <p><b>Comment(s):</b> Revise responsibility of maintenance requirements for dumpsters and functional lids to container owner rather than site operator. Recommend coordination with waste vendors to ensure dumpsters delivered to customers are not damaged.</p> <p><b>Response:</b> Comment is acknowledged, but will not be included in required BMPs. A note about working with waste vendors to ensure waste containers (with lids, etc.) are provided has been added to recommended BMPs.</p> <p><b>Comment(s):</b> Revise inspection frequency for waste storage areas from weekly to monthly to align</p>

Volume 4, Chapter 2 Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
					<p>with SPCC and Washington ISGP requirements. Allow facilities to continue using damaged containers until repair or replacement occurs consistent with SWMMWW BMP S427 guidance.</p> <p><b>Response:</b> The waste container inspection is not intended to be as comprehensive as a monthly SPCC inspection. Waste containers are used frequently, and staff are visually observing the area probably daily.</p> <p><b>Comment(s):</b> City or Ecology should work with waste vendors to develop an inspection/maintenance program for dumpsters to ensure a damaged dumpster is not sent to a customer.</p> <p><b>Response:</b> Broader suggestion is outside the scope of the Code/Manual update; however, a note about working with waste vendors to ensure waste containers (with lids, etc.) are provided has been added to recommended BMPs.</p>

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Section 2.1.5 – BMP 5: Spill Prevention and Cleanup	<ul style="list-style-type: none"> <li>Updated spill cleanup and proper disposal procedures.</li> <li>Added section for discharges associated with firefighting activities.</li> </ul>	Added reasoning to why using emulsifiers or dispersants cannot be used.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarification and strengthening of Spill Prevention and Cleanup BMP per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified why emulsifiers and dispersants should not enter stormwater or receiving waters.</li> </ul>	<p><b>Comment(s):</b> Prescriptive spill kit distances to fueling / fuel transfer areas; how is “Spill Prevention and Cleanup” supposed to be documented during plan review?</p> <p><b>Response:</b> No changes planned. The quoted 25-ft spill kit distance is necessary to be consistent with BMP S104 in Ecology’s SWMMWW.</p>
Section 2.1.6 – BMP 6: Provide Oversight and Training for Staff	<ul style="list-style-type: none"> <li>Clarification and strengthening of Staff training and oversight requirements for BMP6.</li> <li>Added specific instructions for buildings that are suspected or known to contain PCBs.</li> </ul>	Minor editorial change.	Added footnote listing multi-family/unit residential building types and reasons for potential PCB presence.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Updated to include guidance for preventing pollution from PCBs in building materials to support more effective stormwater pollution prevention.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.

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Section 2.1.7 – BMP 7: Property Maintenance	<ul style="list-style-type: none"> <li>Updated required elements of BMP for businesses and public entities.</li> <li>Added section for recommended BMPs including using environmentally safe solvents and materials and preventative actions.</li> </ul>	<ul style="list-style-type: none"> <li>Moved spot clean outdoor surfaces to minimize wastewater generated from a required BMP to a recommended BMP.</li> <li>Added practicing Natural Yard/Lawn Care methods to recommended BMPs.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Ecology equivalency comment. The 2024 Phase I Permit requires that implementing methods of minimizing water use (“public education and water conservation” per S5.C.9.b.ii.b) is a condition for allowing discharges of lawn watering and irrigation runoff to discharge to the MS4.</li> </ul>	<p><b>Comment(s):</b> Working under cover or using drop cloths may not always be feasible.</p> <p><b>Response:</b> No change. Inspector experience suggests covers or cloths are pertinent stormwater source control tools.</p> <p><b>Comment(s):</b> Quarterly facility sweeping requirements, feasibility, and requirements of other NPDES Permits; prompt pavement restoration requirement; superfluous guidance</p> <p><b>Response:</b> 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.</p> <p><b>Comment(s):</b> Remove recommended BMP to "promptly repair, replace, reseal damaged paved areas at industrial facilities."</p> <p><b>Responses:</b> This is a recommended BMP.</p>

