

## Slovick, Mark

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**From:** Rich Rudolf <richrudolf@sbcglobal.net>  
**Sent:** Wednesday, July 16, 2014 10:55 AM  
**To:** Slovic, Mark  
**Cc:** Jon Vick; Dottie Christensen; Anita Noone; Marian&Marcus Klein; Victoria Bausone; Fred Wollman; Lori Lee Jacobs; Minette Ozaki; Larry Gartner  
**Subject:** VCTA Comments on Lilac Hills Ranch Revised Draft EIR

The Valley Center Trails Association (VCTA) hereby submits Comments on the county's Revised Draft EIR on the Lilac Hills Ranch (Accretive) Project.

Do the "new" trails added since the last circulation of the DEIR meet the CTMP standards? If not who or what body has the authority to waive meeting those requirements? Have they been waived? Is that waiver a Significant impact?

This also constitutes a request for response to all the issues, questions and comments in our previously submitted Comments (Attached) which have not been responded to by the Revised DEIR.

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To: Mark Slovic  
From: VCTA  
Date: August 19, 2013  
Via Email

Re: Accretive DEIR Comments on Trails

The Valley Center Trails Association submits the following Comments on the Accretive DEIR, in addition to all the VCCPG Comments separately submitted.

It is difficult to make comments on this Project and its Draft EIR, because it makes up new terms, or misuses well-defined terms in the county's General Plan, Valley Center Community Plan, and the Community Trails Master Plan. There appears to be a very conscious attempt to mislead the staff, public, and potential purchasers of homes in this Project.

The Specific Plan and DEIR suggest that the project includes a functional public trail system, but most of the trails proposed are private. If approved, the amenities the project will provide will certainly bring in local residents from outside the project. The public park and school would bring in Valley Center and Bonsall residents from outside the development, who should also have access to a public trail system. A private trails system is not consistent with community character, and the Valley Center Community Plan and CTMP provisions for an interconnecting public trails system.

The "Trails Plan" shown in SP Figure 20 does not provide the Staging Area shown on the VC portion of the CTMP along West Lilac Road, between Shirey and Birdsong Lanes, near Lancaster Creek Road (north of the Project). (The trail alignments and Staging Areas depicted on the adopted CTMP are proposed general corridors

and sites, and do not represent exact locations.) This Project could and should be, but is not, home to that proposed Staging Area.

Construction of that Planned-For Staging Area as part of this Project would make the required “pathway” along West Lilac Road actually usable by the general public (as well as potential Project residents) as part of the system. It would complement the Project, and facilitate future expansion of the trails system onto Lancaster Creek Road. Like so many necessary infrastructure pieces this Project neglects, or provides minimum compliance with, trails without a Staging Area for cars for hikers and bikers, and equestrian rigs, are not useful or sustainable.

Normally, projects of this size provide a comprehensive public trail system that connects both neighborhoods within and outside the project, as well as other existing and proposed public facilities and trails. The trail alignments depicted on Figure 20 are mostly private, restricted from or otherwise unusable by equestrians, and lack the CTMP-required 15-foot easements.

Where they are CTMP-defined Pathways, in Valley Center the CTMP requires fencing or barriers between the traveled portions of the road (Goal SG 4 and Policy SP 1). Pathways typically have a tread width of 10-feet (8-feet may be acceptable). “Ranch Multi-Use Trails” (apparently intended to be dedicated to the County) appear to be only a 10 to 12-foot easement, instead of the required 15 feet. Worse yet, they are proposed to have only a 3-foot tread! Although this is expressed as “minimum,” consistent with Accretive’s approach, one can be assured any tread larger than 3 feet will be a rarity. This is NOT consistent with the CTMP, but again not discussed or analyzed in the DEIR.

New road construction requires “Type D Special” constructed on one side of the road. (The non-pathway side right-of-way may be reduced to accommodate the minimum 15 feet of pathway right-of-way required.) Neither the SP or DEIR text, nor Figure 20 show these requirements, and thus are NOT in compliance with the G VCCP, or CTMP. Nor does the DEIR discuss or analyze the environmental impacts of the failures.

The “Trails Plan” shows mostly cul de sacs for users of the “Public” trail system, including no way out of the Project to the South. Until Phases 4 and 5, it will be severely truncated and difficult to access for any non-resident of the Project. Even then, it does not provide for a connection out of the Project, as required by the CTMP (assuming Accretive has a legal right to use Mountain Ridge Road, which is apparently highly doubtful).

Although Trail easements adjacent to private roads can be only 10-12 feet, there appears to be no reason (other than Developer skimping on its costs) to create a different, confusing name for a lesser trail component. Similarly, tread width for a county-dedicated Trail Easement along a private road can vary between 3 to 8 feet, but that variance depends on location, grade and topography. Instead, Accretive has made 3 feet their “Standard,” regardless of location, grade and topography.

Finally, the SP and DEIR state that the only financial support for construction and maintenance of ALL the trails and pathways is the HOA. As with Parks, this is a dubious financing mechanism, since the statewide HOA track record for refusal or failure to adequately provide for such infrastructure makes their existence very risky.

The VCTA hopes and expects that the county will require Accretive to be in complete compliance with the GP, VCCP, and the CTMP. The DEIR must be corrected and re-circulated to meet CEQA's disclosure requirements.

Respectfully submitted,

Rich Rudolf

Chairperson

Cc: Valley Center Community Planning Group

Valley Center Vaqueros, Inc.