



March 7, 2024

Steve Marshall, Deputy Director of Community Development  
City of Novato  
922 Machin Avenue  
Novato, CA 94945

**RE: Response to Completeness Review  
Project No. P2023-058  
1316-1320 Grant Avenue & 1020 Fourth Street | APN 141-261-29**

Dear Mr. Marshall,

Thank you for your comments and review of our application. Below please find detailed responses to each of the completeness comments made by the Planning Department and the other City and outside agencies dated August 24, 2023. Responses to Planning's AB 2011 comments dated October 23, 2023 are addressed in a separate memo.

#### **NOVATO PLANNING DEPARTMENT**

---

##### **1. City Comment**

Parking: Notwithstanding whether the Project qualifies for a parking waiver under Government Code Section 65915(p), AMG's density bonus letter states that 48-parking spaces are provided for the Project. However, the Project plans note 39 parking stalls being provided but the garage drawing shows only 37 parking stalls. Accurate parking information is necessary should AMG's proposal not qualify for a parking waiver. Correct the parking information provided for the Project and note whether parking is intended to serve the retail or residential components of the Project. **Incomplete.**

**AMG/CalHDF's Response:** *The project now consists of 42 parking stalls. This is accurately reflected in the density bonus memo and the drawings.*

##### **2. City Comment**

Common Outdoor Open Space: AMG requests a concession to the common outdoor open space requirement of NMC Section 19.34.100 K. AMG's representation of the required common open space area is incorrect. As a result, the reported cost reduction to the Project is not accurate. For clarification, the amount of common outdoor open space required is 15,525 sq. ft. representing 50% of the total of 31,050 sq. ft. of private and common open space required by NMC Section 19.34.100 K. Revise this concession request to accurately reflect the required level of common outdoor open space and the associated cost reduction claimed by AMG. **Incomplete.**

**AMG/CalHDF's Response:** *Please find enclosed a revised density bonus memo that addresses this comment.*

##### **3. City Comment**

Upper Story Building Step-Backs: AMG provided quantified information regarding increases in land cost per

unit resulting from compliance with the upper story building step-back required by NMC Section 19.34.100 E. However, AMG did not provide any documentation listing the actual land purchase price against which the Department can verify the cost increases claimed in this concession request. Provide the Department with the purchase agreement for the Project Site so that AMG's conclusions regarding costs can be verified. **Incomplete.**

**AMG/CalHDF's Response:** *The first page from our purchase and sale agreement with the seller is provided as an attachment to our density bonus memo to confirm the land purchase price.*

#### 4. City Comment

TENTATIVE PARCEL MAP: AMG is requesting a tentative map (TM) to merge seven (7) existing parcels into a single parcel for the purpose of developing the Project. The TM application submitted by AMG is complete on the basis the TPM is not subdividing but merging two existing parcels.

**AMG/CalHDF's Response:** *Acknowledged.*

Thank you for your comments. Please contact me if you have any questions regarding our project or resubmittal.

Sincerely,



Amanda Locke  
AMG & Associates, LLC



Dylan Casey  
California Housing Defense Fund

## NORTH MARIN WATER DISTRICT: Lia Solar

---

### 1. NMWD Comment

The North Marin Water District currently provides potable domestic water service to the above referenced properties from two (2) 1-inch service laterals with two (2) 5/8-inch meters and one (1) 3/4-inch service lateral with one (1) 5/8-inch meter, that serve the addresses of 1312 & 1324 Grant Avenue and 1020 Fourth Street. Normal pressure Zone 1 water service can be provided to this parcel up to an elevation of 60 feet.

*AMG/CalHDF's Response: Acknowledged.*

### 2. NMWD Comment

Construction of new water distribution facilities is likely required for the above referenced project; however, a detailed review of both existing and proposed water facilities is needed to determine the extent. To proceed with project review, the owner must apply to the District pursuant to District Regulations Part B, 20-36 at [www.nmwd.com/about/regulations](http://www.nmwd.com/about/regulations).