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Section 2.1.8 – BMP 8: Constructed Dog Runs	<ul style="list-style-type: none"> <li>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.</li> <li>New section was added for ground-level dog runs to clarify maintenance expectations and appropriate stormwater management practices for those areas.</li> </ul>	Added further detail to the types of dog runs which this section applies to.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified dog run types.</li> </ul>	<p><b>Comment(s):</b> Comments related to dog run discharges and plumbing requirements.</p> <p><b>Response:</b> Seattle revised BMP language to include a reference to connecting drainage to the sanitary system in accordance with the Seattle Plumbing Code.</p>

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Section 2.2.1 – BMP 9: Fueling at Dedicated Stations	<ul style="list-style-type: none"> <li>Added clarity when an overflow is not allowed.</li> <li>Added language for when dispersants are prohibited.</li> <li>Added when to immediately remove and properly dispose of fuel contaminated soils.</li> <li>Figure 4 updated to replaced "Shutoff valve" with "Automatic Shutoff Valve" – refer to redline figure packet for changes.</li> </ul>	<ul style="list-style-type: none"> <li>Clarified the fueling island spill containment pad requirements for an uncovered area or an area that receives run-on from an uncovered area.</li> <li>Clarified fuel spill retention capacity requirements.</li> <li>Added new Figure 6 showing Oil/Water Separator with Oil Stop Valve for Spill Containment – refer to redline figure packet for changes.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Aligned with Volume 3 requirements for oil/water separators.</li> <li>Aligned text with Figure 6.</li> <li></li> </ul>	<p><b>Comment(s):</b> Added language regarding sizing for fuel containment not needed.</p> <p><b>Response:</b> Seattle revised BMP language (removed redundant sentence) to address comment.</p>
Section 2.2.2 – BMP 10: Mobile Fueling of Vehicles and Heavy Equipment	Minor updates to required elements of BMP including containment measures, spill response procedures, and equipment standards.	Minor clarification about when to remove a drain cover if sheen is present.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified per staff experience.</li> </ul>	No comments received.
Section 2.2.3 – BMP 11: In- Water and Over-Water Fueling	<ul style="list-style-type: none"> <li>Updated the definition of in-water and over-water fueling stations to remove ambiguity about their classification.</li> <li>Added requirement to immediate report spills to federal and state agencies, along with the relevant contact information.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul>	No comments received.

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Section 2.2.4 – BMP 12: Maintenance and Repair of Vehicles and Equipment	<ul style="list-style-type: none"> <li>Added text to clarify that mobile maintenance operations are included and that businesses are responsible for spills from customer vehicles, even when parked offsite.</li> <li>Added new requirements for battery storage, vehicle inspections, and frequent monitoring of drains and outdoor areas.</li> <li>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.</li> </ul>	Added clarity for maintenance and repair activity to contain automotive fluids and chemicals.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul>	<p><b>Comment(s):</b> Remove references to sanitary sewer requirements.</p> <p><b>Response:</b> See response above, “Volume 4 - General”.</p>
Section 2.2.5 – BMP 13: Concrete and Asphalt Mixing and Production	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.	Minor editorial changes.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> Keep reference to recycling process water for “pouring and equipment cleaning”.</p> <p><b>Response:</b> Concrete pouring is addressed in BMP 14.</p>

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<p>Section 2.2.6 – BMP 14: Concrete Pouring, Concrete/Asphalt Cutting, and Asphalt Application</p>	<ul style="list-style-type: none"> <li>Added text stating that concrete and asphalt waste must never be washed into storm drains, receiving waters or sanitary/combined systems.</li> <li>Added specific disposal instructions for slurry and runoff.</li> <li>Clarified that catch basin filter socks are only emergency backups, not a substitute for source control.</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that water that comes into contact with diesel or coatings used in asphalt applications, cleanup, or transportation is process water and not allowed to enter the drainage system.</li> <li>Minor editorial changes.</li> </ul>	<p>No new edits.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> 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><b>Response:</b> 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> <p><b>Comment(s):</b> Using drip pans, ground cloths, etc. may not always be feasible.</p> <p><b>Response:</b> This is an Ecology required BMP (e.g., SWMMWW BMP S406).</p>

