

STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE



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June 17, 2026

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Subject: Highway 17 Single-Family Residence, Mitigated Negative Declaration, SCH No. 2026050968, Santa Clara County

Dear Mr. Horwitz:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from the County of Santa Clara Department of Planning and Development (County) for the Highway 17 Single-Family Residence Project (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's Lake and Streambed Alteration (LSA) regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in "take" of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, "take" means "hunt, pursue, catch, capture, or

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86.) CDFW’s issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

California Environmental Quality Act

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the lead agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the lead agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the CEQA document and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act (MBTA).

PROJECT DESCRIPTION SUMMARY

Proponent: County of Santa Clara Department of Planning and Development

Objective: The Project includes plans to construct a single-family residence and related improvements on a 12.8-parcel (APN 558-41-033). Related improvements include an attached garage, new driveway with fire truck turnaround, related drainage improvements, on-site wastewater treatment system, and water tanks and hydrant for fire safety. Total estimated grading quantities for all improvements are 920 cubic yards of cut and 191 cubic yards of fill. Retaining walls of up to 4 feet (ft) in elevation are proposed along the driveway and fire truck turnaround. No tree removal is proposed. Domestic water is proposed to be provided by San Jose Water Company.

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Location: The Project is located in the City of Los Gatos in Santa Clara County, adjacent to Highway 17 and Old Santa Cruz Highway, next to Lexington Reservoir. GPS coordinates 37°10'40.8"N, Longitude: 121°59'34.8"W

Timeframe: TBD

ENVIRONMENTAL SETTING

Sufficient information regarding the environmental setting is necessary to understand any potentially significant impacts on the environment of the proposed Project and any alternatives identified in the MND (CEQA Guidelines, §§ 15125 & 15360). CDFW recommends the MND provide baseline habitat assessments for special-status plant, fish and wildlife species located and potentially located within the Project area and surrounding lands, including all rare, threatened, and endangered species (CEQA Guidelines, § 15380). The MND should describe aquatic habitats, such as wetlands or waters of the U.S. or State, and any sensitive natural communities or riparian habitat occurring on or adjacent to the Project site (for sensitive natural communities see: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities#sensitive%20natural%20communities>), and any stream, riparian, or wetland set back distances the County may require. Fully protected, threatened or endangered, candidate, and other special-status species or sensitive natural communities that are known to occur, or have the potential to occur in or near the Project area include, but are not limited to: the species listed in the State and Federally Listed Endangered and Threatened Animals of California – February 2026 list at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline> or State and Federally Listed Endangered, Threatened, and Rare Plants of California – January 2026 at <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109390&inline>.

Habitat descriptions and species profiles included in the MND should include robust information from multiple sources: aerial imagery; historical and recent survey data; field reconnaissance; scientific literature and reports; U.S. Fish and Wildlife Service's (USFWS) Information, Planning, and Consultation System; California Aquatic Resources Inventory; and findings from "positive occurrence" databases such as California Natural Diversity Database (CNDDDB). Only with sufficient data and information can the County adequately assess which special-status species are likely to occur in the Project vicinity.

CDFW recommends surveys be conducted for special-status species with potential to occur, following recommended survey protocols if available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.

Botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), should also be conducted during the blooming period for all sensitive plant species potentially occurring within the Project area and include the identification of reference populations. Please refer to CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

IMPACT ANALYSIS AND MITIGATION MEASURES

The CEQA Guidelines (§ 15126.2) necessitate the MND discuss all direct and indirect impacts (temporary and permanent) that may occur with implementation of the Project. This includes evaluating and describing impacts such as:

- Land use changes that would reduce open space or agricultural land uses and increase residential or other land use involving increased development;
- Potential for impacts to fully protected and special-status species;

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- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence;
- Obstruction of movement corridors, fish passage, or access to water sources and other core habitat features;
- Water quality impacts resulting from construction and operation of the Project;
- Direct or indirect impacts to the bed, channel, and bank, in the reservoirs and creeks downstream of the Project;
- Permanent and temporary habitat disturbances associated with ground disturbance, noise, lighting, reflection, air pollution, traffic or human presence; and
- Impacts both from construction and future operation of the Project.

The CEQA document also should identify existing and reasonably foreseeable future projects in the Project vicinity, disclose any cumulative impacts associated with these projects, determine the significance of each cumulative impact, and assess the significance of the Project's contribution to each impact (CEQA Guidelines, § 15355). Although a project's impacts may be insignificant individually, its contributions to a cumulative impact may be considerable; a contribution to a significant cumulative impact (e.g., reduction of available habitat for a listed species) should be considered cumulatively considerable without mitigation to minimize or avoid the impact.

