



May 8, 2024

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

**Re: Response to Completeness Review  
Project No. P2023-055  
Landing Court | APN 153-162-70**

Dear Mr. Marshall:

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

#### **NOVATO PLANNING DEPARTMENT**

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

Subject Line: The subject line of AMG's density bonus letter references 1212-1214 Grant Avenue and APNs 141-262-12 & -13. Based on other application materials, the Department believes these references are incorrect and should address AMG's Landing Court parcel and APN 153-162-70. Provide correct location information. Incomplete.

***AMG/CalHDF's Response:** The subject line is updated to reference the correct project.*

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

Proximity to Transit: The Google Earth image at the bottom of page 2 of the density bonus letter identifies the wrong project site presuming AMG intended to address its Landing Court property. Revise the letter with the correct project site location and associated distance measurement proposed by AMG. Accurate site information is necessary to confirm whether AMG's proposal meets the criteria of Government Code Section 65915(f)(3)(D)(ii) as claimed in the density bonus letter. Incomplete.

***AMG/CalHDF's Response:** Image updated. Please see the revised density bonus memo.*

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

Parking Standards: Notwithstanding whether the Project qualifies for a parking waiver under Government Code Section 65915(p), the density bonus letter references providing 24 on-site vehicle parking stalls, but other submittal information, such as the project plans, reference providing 100 onsite vehicle stalls. Accurate parking information is necessary should AMG's proposal not qualify for a parking waiver. Correct the parking information provided for the project. Incomplete.

***AMG/CalHDF's Response:** Discrepancy corrected. Please see the updated density bonus memo.*

**4. City Comment**

Building Height Reference: Page 5 of the density bonus letter references a building height of 67'-7" at the roof level. The Department has reviewed Sheet A5.0 and other building elevation plan sheets (A4.0, A4.1) in the entitlement plan set submitted by AMG and finds the building height at the roof level is 68'-9". Accurate building height information is necessary to confirm consistency with Government Code Section 65915(d)(2)(D). Review the submitted plans and revise the building height as necessary, including the total height of the building if the roof elevation is modified. Incomplete.

*AMG/CalHDF's Response: The discrepancies have been corrected. The project height to top of stair is 65'-6" and is reflected accurately in the plans and the density bonus memo.*

**5. City Comment**

Concessions. AMG is requesting concessions related to building coverage, outdoor open space, and side setback requirements. AMG provided quantified information for each concession addressing reductions in cost based on a land cost per unit calculation. However, AMG did not provide any documentation listing the actual land purchase price against which the Department can verify the claimed cost reductions. Provide the Department with the grant deed listing the purchase price for the Landing Court property so that AMG's conclusions regarding cost reductions can be verified. Incomplete.

*AMG/CalHDF's Response: A transaction history report from our title company First American is provided as an exhibit in our revised density bonus memo to indicate a purchase price of \$3,300,000.*

**6. City Comment**

TENTATIVE PARCEL MAP

The submitted Application for Zoning/Planning/Subdivision Action includes reference to a tentative parcel map (TPM) application. A TPM and other information typically submitted for such a map was not included with the application materials submitted by AMG. If AMG did not intend to submit a TPM for the Landing Court property then revise and resubmit the application form. If AMG intended to submit a TPM application, then provide all required TPM submittal information detailed in the Tentative Map Submittal Requirements, and Novato Municipal Code (NMC) Chapter V (Development Standards), Chapter IX (Land Subdivision), and Chapter XIX (Zoning), as applicable to the proposed subdivision. Incomplete.

*AMG/CalHDF's Response: A revised application form is provided in this resubmittal and it no longer states that a tentative parcel map is a part of this application.*

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**

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### **1. NMWD Comment**

Construction of new water distribution facilities is required before water service can be provided to the above referenced project. The owner must apply to the District, enter into an agreement with the District and complete financial arrangements for the new facilities as a condition of permit approval. Occupancy approval shall not be granted until water service installation and sign off is complete.

*AMG/CalHDF's Response: Acknowledged.*

### **2. NMWD Comment**

The project must conform to District Regulation 15 – Mandatory Water Conservation Measures. Occupancy approval shall not be granted until compliance with water conservation measures, as applicable, can be verified. For the full scope of the required water conservation measures for both indoor fixtures/appliances and landscaping refer to Regulation 15 (section e. and f.) at [www.nmwd.com](http://www.nmwd.com). 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.*

### **3. NMWD Comment**

Installation of an above-ground, reduced pressure principle (RPP) backflow prevention device at the meter is required in accordance with the District's Regulation 6 (at [www.nmwd.com](http://www.nmwd.com)) and California Department of Health Regulations (Title 17). Upon installation, an inspection report (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, for more specific requirements.