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Section 2.2.7 – BMP 15: Recycling Wrecking Yard, and Scrap Yard Operations	<ul style="list-style-type: none"> <li>Expanded list of potential pollutants found at recycling and scrap yards.</li> <li>Added requirement to prevent run-off from property to nearby properties, public right of way or drainage.</li> <li>Added that PCB-contaminated materials cannot be reused and must be segregated and disposed of under EPA’s TSCA rules.</li> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Added additional language requiring entities to inspect incoming materials for batteries, liquid tanks and PCB-containing devices, remove batteries and store them safely, and cover/raise materials.</li> <li>Clarified that the BMP is applicable when the business or public entity is reclaiming materials.</li> </ul>	Added removal and disposal requirements for incoming material.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified based on inspector experience.</li> <li>Public comment.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> Storing material does not constitute a “recycling, wrecking yard, or scrap yard operation”; How is soil contamination and cleanup addressed?</p> <p><b>Response:</b> 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 Aboveground Tanks	Clarified what is considered liquid storage tanks.	<ul style="list-style-type: none"> <li>Provided explicit examples when this BMP does and does not apply.</li> <li>Minor editorial changes.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified based on inspector experience.</li> </ul>	No comments received.

*Volume 4, Chapter 3 – Business and Public Entity Best Management Practices for Specific Activities*

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<p>Section 3.1.1 – BMP 17: Cleaning or Washing</p>	<ul style="list-style-type: none"> <li>Expanded list of activities requiring BMP.</li> <li>Added guidance to contact the local sewer authority for the potential disposal of washwater to the sanitary sewer.</li> <li>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.</li> <li>Added to list of source pollutants.</li> <li>Clarified when stormwater is considered process wastewater.</li> <li>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</li> </ul>	<ul style="list-style-type: none"> <li>Added definition of public drainage system to clarify it is also known as the municipal stormwater system.</li> <li>Reorganized and expanded the list of required BMP elements.</li> <li>Clarified that all staff authorized to wash at the wash pad must receive annual training on the operation of the valve system and the training records must be maintained.</li> <li>Clarified what buildings are assumed to be “suspected” of containing PCBs on their exterior.</li> <li>Expanded on recommended BMPs related to graffiti, artificial turf and athletic surfaces, permeable pavement, and dechlorination.</li> </ul>	<ul style="list-style-type: none"> <li>Added footnote referring to the WAC potable water chlorine residual requirements.</li> <li>Added clarification to off-site hauled cleaning and washing discharge water.</li> <li>Added footnote referring to the definitions of detached dwelling unit and associate accessory structure, and their PCB assessment exemptions.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>Edited/added language to clarify requirements associated with conditionally allowable discharges (e.g., potable water) also for consistency with the Phase I MS4 Permit.</li> <li>Clarified a range of requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Additional information and options based on staff input with the goal of supporting better implementation.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	<p><b>Comment(s):</b> 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><b>Response:</b> 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><b>Comment(s):</b> Impractical to collect wash water associated</p>

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	<p>graffiti impacted areas and building specific requirements.</p> <ul style="list-style-type: none"> <li>Updated list of recommended BMPs for graffiti, artificial turf fields and when to consider spot cleaning.</li> </ul>				<p>with pressure washing / cleaning.</p> <p><b>Response:</b> 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> <p><b>Comment(s):</b> Prohibit use of zinc sulfate for roof moss control due to its high aquatic toxicity and potential discharge to waterways via roof runoff. Recommend the City also conduct education and outreach to property owners and contractors on less toxic moss control alternatives.</p> <p><b>Response:</b> This would be best addressed through Ecology's Product Replacement Program. For Seattle, we have included some information about this in a 2-page</p>

