
VIA EMAIL

Immanuel Bereket – Principal Planner
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**Re: Response to County’s 2nd Incomplete Letter for Project ID P4134 Souang Vesting Tentative
Map and Housing Compliance Review APN 164-280-35**

Dear Mr. Bereket,

Thank you for your letter dated April 10, 2024 (the “2nd Incomplete Letter”) regarding the above-referenced housing development project. The Incomplete Letter includes 13 comments from Planning, plus additional comments from Public Works, Engineering, Las Galinas Valley Sanitation District and Marin County Fire Department. The comments are intended to be addressed before the project application can be deemed complete. We continue to desire to work productively with the County of Marin in efficiently processing this project and our responses to the enumerated comments are thus as follows.

Comment 1. In conformance with submittal checklist item No. 9, provide a staking plan showing development features including building footprints, proposed lot corners, and the limits of grading and development envelopes. Said plan shall be prepared by the project architect, designer, civil engineer or qualified professional and the stakes shall subsequently be installed.

Response. Comment noted. On the Marin County Application Submittal Checklist dated May 2023, Site Staking is noted as an item where “Information may be required based on project-specific circumstances”. Since this is not a universal requirement for all development applicants seeking the same approvals, it is not a state mandated completeness item pursuant to the Permit Streamlining Act (Gov. Code § 65920 et seq.) and in particular Government Code § 65940, which requires (a)(1) Each public agency to compile one or more lists that shall specify in detail the information that will be required from any applicant for a development project (See also Gov. Code §§ 65940.1(a)(1)(C) [requiring uniform application checklists to be posted in advance online], 65942 [any modification to the uniform application checklists shall apply prospectively only to applications submitted subsequently], and 65943(a) [limiting those items included on an incompleteness determination to those “actually required” on the County’s uniform application

checklist]. That said, the applicant will work with the County to provide any and all information needed to prepare the Project application for consideration on the merits, including robust environmental review, and will work with the County to submit and execute a Site Staking plan to the extent necessary to take final action on the Project application and/or comply with CEQA.

Comment 2. In conformance with submittal checklist item No. 18, submit a cross-section through each proposed residence that is based on accurate topography and indicates the finished floor, foundation line, and roof ridge elevations.

Response. Comment noted.

Comment 3. In conformance with submittal checklist item No. 19, provide pictures of the color and materials of all proposed retaining walls in excess of six feet in height on the plans.

Response. Comment noted. Please see revised Landscape Sheets

Comment 4. In conformance with submittal checklist item No. 30, submit a photo simulation of the proposed project prepared by a qualified professional or firm that is acceptable to the County. The location of the viewpoint for the photo-simulation shall be coordinated and approved by Planning staff prior to the photo-simulation being prepared.

Response. Comment noted. On the Marin County Application Submittal Checklist dated May 2023, Photo-Simulations & 3D Renderings is noted as an item where “Information may be required based on project-specific circumstances”. Since this is not a universal requirement for all development applicants seeking the same approvals, it is not a state mandated completeness item pursuant to the Permit Streamlining Act (Gov. Code § 65920 et seq.) and in particular Government Code § 65940, which requires (a)(1) Each public agency to compile one or more lists that shall specify in detail the information that will be required from any applicant for a development project (See also Gov. Code §§ 65940.1(a)(1)(C) [requiring uniform application checklists to be posted in advance online], 65942 [any modification to the uniform application checklists shall apply prospectively only to applications submitted subsequently], and 65943(a) [limiting those items included on an incompleteness determination to those “actually required” on the County’s uniform application checklist]. That said, the applicant will work with the County to provide any and all information needed to prepare the Project application for consideration on the merits, including robust environmental review, and will work with the County to submit a Photo-Simulations & 3D

Renderings to the extent necessary to take final action on the Project application and/or comply with CEQA.

