MEMORANDUM

April 14, 2011

To: Applicable Agency Staff

Re: Indirect Effects Stormwater Runoff Analytical Method to be used in Biological Assessments

The Federal Highway Administration (FHWA), National Marine Fisheries Service (NMFS), US Fish and Wildlife Service (USFWS) and Washington Department of Transportation (WSDOT) have agreed to use the Indirect Effects Stormwater Runoff Analytical Method in consultations which have development identified as an indirect effect of a transportation project. This analytical method is intended to evaluate water quality impacts associated with stormwater runoff from development identified as an indirect effect of transportation projects. The method serves as an addition to the guidance presented in the technical memorandum issued on June 17, 2009 by the Project Management Team (PMT - consisting of representatives from USFWS, NMFS, FHWA and WSDOT) titled Endangered Species Act (ESA), Transportation and Development; Assessing Indirect Effects in Biological Assessments.

All WSDOT projects with a Biological Assessment (BA) submitted 60 days from the date of this agreement are required to use the approach outlined above for analysis of water quality impacts associated with stormwater runoff associated with development identified as an indirect effect of transportation projects.

Local agency projects that have already started preparing project BAs have a six-month "grandfather period" during which this new analytical approach will not be required. However, all local agency BAs submitted to NFMS and USFWS for initiation of consultation after October 14, 2011 will be required to use the new analytical approach in analyzing the potential water quality impacts from stormwater runoff associated with development identified as an indirect effect of transportation projects.

WSDOT provided training to WSDOT and local agency staff and consultants on this approach in March 2011.