



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
West Coast Region  
7600 Sand Point Way  
Seattle, WA 98115-6349

**In response refer to:**  
**NMFS Tracking Number**  
**WCRO-2016-00008**

August 24, 2020

Ms. Michelle Walker  
Chief, Regulatory Branch  
Regulatory Branch CENWS-OD-RG  
Post Office Box 3755  
Seattle, Washington 98124-3755

Megan Webb  
In-Lieu Fee Mitigation and Transfer of Development Rights  
King County Water & Land Resources Division  
Department of Natural Resources & Parks  
201 S. Jackson St., # 600,  
Seattle, WA 98104

Re: IRPP to RAP Transition

Dear Ms. Walker and Ms. Webb:

In 2017, National Marine Fisheries Service (NMFS) and the US Army Corps of Engineers (USACE) completed an Endangered Species Act (ESA) consultation for the Integrated Restoration and Permitting Program (IRPP) for shoreline projects in Lake Washington and Lake Sammamish. This voluntary program included a conservation calculator. In 2019, NMFS, in cooperation with the Corps, revised the program (including the conservation calculator) to improve efficiency and conservation for listed species and renamed it the Restoration and Permitting (RAP) program.

IRPP required early technical assistance (ETA) for all projects. Many projects were still in ETA for IRPP during the transition to RAP. We concluded ETA under IRPP on as many projects as possible prior to starting RAP. Projects that did not complete the ETA step under IRPP were moved to RAP. All projects that completed ETA under IRPP are not eligible for re-evaluation under RAP. Changes to the conservation calculator result in some projects owing higher fees under IRPP than they would under RAP (and vice versa). Allowing resubmission under RAP would create a workload burden for NMFS and result in less conservation for listed-species. Both of these outcomes are contrary to the purpose of the program.



Proposed design changes to IRPP projects the Corps has already permitted will be handled as follows. If the change can be covered with a minor permit modification, the project will stay under IRPP. If the project will require a substantial permit modification or a new permit or letter, the project will move to RAP.

Please contact Mike Lisitza at [mike.lisitza@noaa.gov](mailto:mike.lisitza@noaa.gov) if you have any questions concerning this letter or if you require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Babcock".

Elizabeth L. Babcock  
Branch Chief, North Puget Sound  
Oregon Washington Coastal Area Office

cc: Juliana Houghton, Corps