*AMG/CalHDF's Response: Acknowledged.*

### **4. NMWD Comment**

This response regards domestic water service and potential fire protection requirements. The owner should be directed to the Novato Fire Protection District for determination of all final fire protection requirements. Should you have any questions regarding this matter, please contact our Engineering Services Representative at (415) 761-8935.

*AMG/CalHDF's Response: Acknowledged.*

## NOVATO BUILDING DEPARTMENT: Mark Setterland

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**1. City Comment**

Obtain a building permit.

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the construction document phase.*

**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 construction document phase.*

**3. City Comment**

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

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the construction document phase.*

**4. City Comment**

Accessible design and detailing shall comply with California Building Code chapters 11A and 11B due to "Public Housing" as defined in CBC 1.9.1.1

*AMG/CalHDF's Response: Acknowledged. This will be addressed during the construction document phase.*

**1. City Comment**

Show all proposed bioretention basins on the preliminary grading and drainage plan with top of soil and surrounding elevations. Provide sufficient finish grade elevations within DMAs 1 – 3 to demonstrate that they will drain to the bioretention basins.

*AMG/CalHDF's Response: Slope arrows added to show DMA 1-3 drain to bioretention basins.*

**2. City Comment**

Show grate and invert elevations for all proposed drainage structures.

*AMG/CalHDF's Response: All drainage structures labeled with rim and invert elevations.*

**3. City Comment**

Show all driveway aprons on the preliminary grading and drainage plan consistent with UCS Standard Drawing No. 120.

*AMG/CalHDF's Response: Aprons updated to meet UCS Standard Drawing No. 120.*

**4. City Comment**

The Conceptual Building Plans show a trash staging area in conflict with a bioretention basin shown on the preliminary site plans. Please address.

*AMG/CalHDF's Response: Trashing staging areas updated to not conflict with bioretention basin.*

**5. City Comment**

Be aware that the conditions of approval for this development will require construction of off-site pedestrian improvements in the public right of way as follows:

- a. Construct a new 5-foot wide sidewalk (exclusive of the curb width) along the north side of Landing Court from the west end of the site frontage to the northeast corner of the intersection of Landing Court and main Redwood Boulevard (the smaller eastern frontage road paralleling Redwood Boulevard is referred to herein as Redwood Road). The existing curb and gutter may need to be realigned if there is not sufficient right-of-way between the existing curb and the adjacent property line. Reconstruct the existing driveway serving the adjacent parcel to meet current City Standards.

*AMG/CalHDF's Response: See Sheet C1.1 for improvements to Landing court and Redwood Road.*

- b. Construct new pedestrian curb ramps at the northeast and northwest corners of the intersection of Landing Court and Redwood Road and at the northeast corner of the intersection of Landing Court and Redwood Boulevard (for a total of three new curb ramps). Remove and replace the existing catch basin at the northeast corner of the intersection of Landing Court and Redwood Road to accommodate the new curb ramp.

*AMG/CalHDF's Response: See Sheet C1.1 for improvements to Landing court and Redwood*

*Road.*

- c. Mark a new crosswalk between the northeast and southeast corners of the intersection of Landing Court and Redwood Boulevard. Modify the existing raised median as necessary to accommodate the new crosswalk. Remove and replace the existing pavement markings as necessary to accommodate the new crosswalk.

*AMG/CalHDF's Response: See Sheet C1.1 for improvements to Landing court and Redwood Road.*

- d. Remove the existing mid-block crosswalk markings on Landing Court.

*AMG/CalHDF's Response: See Sheet C1.1 for improvements to Landing court and Redwood Road.*

6. Submit a 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.

*AMG/CalHDF's Response: A preliminary SCP has been included with this submittal.*

7. 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: A preliminary analysis has been reviewed and a letter describing the existing and post-development conditions has been included with this submittal. A more detailed hydraulic study for the on-site storm drain system would not be accurate at this time as the plans will need to be further coordinated, specifically as it relates to roof drainage with the design team and plumbing engineer, but the overall approach will be a net reduction in impervious area on the site and thus an overall reduction in peak runoff post-development, which should be sufficient to address planning level comments. Please also see Exhibit A for Sandis's review of the flood plain.*