The CEQA Guidelines direct the County, as the lead agency, to consider and describe in the MND all feasible mitigation measures to avoid and/or mitigate potentially significant impacts of the Project on the environment based on comprehensive analysis of the potential direct, indirect, and cumulative impacts of the Project. (CEQA Guidelines, §§ 15021, 15063, 15071, 15126.2, 15126.4 & 15370.) This should include a discussion of take avoidance and minimization measures for special-status species, which are recommended to be developed in early consultation with the USFWS, the National Marine Fisheries Service and CDFW. These measures can then be incorporated as enforceable Project conditions to reduce potential impacts to biological resources to less-than-significant levels.

Fully protected species may not be taken or possessed at any time except in limited circumstances (Fish & G. Code, §§ 3511, 4700, 5050, & 5515). Therefore, the MND should include measures to completely avoid "take" of fully protected species.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document.

COMMENT 1: Inadequate Baseline Conditions for Biological Resources

Issue: The MND does not establish complete and current biological baseline conditions for the Project area. The biological analysis relies mostly on desktop database queries and a single biological survey from 2021, even though the MND identified potential for special-status plant and animal species onsite. CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Assessments for rare plants may be considered valid for a period of up to three years, except when significant environmental changes occur, such as disturbance resulting from urbanization or wildfire. Updated general surveys and protocol-level surveys don't appear to have been completed. As a result, the MND lacks sufficient information to accurately characterize existing biological conditions or to support impact significance determinations.

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Evidence of Significant Impacts: CDFW generally considers biological field assessments for wildlife to be valid for a one-year period. Assessments for rare plants may be considered valid for a period of up to three years, except when significant environmental changes occur, such as disturbance resulting from urbanization or wildfire. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if build-out could occur over a protracted time frame, or in phases.

Because many species are cryptic or only seasonally detectable, their presence can be missed by a one-time, non-protocol survey, especially if conducted outside of the correct window. Inconsistent survey methodologies and the absence of County- or agency-level verification increase the risk that projects do not adequately account for impacts to sensitive biological resources. CEQA Guidelines §15125(a) require an MND to describe the environmental setting “as it exists at the time the notice of preparation is published,” and this description forms the baseline against which project impacts are measured. A legally adequate baseline must be based on current, site-specific information sufficient to inform both the impact analysis and the public’s understanding of the project’s environmental consequences. Without a reliable baseline, a MND cannot meaningfully evaluate whether a project would result in a substantial adverse change to biological resources (CEQA Guidelines §15126.2(a); Appendix G).

The absence of current baseline surveys is problematic where the Project proposes potential direct and/or indirect disturbance to streams, riparian habitat, and upland areas capable of supporting special-status species. Numerous studies demonstrate that species’ presence and habitat use can vary substantially across seasons and years, particularly for amphibians, bats, nesting birds, and annual or cryptic plant species. Without recent, seasonally appropriate surveys, the MND may incorrectly assume species absence or underestimate habitat value, leading to flawed impact conclusions (Li et al. 2019; Ranta et al. 2021). Without a current and complete biological baseline, the MND risks underestimating impacts to biological resources.

Recommendations: To address these deficiencies, CDFW recommends the following:

1. A qualified biologist with expertise in regional flora and fauna conducts general and protocol-level surveys for species with potential to be present in and around the Project area, consistent with CDFW and USFWS survey protocols during appropriate seasonal windows, including nocturnal and breeding-season surveys where relevant. Include special status plant surveys during correct blooming periods; and
2. Update impact significance determinations and mitigation measures based on the results of current baseline surveys. If updated data reveal greater biological value or species presence, the MND should revise conclusions and incorporate additional avoidance, minimization, or mitigation measures as necessary.

COMMENT 2: Migratory Birds and Nesting Raptors

Issue: The MND acknowledges there is foraging bird habitat and potential nesting habitat on the Project site that may be impacted by Project disturbance. The MND indicates site disturbance may occur during the nesting bird season (February 1 through August 31). Avoidance and minimization measure BIO-MIT 3a specifies a qualified biologist shall conduct pre-construction nesting bird surveys no earlier than seven days of initiation of work and that a “nesting survey shall be performed by a qualified biologist and cover the entire property, since potential nesting raptors require buffers at a minimum of 300 feet.” CDFW has additional recommendations related to qualified biologist authority and bird and raptor behavior, as the MND allows undefined nest buffers and inadequate monitoring. This is not biologically protective and risks nest abandonment, reduced productivity, and unlawful “take” under California Fish & Game Code and the MBTA.