*AMG/CalHDF's Response: Acknowledged.*

### 3. NMWD Comment

Prior to project completion the owner must enter into an agreement with the District and complete financial arrangements. Occupancy approval shall not be granted until water service installation and sign off is complete.

*AMG/CalHDF's Response: Acknowledged.*

### 4. NMWD Comment

The project must conform to the North Marin Water District's Mandatory Water Conservation Measures. For the full scope of the required water conservation measures for both indoor fixtures/appliances and landscaping refer to District Regulation 15 (section e. and f.) at [www.nmwd.com/about/regulations/](http://www.nmwd.com/about/regulations/).

*AMG/CalHDF's Response: Acknowledged.*

### 5. NMWD Comment

Occupancy approval will not be granted until compliance with water conservation measures, as applicable, can be verified. Please contact the District Water Conservation Coordinator at (415) 761-8933 if you have any question regarding clarification of required water conservation measures or plan submittal requirements.

*AMG/CalHDF's Response: Acknowledged.*

**6. NMWD Comment**

Installation of above-ground backflow prevention device(s) will be required in accordance with District Regulation 6 at [www.nmwd.com/about/regulations/](http://www.nmwd.com/about/regulations/) and California Department of Health Regulations (Title 17).

*AMG/CalHDF's Response: Acknowledged. Above-ground backflow prevention devices are proposed and will be installed in accordance with this Regulation as required.*

**7. NMWD Comment**

Upon installation, an inspection report (including device testing) must be completed and returned to the District prior to the commencement of business activities. Please contact our Cross-Connection Control Technician at (415) 761-8948 or [backflow@nmwd.com](mailto:backflow@nmwd.com) if you have any questions regarding clarification of cross-connection and/or backflow protection requirements.

*AMG/CalHDF's Response: Acknowledged.*

**8. NMWD Comment**

If fire sprinklers are required by the local fire authority, replacement and upsizing of both the service lateral and water meter will likely be necessary in order to provide adequate water flow required by the new sprinkler system. This response regards potential fire protection requirements. The owner should be directed to the local fire authority for determination of all final fire requirements for the project. The North Marin Water District should be informed of any changes or new requirements related to fire protection.

*AMG/CalHDF's Response: Acknowledged.*

**NOVATO BUILDING DEPARTMENT: Mark Setterland**

---

**1. City Comment**

Obtain a building permit.

*AMG/CalHDF's Response: Acknowledged.*

**2. City Comment**

Comply with all applicable provisions of the Novato adopted building codes.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

**3. City Comment**

Provide a geological/geotechnical report including analysis and recommendations for seismic liquefaction potential.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

**4. City Comment**

Residential Accessible design and detailing shall comply with California Building Code chapters 11A and 11B due to "Public Housing" as defined in CBC1.9.1.1

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

1. **City Comment**

Explain why the Applicant believes there are seven existing parcels, as opposed to just one. Submit a chain of title demonstrating such. Merging of existing parcels, if necessary, can be accomplished by a lot merger or lot line adjustment, as an alternative to a tentative map and parcel map.

*AMG/CalHDF's Response: Enclosed is a chain of title recently prepared by our title company which we believe indicates that there are seven existing parcels. We have discussed the two options (lot merge or lot line adjustment) with our civil engineer and have opted to continue with the tentative map process.*

2. **City Comment**

All proposed driveways aprons should conform to Uniform Construction Standards All Cities and County of Marin Drawings Nos. 115 and 120, except that the City requires walks to have a maximum cross-slope of 1.5%. The Preliminary Grading and Drainage Plan shows the cross-slope of the Fire Lane driveway apron at 6.4%.

*AMG/CalHDF's Response: Please see sheet C-3. The fire lane driveway cross-slope is now 1.5%.*

3. **City Comment**

Update the preliminary Stormwater Control Plan for a Regulated Project based upon the template in Appendix D of the current BASMAA Post-Construction Manual dated January 2019.