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					educational sheet for mobile businesses that perform exterior building/property maintenance. The City may also consider residential property outreach through SPU's Education and Outreach Program in the future.
Section 3.2.1 – BMP 18: Loading and Unloading of Liquid or Solid Material	<ul style="list-style-type: none"> <li>Added that BMP is required in areas of transfer to containers or between transport vehicles (rail or highway).</li> <li>Noted that SPCC requirements may apply if transloading oil products over 1,320 gallons in areas that could reach navigable waters.</li> </ul>	Minor clarifying edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> </ul>	<p><b>Comment(s):</b> Include waste pickup and transfer of residential, commercial and public-sector sources from curbside waste collection.</p> <p><b>Response:</b> No change. BMPs 1, 5, and 6 are particularly relevant (and already applicable) to the collection/transfer vehicles referred to.</p>
Section 3.3.2 – BMP 20: Processing of Treated Wood	<ul style="list-style-type: none"> <li>Added clarification that wood preservatives are registered with the US EPA and include oil and water-borne preservatives.</li> <li>Added freshly treated wood definition and BMPs to prevent treated wood products entering stormwater.</li> </ul>	Minor clarifying edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Consistency with BMP S432 in the 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications to support better implementation.</li> <li>Ecology equivalency comment.</li> </ul>	No comments received.

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Section 3.3.3 – BMP 21: Commercial Composting	No new edits.	<ul style="list-style-type: none"> <li>● Clarified the definition of design storm.</li> <li>● Added requirement to line all ponds used to collect, store, or treat leachate and other contaminated waters associated with the composting process to prevent groundwater contamination.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● No new edits.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications to support better implementation.</li> <li>● Public comment.</li> </ul>	<p><b>Comment(s):</b> Concern regarding plastic waste in compost available for retail sale; what does “color” mean when describing Description of Pollutants?</p> <p><b>Response:</b> Minor updates were made to pollutant description. Plastic waste in compost should be addressed through other regulations/requirements.</p>
Section 3.3.5 – BMP 23: Painting, Finishing, and Coating Activities	<ul style="list-style-type: none"> <li>● Added BMP 17 (cleaning and washing) as a required BMP element for preparation and application.</li> <li>● Added best practices for working with surfaces suspected or known to contain PCBs.</li> <li>● Added recommended BMP for water-based paints.</li> </ul>	<ul style="list-style-type: none"> <li>● Added indoor vs outdoor clarifications for cleanup.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Consistency with BMP S451 and BMP S420 of the 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications to support better implementation.</li> <li>● Ecology equivalency comment.</li> </ul>	No comments received.

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Section 3.3.6 – BMP 24: Commercial Printing Operations	<ul style="list-style-type: none"> <li>Added PCBs to list of pollutants.</li> <li>Clarified that waste printing equipment must not be stored outdoors.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Expanded list of potential pollutants and BMPs for storing materials to better address potential inadvertently-generated PCBs as a source of pollutants to stormwater.</li> </ul>	No comments received.
Section 3.4.1 – BMP 26: Storage of Leachable Erodible Materials	<ul style="list-style-type: none"> <li>Added required BMP element to raise solid material off the ground.</li> <li>Updated required BMP elements for stockpiles of materials.</li> </ul>	<ul style="list-style-type: none"> <li>Updated definition of all businesses and public entities engaged in the storage of leachable or erodible materials.</li> <li>Added required and recommended BMP information.</li> <li>Clarified cover requirements and recommended raising solid materials.</li> </ul>	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience aimed at more effective stormwater pollution prevention from this type of activity.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications to support better implementation.</li> </ul>	<p><b>Comment(s):</b> Stockpile storage requirements are overly prescriptive and may require significant infrastructure upgrades. Recommend allowing more flexible compliance options consistent with Stormwater Management Manual for Western Washington BMP S429.</p> <p><b>Response:</b> Based on inspector experience, SPU considers all BMPs essential in order to prevent material from migrating away from the stockpile.</p>

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Section 3.4.3 – BMP 28: Portable Container Storage	<ul style="list-style-type: none"> <li>● Clarified responsible parties must comply with state Dangerous Waste Regulations.</li> <li>● Specifies what kind of containers to use for liquid storage.</li> <li>● 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.</li> </ul>	Minor clarifying edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Public comment.</li> </ul>	<p><b>Comment(s):</b> Feasibility of requiring secondary containment at all times.</p> <p><b>Response:</b> Secondary containment is required for liquids and hazardous / dangerous materials / wastes, not all materials. The City believes those substances present a risk to stormwater if a container leak occurred.</p>

