



MEMORANDUM

Date: January 5, 2015

To: The Honorable Ally Miller, Member
Pima County Board of Supervisors

From: C.H. Huckelberry
County Administrator

A handwritten signature in black ink, appearing to read "CHH", is written over the printed name "C.H. Huckelberry".

Re: **Request for Information Regarding Star Valley Trail Maintenance and Construction of Roadway Improvements**

The attached information responds to your request for information regarding trail maintenance and roadway improvements related to Star Valley. Included is a July 15, 2014 letter from the Development Services Director to Ms. Tanis Duncan at Platinum Management outlining the County's position regarding trail maintenance. This letter contains Mr. Joseph Cesare's May 6, 2009 acceptance of the terms outlined in the letter, including that the County would not accept the trails for maintenance.

Also attached is a February 7, 2014 memorandum to you from the Development Services Director providing information regarding the County's position on roadway construction obligations. Included with this memorandum, as Attachment 6, is correspondence that defines the developer's obligations for roadway improvements to satisfy the conditions of the Specific Plan, including which improvements were eligible for impact fee credits.

CHH/mjk

Attachments

c: The Honorable Chair and Members, Pima County Board of Supervisors
John Bernal, Deputy County Administrator for Public Works
Carmine DeBonis, Jr., Director, Development Services



July 15, 2014

Ms. Tanis Duncan
Platinum Management
P.O. Box 14198
Tucson, Arizona 85732

Re: Response to Your Letter Dated July 2, 2014

Dear Ms. Duncan,

Carla Blackwell's April 9, 2014 letter addressed to your client, Platinum Management, and to the Cesares in their capacity as HOA officers as well as the master developers of Star Valley, addressed various issues that were raised by Star Valley residents. Included in that letter were approximately 130 pages of documentation regarding the trails and other matters. The development issues raised in the April 9th letter are not relevant to you in your current capacity, especially since these have been extensively addressed in previous communications to the Cesares, their partners in the ownership and their separate legal counsel. Please contact them if you would like the documents related to the traffic impact study, improvement obligations, assurance agreements and rezoning conditions. This letter only addresses the issues that are germane to the HOA, which is primarily the trail system.

Pima County regulates land subdivisions, road design, drainage systems, recreation provisions and other development attributes. We do so through the adoption of regulations which protect consumers and assure that the required improvements are installed for the benefit of the home buying public. In the case of Star Valley, Pima County Development Services is the administrator of the Star Valley Specific Plan. The Specific Plan Administration Chapter (Page 123), Section B., states "*The Star Valley Specific Plan shall be administered and enforced by Pima County with the Planning and Development Services Department being the coordinator.*" Since the master planned community is only partially completed, we are charged with enforcement of the provisions of the plan. It is within this capacity that Pima County Development Services Department and its employees act.

As you are aware, we have been apprised from residents about the conditions of the trails. Your letter of July 2, 2014 misrepresents Pima County's position on the trail system. Pima County has been very clear that the trails are not to be maintained by Pima County. In fact, rezoning condition 12.E. of the approved specific plan states that trails within the 100-year floodplain will not be maintained by Pima County. The Specific Plan is clear on Pima County's intentions only to assume maintenance of the two park properties. Mr. Cesare signed a document in 2009 acknowledging the County would not maintain the trails (attached). Therefore, it is incumbent upon Mr. Cesare to solve the maintenance issue with you and the homeowners. Regarding the issue of access for maintenance, attached is a copy of the Flood Control Maintenance Agreement dated December 7, 2004 that runs with the land in perpetuity that grants both

Ms. Tanis Duncan

Re: Response to Your Letter Dated July 2, 2014

July 15, 2014

Page 2

parties (or their assigns) rights to enter the subject property (drainage basins) for maintenance and repair purposes, so there are no issues with the HOA accessing the trails to perform maintenance.

The Specific Plan is very clear regarding construction of the trail system. The Specific Plan states on Page 9, "The major environmental constraint affecting the site is the widespread shallow sheet flooding. In order to address this, a comprehensive system composed of three drainage corridors which will serve as open space areas and linear recreation facilities. Within these multi-use drainage and recreation corridors will be drainage channels to convey surface water across the site, pedestrian and bicycle trails which will provide linkages between residential areas and elementary schools/parks." The developer proposed this in the plan not, as you erroneously reported, that Pima County requested these trails after Plan approval or that the developer voluntarily offered the trails.

In fact, the 5.6 miles of trail was integral to the Specific Plan (Page 85, Exhibit 25, Recreation Concept Plan). This is why rezoning condition 12.E was added by Pima County indicating that the County would not maintain them. This trail system was the cornerstone of the recreation concept plan for Star Valley Specific Plan and there are no less than 8 references to the required trail system within the Specific Plan (Page 64, Exhibit 17; Page 67, Recreation/Schools; Page 73, Exhibit 19; Page 80, Exhibit 21; Page 84 and Exhibit 25, Page 84 - 86, Recreation Concept Plan; Page 85, Exhibit 25; Page 88, Vegetation). Likewise, and in addition to rezoning condition 12.E, Page 70 – 71, Drainage Concept Plan, and Page 120, Parks and Recreation Facilities, delineate the dedication of public drainageways to the County and the County's maintenance responsibilities for the public park site, neither of which include reference to the County accepting maintenance of the trail system.

Your representation that the County approved plans for construction of these required trails is incorrect. The Drainage Improvement Plans for Star Valley Blocks 1 through 32, P1200-184 were approved in January 2003. The drainage channel details (Page 32 and 33) only depict the location of the multi-use bike and pedestrian path relative to the drainage channel. The approved plans do not contain any paving or construction details for the path, and detail "T" for the typical bank channel treatment explicitly states "VARIES 10' – 15' MULTI-USE BIKE AND PEDESTRIAN EARTHEN PATH". General Grading Note #5 on Page 1 states, "THIS PLAN IS TO BE USED FOR GRADING CONSTRUCTION ONLY. CONTRACTOR SHALL USE OTHER SPECIFIC IMPROVEMENT PLANS FOR IMPROVEMENTS OTHER THAN GRADING."