- a. Correct the submittal date and impervious surface areas in Table 1.

*AMG/CalHDF's Response: Both the submittal date and impervious surface areas are corrected.*

- b. Include Tables in Section IV.B.5 for each bioretention facility showing the total minimum and proposed facility sizes.

*AMG/CalHDF's Response: Table now included in this section.*

4. **City Comment**

Submit a preliminary drainage report prepared by a California Registered Civil Engineer. The report should include hydrologic and hydraulic calculations to support the design and sizing of all public and private drainage storm drains and detention facilities. The report shall address existing downstream storm drain facilities and hydraulic conditions which may impact the design of proposed facilities and improvements. Analyses of the conveyance of onsite and downstream facilities shall be based on the 25-year storm. The peak stormwater runoff rate should not exceed the existing peak runoff rate.

*AMG/CalHDF's Response: Hydrology report included in the resubmittal package.*

**NOVATO FIRE DISTRICT: Dennis Moss (Bureau Veritas) and Lynne Osgood (Acting Fire Marshall)**

---

- **NFD/BV Comment**

F1. Sheet 0.0: Please update the Sheet Index to include all pages in the plan set.

*AMG/CalHDF's Response: Sheet Index includes all pages in the plan set.*

- **NFD/BV Comment**

F2. Sheet 0.0: Provide a complete code analysis of the proposed building. Include the complete construction type (Type I A or B, etc.), distances to property line and opening protections required, type of sprinkler system (NFPA 13 required), all occupancy types, occupant load of each floor, separations (stairs, shafts, residences, occupancies, etc.), fire alarm included, square feet, exits and exit widths required and provided, etc. Analysis shall state what is required or the maximums allowed. List all deferred submittals and codes that are applicable.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F3. Sheet A2.1: The exit distance diagram for the center part of the building isn't being measured to the horizontal exit doors. Please adjust the exit designation (red dot) and confirm the distances.

*AMG/CalHDF's Response: The red dashed line indicates the maximum travel distance from trash room to unit door. New Legend added on sheet to A2.0 Conceptual Building Plans for clarification.*

- **NFD/BV Comment**

F4. Sheet A5.0: The site map arrows for views 1 and 2 are in the wrong place.

*AMG/CalHDF's Response: The site map arrows are now in the correct place.*

- **NFD/BV Comment**

F5. Sheet A2.0 & L2: The rooftop garden area at the Podium Level is an assembly area with an occupant load that exceeds 50 persons. A minimum of two exits are required with doors swinging in the direction of egress and supplied with panic hardware. Rooftops will also require standpipe connections per CFC 905.3.8.

*AMG/CalHDF's Response: There are two passageways out of the podium courtyard area serving as two exits. Standpipe locations will be located in the stairwell.*

- **NFD/BV Comment**

F6. This building is greater than 30 feet tall. (The highest occupied floor level is less than 75 feet so this is not a high-rise building.) Fire access roads shall be a minimum of 26 feet wide.

Please redesign the north fire access road to comply with aerial apparatus requirements. (The west and south sides meet the requirements for the 15-to-30-foot requirement.)

*AMG/CalHDF's Response: Fire access road on the north side will be used for hose pull access only. Since the west and south side are 26' and meet the requirements for the 15-to-30-foot requirement, fire aerial apparatus will be from those sides only.*

- **NFD/BV Comment**

F7. Please provide information on the access roadway on the east side of the building accessed from Grant Avenue. What is the width? Is this on the property or are there agreements in place for this roadway? Please submit a clean site plan which shows property lines along with the proposed building footprint and fire access to the building including roadways and hose drag distances for the east side of the building. Access roadways shall be within 150 feet travel distance to all exterior parts of the ground floor of the building.

