

Letter	Comment #	Comment	Relation to Final EIR/EIS
Center for Biological Diversity	1	The Center for Biological Diversity submits the following additional comment on the California WaterFix Final Environmental Impact Report/Environmental Impact Statement ("FEIR/S"). The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.2 million members and online activists worldwide, including within California.	This comment is background of the Center for Biological Diversity. This comment does not raise any environmental issues related to the Final EIR/EIS.
Center for Biological Diversity	2	The Center joined other organizations in its January 19, 2017 letter describing the legal flaws with the purported "close" of the public's ability to submit information to the record. By submitting these comments today, the Center does not concede that either of the lead agencies can limit the public's ability to submit additional comments on the voluminous FEIR/S prior to decisions on the Delta Tunnels project.	This comment is about the public review period. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S. Please see Federal Register Notice Period for the California WaterFix Final Environmental Impact Report/Environmental Impact Statement (EIR/EIS) letter regarding requests for extending NEPA review period.
Center for Biological Diversity	3	The Center has not had an opportunity to review the entire FEIR/S due to the inordinately short time provided for public comment. The Center, however, wishes to express its concern that the Tunnels project will result in unlawful take of Fully Protected Species. In particular, the Center believes that the project will result in take of the greater sandhill crane from bird strikes on transmission lines necessary to serve the project. The project must meet a zero-"take" performance standard for greater sandhill cranes to avoid running afoul of the crane's status as a California Fully Protected Bird. (See Fish & Game Code, §§ 3511, 2835, 86.) Upon the Center's preliminary review, the planned Avoidance and Minimization Measures will be insufficient to avoid take altogether from this massive construction project.	This comment is about impacts to fully protected species and AMM adequacy. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S. On the subject of impacts to the greater sandhill crane, see Master Response 17: Biological Resources, pp. 1-148 through 1-49. Also, see the letter for Friends of the Stone Lakes National Wildlife Refuge comments 3 and 4, Developments after Publication of the Proposed Final Impact Report.
Center for Biological Diversity	4	The Center requests that the lead agencies make the necessary modifications to the project to avoid take of Fully Protected Species prior to issuing any project approvals. Should the Center be provided the opportunity, it will provide additional comments regarding this project and additional issues of concern. Thank you for considering these comments.	This comment is about impacts to fully protected species. This comment does not raise any substantive new environmental information or analysis that was not previously addressed in the Final EIR/S.