



VIA CERTIFIED MAIL; RETURN RECEIPT REQUESTED AND FACSIMILE

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**RE: 60-Day Notice of Intent to Sue over Violations of the Endangered Species Act for
Actions Relating to the Giant Garter Snake**

This letter serves as a sixty-day notice on behalf of the Center for Biological Diversity (the "Center"), and the Butte Environmental Council, of intent to sue the Bureau of Reclamation ("BOR") over violations of Section 7 of the Endangered Species Act ("ESA"), 16 U.S.C. § 1536, for its reliance on the Biological Opinion ("BiOp") issued by the United States Fish & Wildlife Service ("FWS") on the proposed 2008 Conaway Preservation Group Water ("CPG") Transfers to San Luis and Delta-Mendota Water Authority ("SLDMWA"). These water transfers will result in the transfer of 22,552 acre-feet of Central Valley Project water to the SLDMWA, and the subsequent fallowing of 1,000 acres of rice crops, and the replacement of 2,500 acres of rice crops with safflower. Overall, 3,500 acres of rice crops that provide habitat to the threatened giant garter snake will be destroyed. This letter is provided pursuant to the sixty-day notice requirement of the citizen suit provision of the ESA, to the extent such notice is deemed necessary by a court. *See* 16 U.S.C. § 1540(g).

The Center is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 200,000 members and online activists throughout the United States, including many members who live in California. Butte Environmental Council is a public benefit corporation representing 850 members who seek to protect the land, air, and water of the Sacramento Valley ecoregion.

I. Background

As the Bureau of Reclamation is well aware, the purpose of the ESA is to conserve the ecosystems on which endangered and threatened species depend and to conserve and recover those species so that they no longer require the protections of the Act. 16 U.S.C. § 1531(b), ESA § 2(b); 16 U.S.C. § 1532(3), ESA §3(3) (defining “conservation” as “the use of all methods and procedures which are necessary to bring any endangered species or threatened species to the point at which the measures provided pursuant to this chapter are no longer necessary”). “[T]he ESA was enacted not merely to forestall the extinction of species (i.e., promote species survival), but to allow a species to recover to the point where it may be delisted.” *Gifford Pinchot Task Force v. U.S. Fish & Wildlife Service*, 378 F.3d 1059, 1069 (9th Cir. 2004). To ensure that the statutory purpose will be carried out, the ESA imposes both substantive and procedural requirements on all federal agencies to carry out programs for the conservation of listed species and to insure that their actions are not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. 16 U.S.C. § 1536. See *NRDC v. Houston*, 146 F.3d 1118, 1127 (9th Cir. 1998) (action agencies have an “affirmative duty” to ensure that their actions do not jeopardize listed species and “independent obligations” to ensure that proposed actions are not likely to adversely affect listed species). To accomplish this goal, agencies must consult with the Fish and Wildlife Service whenever their actions “may affect” a listed species. 16 U.S.C. § 1536(a)(2); 50 C.F.R. § 402.14(a). Section 7 consultation is required for “any action [that] may affect listed species or critical habitat.” 50 C.F.R. § 402.14. Agency “action” is defined in the ESA’s implementing regulations to “mean all activities or programs of any kind authorized, funded, or carried out, in whole or in part, by Federal agencies in the United States.” 50 C.F.R. § 402.02.

When the Fish and Wildlife Service concludes, as they have done here, that a project is likely to result in incidental takings of a protected species, the FWS must formulate an Incidental Take Statement (“ITS”) that 1) specifies the impact of the incidental taking on the species, 2) specifies the “reasonable and prudent measures” that the FWS considers necessary or appropriate to minimize impact; (3) set forth “terms and conditions” with which the action agency must comply to implement the reasonable and prudent measures and (4) specify the procedures to be used to handle or dispose of any species actually taken. 16 U.S.C. § 1536(b)(4); 50 C.F.R. § 402.14(i). As long as any takings that occur comply with the terms of the Incidental Take Statement, the project proponents are exempt from penalties for such takings. 16 U.S.C. § 1536(o)(2). If the terms and conditions given in the ITS are not complied with, and the amount of allowable incidental take is exceeded, the action agency must immediately reinstate consultation. 50 C.F.R. §§ 402.14(i)(4), 402.16(a).