Volume 4, Chapter 3 – Management Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 3.6.1 – BMP 32: Commercial Animal Care and Handling</p>	<ul style="list-style-type: none"> <li>Updated types of businesses and agencies BMP applies to.</li> <li>Added reference to Seattle and King County Public Health’s Pet Business Program for requirements in addition to Seattle’s Stormwater Code.</li> <li>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.</li> <li>Updated recommended BMPs for disinfecting outside surface areas.</li> </ul>	<ul style="list-style-type: none"> <li>Added required BMP element that washwater containing disinfectant is never allowed to infiltrate.</li> <li>Added reference to BMP 8.</li> </ul>	<p>No new edits.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> <li>Reference to BMP 8 based on an Ecology suggestion during equivalency review process.</li> </ul>	<p><b>Comment(s):</b> Where is source control for dog parks included?</p> <p><b>Response:</b> Volume 4 BMPs 1 through 8 apply to all real property in the City, including publicly-owned parks. In addition, Seattle implements a Pet Waste Program as part of the City’s Stormwater Permit-required Education and Outreach Program, supplying Mutt-Mitts in parks.</p>

Volume 4, Chapter 3 – Management Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Section 3.6.4 – BMP 35: Cleaning and Maintenance of Pools, Spas, Hot Tubs, and Fountains</p>	<ul style="list-style-type: none"> <li>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.</li> <li>Clarified that discharge to a drainage system to be dechlorinated/debrominated to a "total residual concentration" of 0.1 ppm.</li> <li>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.</li> <li>Added recommended BMP to maintain proper chloride levels, water filtration, and circulation to minimize need to drain structures.</li> </ul>	<p>No new edits.</p>	<p>No new edits.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Updated for consistency with BMP S433 of the 2024 SWMMWW and the conditionally allowable discharge language in the 2024 Phase I Permit.</li> </ul>	<p><b>Comment(s):</b> This BMP only applies to commercial and public Pools, Spas, Hot Tubs, and Fountains – what about residential applications?</p> <p><b>Response:</b> 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"> <li>Added airport taxiways and ramp/gate areas to list of areas where BMP applies.</li> <li>Clarified that the relevant NPDES permit is the Industrial Stormwater General Permit.</li> <li>Emphasized that chemicals must not enter the drainage conveyance system.</li> </ul>	<p>Added clarification to increase the frequency of maintaining stormwater structures in areas where deicing and anti-icing activities occur on streets and highway</p>	<p>No new edits.</p>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience and for consistency with language in BMP S405 of the 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul>	<p>No comments received.</p>

Volume 4, Chapter 3 – Management Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 3.6.6 – BMP 37: Maintenance and Management of <del>Roof and Building Drains</del> Roofs/Building Surfaces at Industrial and Commercial Buildings	<ul style="list-style-type: none"> <li>Revised name of BMP.</li> <li>Minor clarification of likely sources of PCBs.</li> <li>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.</li> </ul>	No new edits.	Added PCB Assessment requirements.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul>	No comments received.
Section 3.6.8 – BMP 39: Maintenance of Public and Private Utility Corridors and Facilities	Updated required BMP elements for work occurring in a vault with contaminants present and BMPs for preventing erosion of access roads or bare ground.	Minor editorial changes.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarifications for readability.</li> </ul>	No comments received.
Section 3.6.9 – BMP 40: Maintenance of Roadside Ditches	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.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified requirements per inspector experience and to support better management of stormwater flow in ditch and culvert systems.</li> </ul>	No comments received.

