

LETTER

RESPONSE

Letter C4

From: Rich Rudolf [<mailto:richrudolf@sbcglobal.net>]
Sent: Wednesday, July 16, 2014 10:55 AM
To: Slovick, 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.

Rich Rudolf
 VCTA Chairperson
richrudolf@sbcglobal.net
 760-749-0662
www.vctrails.org

} C4-1
 } C4-2

C4-1 No new trails have been added to the project; however, Figure 20 of the Specific Plan, "Trails Plan & Biological Open Space Signage" and the discussion of the trails in the Specific Plan text has been revised in regards to the County Master Trail segments crossing the project. The first change is in regards to the CMT segment which is located along West Lilac Road and which is proposed along the project (south) side of West Lilac Road forming the project's northern boundary. There is one small segment that will be realigned south of the West Lilac Road right-of-way due to steep topography. This segment can no longer be defined as "Type D" trail because it is no longer in the road right-of-way for West Lilac Road. For this reason, it has been reclassified as a Ranch Multi-Use trail. The other Master Trail segment to cross the project is located in the southern portion of the project within an existing Valley Center Municipal Water District (VCMWD) water line easement. In this case the project proposes to build the trail segment within the project which will allow future trail development to the east and west to traverse the community. This trail also cannot be classified as a Type D trail because it is not in a road-right-of-way. As above this trail segment is classified as a Ranch Multi-Use trail. Both CTMP trails will be built in accordance with the applicable CTMP development standards.

No trail waivers requested.

C4-2 See attached responses:



Letter C4
Attachment1

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.

C4-3

C4-3 Comment noted. The comment does not provide any explanation, information, specific examples, or other support for the comment.

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.

C4-4

C4-4 The Specific Plan states that the proposed trails system will consist of public trails segments (as shown on the Community Master trails Plan, Figure 1-8, REIR, pp. 1-101) and private trails. The private trails which will be owned and maintained by the Community HOA are, with one exception, open and available to the public. (e.g., Specific Plan, p. II-1, pp. II-24 to II-25) The only trails which will not be open to the public are the trails within the gated Senior neighborhood.

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.

C4-5

C4-5 The West Lilac Staging Area depicted in the CTMP is conceptual. The staging area was relocated to the interior of project (see Specific Plan Figures 60 and 61). This facility is located on a 0.6-acre lot which provides public access to a central location for access to the public trail system leading to the pathway that is being provided along West Lilac Road. The Trailhead facility includes a number of off-street parking spaces and immediate access to the community trail system. On-street parking is also located throughout the community and will accommodate visitors to the area who wish to access the trail network.

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.

PO Box 605; Valley Center, CA 92082; contactus@vctrails.org; www.vctrails.org

A 501(c)(3) tax-exempt organization dedicated to the creation of non-motorized trails and pathways for walking, biking and equestrian use in Valley Center.

Please see response to comment above.

LETTER

RESPONSE

<p>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.</p> <p>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 GP, VCCP, or CTMP. Nor does the DEIR discuss or analyze the environmental impacts of the failures.</p> <p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Respectfully submitted,</p> <p>Rich Rudolf Chairperson</p> <p>Cc: Valley Center Community Planning Group Valley Center Vaqueros, Inc.</p> <p>PO Box 605; Valley Center, CA 92082; contactus@vctrails.org; www.vctrails.org</p> <p>A 501(c)(3) tax-exempt organization dedicated to the creation of non-motorized trails and pathways for walking, biking and equestrian use in Valley Center.</p>	<p>C4-6 In response to this comment, Figure 20 in the Specific Plan and Figure 1-8 in the FEIR have been revised to show the two Community Trails Master Plan trails that are located on the project. One is located along West Lilac Road and is proposed along the project (south) side of West Lilac Road which forms the project's northern boundary. There is one small segment that will be realigned south of the West Lilac Road right-of-way, due to steep topography. The second crosses the southern portion of the property where the Community Master Trails Plan (CMTP) has located the trail within an existing Valley Center Municipal Water District (VCMWD) water line easement. In this case, the project proposes to build the trail within the project which will allow future trail development to the east and west to traverse the community. Both CTMP trails will be built as approved by the County.</p> <p>The Valley Center Community Road Standards (VCRDS) includes a section discussing the Type D pathways (page 27) and also includes a graphic (Figure 8). In regards to the comments above the VCRDS state:</p> <ol style="list-style-type: none"> 1. Figure 8 includes a note (7) that fencing between the pathway and travel lane is optional. 2. Figure 8 also shows the pathway (trail) width as 8 feet and page 27 states that Type D pathways shall be at least 8 feet wide. <p>Ranch Multi-Use Trails are not CTMP trails and will be built to the standards shown in the Specific Plan. These trails are owned and maintained by the HOA but open to the public. The impact of trails is fully analyzed in EIR Subsections 2.5 and 2.6.</p> <p>C4-7 The CTMP trails are shown on Specific Plan Figure 20. The cross section for the on-site CTMP trails is shown in Figure 21 and in Figure 28 in the Specific Plan. The West Lilac Road pathway will meet special Type D requirements and includes a 15-foot easement with an 8-foot treadway. The EIR analyzes the physical impacts of the trail system footprint and use throughout the EIR. For example, refer to FEIR, Chapter 2.0 (Traffic/Transportation) and Chapter 3.0 (Biological Resources).</p>
---	--

LETTER

RESPONSE

	<p>C4-8 The Community Trail Plan (Specific Plan Figure 20) creates a trail network with over 16 miles of trails open to the public designed to serve the community and surrounding area residents. As shown, the trail exits at the southern portion of the project site onto Mountain Ridge Road, which would continue within the improved off-site portion of Mountain Ridge Road south to Circle R Drive. The comment is correct that the trails system will be built in phases with the West Lilac Road trail and an internal loop be constructed with Phase 1. The trails will be constructed to meet the appropriate trail grade requirements shown on Table DCG-1 “Community Trails Master Plan Design Guidelines Matrix.” Non-residents can access the trail network from West Lilac Road and Covey Lane until the CTMP trail in Phase 4 is constructed.</p> <p>C4-9 The project will construct and dedicate the two public trail segments shown on the CTMP as required. The Community trails system proposed by the applicant connects the two east-west CMTMP segments with a Community trails system, privately owned and maintained, but available to the public. The project proposed Ranch Multi-Use Trail would provide necessary links to the Regional Trails identified in the CTMP. As stated in the Specific Plan, tread width on trails will vary from 3 to 8 feet (3 feet is not a standard).</p> <p>C4-10 The Lilac Hills Ranch HOA will be established and responsible for the maintenance of all trails. This arrangement has been successfully implemented and used in other communities such as San Elijo Hills, which has an 18-mile trail system that is responsibly maintained by the HOA.</p> <p>C4-11 The comment expresses the opinions of the commentator only. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required. Since this letter, the FEIR has been recirculated for public comment. With regards to concerns about the General Plan, please refer to Appendix W for a thorough discussion of this topic, including consistency with the Valley Center Community Plan and county trail-related policies.</p>
--	--