*AMG/CalHDF's Response: The width of the access roadway on the east side of the building from Grant Ave. is 4 feet. This access roadway is within the property line of the proposed development. Please see sheet C3.*

- **NFD/BV Comment**

F8. Ensure compliance with Novato Fire Prevention Standards for Fire Protection and CFC 2022 Appendix B & C Fire flow requirements & Fire Hydrant Locations & Distribution.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F9. Based on the proposed building height of 67'-7", this building will require a fire protection - Class III or Class I standpipe system per 2022 CFC §905.3.1. Coordinate standpipe type (manual or automatic) with Novato Fire Department.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F10. Based on the proposed building height of 67'-7", this building will likely require fire protection - fire pump to support both fire sprinkler system(s) and fire protection standpipe system(s).

*NOTE: If a fire pump is necessary, unless a diesel driven fire pump is provided, the city requires a letter from the local power utility company providing electricity to this site indicating the supporting electrical infrastructure to this building is considered a reliable source per 2022 NFPA 20 §9.3.2 and/or §9.3.3 for electric-motor driven fire pumps*



*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F11. Note: Ensure the bedroom SID & C/O detector comply with 2022 NFPA 72, 29.11.3.4  
Smoke alarms and smoke detectors shall not be installed within a 36 in. (910 mm) horizontal path from a door to a bathroom containing a shower or tub unless listed for installation in close proximity to such locations. 2022 CFC 907.2.11.8; NFPA 72, 29.11.3.4

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F12. Ensure the building address meets the Novato Fire Department & Novato Building Department standards. Please correct as needed and provide consistency throughout

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F13. Please check with Novato Fire if Emergency Responder Radio Communication Coverage is adequate in this area or required for this proposed building. Please correct as needed and provide consistency throughout. 2022 CFC 510.

*AMG/CalHDF's Response: Acknowledged. We will work with Novato Fire and address this during the building permit stage.*

- **NFD/BV Comment**

F14. Pre-Plans: When required by the fire code official, pre-plans shall be developed for target hazard buildings according to the written standards developed by the authority having jurisdiction. 2022 CFC 403.1.1.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F15. Aerial fire apparatus access. Buildings or facilities exceeding 30 feet or three stories in height, approved aerial apparatus access roads shall be provided. For the purposes of this section, the highest rood surface shall be determined by the measurement to the eave of the pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, whichever is greater. 2022 CFC 503.1.5.

*AMG/CalHDF's Response: Acknowledged. Since the west and south side meet the requirements for the 15-to-30-foot requirement, the aerial fire apparatus access will be from Fourth St. and*

*Grant Ave.*

- **NFD/BV Comment**

F16. Width. Aerial fire apparatus access roads shall have a minimum unobstructed width of 26 feet, exclusive of shoulders, in the immediate vicinity of the building or portion thereof. 2022 CFC 503.1.5.1.

*AMG/CalHDF's Response: Acknowledged. Since the west and south side meet the requirements above, fire aerial apparatus will be from those sides only.*

- **NFD/BV Comment**

F17. Proximity to building. One or more of the required access routes meeting this condition shall be located not less than 15 feet and not more than 30 feet from the building and shall be positioned parallel to one entire side of the building. The side of the building on which the aerial fire apparatus access road is positioned shall be approved by the fire code official. 2022 CFC 503.1.5.2.

*AMG/CalHDF's Response: Acknowledged. Since the west and south side meet the requirements above, fire aerial apparatus will be from those sides only.*

- **NFD/BV Comment**

F18. Obstructions. Overhead utility and power lines shall not be located over the aerial fire apparatus access road or between the aerial fire apparatus access road and the building. Other obstructions shall be permitted to be placed with the approval of the fire code official. 2022 CFC 503.1.5.3.