**1. NFD/BV Comment**

F1. CS-1: Under proposed building design information "MAXIMUM BUILDING HEIGHT", it shows the building will be comprised of six (6) aboveground stories with a height of 67'-7" (77'-6" to top of stair). Per City of Novato Design Guidelines & Municipal Code, this building elevation may not exceed 35' in total height. The California State Density Bonus Law (SDBL) §65915(d)(2)(D) cited to increase the buildings permitted height as stated above would require prior City approval as well as competently demonstrating the specific percentage (%) of affordability units proposed (Very-low income, low income or moderate-income households based on the area's median income (AMI). Provide all justifying documentation and calculations for examination by the city for review of this request. See: May 17, 2023 update to SBDL. California State SBDU update. May 17, 2023

*AMG/CalHDF's Response: A density bonus memo is provided which speaks to our ability to have a height greater than 35 feet.*

**2. NFD/BV Comment**

F2. CS-1: Based on proposed use, the entire building (all six [6] stories of parking and apartments) will be required to be fully protected by a fire sprinkler system conforming to 2022 NFPA 13 & 2022 CFC §903.3.1.1.

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

**3. NFD/BV Comment**

F3. CS-1: 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.

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

**4. NFD/BV Comment**

F4. CS-1: Based on the proposed building height of 67'-7", this building will likely require a 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.*

**5. NFD/BV Comment**

F5. Ensure compliance with Novato Fire Prevention Standards for Fire Protection and CFC 2022 Appendix B & C Fire flow requirements & Fire Hydrant Locations & Distribution (as it appears to be only one fire hydrant on the corner of Grant Ave. & 1st Street, on the opposite corner from the building).

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

**6. NFD/BV Comment**

F6: A1.1 Based on the conceptual fire plan provided, no new or existing fire hydrants are shown on this site

plan or within surrounding areas. It will be necessary to provide fire hydrants capable of supporting the required fire flow per 2022 CFC §507.3 based on the total area of the building and the building's construction type per 2022 CFC §507.1, Appendix B & C and City of Novato Standards.

*AMG/CalHDF's Response: Five hydrants have been called out on the plan.*

**7. NFD/BV Comment**

F7. A1.1: Based on building height and location on property, it may be required the site fire access be modified to meet Novato Fire Department operational abilities for their aerial ladder trucks with outriggers deployed based on building proximity to fire apparatus access roadways and building height per 2022 CFC §503.1.1.

NOTE: The dimensions of required fire apparatus access roadways (fire lanes) may exceed the 24' shown on plans in proposed fire lane(s) from Landing Ct.

*AMG/CalHDF's Response: Acknowledged. We are proposing a 24'-0" wide fire lane located northerly of the site, and a 26'-0" wide fire aerial apparatus access lane with a commercial cul de sac for fire turnaround located southerly of the site. Refer to Sheet A1 Site Plan and Sheet C1.0 for reference.*

**8. NFD/BV Comment**

F8. A2.0: Proposed trash collection rooms and trash chute intake rooms will be required to be separated from the rest of the building by both vertical and horizontal rated assemblies with rated opening protectives and chute (shaft) vents at the roof level per 2022 CBC §707, §711, §713.2 2019 NFPA 82.

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

**9. NFD/BV Comment**

F9. L1: Any proposed gates or fences on this site are required to be submitted for review and approval by both the City of Novato Building and Fire department per 2022 CFC §503.4, §503.6 & §504.1.

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

**10. NFD/BV Comment**

F10. Note: 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. This will be addressed during the building permit stage.*

**11. NFD/BV Comment**

F11. 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 Section 403.1.1

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

**12. NFD/BV Comment**

F12. 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 Section 503.1.5

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

13. F13. 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 Section 503.1.5.1

**AMG/CalHDF's Response:** *Acknowledged. The fire aerial apparatus access lane with a commercial cul de sac for fire turnaround is 26 feet in width, and the cul de sac is designed per Novato Fire Protection District Fire Loss Management Division – Fire Protection Standard 215-20, Commercial Cul de sac turnaround. Refer to Sheet A1 Site Plan and Sheet C1.0 for reference.*

14. F14. 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. 2022CFC Section 503.1.5.3

**AMG/CalHDF's Response:** *There are no overhead lines conflicting with aerial fire apparatus access.*

15. F15. All driveways and parking areas shall accommodate Novato Fire District apparatus turning radius per NFD standards.