As detailed below, the Biological Opinion provided by the FWS is substantially flawed and therefore, the Service’s issuance of the Biological Opinion, and the BOR’s reliance on that Biological Opinion, violate the substantive and procedural provisions of Section 7 of the ESA. As well, the BOR will be in violation of Section 9 of the ESA if the proposed project goes forward because the BOR does not have valid take authority under Sections 7 of the ESA. Because the Biological Opinion and the accompanying Incidental Take Statements are

inadequate and unlawful, no take of listed species is properly authorized for the proposed project. In addition, the FWS has completely failed to identify and provide terms and conditions for meaningful mitigation measures to minimize the impact of any take.

II. Proposed Project's Impacts on the Giant Garter Snake

The giant garter snake ("GGS") is an endemic species to Central Valley California wetlands. (Draft Recovery Plan for the Giant Garter Snake ("DRP") 1). The giant garter snake, as its name suggests, is the largest of all garter snake species, not to mention one of North America's largest native snakes, reaching a length of up to 64 inches. Female GGS tend to be larger than males. GGS vary in color, especially depending on the region, from brown to olive, with white, yellow, or orange stripes. The GGS can be distinguished from the common garter snake by its lack of red markings and its larger size. GGS feed primarily on aquatic fish and specialize in ambushing small fish underwater, making aquatic habitat essential to their survival. Females give birth to live young from late July to early September, and brood size can vary from 10 to up to 46 young. Some studies have suggested that the GGS is sensitive to habitat change in that it prefers areas that are familiar and will not typically travel far distances. However, in response to droughts and other changes in water availability, the GGS has been known to travel up to 5 miles in only a few days.

The giant garter snake was listed as a federally threatened species on October 20, 1993. (58 FR 54053). While the GGS historically inhabited natural wetlands, human encroachment and destruction of its habitat have relegated the GGS to certain agricultural crop-land, and severely limited its range. (DRP 1, 10). Rice lands are now essential to the survival of the giant garter snake. (DRP 23). For example, the relative availability of rice fields in Sacramento Valley explains the larger presence of the GGS than in other locales. (BiOp 15). Threats to GGS habitat are expected to increase as more rice crops and other GGS habitat is destroyed and fragmented. For example, the American Farmland Trust projects that more than one million acres of Central Valley farmland will be lost to urbanization by the year 2040. (FWS GGS Five Year Review 2006).

As the most aquatic of any garter snake, an adequate and clean water supply is essential to the survival of the species. (DRP 12, 23). Interrupted water supply, poor water quality, and water contamination has severely impacted the species. (DRP 23). Loss of habitat and habitat degradation have resulted in the direct mortality of individual GGS, an increase in predation, lack of food for the snake, and lack of foraging and breeding grounds and capability. (DRP 27). Therefore, the proposed water transfer, which will leave up to 3,500 acres of wetland crops either fallow or converted to non-wetland crop, and therefore, as unsuitable habitat for the GGS, will have a direct impact on the survival and restoration of the species.

The proposed water transfer will destroy GGS habitat and cause further habitat fragmentation. In addition, the water transfer will directly reduce the value of remaining habitat. Giant garter snakes utilize many aspects of rice fields; GGS will forage for prey in the shallow rice field water, utilize rice plants and berms for shelter and basking, and shallow warm water for

birthing. (BiOp 14). Rice fields also have also become important habitat in their ability to provide for winter hibernation within their associated canals and banks. (BiOp 14). Because the GGS primarily feeds on other aquatic animals such as fish and amphibians, fallowing and converting wetland crops will directly reduce the amount and availability of food for the GGS. (BiOp 12). Rice crops and native wetlands provide better protection from predators due to their dense cover. (BiOp 19). GGS breeding will also be impacted. Female GGS often give birth in rice fields and wetland crops serve as vital nursery habitat for young GGS. (BiOp 12). As the FWS acknowledges, the proposed project will have “adverse effects on reproduction, recruitment, and survival of the snake that will continue to affect giant garter snake populations well beyond the one year project time frame.” (BiOp 26).

The Draft Recovery Plan for the giant garter snake also specifically stipulates that private land owners should be encouraged via incentive programs to maintain agricultural lands that provide habitat for the species. (DRP 70). The proposed project will, in contrast, allow farmers to fallow the rice fields that provide essential habitat by selling tens of thousands of acre-feet of water to the SLDMWA for other agricultural users which will result in a significant decrease in GGS habitat.

