

Mr. Matt Peters
Associate Planner
City of Temecula Planning Department
41000 Main Street Temecula, CA 92590

cc: Mayor Mike Naggar
Temecula City Council
Ambient Communities
California Department of Fish and Wildlife
US Fish and Wildlife Service
Western Riverside County Regional Conservation Authority

**Subject: Altair Development Specific Plan Draft Environmental Impact Report (“DEIR”)
SCH No. 2014111029**

Dear Mr. Peters,

On behalf of the Mountain Lion Foundation and the undersigned groups, we oppose the Altair development project on the basis of severe inadequacies with the DEIR and the unavoidable, irreversible damage to southern California's wildlife that would occur if the development moves forward.

Deny the development permit because of DEIR deficiencies.

The DEIR used an outdated model, unavailable to the public, to evaluate the impacts on wildlife habitat. This lack of transparency means we cannot verify the accuracy of Helix's model nor properly compare it to other models generated by wildlife researchers in the region.¹ Any proposed development project in Temecula should be utilizing data from mountain lions collared in the region by UC Davis Wildlife Health Center's Southern California Mountain Lion Project. Their peer-reviewed publications and models for habitat usage and gene flow were not incorporated into the DEIR.² To make matters worse, the DEIR anecdotally mentions some of the Mountain Lion Project's findings to imply lions will find a way across I-15 and through new housing tracts; this is inappropriate and shows an alarming disregard for modern wildlife conservation efforts.

Non-conformance with MSHCP is unacceptable.

Habitat connectivity cannot be viewed on such a small scale, and the vital link this region plays as a corridor for wildlife between the Santa Ana and Palomar Mountain ranges needs to be taken into account.³ The Altair project is the epitome of how smaller, seemingly-

innocuous impacts can generate very complicated and devastating results to the big picture for not only mountain lions, but all wildlife and the human population. Narrowing corridors and degrading habitat has far reaching impacts for the environment beyond the project borders and even beyond local communities.⁴ Steps must be taken to ensure that a breakdown of critical habitat connectivity does not occur.

The Altair housing development and Civic Site, combined with the separately planned housing tract on the eastern side of I-15 along the golf course, will collectively shut down this wildlife corridor for mountain lions. We will then see a complete isolation of the mountain lion population in the Santa Ana Mountains, which already suffers from one of the highest mortality rates and lowest genetic health of any lion population ever recorded in North America. Again, the DEIR should have worked with southern California's wildlife researchers to show broader impacts to dispersal and gene flow of wild animals in the region.⁵

The Civic Site plan omission could be devastating for wildlife.

The Civic Site needs to be fully planned before the project and CEQA process can move forward. News reports mention plans to possibly use this property for a hospital or university.⁶ Both of these facilities would see 24-hour activity, higher levels of noise and lights than a residential area, and severely impact the movements and reproductive ability of local wildlife.

Mountain lions and other wildlife may travel through urban areas at night, but can be deterred by lights and sound, thus making the Civic Site an exponentially larger blockage along the wildlife corridor. The proposed development is also within close enough proximity to the Golden Eagle Core Breeding Area and nesting sites of other important bird species that primary and secondary impacts on these species should have been considered in all environmental reviews.⁷

Until more information is available about the intended use of the Civic Site and a comprehensive impact evaluation is undertaken, the entire plan must not move forward. Omitting the Civic Site from the DEIR indicates even more ambiguity, secrecy, and violations of CEQA.

Eventual extirpation of mountain lions from the Santa Ana Mountains.

As mentioned above, decades of research have shown mountain lions in this region are suffering from habitat loss and limited connectivity. Even before the Altair proposal, lions

in the Santa Ana and Palomar Mountains were facing enormous challenges against their immediate survival and long term genetic health. The Altair proposal further threatens these populations by effectively removing their natural corridor, and replacing it with an urban community that is likely to kill lions through depredation permits, vehicle collisions, and fears for public safety.⁸

With its insufficient model, the DEIR lists linkages they claim to still be usable by mountain lions after the Altair project's completion. It also over-emphasizes lions' potential use of agricultural lands.⁹ Both of these claims contradict models created by the best available science. We believe this region cannot afford any narrowing or additional degrading of current usable corridors. If anything, developments along I-15 should be required to expand all wildlife crossings.

California spends millions of dollars annually to protect wildlife habitat, corridors, and restore lost linkages.¹⁰ The City of Temecula should not even consider the Altair development as this reverses conservation efforts in the region. We cannot rely on the proposed severely-constrained linkages and the possibility of building a new crossing further South. If anything, current crossings should be improved and new ones built, and proven effective, before moving forward with any new developments like Altair.

Placing a housing tract directly on a wildlife corridor not only restricts gene flow for mountain lions, but increases conflicts with people and domestic animals. Living on the urban edge means pets and small livestock are at risk from depredation by mountain lions, coyotes and bobcats.¹¹ Wild animals are often killed in retaliation for these losses by people unaccustomed to and intolerant of sharing the land with large wildlife. These losses can lead to increased fear for personal safety, and ultimately more mountain lions killed by people.