The drainage plan was subsequently revised and the Drainage Improvement Plans for Star Valley Blocks 1 through 30, P1200-184 were approved in January 2003. Each of the just referenced notes and details remained on the revised set of plans. Revision #3 on the plan did make reference to an asphalt path, however the plan view detail on Page 33A specifically states "FUTURE PATH SURFACING BY OTHERS", and no additional pavement construction details were included, further emphasizing that construction of a paved path was not included in the approved drainage plans. Likewise, no design criteria for the bike paths and pedestrian ways were approved by the Pima County Department of Transportation and Flood Control District as required by rezoning condition 11.C of the approved Specific Plan.

Ms. Tanis Duncan

Re: Response to Your Letter Dated July 2, 2014

July 15, 2014

Page 3

This absence of approved plans for construction of the paved trails is in no way negated by installation of an irrigation system which was necessitated primarily to supply irrigation for re-vegetation of the drainage basins which was critical to control erosion and stabilize the drainage basins.

I trust the above clarifies Pima County Development Services' position regarding the trails. Please note that the information provided is in response to your July 2, 2014 letter and should not be construed as an exhaustive accounting of our position or a formal interpretation of the Specific Plan provisions relative to the trails. Should you be interested in a formal interpretation of the trail requirements of the Star Valley Specific Plan, please submit your request in writing along with the exact applicable provisions of the Specific Plan that you wish to have interpreted.

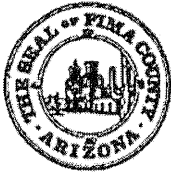
Sincerely,

A handwritten signature in black ink, appearing to read 'Carmine DeBonis Jr.', with a long horizontal flourish extending to the right.

Carmine DeBonis Jr.

Development Services Director

c: C. H. Huckelberry, County Administrator
John M. Bernal, Deputy County Administrator
Chris Cawein, Natural Resources Parks and Recreation Director
Suzanne Shields, Regional Flood Control District Director
Carla Blackwell, Deputy Development Services Director
Arlan Colton, Planning Official
Lesley Lukach, Deputy County Attorney



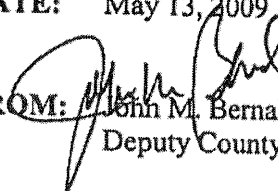
MEMORANDUM

Public Works Administration



DATE: May 13, 2009

TO: Suzanne Shields, Department Director
Regional Flood Control District

FROM:  John M. Bernal
Deputy County Administrator

Rafael Payan, Department Director
Natural Resources, Parks and Recreation

RE: Star Valley Accepted Improvements

Attached is a signed copy of my May 1, 2009 letter to Star Valley acknowledging our acceptance of certain drainage improvements associated with the Star Valley development project. As noted in this letter, Pima County, as of May 7, 2009 (date of the transmittal letter also attached) assumes maintenance responsibility for certain constructed drainage improvements as identified in the nine aerial photographs attached to the May 1, 2009 letter.

As further noted in this May 1st letter, Pima County is specifically not accepting responsibility for, or maintenance of, trails built within those drainage channels. Further clarification of the location of the excluded trails, described as Basin, Ridge, and Soil-surfaced trails, is provided in the attached aerial photograph prepared by the Natural Resources, Parks, and Recreation Department.

Until such time as the issues related to trail acceptance are resolved, the Natural Resources, Parks, and Recreation Department is specifically prohibited from expending public funds for the operation and maintenance of these trails.

JMB:jgs

Attachments

Cc: C.H. Huckelberry, County Administrator



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, TUCSON, AZ 85701-1317
(520) 740-8661 FAX (520) 740-8171

C. H. HUCKELBERRY
County Administrator

May 1, 2009

Mr. Joseph R. Cesare, President C/O USH/SVA Star Valley, LLC
Broadway Realty & Trust, Inc.
P.O. Box 12863
Tucson, Arizona 85732

Re: Star Valley

Dear Mr. Cesare:

I am writing to inform you that we are accepting the drainage improvements outlined on the attached aerial photographs, which lie within the drainage ways in the Star Valley development that were previously dedicated to Pima County on the Plat recorded in Book 56 of Maps and Plats at Page 55. These areas, which are within the "primary flow regime" as illustrated on Exhibit E to the 2004 Flood Control Maintenance Agreement between Pima County and USH/SVA Star Valley L.L.C., will hereafter be maintained by the Pima County Flood Control District, subject to Star Valley's responsibility for erosion maintenance related to the undeveloped property within the Star Valley master development pursuant to Article 11 of the 2004 agreement.

The trails that have been built within the drainage channels, whether within the primary or secondary flow regime, are specifically excluded from this acceptance of the above-described drainage improvements, and the County shall not by this acceptance of the drainage improvements be deemed to have in any way accepted maintenance of or responsibility for those trails.

Please indicate your acceptance of these terms and conditions by signing the enclosed copy of this letter where indicated and returning it to me. Thank you.

Sincerely,

John M. Bernal

Deputy County Administrator for Public Works

Attachment

Cc: Honorable Sharon Bronson, District 3 Supervisor
Honorable Ramón Valadez, District 2 Supervisor
C.H. Huckelberry, County Administrator
Rafael Payan, NRPR Department Director
Suzanne Shields, RFCD Department Director
Keri Sylvan, Esq., Lewis & Roca LLP
Regina L. Nassen, Deputy County Attorney

I accept the terms and conditions in this letter.

USH/SVA Star Valley, LLC
SVA Corporation, Member By

Joseph R. Cesare
V.P.

May 09
Date



DATE: February 7, 2014

TO: Honorable Supervisor Miller, Board of Supervisors, District 1

FROM: Carmine DeBonis Jr., Development Services Director 

SUBJECT: **Information Related to the Star Valley Development**

The Star Valley Specific Plan was approved by the Board of Supervisors in 1987. The Specific Plan included a transportation circulation concept plan and preliminary street phasing plan. The adopted rezoning ordinance contained conditions related to the transportation improvements. Specifically, rezoning condition 11.D required approval of a transportation improvement financing plan and a transportation system implementation plan.