Additionally, climate change is expected to have a massive impact on water supply and availability in California. This in turn will of course affect species such as the GGS that reside within aquatic habitat. The FWS itself has acknowledged that climate change will have a negative impact on the GGS. (USFW GGS Five Year Review, 2006). That the Biological Opinion includes no information or analysis as to the proposed water transfer in light of the coming climate crisis, and thus, the cumulative affects of climate change and habitat reduction on the GGS, renders the document incomplete.

Because the giant garter snake is known to occur within the project area and the proposed project will directly destroy prime GGS habitat and present numerous other impacts to the GGS that meet the definition of incidental take under the ESA, the FWS was required to prepare a biological opinion that analyzed impacts to the GGS, an incidental take statement (“ITS”) that expressly stipulates a specific allowable take number of GGS, and mitigation measures to minimize the impacts of any such take on the species. The FWS’ failure to do so renders the BiOp and ITS invalid and BOR’s reliance on them arbitrary and capricious.

III. Violations of the Endangered Species Act

a. The ITS Failed to Specify Authorized Take In Violation of the ESA

The ESA requires that the FWS include as part of a Biological Opinion an Incidental Take Statement (“ITS”) that specifies the impact of incidental takings on listed species. 16 U.S.C. § 1536(b)(4)(i); 50 C.F.R. § 402.14(i)(1). This impact should be expressed in terms of a specific number whenever possible. *Oregon Natural Resources Council v. Allen*, 476 F.3d 1031, 1037 (9th Cir. 2006) (“[T]he permissible level of take ideally should be expressed as a specific number.”) Here, the FWS has not provided a specific take number in violation of the ESA.

The purpose of developing a specific level of take is to establish a “trigger” number of takings that when reached, “results in an unacceptable level of incidental take...requiring the parties to re-initiate consultation.” *ONRC v. Allen*, 476 F.3d at 1038. See, e.g., *Mausolf v. Babbitt*, 125 F.3d 661 (8th Cir.1997) (snowmobiling activity may take no more than two wolves); *Fund for Animals v. Rice*, 85 F.3d 535 (11th Cir.1996) (municipal landfill may take fifty-two snakes during construction and an additional two snakes per year thereafter); *Mt. Graham Red Squirrel v. Madigan*, 954 F.2d 1441 (9th Cir.1992) (telescope construction may take six red squirrels per year); *Center for Marine Conservation v. Brown*, 917 F.Supp. 1128 (S.D.Tex.1996) (shrimping operation may take four hawksbill turtles, four leatherback turtles, ten Kemp's ridley turtles, ten green turtles, or 370 loggerhead turtles).

The FWS has provided no quantification of take and no such trigger; thus, it is impossible to determine when an unacceptable level of take would occur and when consultation must be re-initiated. The BiOp therefore fails to comply with the required ESA mandates and FWS failed to carry out its mandatory duties to protect the giant garter snake. A court will invalidate a take statement that does not provide for a take calculation that will not trigger consultation. *ONRC v. Allen*, 476 F.3d at 1038.

b. FWS' Reliance on the Lack of Data and Surveys is Unlawful.

In crafting the ESA, Congress recognized that calculating a specific number may not always be logistically possible. “Where possible, the impact should be specified in terms of a numerical limitation on the Federal agency or permittee or licensee.” H.R.Rep. No. 97-567, at 27 (1982), *reprinted in* 1982 U.S.C.C.A.N. 2807, 2827. (emphasis added). Here, the FWS has stated that no specific numerical value is possible because surveys have not occurred within the project area that allow for an estimate of how many GGS actually reside there. (BiOp 6, 7, 9, 20-21, 24). However, such an explanation has been expressly rejected by the courts. See *ONRC v. Allen*, 476 F.3d at 1038 (rejecting FWS contention that no specific number could be given because applicable surveys on the project area were not available, and stating that the FWS did not show that it was not possible to update/complete the survey date, “only that it has not actually done the surveys. This does not establish the numerical measure’s impracticality.”); *Center for Biological Diversity v. Bureau of Land Mgmt.*, 442 F.Supp. 1115, 1137-38 (N.D. Cal. 2006) (FWS did not adequately establish that no numerical value of take could practically be obtained where FWS simply had not completed surveys for the listed species in the project area); *Natural Resource Defense Council, Inc. v. Evans*, 279 F.Supp. 2d 1129, 1184-85, (N.D. Cal. 2003) (rejecting ITS that failed to state specific take number and offered no evidence that it was impractical to obtain such numerical estimates).

