



TO: Environmental Services Managers, Surface Water Management Staff and
City of Tacoma Website

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SUBJECT: New Impervious Surface Definition

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The City of Tacoma's (City) Environmental Services Department has developed this guidance document to clarify the requirements of the City's 2012 Stormwater Management Manual (SWMM).

Although the City SWMM identifies various actions as new impervious surface, currently the manual does not have a single concise definition for new impervious surface. In developing the City's SWMM, the City largely relied upon the Washington State Department of Ecology's (Ecology) 2005 Surface Water Management Manual and NPDES Phase I Municipal Stormwater Permit, which also do not provide a definition for new impervious surface.

In order to clarify the Minimum Requirements of the SWMM, the following definition for new impervious surface will apply to new and redevelopment projects as required by the Tacoma SWMM. This definition collects actions currently identified in the manual as new impervious surface and adds clarification regarding expansion of structures over existing asphalt or concrete surfaces.

New Impervious Surface

Creation of an impervious surface, including

- *Extending the pavement edge without increasing the size of the road prism*
- *Paving gravel shoulders*
- *Upgrading from dirt to gravel, asphalt, or concrete*
- *Upgrading from gravel to asphalt or concrete*
- *Upgrading from bituminous surface treatment ("chip seal") to asphalt or concrete (see the Bituminous Surface Treatment Policy memo, dated June 19, 2013)*

On redevelopment sites, the following apply

- *For structures, the construction of a structure over an existing asphalt or concrete surface will not be considered new or replaced impervious surfaces and will not be counted toward project thresholds if the existing underlying impervious surface remains in place.*
- *Asphalt or concrete overlays will not be considered new or replaced impervious surface and will not be counted toward project thresholds.*

Based upon project scope and location, the City may require a capacity analysis of the downstream system at their discretion, regardless of project thresholds.