In February 2002, a Traffic Impact Analysis (TIA) was submitted with the Star Valley Master Block Plat which provided specific transportation detail beyond the conceptual/preliminary exhibits of the Specific Plan. The information included in the TIA formed the basis of the required transportation improvement financing and implementation plan. The transportation improvement financing and implementation plan was agreed to by the developer in October 2002. Included in this plan was phased construction of Wade, Camino Verde, Los Reales, Vivianna and Yedra roadways and signalization for key intersections.

Accordingly, the transportation improvement financing and implementation plan (derived from the Master TIA), the Star Valley Master Block Plat and the associated assurance agreements for construction of subdivision improvements collectively reflect the obligations of the master developer. A subsequent addendum to the Master TIA for Star Valley Blocks 4, 7 & 8 further identified needed transportation improvements.

Since approval of the Master Block Plat, five Blocks have been re-platted and over 1,500 lots have been released for sale. Roughly, 1,300 building permits have been issued for single-family homes. All of the homes within these subdivisions rely on access via Wade Road, the only constructed roadway into the master development. Three additional Blocks (4, 7 & 8) have been re-platted into 1,079 lots which have not been released. Another nine Blocks were released from the Master Block Plat and sold to the Pasqua Yaqui Nation.

Despite agreeing to the transportation improvement financing and implementation plan, the master developer is disputing any obligation to construct the required improvements. On this basis, we do not plan to release further Blocks or lots for sale until the master developer commits to complete specific improvements contained in the transportation improvement financing and implementation plan and the TIA addendum for Blocks 4, 7 & 8, which include installation of the Wade Road traffic signal, construction of Camino Verde from the Specific Plan boundary to Valencia Road, and the possible widening of Wade Road to four lanes.

To address traffic safety concerns Pima County has installed a temporary traffic signal at the intersection of Wade Road and Valencia and is proceeding with the design for Camino Verde.

Attached, as requested, are the following key documents related to the Star Valley development and associated required transportation improvements:

- Star Valley Specific Plan Adopted Ordinance #1987-212 (Attachment 1)
- Link to [Star Valley Specific Plan](#)
- Specific Plan Circulation Concept Plan (Attachment 2)
- Specific Plan Preliminary Street Phasing Plan (Attachment 3)
- Master Block Plat – Page 1 & 2 (Attachment 4)
- Conclusion/Recommendation/Implementation Section - Master TIA (Attachment 5)
- Correspondence on Acceptance of Transportation Improvement Financing and Implementation Plan (Attachment 6)
- Star Valley Original Master Block Plat Assurance Agreement (Attachment 7)
- Conclusion/Recommendation Section - TIA Addendum for Blocks 4, 7 & 8 (Attachment 8)
- Recent Correspondence with Master Developer (Attachment 9)

Following your review of these materials, staff is available to meet with you to answer questions or provide additional documentation, if needed.

c: C. H. Huckelberry, County Administrator
John M. Bernal, Deputy County Administrator – Public Works

ORDINANCE #1987-212

ADOPT THE STAR VALLEY SPECIFIC PLAN (AS ENACTED BY ORDINANCE #1987-64) AND AMEND AND CHANGE PIMA COUNTY ZONING MAP #64, 65, 99 and 100, IN THE VICINITY OF PASCUA YAQUI PUEBLO INDIAN RESERVATION AND WEST OF CAMINO RANCHO ALIGNMENT, AS REFERRED TO IN PIMA COUNTY ORDINANCE #1985-82, AND REPEALING ALL ORDINANCES AND PARTS OF ORDINANCES IN CONFLICT HERewith.

BE IT ORDAINED BY THE BOARD OF SUPERVISORS OF PIMA COUNTY, ARIZONA:

SECTION 1. That the Star Valley Specific Plan, as attached, is hereby adopted subject to the following conditions:

- A. This specific plan (dated October 19, 1987) shall be subject to the following conditions prior to this ordinance becoming effective:
1. Amendment of the specific plan document as may be necessitated by Board of Supervisors action.
 2. Approval by the Board of Supervisors of a Surveyed Boundaries Map for the specific plan within THREE MONTHS of specific plan ordinance adoption by the Board of Supervisors.
 3. Recording a covenant that the specific plan will abide by all applicable adopted Pima County ordinances, existing or as may be adopted or amended, not included or specifically addressed within the specific plan.
 4. Recording a covenant that within five years of ordinance adoption of this specific plan, the petitioner will record an acceptable master plat in accordance with Condition B.1.
 5. Recording a covenant that there will be no further subdividing or lot splitting without the written approval of the Board of Supervisors.
 6. Recording a covenant holding Pima County harmless in the event of flooding.
 7. Representatives of the San Xavier District of the Tohono O'Odham Nation and the Pascua Yaqui Pueblo Nation shall be involved in all relevant meetings (including the Subdivision and Development Review Committee) of the primary developer and Pima County, and the primary developer shall hold regular meetings with the representatives to evaluate trespassing issues, including equestrian easements, prior to any future Board of Supervisors action on this specific plan.
- B. Within FIVE YEARS of ordinance adoption, the specific plan shall be subject to the following:
1. Recording an acceptable master plat which will provide for development-related studies, assurances and dedications, as required by the appropriate agencies, and any related conditions that may be approved by the Board of Supervisors. Otherwise, any or all of this specific plan shall be referred to the Planning and Zoning Commission for consideration of amendment or repeal.
- C. Approval of a subdivision plat, development plan or issuance of a building permit shall be subject to the following:
1. Conformance with the Star Valley Specific Plan as adopted.
 2. Provision of development-related assurances as required by the applicable agencies.