The BiOp at issue asserts that no specific take number can be calculated because the appropriate surveys for GGS have not been conducted within the project area. The BiOp concludes that applicable surveys have not been conducted, not that they *cannot* be conducted. This is a significant difference, which case law holds invalidates an ITS that fails to provide a specific number. See *ONRC v. Allen*, 476 F.3d at 1038 (stating that FWS did not show that it

was not possible to undertake species survey, “only that it has not actually done the surveys. This does not establish the numerical measure’s impracticality.”); *NRDC v. Evans*, 279 F.Supp.2d 1129, 1185 (N.D. Cal. 2003) (rejecting agency argument that specific take number could not be given because surveys had not been conducted, but not that these studies could not be conducted); *Center for Biological Diversity v. Bureau of Land Management*, 422 F.Supp.2d 1115, 1138 (N.D. Cal. 2006) (finding that the reasoning behind decision not to provide specific take number “that the number of desert tortoises within the [project area] has not been estimated -- is circular and unavailing: essentially the Service states that it cannot estimate the number of desert tortoise take because they do not know how many desert tortoise are in the [project area]. However, this is different from stating that it is not *possible* to estimate the number of desert tortoise in the [project area].”)

The FWS cannot rely on the applicable survey not having been conducted within the project area. The FWS has nowhere shown nor mentioned that accurate surveys *could not* be completed; indeed, such an argument would be undermined by the BiOp’s reliance on GGS survey’s in other areas. Therefore, the reasoning employed in the BiOp for not providing a specific take number is unpersuasive.

The BiOp’s contention that a specific take number cannot be given is also inconsistent with numerous other data points in the BiOp that document the number of GGS. For instance, the BiOp states that there are thirty-three California Natural Diversity Database (“CNDDDB”) records for the giant garter snake within eight miles of the project area, five of which are directly within the project area. (BiOp 6). As well, the BiOp discusses that results of another survey, not yet entered into the CNDDDB, in which fifty-one individual giant garter snakes were found within the project vicinity or within the actual project area. (BiOp 7). *See NRDC v. Evans*, 279 F.Supp. 2d at 1186 n. 16 (“Plaintiffs note that this explanation is inconsistent with defendants’ repeated use of similar data of observed interactions between sea turtles and fishing gear as a proxy for sea turtle distribution data.”).

If accurate GGS surveys can be completed within the vicinity of the project site, there is no reason why such surveys could not be completed on the CPG land prior to the issuance of the BiOp. No reason is given as to why GGS surveys can be conducted in other locales but not within the project area. Further such surveys are mandated by the Draft Recovery Plan for the species. (DRP 41). FWS’ failure to provide a specific take number for the giant garter snake renders the ITS invalid.

The BiOp also states that a baseline garter snake population is not known because suitable habitat is not “uniformly distributed” throughout the project area. (BiOp 6). This in no way precludes an accurate estimate of the garter snake population, the population estimate could be determined in several ways including, for example, by quantifying the amount of habitat within the project area that is suitable.

The BiOp’s contention that no specific take number need be given in light of a lack of surveying on the property is especially bizarre given that the reasonable and prudent measure

laid out in the BiOp mandates that survey's be conducted within the project area "to determine the population levels and distribution of giant garter snake." (BiOp 26). FWS thus accepts that such surveys can be completed and that the surveys will be an accurate reflection that will aid the implementation of "a long-term program that will evaluate the effects of future water transfer proposals; while assuring the long-term survival, and eventual recovery of the giant garter snake." (BiOp 26). To conduct such surveys after project approval, not before, is a violation of the ESA, which mandates that a specific numerical take statement be developed, typically based on such surveys. To allow the BOR wait to begin such surveys until after the BiOp is prepared, the ITS issued, and the project is approved is illogical and an affront to the purposes and intent of the ESA.