*AMG/CalHDF's Response: Acknowledged. Please see sheet C-2 indicating that the power pole and overhead power lines adjacent to our proposed fire access lane will be undergrounded.*

- **NFD/BV Comment**

F19. All driveways and parking areas shall accommodate Novato Fire District apparatus turning radius per NFD standards.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F20. 'Knox' key access shall be installed at the premises conforming to Novato Fire Protection Standard #202.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F21. Commercial occupancies will require separate conditions and review based on occupancy type and use: For example, any Assembly occupancies will require a separate NFD permit.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

- **NFD/BV Comment**

F22. Fire Department access shall be maintained to the site during demolition of the building. Fencing surrounding the demolition site shall not impede access to fire hydrants if fire hydrants are located within the demolition area. Fire extinguishers shall be onsite during any cutting or welding that takes place during demolition. Demolition and construction shall conform to 2019 CFC Chapter 33 - Fire safety during construction and demolition.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the building permit stage.*

**1. NSD Comment**

One aspect of the project involves the connection to the sewer system on the west side of the building along 4th Street. As per the proposal, it is stated that the new building cannot be connected to an existing cleanout, necessitating the installation of a 6" lateral leading to a new manhole. To proceed, we would appreciate additional details regarding the specific design and routing of this new sewer connection, including its depth, alignment, and any potential impact on the surrounding infrastructure.

*AMG/CalHDF's Response: The plans are updated to remove the existing clean out and propose to replace with a new sanitary sewer manhole. Please see sheet C-2.*

**2. NSD Comment**

Furthermore, it is noted that the first floor of the building is intended to accommodate commercial units, which may include food service facilities. It is stipulated that these commercial units must be plumbed to connect to a grease interceptor. To ensure the feasibility and effectiveness of this arrangement, we request further information regarding the sizing, location, and maintenance plan for the proposed grease interceptor system. This will help us confirm that the necessary provisions are in place to support food service operations and mitigate potential environmental concerns.

*AMG/CalHDF's Response: Please see sheet A1.0. A grease interceptor is indicated adjacent to the Maintenance Room.*

**3. NSD Comment**

In relation to the existing sewer laterals, we need clarification on whether these will be re-used for the new building or if they will be abandoned in accordance with district standards. A clear explanation of your intentions will aid in our assessment of the project's impact on the existing infrastructure and the long-term sustainability of the proposed development.

*AMG/CalHDF's Response: These will not be re-used, they will be abandoned.*

**1. PG&E Comment**

This plan review process does not replace the application process for PG&E gas or electric service your project may require. For these requests, please continue to work with PG&E Service Planning: [https://www.pge.com/en\\_US/business/services/building-and-renovation/overview/overview.page](https://www.pge.com/en_US/business/services/building-and-renovation/overview/overview.page).

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E when we reach the construction document phase.*

**2. PG&E Comment**

If the project being submitted is part of a larger project, please include the entire scope of your project, and not just a portion of it. PG&E's facilities are to be incorporated within any CEQA document. PG&E needs to verify that the CEQA document will identify any required future PG&E services.

*AMG/CalHDF's Response: The project submitted is not part of a larger project.*

**3. PG&E Comment**

An engineering deposit may be required to review plans for a project depending on the size, scope, and location of the project and as it relates to any rearrangement or new installation of PG&E facilities.

*AMG/CalHDF's Response: Acknowledged. We will address this when we reach the construction document phase.*

**4. PG&E Comment**

Any proposed uses within the PG&E fee strip and/or easement, may include a California Public Utility Commission (CPUC) Section 851 filing. This requires the CPUC to render approval for a conveyance of rights for specific uses on PG&E's fee strip or easement. PG&E will advise if the necessity to incorporate a CPUC Section 851 filing is required.