3. Dedication of necessary rights-of-way for roads and drainage by plat, or by separate instrument if the property is not to be subdivided.
4. Conformance with Pima County paving policies as determined applicable by the Department of Transportation and Flood Control District.
5. Alley access to garages (page 94) shall be permitted only as secondary access to individual lots.
6. Performance of the significant vegetation transfer program as established within the Environmental Resources Conservation Element of the specific plan, including an approved revegetation program for the drainageways and detention/retention basins identified within the Drainage Concept Element of the specific plan.
7. Standards for detached accessory buildings in residential areas shall be as follows:
 - a. Maximum lot coverage: As determined by the Star Valley Development Review Authority.
 - b. Maximum building height: 24 feet.
 - c. Minimum setback requirements:
 - 1) To main building: 7 feet;
 - 2) To front lot line: 20 feet;
 - 3) To side lot lines: 3 feet;
 - 4) To rear lot line: 3 feet.
8. Model home permits (page 93) shall be limited to 15 dwelling units or 10% of the number of lots within a proposed subdivision, whichever is more restrictive, per subdivision.
9. Conformance with the night light program as established within the Environmental Resources Conservation Element of the specific plan.
10. Requirements of the Wastewater Management Department:
 - A. The property owner must connect to the public sewer system at the location and in the manner specified by Wastewater Management at the time of review of the tentative plat or development plan.
 - B. The property owner must construct an off-site public sewer extension to serve this specific plan and must construct the on-site sewers in a manner which will provide flow-through for upstream tributary areas at points and with capacities as specified by Wastewater Management prior to submittal of tentative plat or development plans. The public sewer improvements must be sized and located in accordance with a Basin Study prepared by the property owner and reviewed and approved by Wastewater Management. The public sewer improvements must be designed and constructed in conformance with the applicable Pima County standards and must be completed, inspected and released for service prior to the issuance of any building permits.
11. Requirements of the Department of Transportation:
 - A. An access control policy shall be established for the principal streets (Types I and II) within the specific plan area. At a minimum, the number of vehicular access points along major streets shall be limited. Also, no direct access to individual residential lots will be permitted from these streets. Median breaks and local collector streets shall be spaced at intervals sufficiently far enough to maintain the through traffic characteristics of these roadways.

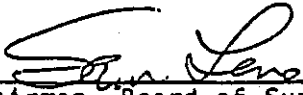
- B. All arterials, collector and local streets required for development shall be designed to provide sufficient capacity for ultimate development of the plan. All roadway improvements shall be constructed to the ultimate design per the approved transportation system implementation plan. All development related internal transportation improvements for the specific plan shall be provided by the developer.
 - C. Establishment of design criteria to include right-of-way widths, typical cross-sections, design speeds, utility locations, maximum design roadway slopes, access control, bike paths and pedestrian way or sidewalks shall be subject to approval by the Pima County Department of Transportation and Flood Control District.
 - D. A transportation improvement financing plan and transportation system implementation plan for the specific plan area shall be required before any subdivision plat is approved. The implementation plan shall address the provision of major routes within the plan area, the provision of capacity and route continuity adjacent to the plan and the areas of responsibility of the County, the primary developer and any subsequent developers.
 - E. Type I streets (Wade, Camino Verde, Viviana, Los Reales) shall have a maximum right-of-way of 120 feet. Final cross-sections shall need the approval of the Pima County Department of Transportation and Flood Control District.
 - F. Type II streets (collector roads) shall have a maximum right-of-way of 90 feet. Final cross sections shall need to be approved by the Pima County Department of Transportation and Flood Control District.
 - G. Type III streets (local roads) shall have a maximum right-of-way of 52 feet. Final cross sections shall need to be approved by the County Department of Transportation and Flood Control District.
 - H. Building setbacks for Type I streets shall be a minimum of 30 feet. Type II and III streets shall have a minimum building setback of 20 feet.
 - I. All landscaping in rights-of-way shall conform to Pima County Department of Transportation and Flood Control District standards and must be approved by the Pima County Department of Transportation and Flood Control District.
12. Requirements of the Flood Control District:
- A. The petitioner shall expand the Master Drainage Study into a Sub-Basin Management Study to evaluate offsite drainage problems and potential resolutions. The limits of study and scope of work shall be determined by the District. The Sub-Basin Management Study shall be conducted at no cost to the District and shall be submitted and approved by the District prior to submission and acceptance of a Master Block Plat.
 - B. The petitioner shall expand the Master Drainage Study for on-site drainage to include evaluation of alternatives for channel alignment, collection, sizing, treatment, and evaluation of detention/retention basins including location, sizing and mitigation measures. The Master Drainage Study shall be conducted at no cost to the District and shall be submitted and approved by the District prior to submission and acceptance of a Master Block Plat.

- C. The petitioner shall be financially responsible for constructing offsite drainage improvements necessitated by the subject property as determined from the Sub-Basin Management study. The phasing of constructing these improvements shall be determined by the petitioner and approved prior to the Master Block Plat.
 - D. All internal drainage improvements shall be constructed at no cost to Pima County.
 - E. Trails within the 100-year floodplain shall not be maintained by Pima County. Trails within the access easement are acceptable and can be incorporated into a mitigation plan.
 - F. Detention/retention basins shall be designed in conformance with the Stormwater Detention/Retention Manual.
 - G. Landscaping mitigation plan for drainage channels shall be developed by the petitioner and approved by the District prior to submission and acceptance of the Master block Plat.
 - H. The petitioner must finalize a phasing plan of drainage improvements prior to acceptance of the Master Block Plat.
 - I. Internal drainage scheme for blocks shall be determined at the Master Block Plat phase as shown on the conceptual master plat (page 97 of the Star Valley Specific Plan).
13. Parks are to be provided as follows:
- A. Neighborhood parks shall be developed according to Pima County standards. The park adjacent to proposed Calle Torim shall be developed when 70% of the residential development west of Drainageway B has been provided; the park adjacent to the Los Reales alignment shall be developed when 70% of the residential development east of Drainageway B has been provided.
 - B. The primary developer of the specific plan shall provide standards and requirements for the development of subneighborhood parks.

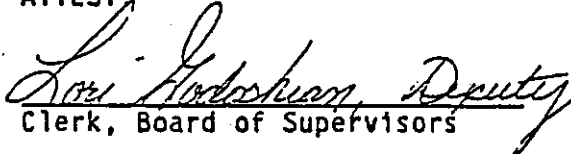
and that Pima County Zoning Map #64, 65, 99 and 100, in the vicinity of Pascua Yaqui Pueblo Indian Reservation and west of Camino Rancho alignment, as referred to in Pima County Ordinance #1985-82 be, and the same is, hereby amended and changed to the SP (Specific Plan) zone as shown on the entitled "Amendment # 35/41 by Ordinance #1987-212 to Pima County Zoning Map #64, 65, 99 and 100" hereto attached and by reference made a part thereof.

