



June 19, 2002

Mr. Bruce Ellis, Chief
Environmental Resources Management Division
Bureau of Reclamation
Phoenix Area Office (PXAO-1500)
PO Box 81169
Phoenix, AZ 85069-1169

Re: Request for Withdrawal & Recirculation of Imperial Irrigation District Water Conservation and Transfer Project and Draft Habitat Conservation Plan, Draft Environmental Impact Report/Environmental Impact Statement (State Clearinghouse No. 99091142, Jan. 18. 2002) and Draft EIS for the Implementation Agreement/Inadvertent Overrun Policy.

Dear Mr. Ellis:

Defenders of Wildlife, National Audubon Society - California, Planning and Conservation League, National Wildlife Federation, and Sierra Club - California join in the request by the County of Imperial, made by letter dated June 5, 2002, that the Bureau of Reclamation withdraw the draft environmental impact statement/environmental impact report (draft EIS/EIR) for the Imperial Irrigation District/San Diego County Water Authority Water Transfer and the draft EIS for the Implementation Agreement/Inadvertent Overrun Policy and revise and recirculate both documents before issuing final environmental documents for the two projects.

By copy of this letter to the co-lead agencies for the Quantification Settlement Agreement, we also request that those agencies withdraw, revise, and recirculate the QSA DEIR.

Our requests are based on the information described in the County's June 5 letter and the comments previously submitted on the above-referenced environmental documents, including comments submitted by many of the organizations signing this letter and contained in the letters from Defenders of Wildlife et al. dated March 26, 2002 and National Audubon Society dated March 25, 2002 commenting on the QSA DEIR, the letter from Defenders of Wildlife dated March 26, 2002 commenting on the IA/IOP DEIS, and the letter from National Audubon Society et al. dated April 25, 2002 commenting on the water transfer DEIS/DEIR. Those comments demonstrate that the draft water transfer EIS/EIR, as well as the QSA DEIR and the IA/IOP DEIS, which both rely on the water transfer DEIR/DEIS, fail to adequately address growth-inducing impacts in San Diego County and the impacts of the water transfer on biological resources in and around the Salton Sea and air quality in the Imperial Valley. In addition, at the

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proceeding on the water transfer before the California State Water Resources Control Board, witnesses for IID testified that IID planned to add significant new information to the final EIS/EIR, including:

- A Habitat Conservation Plan revised in light of the May 29, 2002 letter from the California Department of Fish and Game stating that HCP Alternative 1 from the draft EIR/EIS could not be permitted consistent with the requirements of the California Endangered Species Act.
- A revised analysis of air quality impacts, including a wholly new dust abatement plan consisting of research, monitoring, and mitigation components.

It also appears that IID may significantly revise or significantly flesh out a project alternative that generates the conserved water for the transfer via fallowing.

Both NEPA and CEQA require recirculation of a draft environmental impact document when significant new information is added. In addition, recirculation of all three documents will give the public a full opportunity to consider and comment upon these important changes in the transfer and inextricably linked programs and agreements in a coordinated fashion. Finally, as emphasized by Imperial County, revising and recirculating adequate environmental documents offers the best chance of developing projects that are acceptable to a broad range of stakeholders.

Thank you,

Brendan Fletcher
California Program Associate
Defenders of Wildlife, for

J. William Yeates
Attorney for
National Audubon Society - California

Karen Douglas
Natural Resources Director
Planning and Conservation League

Kevin Doyle
Director of Habitat Conservation Programs
National Wildlife Federation

Jim Metropulos
Legislative Representative
Sierra Club California

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cc: Senator Dianne Feinstein
Senator Sheila Kuehl
Assembly Member Joe Canciamilla
State Water Resources Control Board Chair Art Baggett, Jr.
Director of Water Resources Director Tom Hannigan
Jesse Silva, General Manager, IID
Maureen Stapleton, General Manager, SDCWA
Ronald Gastelum, Chief Executive Officer, MWD
Tom Levy, General Manager, CVWD
Lisa B. Hanf, Manager, USEPA Region 9 Federal Activities Office