*AMG/CalHDF's Response: Acknowledged. We will address this, if applicable, when we reach the construction document phase.*

**Gas Facilities**

• **PG&E Comment**

There could be gas transmission pipelines in this area which would be considered critical facilities for PG&E and a high priority subsurface installation under California law. Care must be taken to ensure safety and accessibility. So, please ensure that if PG&E approves work near gas transmission pipelines it is done in adherence with the below stipulations. Additionally, the following link provides additional information regarding legal requirements under California excavation laws:

<https://www.usanorth811.org/images/pdfs/CA-LAW-2018.pdf>

*AMG/CalHDF's Response: Acknowledged. We will address this, if applicable, when we reach the construction document phase.*

**1. PG&E Comment**

Standby Inspection: A PG&E Gas Transmission Standby Inspector must be present during any demolition or construction activity that comes within 10 feet of the gas pipeline. This includes all grading, trenching, substructure depth verifications (potholes), asphalt or concrete demolition/removal, removal of trees, signs, light poles, etc. This inspection can be coordinated through the Underground Service Alert (USA) service at 811. A minimum notice of 48 hours is required. Ensure the USA markings and notifications are maintained throughout the duration of your work.

*AMG/CalHDF's Response: Acknowledged. We will address this, if applicable, when we reach the construction document phase.*

**2. PG&E Comment**

Access: At any time, PG&E may need to access, excavate, and perform work on the gas pipeline. Any construction equipment, materials, or spoils may need to be removed upon notice. Any temporary construction fencing installed within PG&E's easement would also need to be capable of being removed at any time upon notice. Any plans to cut temporary slopes exceeding a 1:4 grade within 10 feet of a gas transmission pipeline need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**3. PG&E Comment**

Wheel Loads: To prevent damage to the buried gas pipeline, there are weight limits that must be enforced whenever any equipment gets within 10 feet of traversing the pipe.

Ensure a list of the axle weights of all equipment being used is available for PG&E's Standby Inspector. To confirm the depth of cover, the pipeline may need to be potholed by hand in a few areas.

Due to the complex variability of tracked equipment, vibratory compaction equipment, and cranes, PG&E must evaluate those items on a case-by-case basis prior to use over the gas pipeline (provide a list of any proposed equipment of this type noting model numbers and specific attachments).

No equipment may be set up over the gas pipeline while operating. Ensure crane outriggers are at least 10 feet from the centerline of the gas pipeline. Transport trucks must not be parked over the gas pipeline while being loaded or unloaded.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

#### **4. PG&E Comment**

Grading: PG&E requires a minimum of 36 inches of cover over gas pipelines (or existing grade if less) and a maximum of 7 feet of cover at all locations. The graded surface cannot exceed a cross slope of 1:4.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

#### **5. PG&E Comment**

Excavating: Any digging within 2 feet of a gas pipeline must be dug by hand. Note that while the minimum clearance is only 24 inches, any excavation work within 24 inches of the edge of a pipeline must be done with hand tools. So to avoid having to dig a trench entirely with hand tools, the edge of the trench must be over 24 inches away. (Doing the math for a 24 inch wide trench being dug along a 36 inch pipeline, the centerline of the trench would need to be at least 54 inches [ $24/2 + 24 + 36/2 = 54$ ] away, or be entirely dug by hand.)

Water jetting to assist vacuum excavating must be limited to 1000 psig and directed at a 40° angle to the pipe. All pile driving must be kept a minimum of 3 feet away.

Any plans to expose and support a PG&E gas transmission pipeline across an open excavation need to be approved by PG&E Pipeline Services in writing PRIOR to performing the work.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

#### **6. PG&E Comment**

Boring/Trenchless Installations: PG&E Pipeline Services must review and approve all plans to bore across or parallel to (within 10 feet) a gas transmission pipeline. There are stringent criteria to pothole the gas transmission facility at regular intervals for all parallel bore installations.

