



# MOUNTAIN LION FOUNDATION

## *Saving America's Lion*

November 14, 2017

#### Executive Director

Lynn Cullens

#### Board of Directors

Toby Cooper  
*Chair*

Elizabeth Sullivan  
*Vice Chair*

Ann Hamilton  
*Treasurer*

Donald Molde, M.D.  
*Secretary*

Steve Harris  
Rabbi Joseph Hurwitz  
Bob McCoy  
Jonathan Naimon  
John Taft  
Chris Tromborg, Ph.D.

#### Honorary Board

Robert Bateman  
Doris Day  
Sir William Fries II  
Mr. & Mrs. Gordon P. Getty  
Marian Heiskell  
Sandy Lerner  
Barry Lopez  
Hon. William Newsom  
Alan Rabinowitz  
Robert Redford  
Nathaniel P. Reed  
Dr. George Schaller  
Robert Wagner

**30**  
YEARS OF  
Saving America's Lion  
**1986 ~ 2016**

Post Office Box 1896  
Sacramento CA 95812  
[www.mountainlion.org](http://www.mountainlion.org)  
[info@mountainlion.org](mailto:info@mountainlion.org)  
(916) 442-2666

GIVE TO AMERICA'S  
LIONS ON THE WEB:  
[mountainlion.org/give](http://mountainlion.org/give)

John H. Telesio, Chair  
Planning Commission  
City of Temecula  
41000 Main Street  
Temecula CA 92590

In care of: [denise.jacobo@temeculaca.gov](mailto:denise.jacobo@temeculaca.gov)

RE: Planning Commission Agenda Item 2, November 15, 2017,  
Altair Project (GPA, Specific Plan, EIR, Development Agreement)  
Opposition Unless Modified

Dear Chairperson Telesio and Members of the Commission,

The Mountain Lion Foundation is grateful for this opportunity to comment on the proposed Altair development as outlined in the Environmental Impact Report and other documents listed above.

We are in strong agreement with the California Department of Fish and Wildlife, the Western Riverside County Regional Conservation Authority (RCA), and the U.S. Fish and Wildlife Service, all of whom have carefully delineated the Altair project's many and significant inconsistencies with the Multi-Species Habitat Conservation Plan (MSHCP).

The Altair project proposes development in an area allocated by the MSHCP for conservation, rendering this development inconsistent with the MSHCP Reserve Assembly Criteria. The location and extent of the proposed development would significantly constrict both Proposed Linkage 10 and Proposed Constrained Linkage 14.

The areas affected are critical movement corridors that connect the highly threatened mountain lion population in the Santa Ana Mountains with important sources of young dispersing lions from the mountain ranges of San Diego County. Reducing this critical corridor would further isolate mountain lions living in the Santa Ana Mountains and could lead to local extinction. Mountain lions are important contributors to the ecosystems in which they live, and negative impacts dealt to the mountain lion population would affect the local environment to its detriment.

These corridors are critical to other species as well, and developing into the corridors would have wide ranging negative impacts to the MSHCP Conservation Area.

In the Joint Project Review findings, the RCA states that the development of the Altair South Parcel in MSHCP Cells 7355 and 7356 "will significantly reduce the viability of the MSHCP Linkage 10 as movement and live-in habitat for mountain lions." Moving forward on the Altair Project would greatly reduce the mountain lion habitat corridor remaining after development of the South Parcel "where nearly all mountain lion activities (i.e., breeding, hunting, transit) would be affected, which is in direct conflict with what the MSHCP intended for this Linkage" (Section 6.2 Helix MSHCP Consistency Report).

To be specific, the proposed development would narrow the width of Linkage 10 from the MSHCP-planned range between 1,200 to 2,700 feet to less than 500 feet at its narrowest point (RCA 2015).

As the design stands, narrowing the existing linkages will direct mountain lions into residential areas where there is potential for greater conflict between mountain lions, pets, and humans. Such conflicts – and even our perceptions of conflicts – are one of the leading threats to mountain lions in California. Funneling mountain lions into areas that will be densely populated by people exacerbates many of the problems that the MSHCP was designed to resolve.

