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STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

Bay Delta Region
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July 24, 2026

California Department of Transportation, District 4
Office of Environmental Analysis
ATTN: Christopher Pincetich
Post Office Box 23660 MS-8B
Oakland, CA 94623-0660
Christopher.Pincetich@dot.ca.gov

Subject: Sonoma State Route 12 Shoulder Widening (04-4Q830), Mitigated Negative Declaration, SCH No. 2026061179, Sonoma County

Dear Mr. Pincetich:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt a Mitigated Negative Declaration (MND) from the California Department of Transportation (Caltrans) for the Sonoma State Route 12 Shoulder Widening (04-4Q830) 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.

PROJECT DESCRIPTION SUMMARY

Proponent: Caltrans

Objective: The proposed Project plans to reduce cross-centerline collisions and enhance safety conditions by incorporating Project Activities such as widening shoulders and installing

[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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both centerline and edge-line rumble strips from PM 28.10 to PM 31.67. Additionally, the Project includes replacing two culverts at PM 28.23 and PM 28.34 and installing a drainage ditch in the westbound direction.

Location: The Project Area consists of the area surrounding State Route-12 (SR-12) in Sonoma County from post mile (PM) 28.10 in Glen Ellen to PM 31.67 near Kenwood.

Timeframe: Construction will require 160 working days and is anticipated to begin in February 2029. Daytime construction work and night work are anticipated. Working days are typically limited to Monday through Friday, but the contractor may also work on weekend days.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist Caltrans 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: Wildlife Connectivity Improvements, MND page 2-13

Issue: The MND states on page 2-13, d): "*No barriers to terrestrial wildlife connectivity would be constructed by the Project, and culverts that cross under the roadway and may be used by wildlife would not be impacted by the Project.*". However, the MND does not identify nor address existing wildlife connectivity issues for this stretch of SR-12 is identified as part of a priority barrier for terrestrial wildlife (Barrier ID: W026; Barrier Name: "SR-12 near Glen Ellen" segment (CDFW 2020; CDFW 2021; CDFW 2022,; CDFW 2026). After Assembly Bill (AB) 2344 passed in 2022, Caltrans plays a central role in the implementation to remediate existing wildlife connectivity priorities.

The MND identifies the purpose of the Project is to reduce head-on collisions and improve overall roadway safety conditions via the installation of rumble strips. Although rumble strips are an effective countermeasure for preventing lane-departure crashes, it remains uncertain whether some documented head-on collisions may be the result of drivers swerving to avoid wildlife on or near the roadway. This uncertainty highlights the need for further evaluation of wildlife-vehicle interactions in the Project area to better understand whether wildlife avoidance behavior contributes to head-on collision trends and to ensure that the selected safety improvements effectively address all potential contributing factors.

Supporting Evidence: "SR-12 near Glen Ellen" barrier segment is over 12 miles long and impacts movement of deer, mountain lion, and mesocarnivores. Ongoing surveys have been conducted since August 2025 to present have documented hundreds of roadkills, including 39 deer,1 mountain lion, as well as man coyote, fox, mink, otter, raccoon, skunk, opossum, snakes and frogs (personal conversations with CDFW wildlife connectivity staff, July 21, 2026). The proposed project may have the opportunity for connectivity enhancements by implementing movement studies, light-based warning systems designed for drivers, removal of unnecessary barriers across culverts (e.g. fencing, debris, sediment), appropriate culvert elevation placement (flush with ground and not perched), and road studies to develop well-designed undercrossings.

Recommended Mitigation Measure: To reduce potential impacts to wildlife to less-than-significant and comply with AB2344 and Senate Bills 1250 and 790, CDFW recommends early engagement with CDFW's Caltrans connectivity liaison to improve connectivity features and recommend including the measure below. In addition, CDFW created a team to assist Caltrans with the implementation of AB 2344, developed the Terrestrial Wildlife Connectivity Barriers Dataset, and provided technical advice regarding wildlife connectivity to Caltrans and advance connectivity science in California. CDFW's Region 3 Wildlife Connectivity staff remains interested and available to assist Caltrans to meet priority wildlife connectivity remediation needs for any project.

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Permanent Barrier Restriction to Support Wildlife Connectivity. The Permittee shall design and implement the Project to avoid and/or restrict the installation of permanent barriers to wildlife movement. Project design shall be consistent with CDFW Wildlife Connectivity Priority Barriers recommendations and Caltrans wildlife connectivity guidance, and in alignment with state policy direction under Assembly Bill 2344 and Senate Bills 1250 and 790, which emphasize integrating wildlife connectivity and collision reduction into transportation planning and infrastructure. The Project shall avoid continuous or impermeable features (e.g., solid fencing, walls, or roadway elements) within mapped or known movement corridors unless demonstrated to be necessary for public safety and only where wildlife permeability is maintained or improved (CDFW 2020; CDFW 2022; CDFW 2026).