SECTION 2. That this ordinance becomes effective upon satisfaction of conditions of Subsection A and that all ordinances and parts of ordinances in conflict herewith be and the same are hereby repealed to the extend of such conflict.

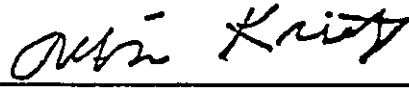
PASSED AND ADOPTED by the Board of Supervisors of Pima County, Arizona,
this 1st day of December, 1987.


Chairman, Board of Supervisors

ATTEST:


Clerk, Board of Supervisors

APPROVED AS TO FORM:


Civil Deputy County Attorney


Executive Secretary, Pima County
Planning and Zoning Commission

E. Circulation Concept Plan

The Star Valley Circulation Plan is designed to provide two functions. First, to provide a connection for the Star Valley community to the metropolitan area arterial street system and, secondly, to provide for safe, convenient access to all areas within the Star Valley Specific Plan (see Exhibit 21, Circulation Concept Plan).

Presently, no constructed public streets provide access to the Star Valley Specific Plan area. Vehicular access is proposed for the Wade Road alignment at the Specific Plan area's west boundary and Viviana Road. Wade Road will be constructed by the Star Valley developer prior to July 1, 1989. This will provide initial access to the Star Valley Specific Plan area.

The primary internal street system includes Los Reales Road, which is an east-west arterial street bisecting the site, Viviana Road, which is the easternmost north-south arterial which will connect Los Reales to Valencia Road, and Camino Verde, which is also a proposed north-south route to connect Los Reales to Valencia Road. Access to the southwest portion of the Specific Plan area will be the extension of Camino Verde, which is to be named Calle Torim and aligned with an existing public right-of-way to the west. Wade Road will transition from its present north-south alignment to the Los Reales Road east-west alignment in the western portion of the plan area.

There are three standard street cross-sections provided. They are identified as Type I streets, Type II streets and Type III streets.

Type I streets are the major arterial streets serving the project. They are four-lane, divided thoroughfares with a landscaped median. Parking is not permitted on Type I streets. The standard cross-section for a Type I street is shown as Exhibit 22.

Type II streets are secondary arterials and are composed of one lane in each direction and a center turn lane. No on-street parking provisions are made for Type II streets because they serve primarily to convey traffic from one destination point to another. The cross-section for Type II streets is Exhibit 23.

Type III streets are the public interior subdivision streets and are not shown on the Circulation Plan. The cross-section for the Type III streets provides for two traffic lanes and parking on either side of the street. Parking is included in the Type III streets in recognition of their use in residential areas and the relatively low traffic volumes normally associated with subdivision streets. The cross-section for Type III streets is shown as Exhibit 24. Private streets may be used within subdivisions also. Their cross sections will be a minimum of 28' including curbs.

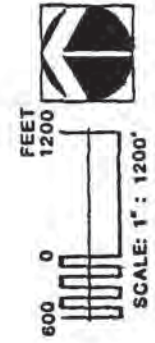
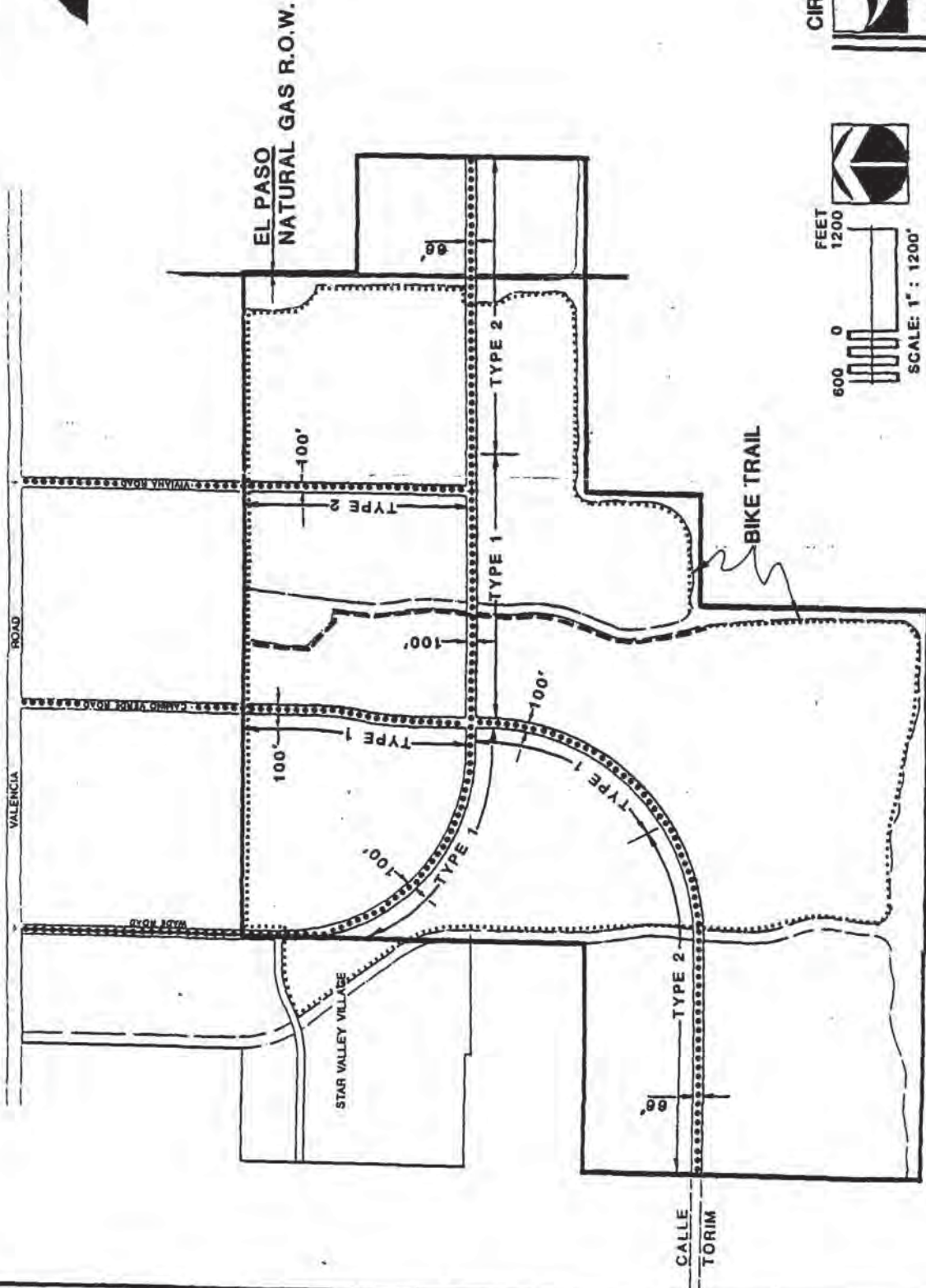
The extent of Type I and Type II streets is shown on Exhibit 22, the Circulation Plan.