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Evidence that the impact would be significant: Bird and Raptor species are highly sensitive to human disturbance during courtship, incubation, and fledging. Repeated flushes and noise/activity near nests are linked to lower nesting success. Spatial and temporal buffers are necessary to prevent disturbance, and effective distances vary by species and site conditions, often exceeding a few hundred ft (Richardson and Miller 1997). CDFW emphasizes that most birds and all raptors are protected under state law (Fish & Game Code §§3503, 3503.5, 3513) and inadequate buffers that cause nest failure or harassment would constitute a significant impact and potential violation (CDFW 2019). Additional raptor research underscores that buffer-setting should account for species traits and local visibility/line-of-sight; conservative distances and seasonal restrictions reduce disturbance risk (White et al. 2022).

Recommendations: The County should revise the MND's mitigation to adopt species-specific, seasonally appropriate, and enforceable measures, including:

1. **Minimum no-disturbance buffers:** Passerine bird species should generally have a nesting buffer of 50-150 ft (species dependent), and general raptors should have a buffer of greater than or equal to 500 ft with direct line-of-sight, which may only be reduced with screening and qualified biologist approval (Richardson and Miller 1997). For species like Swainson's hawk (*Buteo swainsoni*), there should be at least a 0.5-mile buffer until fledging is confirmed by a qualified biologist (CDFW 2000). No work shall occur in the nesting buffer until the nest has fledged.
2. **Surveys & timing:** Conduct raptor surveys within at least 1,000 ft of disturbance footprint before any work during nesting season. If there is a lapse in Project activities of more than 5 days, perform new nesting bird surveys.
3. **Seasonal work windows:** Schedule tree removal and high-noise activities outside the nesting season where feasible; if not feasible, implement full buffers and monitoring (Richardson and Miller 1997).
4. **Regulatory coordination:** Consult with CDFW/USFWS when active nests are within the Project area and when a qualified biologist is proposing to reduce a nesting buffer.

COMMENT 3: Exterior Windows

Issue: The glass used for exterior building windows could result in bird collisions, which can cause bird injury and mortality.

Evidence the impact would be significant: Birds, typically, do not see clear or reflective glass, and can collide with glass (e.g., windows) that reflect surrounding landscape and/or habitat features (Klem and Saenger 2013). When birds collide with glass, they can be injured or killed. In the United States, the estimated annual bird mortality is between 365-988 million birds (Loss et al. 2014).

Recommendations to minimize significant impacts: CDFW recommends incorporating visual signals or cues to exterior windows to prevent bird collisions. Visual signals or cues include, but are not limited to, patterns to break up reflective areas, external window films and coverings, ultraviolet patterned glass, and screens. For best practices on how to reduce bird collisions with windows, please go to the USFWS's website for Buildings and Glass (<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/buildings-and-glass.php>).

COMMENT 4: Lake and Streambed Alteration Notification

Issue: The MND notes discusses proposed impacts to a "swale". From reviewing aerial imagery, United States Geological Survey (USGS) hydrological maps, and topographic maps, this "swale" appears to more likely be a tributary to nearby creeks and the adjacent

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Lexington Reservoir. CDFW requires an LSA Agreement when a project activity may substantially adversely affect fish and wildlife resources, including streams and riparian habitat. LSA Agreements provide actions to avoid and minimize adverse impacts and provide protections to California's fish and wildlife resources. It appears that CDFW does not currently have a record of LSA notification on file for this Project.

Recommendations: CDFW recommends the Applicant submit an LSA notification for the Project pursuant to Fish and Game Code section 1602 well in advance of Project construction. Additional information about the LSA notification process is described on CDFW's website at <https://wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to CNDDDB. The CNDDDB field survey form can be filled out and submitted online at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found at the following link: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed Emily Carlson, Environmental Scientist, at Emily.Carlson@wildlife.ca.gov; Jason Faridi, Senior Environmental Scientist (Supervisory), at Jason.Faridi@wildlife.ca.gov.

Sincerely,

DocuSigned by:

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Erin Chappell
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ec: Craig Weightman, CDFW Bay Delta Region - Craig.Weightman@wildlife.ca.gov
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