**AMG/CalHDF's Response:** *The project has included a 90' radius cul-de-sac turnaround on site in compliance with Novator Fire District standards.*

16. F16. 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.*

17. F17. CS-1: Per Marin County's Assessor map for parcel 153-162-70, this parcel falls within a wildland urban interface (WUI) area and is subject to all Marin County and Novato Fire Protection District WUI construction requirements. These include construction type and ignition-resistant materials, fire-resistant vegetation (landscape per 2022 CFC §4906.3), fire protective features as required per 2022 CBC Ch. 7A and 2022 CFC Ch. 49.

See City of Novato Fire Prevention link below for specific WUI vegetation management plan requirements (Novato FPS-220):

<https://www.novatofire.org/home/showpublisheddocument/9966/637705158877430000>

See City of Novato Building Department link below for other WUI-related documents:

<https://www.novato.org/government/community-development/building-division/guides-forms-consumer-alerts>

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

## NOVATO SANITARY DISTRICT: Michael Brewer

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1. The project plans indicate a connection to the sewer system on the southwest side of the building using a 6-inch lateral, which is intended to connect to a 6-inch sewer main. It has come to our attention that, based on both district standards and the California plumbing code, a development of this magnitude must connect using a lateral of 8 inches or greater. This requirement ensures the capacity and integrity of the sewer system for a project of such scale.

*AMG/CalHDF's Response: OK, the sewer laterals for the building have been revised to show two 8" lines. We will determine if one can be used with coordination with the project MEP during the project's permit phase. The existing sewer lateral will be removed / plugged at the main.*

2. Moreover, upon a thorough analysis, it has become evident that the existing 6-inch sewer main lacks the capacity to adequately serve a development of the proposed size. As such, we must insist that the project be modified to comply with the following directives:

- a. Lateral Size Requirement: The project shall be required to connect to the sewer system using an 8-inch or greater lateral, in accordance with district standards and the California plumbing code.

*AMG/CalHDF's Response: OK, the sewer laterals for the building have been revised to show two 8" lines. We will determine if one can be used with coordination with the project MEP during the project's permit phase.*

- b. Connection to Existing Main: The project shall connect to the existing 39-inch sewer main located in the right-of-way (ROW) of Landing Court. This connection should be established using an appropriately sized lateral, connecting to either an existing or a newly constructed manhole, as per engineering recommendations.

*AMG/CalHDF's Response: OK, the sewer laterals are shown connecting to the existing 39 inch sewer main with new manholes in Landing Ct.*

## PACIFIC GAS & ELECTRIC: Plan Review Team, Land Management

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### 1. PG&E Comment

PG&E operates a 2" underground gas distribution main within the subject property. All trees and brush planted near the referenced gas main shall maintain a minimum distance of 5-feet for safety and access purposes, both routinely and in case of an emergency.

Please contact the Building and Renovation Center (BRSC) for facility map requests by calling 1-877-743-7782 and PG&E's Service Planning department at [www.pge.com/cco](http://www.pge.com/cco) for any modification or relocation requests, or for any additional services you may require.

*AMG/CalHDF's Response: Notes regarding the existing gas main and the prohibition of trees / shrubs within 5' of it has been added.*

### 2. PG&E Comment

As a reminder, before any digging or excavation occurs, please contact Underground Service Alert (USA) by dialing 811 a minimum of 2 working days prior to commencing any work. This free and independent service will ensure that all existing underground utilities are identified and marked on-site.

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

### 3. 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.*

### 4. 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.*

### 5. 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.*

### 6. 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**

#### **1. 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&E'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.*



April 30, 2024  
Project No. 619115.A

Amanda Locke  
AMG & Associates, LLC  
P.O. Box 260770  
Encino, CA 91426  
T: 818.600.2518  
E: alocke@amgland.com

**RE: 125 LANDING COURT  
FLOODPLAIN REVIEW  
NOVATO, CA**

Dear Amanda,

This letter is written in response to Comment #7 of the City of Novato's Incompleteness Letter, dated August 24, 2023, requesting an analysis to confirm the project will not exceed the existing peak runoff rate for the 25-year storm event. The proposed project will be reducing the overall imperviousness of the site by approximately 20% (80,309 SF predevelopment vs. 64,860 SF post development). Therefore, the project will see a similar reduction in peak flow rate post project development, thus exceeding this requirement. Additional calculations for the sizing of the onsite private storm drain pipes can be provided in the permit submittal when the design is further along, if necessary, but we believe this explanation satisfies Comment #7 of the city's letter.