Finally, the requirement for future surveys undercuts the FWS' argument that no numerical take statement can be developed. As case law clearly holds, it is not whether surveying *has not* been conducted on the project site but whether surveying *can* be conducted on the project site that is the crucial issue. Merely because surveying has not yet been conducted on the project site does not excuse the FWS from its ESA mandated obligation of developing an accurate specific take number or excuse BOR from its duties under the ESA.

That data establishing the GGS population within the project site is not currently available does not excuse the FWS from completing its ESA mandated duties. If the FWS is not able to accurately say what the GGS population is, they are in no way able to effectively determine what the actual project impact on the species will be. This project should be put on hold until accurate data establishing GGS population within the project site is completed and a meaningful assessment of the impacts can be made.

c. The ITS Also Failed to Provide a Meaningful Surrogate for the Amount of Take

Even if the FWS had demonstrated that obtaining a specific number was impossible, they would still be required to employ a "surrogate" method that "must be able to perform the functions of a numerical limitation." *ONRC v. Allen*, 476 F.3d at 1038. When no specific take number can be determined, Incidental Take Statements are also valid when they employ a combination of numbers and estimates. *See Ramsey v. Kantor*, 96 F.3d 434, 441 n. 12 (9th Cir.1996) (utilizing both harvesting rates and estimated numbers of fish to reach a permitted take); *Pacific Northwest Generating Coop. v. Brown*, 822 F.Supp. 1479, 1510 (D.Or.1993) (ruling that an Incidental Take Statement that defines the allotted take in percentage terms is valid). No surrogate methods capable of performing the functions of a numerical limitation are provided within the ITS.

Instead of providing the mandatory metric calculation for take, the BiOp merely states that acceptable take will be exceeded if more than 3,500 acres of GGS habitat are destroyed or converted to non-wetland crop. (BiOp 27). Such a take statement has previously been held as inadequate to meet ESA standards. *ONRC v. Allen*, 476 F.3d at 1037-1038 ("Contrary to the FWS' argument, "quantifying" take in terms of habitat acreage lost is simply not the type of numerical limitation on take contemplated by Congress or this court's precedent.")

Further, the proposed project description states that the water transfer will result in 3,500 acres of cropland being rendered fallow or planted with non-wetland crops. (BiOp 2). Therefore, the proposed project will, by its own terms, not exceed the take level the BiOp establishes. The FWS has set up a scheme in which the take statement is so broad that it includes the entirety of the project, and by definition, take will never be exceeded, and re-consultation will never be triggered. The only way in which take could be exceeded was if CPG went outside the bounds of the proposed project, transferring more water than there were allotted.

As such, the ITS is directly at odds with the purpose of the ESA's take statement requirement. The purpose of establishing a level of permissible and impermissible take is to provide a trigger that when reached will invalidate the safe harbor provision and reinitiate the consultation process. *ONRC v. Allen*, 476 F.3d at 1039. An ITS is rendered ineffective and useless if there is no trigger requiring agency re-consultation within the actual stated bounds of the project. The FWS has established a take parameter that will require nothing more of them than to merely complete the identified project. Such an ITS curtails the intent and purpose of the ESA and fails to provide for adequate, if any, protection for the threatened giant garter snake.

Such an ITS has been expressly rejected by various courts. *ONRC v. Allen*, 476 F.3d at 1039 (rejecting ITS in which "the authorized level of take . . . cannot be reached until the project itself is complete. Even if the actual number of takings of [listed species] that occurred during the project was considerably higher than anticipated, the Incidental Take Statement would not permit the FWS to halt the project and reinitiate consultation. Instead, the permissible level of take is coextensive with the project's own scope.") See also *National Wildlife Federation v. National Marine Fisheries Service*, 235 F.Supp.2d 1143, 1160 (W.D. Wa. 2002) (rejecting ITS relying on non-numerical triggers that "in effect, amounts to the project's required work conditions.")

The BiOp also offers as part of its ITS that CPG must comply with the Giant Garter Snake Best Management Practices in management of irrigation conveyances and farming operations. (BiOp 27) Again, this does not satisfy ESA requirements for take statements. Construing compliance with the Best Management Practices for the GGS confuses the take statement requirement with the requirement to list reasonable and prudent measures to avoid harm to the species. These two ESA requirements serve completely different purposes. Stipulating reasonable and prudent measures helps to ensure that impact to a listed species will be minimized to the extent reasonably possible. A numerical take statement on the other hand, provides the agency with a set marker for determining when to re-institute consultation. Compliance with the Best Management Practices should have been included as part of the reasonable and prudent measures that CPG must take, but is in no way a substitute for a specified number of allowable take.