Where barriers cannot be avoided, the Permittee shall incorporate wildlife-permeable design features, such as crossing structures, strategically placed openings (e.g. escape ramps), and exclusion fencing (e.g. median and roadside cement barriers) designed to guide wildlife to safe crossing locations rather than impede movement, consistent with Caltrans requirements to improve connectivity (per AB 2344). Project design shall develop in coordination with CDFW to ensure the Project does not create new or exacerbate existing movement barriers and supports long-term functional landscape connectivity. In addition, any nightwork occurring within a segment identified as a priority barrier for terrestrial wildlife should include additional measures to maintain habitat connectivity and support the movement of species and ecological processes across the landscape.

COMMENT #2: Light Impact Analysis, MND page 2-15

Issue: The MND states that night work will be limited wherever possible but does not provide an estimated amount planned. The Project is situated in an undeveloped section of SR-12, however the MND only proposes to mitigate night lighting (AM-BIO-5, Nighttime Restrictions/Lighting) by "*lighting will be directed towards the roadway to the greatest extent practicable to avoid exposing nocturnal wildlife and their habitats to excessive glare*". Artificial light pollution has the potential to significantly and adversely affect wildlife species and the habitat that supports them, alter predator-prey dynamics, and can serve as an impediment to wildlife movement and connectivity. Therefore AMM-BIO-5 does not adequately minimize the project specific light impacts during night work.

Supporting Evidence: Increased lighting on the landscape has reduced dark sky availability, resulting in impacts to bats and many other light-sensitive animals (Longcore et. al. 2016). Artificial light at night (ALAN) can interfere with natural light cues that wildlife rely on, leading to mis-timed behaviors such as feeding, growth, and breeding, as well as disrupting sleep patterns and internal biological clocks (DCCEEW 2023). Many species become disoriented or navigate poorly under artificial lighting, while others are drawn toward lights in ways that increase their exposure to predators or other threats, ultimately reducing their chances of survival and reproduction. These impacts extend across entire ecosystems, where excessive lighting can fragment habitats, hinder nocturnal pollinators, alter food and nutrient cycles, and even give invasive species an advantage by making prey more accessible (DCCEEW 2023).

Recommendations: The MND should acknowledge that unavoidable ALAN associated with night work may significantly affect multiple sensitive species known or expected in the Project vicinity.

Because ALAN impacts cannot be fully avoided, the MND should not only ensure "*lighting will be directed towards the roadway*", but also require Project-specific lighting minimization measures, including fully shielded, low-intensity, amber-spectrum fixtures limited to active work zones and managed with adaptive controls that reduce duration, brightness, and spread consistent with wildlife-sensitive lighting principles (DCCEEW 2023). Expanded nighttime buffers should be implemented around Project Activities, supported by nocturnal monitoring to identify wildlife behavioral changes and adjust lighting or work timing in real time.

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In addition to Project-level minimization, Caltrans should incorporate long-term ALAN reduction strategies into their Standards, including routine ALAN compliance audits, district-wide adoption of dark-sky-compatible lighting designs, and sustained monitoring programs to inform adaptive management across transportation corridors. Persistent residual impacts should trigger long-term compensatory measures such as enhancing dark refugia, improving wildlife corridor connectivity, and supporting conservation lighting in surrounding jurisdictions to offset chronic sensory disturbance.

Recommended Mitigation Measures:

Temporary and Permanent Artificial Light at Night Emission Restrictions: All (temporary and permanent) ALAN design should meet the recommendations of the lighting resources described in the Dark Sky Society Guidelines (2020) ((https://www.darkskysociety.org/handouts/LightingPlanGuidelines.pdf) and incorporate fully shielded (full-cutoff) or zero uplight as defined in Dark Sky Guidelines to ensure light is directed downward onto the roadway, preventing upward light pollution and reducing stray light and shall not be directed into natural areas outside of the road surface to prevent additional light pollution and disruption of nocturnal wildlife activity. All Project lighting should also use amber or orange, low-wavelength lights (typically 560nm–610nm), which are less visible to many animals and insects.

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 the California Natural Diversity Database (CNDDB). The CNDDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/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 Caltrans in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Karen Taylor, Senior Environmental Scientist (Specialist), at (707) 287-2144 or Karen.Taylor@wildlife.ca.gov; or Jason Faridi, Senior Environmental Scientist (Supervisory), at Jason.Faridi@wildlife.ca.gov.

Sincerely,

DocuSigned by:
Erin Chappell
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Erin Chappell
Regional Manager
Bay Delta Region

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ec: Office of Land Use and Climate Innovation, State Clearinghouse (SCH No. 2026061179)
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