In addition, we understand based on previous meetings with city staff in 2020, that there was a concern the project site may experience flooding during large storm events. In response to this concern, we have reviewed the attached Marin County Flood Control District Maps and determined our site is not in a flood hazard zone. The storm drain system from our site ultimately discharges via a 48" outfall to a Marin County Flood Control District ponding area that is southeast of our site. Based on the attached as-built, the flood elevation of the ponding area is at elevation 10.0. The proposed building's finished floor elevation is 13.4 and the lowest catch basin rim elevation is at 12.0. Our site is a minimum of 2.0-ft above the downstream flood plain, and therefore, the proposed site will not flood during large storm events.

Regards,

**SANDIS**

A handwritten signature in blue ink, appearing to read "Gregory Trela".

Gregory Trela  
Project Engineer

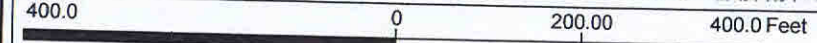
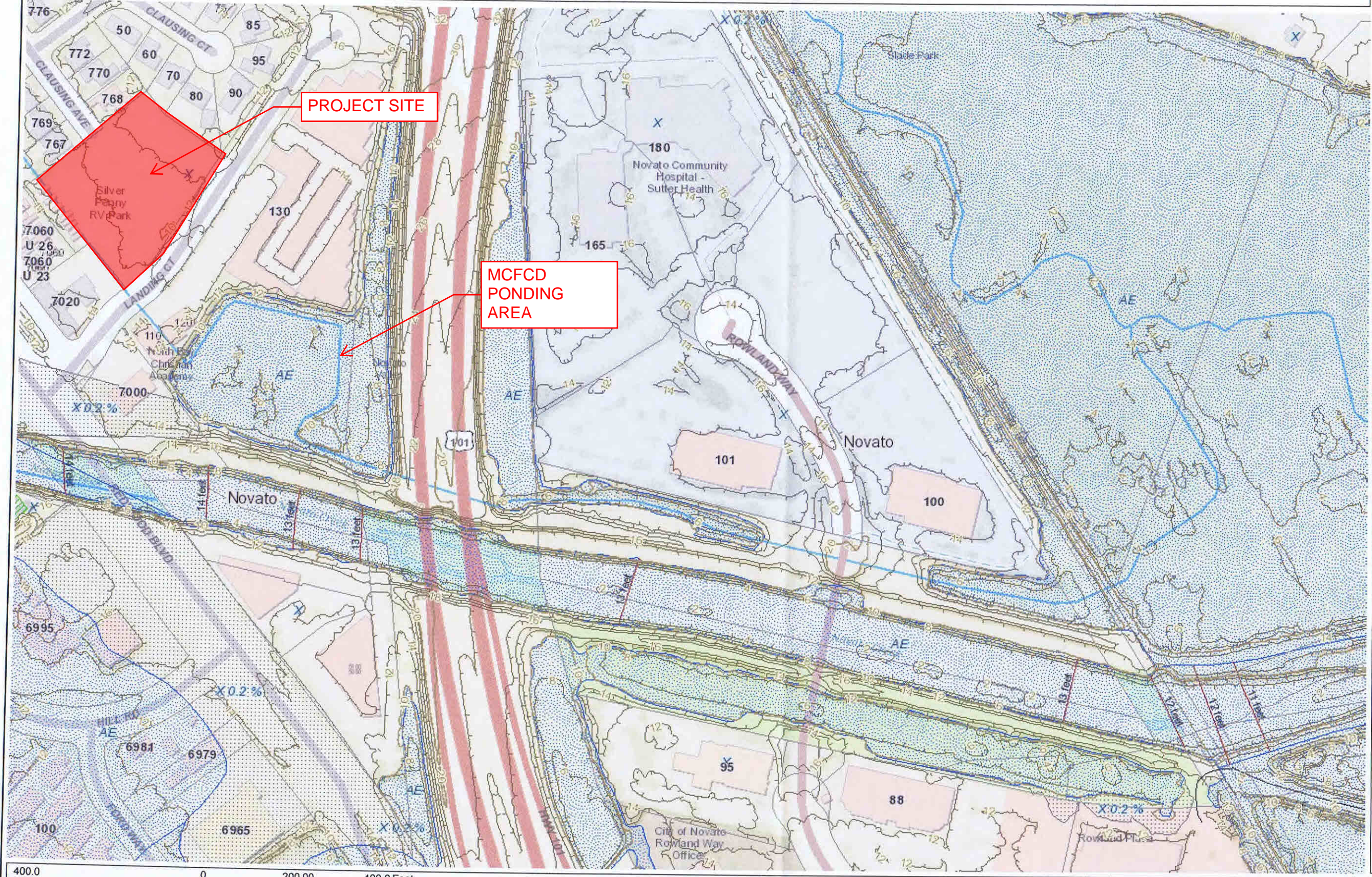
Attachment: Marin County Flood Control District Maps