For bore paths that cross gas transmission pipelines perpendicularly, the pipeline must be potholed a minimum of 2 feet in the horizontal direction of the bore path and a minimum of 24 inches in the vertical direction from the bottom of the pipe with minimum clearances measured from the edge of the pipe in both directions. Standby personnel must watch the locator trace (and every ream pass) the path of the bore as it approaches the pipeline and visually monitor the pothole (with the exposed transmission pipe) as the bore traverses the pipeline to ensure adequate clearance with the pipeline. The pothole width must account for the inaccuracy of the locating equipment.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E when we reach the construction*

*document phase.*

**7. PG&E Comment**

Substructures: All utility crossings of a gas pipeline should be made as close to perpendicular as feasible (90° +/- 15°). All utility lines crossing the gas pipeline must have a minimum of 24 inches of separation from the gas pipeline. Parallel utilities, pole bases, water line 'kicker blocks', storm drain inlets, water meters, valves, back pressure devices or other utility substructures are not allowed in the PG&E gas pipeline easement.

If previously retired PG&E facilities are in conflict with proposed substructures, PG&E must verify they are safe prior to removal. This includes verification testing of the contents of the facilities, as well as environmental testing of the coating and internal surfaces. Timelines for PG&E completion of this verification will vary depending on the type and location of facilities in conflict.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**8. PG&E Comment**

Structures: No structures are to be built within the PG&E gas pipeline easement. This includes buildings, retaining walls, fences, decks, patios, carports, septic tanks, storage sheds, tanks, loading ramps, or any structure that could limit PG&E's ability to access its facilities.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**9. PG&E Comment**

Fencing: Permanent fencing is not allowed within PG&E easements except for perpendicular crossings which must include a 16 foot wide gate for vehicular access. Gates will be secured with PG&E corporation locks.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**10. PG&E Comment**

Landscaping: Landscaping must be designed to allow PG&E to access the pipeline for maintenance and not interfere with pipeline coatings or other cathodic protection systems. No trees, shrubs, brush, vines, and other vegetation may be planted within the easement area. Only those plants, ground covers, grasses, flowers, and low-growing plants that grow unsupported to a maximum of four feet (4') in height at maturity may be planted within the easement area.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**11. PG&E Comment**

Cathodic Protection: PG&E pipelines are protected from corrosion with an "Impressed Current" cathodic



protection system. Any proposed facilities, such as metal conduit, pipes, service lines, ground rods, anodes, wires, etc. that might affect the pipeline cathodic protection system must be reviewed and approved by PG&E Corrosion Engineering.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

## **12. PG&E Comment**

Pipeline Marker Signs: PG&E needs to maintain pipeline marker signs for gas transmission pipelines in order to ensure public awareness of the presence of the pipelines. With prior written approval from PG&E Pipeline Services, an existing PG&E pipeline marker sign that is in direct conflict with proposed developments may be temporarily relocated to accommodate construction work. The pipeline marker must be moved back once construction is complete.

*AMG/CalHDF's Response: Acknowledged.*

## **13. PG&E Comment**

PG&E is also the provider of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs which may endanger the safe operation of its facilities.

*AMG/CalHDF's Response: Acknowledged. We will address this when we reach the construction document phase.*

## **Electric Facilities**

### **1. PG&E Comment**

Buildings and Other Structures: No buildings or other structures including the foot print and eave of any buildings, swimming pools, wells or similar structures will be permitted within fee strip(s) and/or easement(s) areas. PG&E's transmission easement shall be designated on subdivision/parcel maps as **"RESTRICTED USE AREA – NO BUILDING."**

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

### **2. PG&E Comment**

Grading: Cuts, trenches or excavations may not be made within 25 feet of our towers. Developers must submit grading plans and site development plans (including geotechnical reports if applicable), signed and dated, for PG&E's review. PG&E engineers must review grade changes in the vicinity of our towers. No fills will be allowed which would impair ground-to-conductor clearances. Towers shall not be left on mounds without adequate road access to base of tower or structure.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**3. PG&E Comment**

Fences: Walls, fences, and other structures must be installed at locations that do not affect the safe operation of PG&'s facilities. Heavy equipment access to our facilities must be maintained at all times. Metal fences are to be grounded to PG&E specifications. No wall, fence or other like structure is to be installed within 10 feet of tower footings and unrestricted access must be maintained from a tower structure to the nearest street. Walls, fences and other structures proposed along or within the fee strip(s) and/or easement(s) will require PG&E review; submit plans to PG&E Centralized Review Team for review and comment.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**4. PG&E Comment**