In addition to the proposed street system, a pedestrian/bicycle circulation system is also provided. This system is separate from the vehicular circulation system and is located in conjunction with major drainage facilities. The pedestrian/bicycle circulation system will link major recreation facilities and elementary school sites within the plan area. Subdivision designs for the planning areas should include safe and convenient access to this pedestrian/bicycle circulation system. Pedestrian circulation will also be provided by sidewalks to be constructed as part of the major street network. Sidewalks are also included within the interior subdivision streets as shown by the typical cross-section. Multi-family developments, such as townhouses and apartments, are responsible for providing private pedestrian facilities within their respective developments.



LEGEND

- ARTERIAL STREET SYSTEM
- BICYCLE PATH
- PEDESTRIAN PATH
- 100' R.O.W.



CIRCULATION CONCEPT PLAN

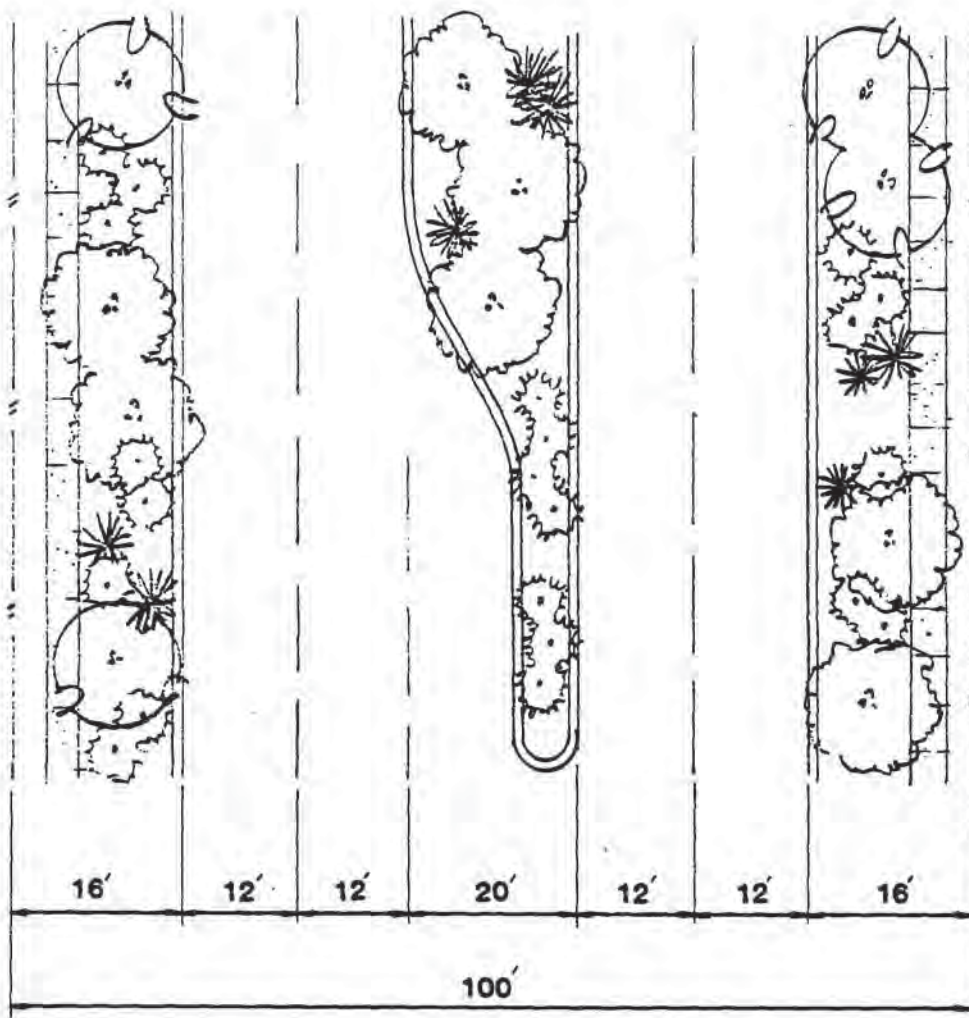


McGovern
MacVittie
Lodge
and Associates, Inc.