Compliance with the Best Management Practices will mandate that CPG take such measures as educating personnel to recognize and avoid contact with GGS, clean only one side of a conveyance channel per year so as to maintain habitat, provide rock-basking habitat in the

system's water prisms, and raise mower blades to a certain height to avoid contact with the snake. (BiOp 5). While such measures may decrease the amount of take associated with the project, they do not provide specifics as to what extent such measures will decrease take, and thus, what the overall take will be. In other words, they are not a substitute for providing an actual take number.

Because no specific take number or meaningful surrogate is given it is impossible to accurately determine the effect the project will have both on individual giant garter snakes, and the giant garter snake population as a whole. Given the gravity of the impact on the giant garter snake as outlined in the BiOp, including serious threats to foraging and breeding capabilities, the FWS conclusion that the project is "not likely to jeopardize the continued existence of the giant garter snake," (BiOp 24) is completely unsubstantiated by any hard data or evidence. As the FWS itself states, they are "not able to accurately predict the number of individual giant garter snakes that will be lost" due to project impacts, nor are they able to predict with any degree of accuracy population losses and impacts on the giant garter snake as a whole. (BiOp 24). Thus, their conclusion that these impacts are "not likely to jeopardize" the viability of the giant garter snake population has not basis in fact. (BiOp 24).

d. The BiOp Failed to Consider Appropriate Mitigation Measures to Minimize the Impacts of the Action on the Giant Garter Snake and the ITS Failed to Provide for Such Minimization in the Reasonable and Prudent Measures and Terms and Conditions.

The ESA requires an ITS to specify those reasonable and prudent measures the Secretary deems "necessary or appropriate" to minimize the impact on listed species and set forth terms and conditions implementing each reasonable and prudent measure. 16 U.S.C. § 1536(b)(4)(C)(ii), (iv). *See, e.g., Center for Biological Diversity v. Bureau of Land Management*, 422 F. Supp. 2d 1115, 1141 (N.D. Cal. 2006) (finding that the "Service's failure to include T&C to minimize the potential for incidental take of . . . violates the plain language of the ESA, 16 U.S.C. § 1536(b)(4), and is therefore arbitrary and capricious.")

While determining the population levels and distribution of the GGS in the project area is *necessary* (and, as discussed above, should have been undertaken *before* the BiOp was issued), and the development of a long term program is vital, such actions will not minimize the impact of authorized take from *this project* as the statute requires. *See* 16 U.S.C. § 1536(b)(4)(C)(ii). Similarly, the terms and conditions in the BiOp requiring that the agencies work together to determine population levels and distribution, long-term responses to changes in habitat due to fallowing rice fields, and a long term program to evaluate the effects of the water transfers are necessary and essential to the survival and recovery of the species if water transfers and fallowing of rice fields are going to proceed, however, these terms and conditions do nothing to mitigate or minimize the impacts from this project on the species.

Because the FWS failed to comply with the ESA and provide information necessary to establish the impact on the threatened giant garter snake and failed to provide measures to minimize the impact of take, the BiOp and the Incidental Take Statement are invalid. Because

the document is invalid, reliance on the BiOp by the BOR is also a violation of both Section 7 and Section 9 of the Endangered Species Act.

IV. Conclusion

If the Bureau of Reclamation does not act within 60 days to correct these violations of the ESA by re-initiating consultation with the FWS, the Center for Biological Diversity and Butte Environmental Council will pursue litigation in federal court against the agency and the officials named in this letter. We will seek injunctive and declaratory relief, and legal fees and costs regarding these violations.

It is our practice to pursue negotiations whenever possible. In keeping with this policy, we invite BOR and FWS to discuss their obligations under the ESA with us. If you have any questions and wish to meet to discuss this matter, or feel this notice is in error, please do not hesitate to contact me.

Sincerely,



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Please note change of address as of June 1, 2008

References

USFWS Biological Opinion, 2008.

USFWS Draft Recovery Plan for the Giant Garter Snake, 1999.

USFWS Giant Garter Snake Five Year Review: Summary and Evaluation, 2006.

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