Volume 4, Chapter 3 – Management Section Name or BMP Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Section 3.6.10 – BMP 41: Potable Water Line Flushing, Water Tank Maintenance, and Hydrant Testing	Updated required BMP elements that would allow potable water sources discharged to drainage systems.	Added chlorine as an example of chemicals associated with water line flushing and water tank maintenance.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Updated for consistency with the conditionally allowable discharge language in the 2024 SWMMWW.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Clarification.</li> </ul>	No comments received.
Section 3.6.23 – BMP 54: Streets and Highways	Clarified what is considered a street.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Clarified definition and requirements per inspector experience to support compliance with the Manual's requirements.</li> </ul>	No comments received.
Section 3.6.25 – BMP 56: Light Rail Washing	Added new BMP that references S453 and S454 BMPs in the 2024 SWMMWW.	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Added new BMP for equivalency with 2024 SWMMWW.</li> </ul>	<p><b>Comment(s):</b> Include “Railway Washing” in addition to “Light Rail Washing”.</p> <p><b>Response:</b> No change. Seattle is referencing the exact Ecology language to be equivalent to BMPs S453/454 in the SWMMWW.</p>

## Volume 5 (Enforcement) of the Seattle Stormwater Manual - Summary of Proposed Changes

Volume 5	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
General	No edits.	No edits.	No edits.	No edits.	<p><b>Comment(s):</b> Please provide the inspection/enforcement protocols for private property owners.</p> <p><b>Response:</b> Refer to the City's Stormwater Management Program Plan for more information about how the City implements the Permit including escalating enforcement protocols. SMC Chapter 22.808 and Volume 5 provide enforcement authority and criteria.</p>

## Appendices of the Seattle Stormwater Manual - Summary of Proposed Changes

In the draft documents, the following changes will be noted as follows:

**Red** text: July 2025 proposed changes

**Blue** text: January 2026 proposed changes

**Green** text: March 2026 proposed changes

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Appendix A – Definitions	Placeholder page only. Refer to SMC, Chapter 22.801 to review definitions.	NA	NA	NA	<p><b>Comment(s):</b> Definitions missing from Appendix A.</p> <p><b>Response:</b> Refer to revised definitions included in Stormwater Code Ordinance under 22.801. Only revised code is shown in ordinance – sections not included in ordinance have no changes.</p>

Appendices

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Appendix B – Additional Submittal Requirements	<ul style="list-style-type: none"> <li>● 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.</li> <li>● Added and clarified conditions under which a separate Preliminary Drainage Control Plan is not required with the MUP submittal for a lot boundary adjustment.</li> <li>● 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.</li> </ul>	No new edits.	No new edits.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> <li>● Clarification to align Land Use Code.</li> </ul>	No comments received.

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p>Appendix C – On-site Stormwater Management Infeasibility Criteria</p>	<ul style="list-style-type: none"> <li>Revised the allowable distance of dispersion flowpath areas to septic system drainfields, reserve areas, and septic sewage tanks and distribution boxes.</li> <li>Added criteria that would make an infiltration BMP infeasible, specifically if it would threaten an existing or proposed structure based on a determination by a licensed professional, are not desired.</li> <li>Changed infiltration trench infeasibility criteria of underlying soil infiltration rate to less than 2 inches/hour. See revision to Volume 3, Section 3.2 for additional information.</li> <li>Added depth to the bottom of ponding infeasibility criteria for infiltrating and non-infiltrating bioretention facilities to address infeasibility of deep facilities.</li> <li>Added onsite list infeasibility criteria for Infiltrating and Non-infiltrating Structural Soil Cells.</li> </ul>	<ul style="list-style-type: none"> <li>Updated minimum tree size requirements for deciduous tree trunks to be at least 2 inches in diameter and evergreen trees must be at least 5 feet tall.</li> <li>On-site List Infeasibility Criteria tables have been updated to reflect the Parcel-based Project list.</li> <li>Added clarity for bottom slope requirements for rain gardens and infiltrating bioretention facilities.</li> <li>Added infeasibility criteria if rain garden or infiltrating bioretention is located within ¼ mile of nutrient critical water body.</li> <li>Added clarity that permeable pavement is infeasible if hard surface is set of stairs or is a 6 foot long or less landing between stairs.</li> <li>Added reference to Green Factor Tree List and SDOT’s Approved Street Tree list for determine if medium or large tree is infeasible.</li> </ul>	<ul style="list-style-type: none"> <li>Provided clarity of what is applicable to permeable pavement and surfaces.</li> <li>Clarified Rain Garden and Infiltrating Bioretention infeasibility criteria based on right-of-way applications where the roadway has a slope of 8 percent or more.</li> <li>Added Soil Cell Bioretention infeasibility criteria based on bottom slope and ground level slope.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>Revisions to state law setbacks for septic systems.</li> <li>Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>Public comment.</li> <li>Adjusted tree thresholds to better reflect trees in good health.</li> <li>Tables updated to reflect Parcel-based Project list since Single-Family Residential Projects have been removed from Manual.</li> <li>Clarifications.</li> </ul>	<p><b>Comment(s):</b> <u>Clear language:</u> Provide clear language throughout, especially for “All BMPs”.</p> <p><b>Response:</b> Additional parameters added.</p> <p><b>Comment(s):</b> <u>Tree protection:</u> Provide more clarity related to tree protection.</p> <p><b>Response:</b> Seattle relies on SMC 25.11 Tree Protection code for specific tree protection requirements. Appendix C lists infeasibility criteria for On-site Stormwater BMPs and explicitly lists when these BMPs are not required to be installed when they impact existing trees. Additionally, the Stormwater Code (22.805.020.D), Volume 1, and Volume 2 require protection of preserved trees during construction.</p>