PROJECT SITE

MCFCFD PONDING AREA

- Legend**
- Parcel Note
    - ◻ easement
    - ◻ centerline
  - Address
    - ◻ Parcel
    - ◻ Condominium Common Area
    - ◻ Mobile Home Pad
    - ◻ City
    - ◻ Community
  - Elevation\_2017\_1ft
  - Elevation\_2017\_idx\_5ft
  - Marin County Legal Boundary
  - Other Bay Area County
  - 2-foot Elevation NAVD88
  - Interior
  - Index
  - Base Flood Elev, August 2017
  - Flood Hazard Zone, August 20
    - A
    - AE
    - AE, FLOODWAY
    - AH
    - AO
    - D
    - V
    - VE
    - X
    - X
    - X
  - Letter of Map Change: Valid O
    - LOMC Approved
    - LOMC Denied

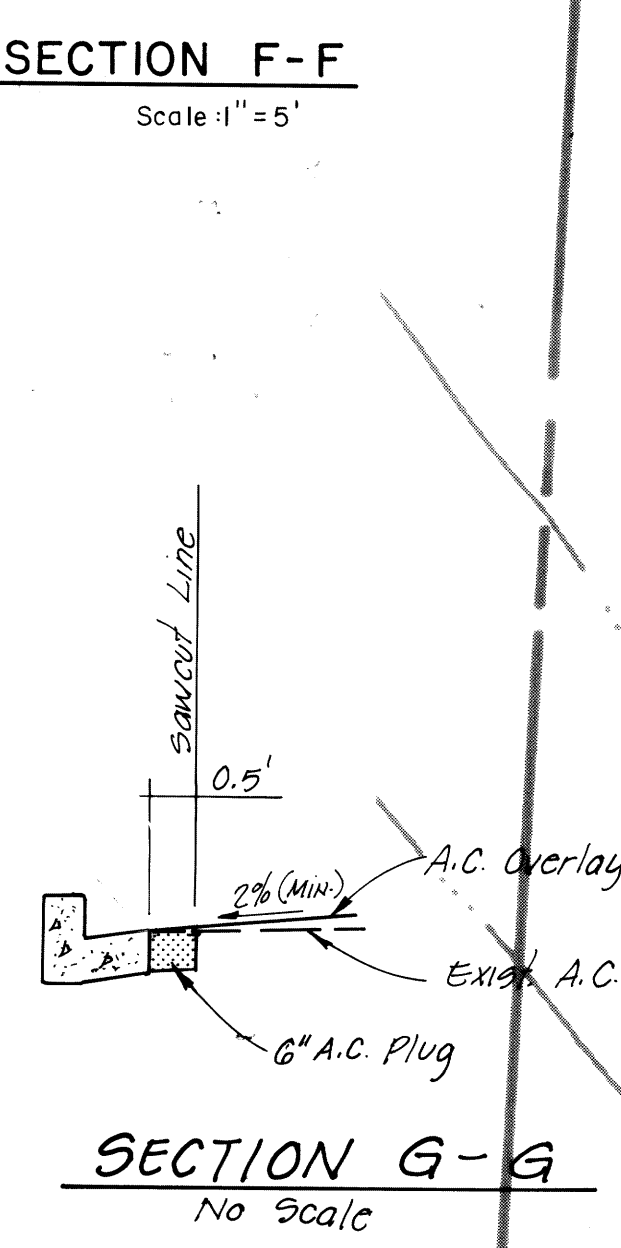
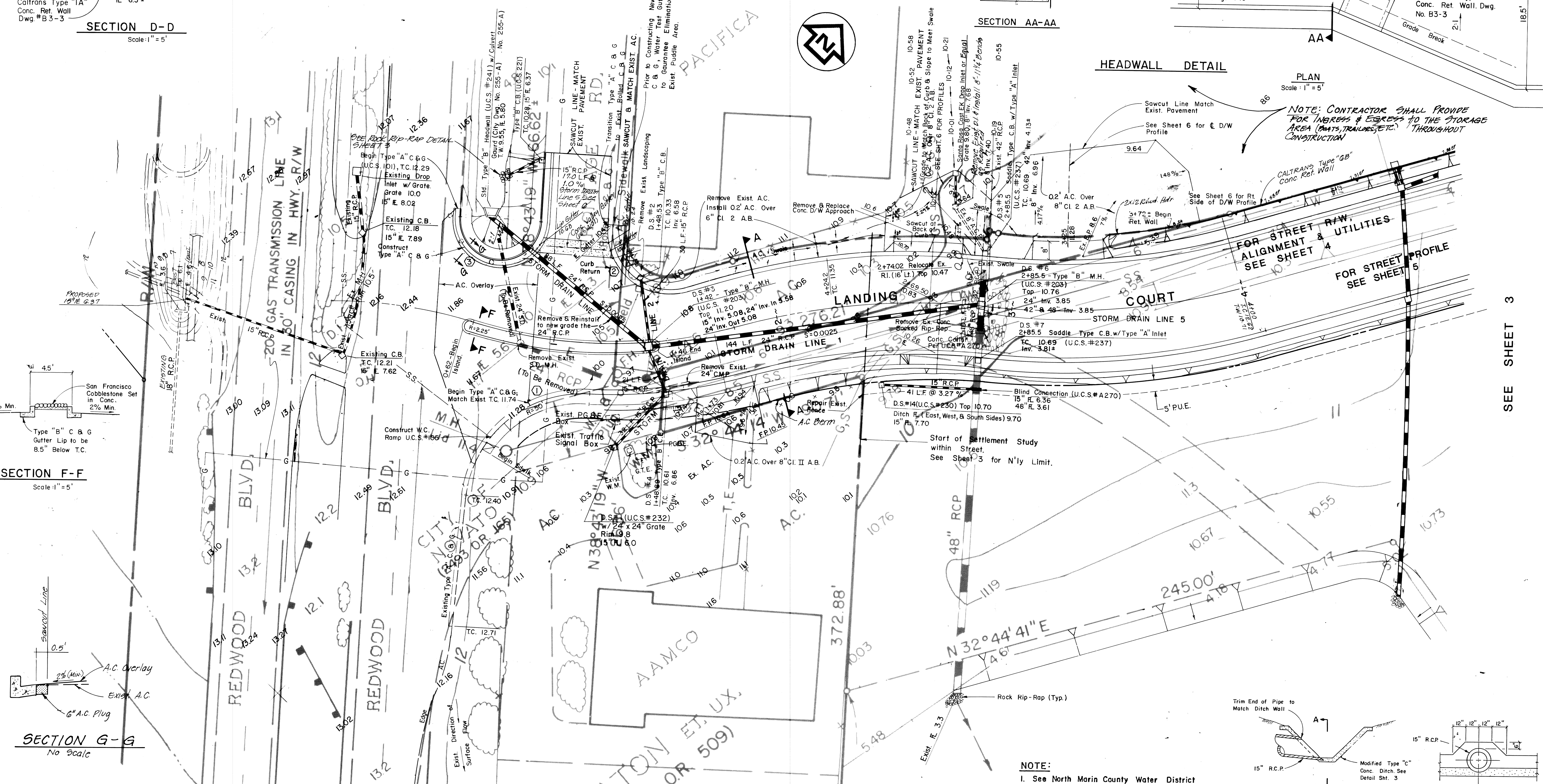
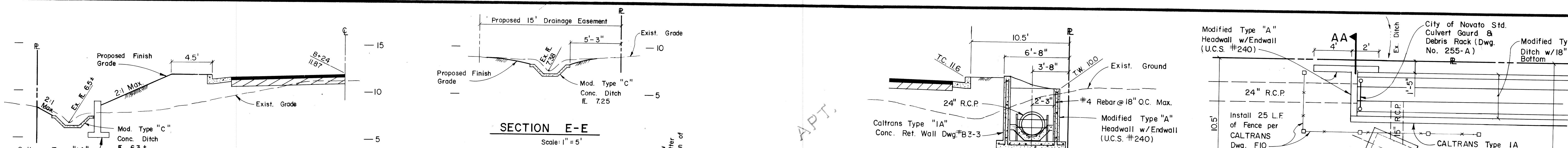


NAD\_1983\_HARN\_StatePlane\_California\_III\_FIPS\_0403\_Feet  
© Latitude Geographics Group Ltd.