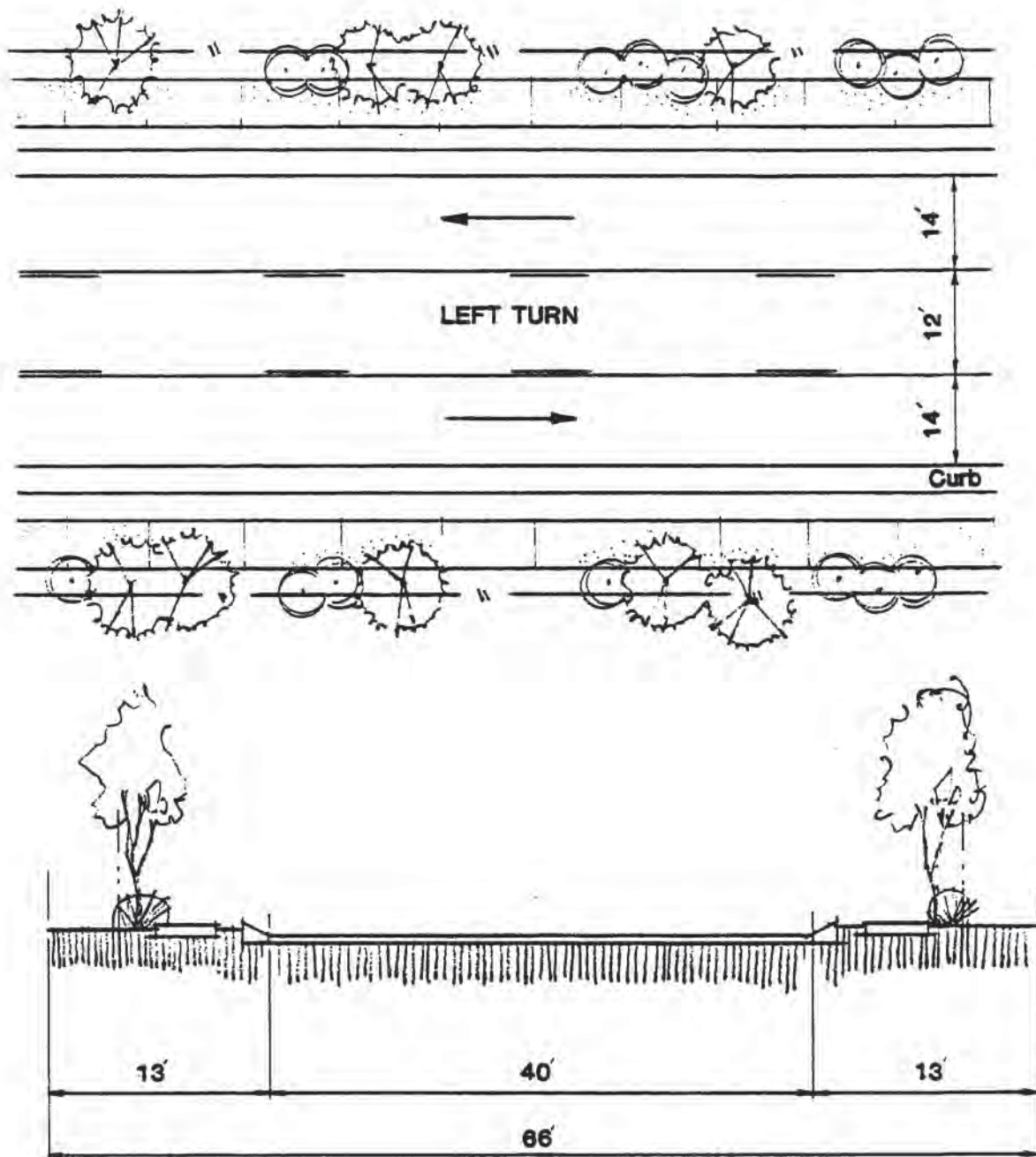
EXHIBIT 21

8235 986

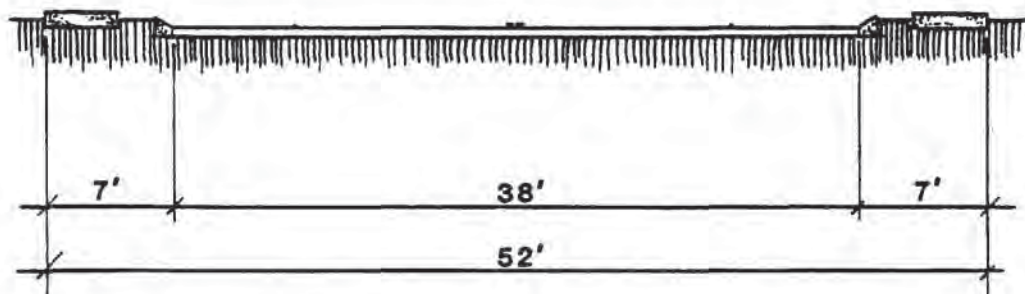
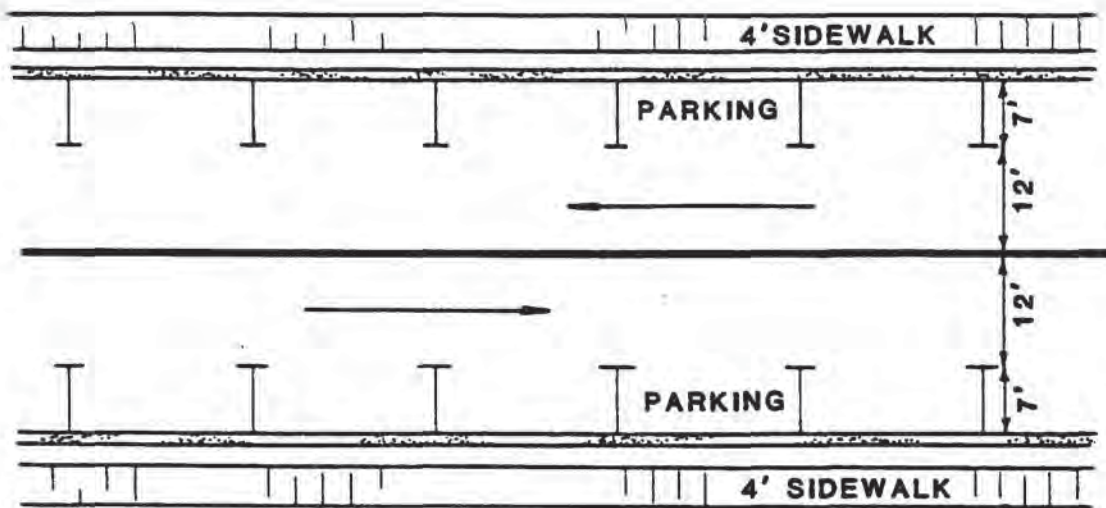
8235 987



TYPE I STREET



TYPE II STREET



TYPE III STREET
PUBLIC

8235 290

E. Streets

The primary street system shown on Exhibit 28 shall be implemented in three phases with responsibility shared between the primary developer and secondary builder/developer. The shared responsibility is done in recognition of the timing between the initial need for paved roads in the area and the actual development of subdivisions within the planning areas. Therefore, only the essential street improvements are provided by the primary developer in order to avoid the inefficiency of providing improvements which must be removed because of conflict with the secondary builder/developer required improvements.