Appendices

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Appendix D – Subsurface Characterization and Infiltration Testing for Infiltration Facilities	No edits.	No edits.	No edits.	NA	<p><b>Comment(s):</b> <u>Infiltration testing:</u> Allow geotechnical engineer to recommend infiltration rate based on site analysis instead of performing infiltration testing.</p> <p><b>Response:</b> See response to Section 3.2 of Volume 3.</p>
Appendix E – Additional Stormwater Design Requirements	<ul style="list-style-type: none"> <li>● Changed name of Appendix from "Additional Design Requirements and Plant Lists" to "Additional Stormwater Design Requirements".</li> <li>● Specified that the minimum allowable weir length is 0.5 inches.</li> </ul>	<ul style="list-style-type: none"> <li>● Updated Table E.1 to clarify that 10,-year, 24 hour design storm or peak flowrate for the 10-year recurrence flow can be used to calculate the length of a temporary level spreader, and a 25-year, 24-hour design storm or peak flowrate for the 25-year recurrence flow can be used to calculate the length of a permanent level spreader.</li> <li>● New Figure E.9. "Fat Pipe" Presettling Vault.</li> <li>● New Figure E.10. Catch Basin/Maintenance Hole with an Extended Sump and a Baffle.</li> </ul>	Changed minimum allowable weir length from 0.5 inches to 0.25 inches.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Moved plant list to Appendix J.</li> <li>● Clarification.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Response to public comment.</li> </ul>	<p><b>Comment(s):</b> Reduce minimum length of weirs for flow control risers to 0.25 inch.</p> <p><b>Response:</b> Min. weir length reduced. This is consistent with past WSDOT requirements.</p>

Appendices

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Appendix F – Hydrologic Analysis and Design	<ul style="list-style-type: none"> <li>● Changed the land cover type from "wetland" to "Saturated or Wetland".</li> <li>● Updated the step-by-step procedures for using different versions of MGSFlood when evaluating on-site BMP performance standards.</li> </ul>	Added reference to 2021 King County Surface Water Design Manual guidelines, Section 4.2.1 for backwater analysis methods.	Moved HSPF to the category of “Other” continuous hydrologic models that may be used for project-specific situations.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Added saturated soils to wetland row in table since wetlands can be modeled as saturated soils.</li> <li>● Newer versions of MGSFlood have an automatic feature for this purpose. Older versions require a different technique.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul> <p><b>March 2026</b></p> <ul style="list-style-type: none"> <li>● Clarification.</li> </ul>	<p><b>Comment(s):</b> Concern the Manual lists hydrologic models that may be outdated or have inconsistent practices.</p> <p><b>Response:</b> The models allowed in the Stormwater Manual are approved by Ecology. Seattle relies on best available science but must also rely on Ecology’s approval of models and assumptions which is based upon the MS4 Permit and Ecology's Stormwater Management Manual for Western Washington.</p> <p><b>Comment(s):</b> Concern about compliance with standards being subjective and data resources housed on City webpages being accessible.</p> <p><b>Response:</b> OSM Performance Standards are based on numerically derived graphs and are not subjective. Output reports from the models indicate the pass/failure goals that are set. The City Standards are slightly different from the defaults in the approved models, so the reviewers are accustomed to looking for this.</p>