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.  
THIS MAP IS NOT TO BE USED FOR NAVIGATION

1:2,400

**Notes**  
This map was automatically generated using Geocortex Essentials.



NUMBER	DATE	DESCRIPTION	BY
15	7/1 and 7/19/88	REVISED D/W AREA AT PACIFICA APTS.	J.K.M.
12	4/25/85	REVISED D/W ENTRY @ STN 3+25	J.C.S.
11	4/9/85	REVISED STORM DRAIN	PMI
10	2/25/85	ADDED CONC VALLEY GUTTER, RIP-ROCK ETC @ INTERSECTION	M.P.A.
9	1-13-88	REVISED PER CITY CHECK PRINT #2	S.K.B.
8	12-10-87	REVISED PER CITY CHECK PRINT #1	S.K.B.
7	8-14-87	REVISED OFFSITE & STREET IMPROVEMENTS	RT
6	8-13-87	REVISED INTERSECTION OF REDWOOD BLVD AND LANDING CT.	S.K.B.
5	8-28-86	REVISED PER CITY CHECK PRINT #4	S.K.B.
4	4-7-86	REVISED PER CITY CHECK PRINT #3	S.K.B.
3	3-11-86	REVISED PER CITY CHECK PRINT NO. #2	S.K.B.
2	12-2-85	REVISED PER STORM DRAIN CHECK PRINT #2	S.K.B.
1	11-25-85	REVISED PER STORM DRAIN CHECK PRINT #1	S.K.B.

DRAWN BY:	S.K.B.
DESIGNED BY:	G.C.
CHECKED BY:	S.K.B.
SCALE:	1" = 20'
DATE:	NOV. 1984
F.B. REF.	

**(St) STUBER-STROEH ASSOCIATES, INC.**  
CONSULTING ENGINEERS & SURVEYORS  
790 De Long Ave., Suite 7, Novato, CA, 94947, 415-892-4763

PREPARED UNDER THE DIRECTION OF:  
  
DATE: \_\_\_\_\_

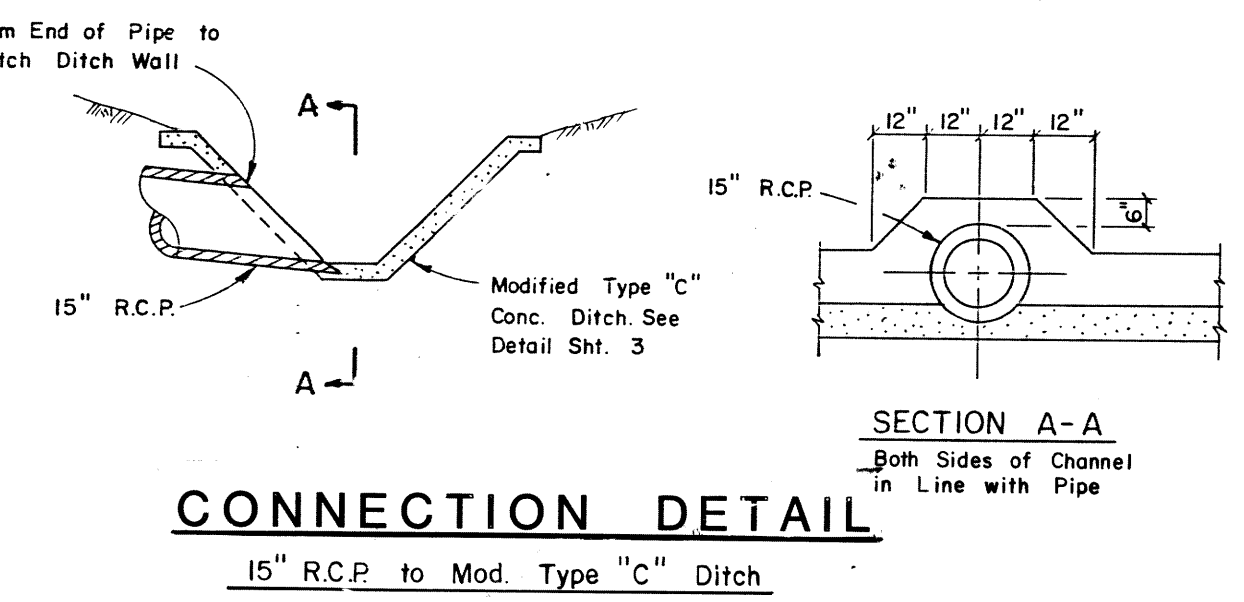
**NOVATO CREEK LANDING OFFICE COMPLEX GRADING & DRAINAGE PLAN**

NOVATO CALIFORNIA

JOB NO. 367-011

80-808

- NOTE:**
- See North Marin County Water District Drawing Number 12106.00-C-1 for all Water Main Construction.
  - See Sheets 5 & 6 for Storm Drain Profiles.
  - See Sheet 6 for Curb Returns.



SEE SHEET 3

SHEET 2 OF 9