Type I Streets (Four Lanes and Median)

The primary developer will be responsible for 24 feet of asphalt paving, a 20-foot landscaped median, and landscaping at the edge of the road. The major intersections will be developed to their ultimate width by the primary developer. The intersection development will be carried 400 feet on each side of the intersection.

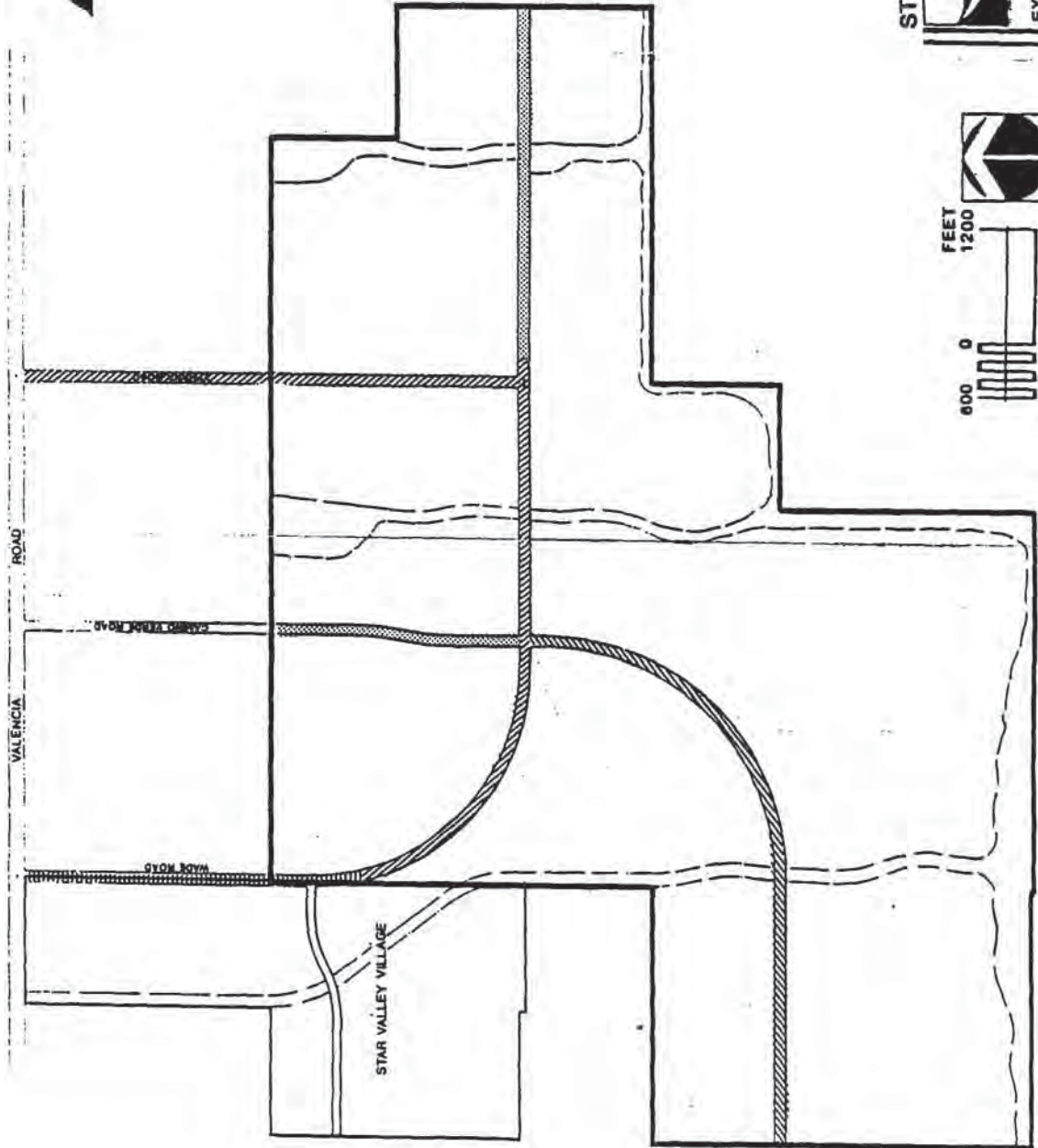
The secondary developer(s) will be responsible for an additional 24 feet of paving and a 1" overlay of the previously installed pavement, the outside curb on each side of the road, and sidewalks on each side of the street. Exhibit 21 depicts the extent of Type I streets.



- PHASE 1

- PHASE 2

- PHASE 3

STREET PHASING PLAN



McGovern
MacVittie
Lodge
and Associates, Inc.

EXHIBIT 28

8235 1029

8235 1028

Type II Streets (Two Lanes and Left-Turn Lane)

Responsibility for implementation of the Type II streets shall be shared between the primary developer and secondary builder/developer. The primary developer shall be responsible for 24 feet of paving and construction of the intersections to the ultimate width. The intersection development will be carried 400 feet on each side of the intersection.

The secondary builder/developer will be responsible for 16 feet of additional paving, a 1" overlay for the 24-foot width, and the outside curbs and sidewalks on their side of the street.

Type III Streets (Subdivision Streets - Two Lanes and Parking Area)

Responsibility for implementation of Type III streets and their intersection with Type I and Type II streets is the sole responsibility of the secondary builder/developer because they are constructed in conjunction with subdivisions within the planning areas.

Phasing of Street Improvements

Phase I shall include the following: construction of Wade Road from Valencia Road southerly approximately 3700 feet. This construction shall be accomplished with the development of the adjacent area known as Star Valley Village, which is not a part of the Specific Plan area.

Phase II shall include the following: construction of Wade Road through its transition to its intersection with Camino Verde; construction of Los Reales Road from the Camino Verde intersection to Viviana Road; construction of Camino Verde south of Los Reales Road through its transition to Calle Torim, terminating at the project's west boundary; construction of Viviana Road from Valencia Road southerly one mile to Los Reales Road.

Phase III shall include the following: construction of Los Reales Road from Viviana Road to the eastern boundary of the project; construction of Camino Verde from Los Reales northerly to the project's north boundary.