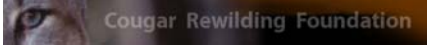



Data from the Southern California Mountain Lion Project shows lions are frequently killed near Temecula for preying on domestic animals. Poisoning from chemicals used on agricultural lands and household rodenticides are also becoming more common.¹² To make matters worse, this region is also a hotspot for roadkill. Collisions on roadways have become so extreme that some areas have mandated new fencing along freeways to funnel wildlife to safe crossing points.¹³ These are multi-million dollar construction efforts and should not be excluded from the Altair proposal.

The Altair development, and resulting increased human activity, will create a barrier for wildlife who desperately need this corridor of habitat. Negative human-wildlife

interactions will increase. And ultimately, we will see the isolated population of Santa Ana mountain lions die off from human impacts and genetic decline. But you can choose a different future.

We encourage you to deny the Altair proposal on the basis of its flawed DEIR and unacceptable negative consequences to our wildlife. We will stand behind you as you set an example, preserving our remaining open spaces for future generations to enjoy.

Sincerely,

 <p>Amy Rodrigues Biologist Mountain Lion Foundation</p>	 <p>THE HUMANE SOCIETY OF THE UNITED STATES</p> <p>Courtney Fern California State Director The Humane Society of the United States</p>	 <p>THE COUGAR FUND <i>Protecting America's Greatest Cat</i></p> <p>Penelope Maldonado Executive Director The Cougar Fund</p>
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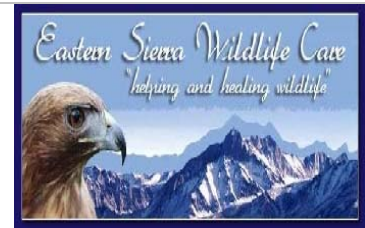
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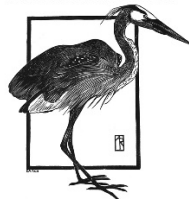


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Mary H. Clarke Oceanside resident	Veronica Yovovich Researcher UC Santa Cruz	

¹ See comment letter submitted by T. Winston Vickers, UC Davis Karen C. Drayer Wildlife Heath Center, Southern California Mountain Lion Project.

² Zeller KA, et al. (2015) Using step and path selection functions for estimating resistance to movement: pumas as a case study. *Landscape Ecology* (Nov 2015): 1-17. doi:10.1007/s10980-015-0301-6

³ Vickers TW, et al. (2015) Survival and Mortality of Pumas (*Puma concolor*) in a Fragmented, Urbanizing Landscape. *PLoS ONE* 10(7): e0131490. doi:10.1371/journal.pone.0131490

⁴ McGarigal K, et al. (2016) Multi-scale habitat selection modeling: a review and outlook. *Landscape Ecology* (Apr 2016): 1-15. doi:10.1007/s10980-016-0374-x

⁵ Ernest HB, et al. (2014) Fractured Genetic Connectivity Threatens a Southern California Puma (*Puma concolor*) Population. *PLoS ONE* 9(10): e107985. doi:10.1371/journal.pone.0107985

⁶ Claverie A (2014) TEMECULA: Review of 270-acre housing project wrapping next year. *The Press Enterprise*: Sept 22. Accessed June 17, 2016. <http://www.pe.com/articles/development-750398-review-city.html>

⁷ See comment letter submitted by Dave Bittner, Wildlife Research Institute.

⁸ James E (2014) Mountain lion deaths spike in Southern California. *The Orange County Register*: Apr 7. Accessed June 17, 2016. <http://www.ocregister.com/articles/mountain-608556-lions-lion.html>

⁹ Zeller KA, et al. (2014) Sensitivity of landscape resistance estimates based on point selection functions to scale and behavioral state: pumas as a case study. *Landscape Ecology* (Mar 2014): 541-557. doi:10.1007/s10980-014-9991-4

¹⁰ California Wildlife Protect Act of 1990 (Proposition 117) allocates \$30,000,000 per year for 30 years (through 2020) to acquire, enhance, or restore specific types of lands for wildlife and open space.

¹¹ Smith JA, Wang Y, Wilmers CC (2016) Spatial characteristics of residential development shift large carnivore prey habits. *The Journal of Wildlife Management* (Jun 2016). doi:10.1002/jwmg.21098

¹² Riley SPD, et al. (2007) Anticoagulant Exposure and Notoedric Mange in Bobcats and Mountain Lions in Urban Southern California. *The Journal of Wildlife Management* (Aug 2007): 1874-1884. doi: 10.2193/2005-615

¹³ Brennan P (2013) Fences would protect wildlife along toll road. *The Orange County Register*: Dec 9. Accessed June 17, 2016. <http://www.ocregister.com/articles/mountain-540797-road-lions.html>