Landscaping: Vegetation may be allowed; subject to review of plans. On overhead electric transmission fee strip(s) and/or easement(s), trees and shrubs are limited to those varieties that do not exceed 10 feet in height at maturity. PG&E must have access to its facilities at all times, including access by heavy equipment. No planting is to occur within the footprint of the tower legs. Greenbelts are encouraged.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**5. PG&E Comment**

Reservoirs, Sumps, Drainage Basins, and Ponds: Prohibited within PG&E's fee strip(s) and/or easement(s) for electric transmission lines.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**6. PG&E Comment**

Automobile Parking: Short term parking of movable passenger vehicles and light trucks (pickups, vans, etc.) is allowed. The lighting within these parking areas will need to be reviewed by PG&E; approval will be on a case by case basis. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications. Blocked-up vehicles are not allowed. Carports, canopies, or awnings are not allowed.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**7. PG&E Comment**

Storage of Flammable, Explosive or Corrosive Materials: There shall be no storage of fuel or combustibles and no fueling of vehicles within PG&E's easement. No trash bins or incinerators are allowed.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**8. PG&E Comment**

Streets and Roads: Access to facilities must be maintained at all times. Street lights may be allowed in the fee strip(s) and/or easement(s) but in all cases must be reviewed by PG&E for proper clearance. Roads and utilities should cross the transmission easement as nearly at right angles as possible. Road intersections will not be allowed within the transmission easement.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**9. PG&E Comment**

Pipelines: Pipelines may be allowed provided crossings are held to a minimum and to be as nearly perpendicular as possible. Pipelines within 25 feet of PG&E structures require review by PG&E. Sprinklers systems may be allowed; subject to review. Leach fields and septic tanks are not allowed. Construction plans must be submitted to PG&E for review and approval prior to the commencement of any construction.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**10. PG&E Comment**

Signs: Signs are not allowed except in rare cases subject to individual review by PG&E.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

**11. PG&E Comment**

Recreation Areas: Playgrounds, parks, tennis courts, basketball courts, barbecue and light trucks (pickups, vans, etc.) may be allowed; subject to review of plans. Heavy equipment access to PG&E facilities is to be maintained at all times. Parking is to clear PG&E structures by at least 10 feet. Protection of PG&E facilities from vehicular traffic is to be provided at developer's expense AND to PG&E specifications.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

## 12. PG&E Comment

Construction Activity: Since construction activity will take place near PG&E's overhead electric lines, please be advised it is the contractor's responsibility to be aware of, and observe the minimum clearances for both workers and equipment operating near high voltage electric lines set out in the High-Voltage Electrical Safety Orders of the California Division of Industrial Safety (<https://www.dir.ca.gov/Title8/sb5g2.html>), as well as any other safety regulations. Contractors shall comply with California Public Utilities Commission General Order 95 ([http://www.cpuc.ca.gov/gos/GO95/go\\_95\\_startup\\_page.html](http://www.cpuc.ca.gov/gos/GO95/go_95_startup_page.html)) and all other safety rules. No construction may occur within 25 feet of PG&E's towers. All excavation activities may only commence after 811 protocols has been followed.

Contractor shall ensure the protection of PG&E's towers and poles from vehicular damage by (installing protective barriers) Plans for protection barriers must be approved by PG&E prior to construction.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*

## 13. PG&E Comment

PG&E is also the owner of distribution facilities throughout many of the areas within the state of California. Therefore, any plans that impact PG&E's facilities must be reviewed and approved by PG&E to ensure that no impact occurs that may endanger the safe and reliable operation of its facilities.

*AMG/CalHDF's Response: Acknowledged. We will work closely with PG&E on this, if applicable, when we reach the construction document phase.*