Appendices

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
Appendix G – Stormwater Control Operations and Maintenance Requirements	No edits.	<ul style="list-style-type: none"> <li>● Added maintenance criteria: action is required when the cover/lid is not locatable or accessible and specifying that access holes must remain at grade and readily accessible at all times based on inspector experience (No.3, 4, 5, 13, 16, 17, 18).</li> <li>● Clarified maintenance outcomes to specify reseeding/planting, aeration without damaging grid material for permeable pavement (No. 26).</li> <li>● Expanded maintenance conditions to clarify that excessively tall grass requiring maintenance includes vegetation that impedes swale performance (No. 9)</li> </ul>	Expanded tree maintenance table in Appendix G.	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● NA</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications.</li> </ul> <p><b>March 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications.</li> </ul>	<p><b>Comment(s):</b> Tree maintenance includes assessing and pruning the tree periodically.</p> <p><b>Response:</b> Expanded tree maintenance table in Appendix G</p> <p><b>Comment(s):</b> Add section for routine water quality and temperature testing of stormwater.</p> <p><b>Response:</b> The stormwater outfall monitoring topic is not related to O&amp;M requirements laid out in Appendix G. The City's Stormwater Management Program Plan describes how the City meets the monitoring requirements in our Phase I MS4 Permit.</p> <p><b>Comment(s):</b> Remove reference to “at all times” under the column Results Expected When Maintenance is Performed.</p> <p><b>Response:</b> No changes proposed. The inclusion of "at all times" is intended to prevent property owners from building or storing items over the access points.</p> <p><b>Comment(s):</b> Concern that some inspection frequencies are “recommended only”.</p> <p><b>Response:</b> Seattle adopts the maintenance standards described</p>

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					in Ecology's Stormwater Management Manual for Western Washington, which uses the term Recommended Inspection Frequency.
Appendix H – Financial Feasibility Documentation for Vegetated Roofs and Rainwater Harvesting	No edits.	No edits.	No edits.	NA	<p><b>Comment(s):</b> Review process for financial infeasibility criteria for vegetated roofs and rainwater harvesting are largely narrative-based and do not mandate third-party review.</p> <p><b>Response:</b> No changes proposed. Current review does not experience exploitation by applicants.</p>
Appendix I – Landscape Management Plans and Integrated Pest Management Plans	No edits.	No edits.	No edits.	NA	No comments received.

Appendices

Appendix Name	July 2025 Public Review Draft Proposed Change	January 2026 Public Review Draft Proposed Change	March 2026 Public Review Draft Proposed Change	Driver for Change	Response to Public Comment
<p><u>Appendix J – Plant and Tree Lists</u> <i>(new appendix)</i></p>	<p>Moved Plant Lists from Appendix E to new Appendix J; Tree Lists to be developed in Phase 2.</p>	<ul style="list-style-type: none"> <li>● Added Figure J.1 to show bioretention planting zones.</li> <li>● Added reference to Volume 3 minimum tree requirements for stormwater management</li> <li>● Added references to Green Factor and SDOT approved plant lists.</li> </ul>	<ul style="list-style-type: none"> <li>● Updated table references.</li> <li>● Added Soil Cell Bioretention language throughout.</li> <li>● Added “...Suitable for Bioretention BMPs” to plant list tables.</li> <li>● Formatted tables throughout.</li> <li>● Specify which trees are “features in Growth Rates and Performance of Trees in Silva Cells (Urban and Marritz 2016).”</li> <li>● Added more tree information/design comments throughout.</li> <li>● Added that the Tree Lists in the Plants and Trees for Bioretention section can also be used to select trees for OSM and Flow Control management.</li> </ul>	<p><b>July 2025:</b></p> <ul style="list-style-type: none"> <li>● Moved plant list from Appendix E to Appendix J.</li> </ul> <p><b>January 2026:</b></p> <ul style="list-style-type: none"> <li>● Clarifications.</li> </ul>	<p>No comments received.</p>