We are also strongly opposed to the idea – suggested repeatedly by the developer - that the loss of these corridors can be effectively mitigated by study, restoration, or construction of corridors that are miles away. The opportunities for safe passage across Southern California freeways and between developments have become so few that each must stand and be defended on its own merits and not merely as alternatives. The expected \$60 million cost of creating a new crossing at Liberty Canyon in the Santa Monica Mountains illustrates the folly of closing existing pathways with the expectation that taxpayers will foot the conservation bill for recreating a corridor once the developers have walked away and the related habitat loss is complete.

Finally, we regard the various development proposals surrounding the 55-acre South Parcel as distractions from the deep flaws represented by Altair's proposed incursion into all of the areas set aside by the MSHCP but remaining within the project's footprint. It should not be possible to negotiate away the acreage shortfall of 140-160 acres, or mitigate corridor loss, by further construction on this parcel which is essential for wildlife.

By designating the parcel for civic use, an expectation has been created that human activity on the site is required in order for the parcel to serve a purpose. Nothing could be further from the truth. CEQA established the belief of Californians, and the MSHCP records the City's agreement, that preservation of open space and wildlife habitat are vital to the well-being of citizens.

We write in support of preserving the aforementioned parcel as natural open space without modification other than wildlife friendly fencing and other exclusionary measures to prevent human entry into the corridor, and habitat restoration and removal of existing infrastructure. Conserving this 55-acre parcel would benefit the human and wild communities in many ways, including:

- Increasing consistency between the MSHCP Cell Criteria and Permittee Responsibilities;
- Increasing mountain lion and other wildlife habitat connectivity through Proposed Linkage 10;
- Maintaining wildlife access and use of the I-15 underpass, thereby protecting wildlife and humans from dangerous roadway collisions;
- Reducing the potential for human-wildlife conflict; and
- Preserving and reducing encroachment on vital wildlife habitat on the South Parcel.

Preserving the 55-acre South Parcel in a natural state would reduce some of the overall impacts of the entire Altair development. We urge such conservation of the site without modification other than wildlife-friendly fencing and other exclusionary measures to prevent human entry into the corridor, habitat restoration, and removal of existing infrastructure

Resolution of all of the issues outlined above will be required in order to proceed with a development

that meets the needs and demands of Californians for environmental quality, and thus we urge that the Temecula Planning Commission defer action and withhold approval of the Final Environmental Impact Report until substantial refinements have been made in order to adequately disclose the real environmental impacts of the proposed project, effectively mitigate these impacts, and achieve MSHCP consistency.

Thank you for your consideration.

Sincerely,

Sincerely,



Lynn Cullens

EXECUTIVE DIRECTOR

(916) 606-1610

[LCullens@MountainLion.org](mailto:LCullens@MountainLion.org)

POST OFFICE BOX 1896  
SACRAMENTO CA 95812

#### REFERENCE MATERIALS

Ernest, Holly B., T. Winston Vickers, Scott A. Morrison, Michael R. Buchalski, and Walter M. Boyce. "Fractured genetic connectivity threatens a southern California puma (*Puma concolor*) population." *PloS one* 9, no. 10 (2014): e107985.

Riley, Seth PD, Laurel EK Serieys, John P. Pollinger, Jeffrey A. Sikich, Lisa Dalbeck, Robert K. Wayne, and Holly B. Ernest. "Individual behaviors dominate the dynamics of an urban mountain lion population isolated by roads." *Current Biology* 24, no. 17 (2014): 1989-1994

Vickers, T.W., Sanchez, J.N., Johnson, C.K., Morrison, S.A., Botta, R., Smith, T., Cohen, B.S., Huber, P.R., Ernest, H.B. and Boyce, W.M., 2015. Survival and mortality of pumas (*Puma concolor*) in a fragmented, urbanizing landscape. *PloS one*, 10(7), p.e0131490.