Comment 5. In conformance with submittal checklist item No. 1 (Land Division or Subdivision), submit all items described in the Planning Application Submittal Checklist for a Tentative Map (starting on page 9 of the Marin County Planning Application Submittal Checklist). The application did not provide the required information and documents. The Tentative Map must be prepared by a registered civil engineer or licensed surveyor to clearly show the details of the map (preferably one-inch equals 10 feet). The title of the tract must be shown on the Tentative Map. Existing and proposed property lines, easements, and other boundary lines such as zoning and city limits, as well as Assessor Parcel numbers are required. Average lot slope calculations for the original lot and all proposed lots must be shown on the Tentative Map. The net lot area calculation must be shown on the Tentative Map. Either “Tentative Map” or “Vesting Tentative Map” must be printed in bold letters across the top of the Tentative Map. Proposed drainage, proposed public areas, and justifications and reasons for any exceptions requested must be provided. Tentative Map does not appear to include the remainder parcel, over which much of the grading will occur.

Response. Comment noted. Please see revised Civil Sheets

Comment 6. . In conformance with submittal checklist item No. 1, submit all of the following items:

a. 1.B. Boundaries – The site plan must show all existing and proposed lot lines, labeled with their metes and bounds, identify open space and plot, label and dimension the boundaries for all existing and proposed easements and rights of way. Refer to Marin County Code (MCC) 24.05 for minimum easement widths and MCC 24.04 for minimum required road widths. As the roads are to be private, clarify if an access easement and utility easement will be created for the home and Nunes Fire Road on remainder parcel.

b. 1.C. Structures – Show and label the footprint of all existing and proposed structures and buildings on the property, including any structures to be removed. Label proposed retaining walls and indicate the top and bottom of wall elevations. The minimum setbacks from the exterior walls of all buildings to all property lines and access easements must be dimensioned on the plans.

c. 1.E. Lighting – Applicant shall identify all proposed exterior lighting, including for the individual homes, landscaping, common areas and streetlights. Plan shall include existing street lights on Lucas Valley Road and any lighting proposed at the intersection with Lucas Valley Road.

d. 1.I Parking and Access – Plans shall provide detailed information on access to the site from the improved Lucas Valley Road. Roadway Improvements shall conform to Marin County Code 24.04 Section I. Roads (MCC 24.04.020 – 24.04.230). This Application proposes 36 new homes in addition to the existing residence and 9 proposed Junior Accessory Dwelling Units; the road A Street shall be considered a3 residential road and roads B and C Streets will be considered minor residential roads.

i. Show the entire width of the Lucas Valley Road right of way along the frontage of the subject property and 300 feet to the east of the subject parcel (east of tree cluster at parking area for trail head to include mapped ephemeral water course), including all roadway improvements (road surface, curb, gutter, striping, signage, drainage improvements) and the improvements associated with Mt Muir Court intersection, road side drainage, the area associated with parking for the trail head and access to the neighboring property at 1499 Lucas Valley Road.

ii. Identify improvements associated with connecting the road for the new subdivision to the travel way on Lucas Valley Road, including striping, signage, intersection improvements, drainage improvements, etc.

iii. Clarify how modified access to existing home will maintain access to the Fire road and will provide turnouts, and if the access through the subdivision will be via an easement.

e. 1.K. Associated Design Elements – show the location of identification signs, street signs, trash enclosures, fencing, paths, walkways, mailboxes and retaining walls that affect the exterior use of the property.

Response. Comment noted. Please see revised Civil Sheets

Comment 7. In conformance with submittal checklist item No. 3, provide a preliminary drainage plan, prepared by a qualified civil engineer, hydrologist, architect or landscape architect, showing all existing and proposed drainage improvements and drainage patterns for the site, structures, proposed roads and other improvements. Plan shall show existing roadside drainage along Lucas Valley Road and indicate drainage improvements associated with the required grading. Provide sufficient information to demonstrate that the project will not increase runoff onto adjacent properties. Hydrologic calculations are required to determine whether there would be any additional surface run-off resulting from the development. Drainage improvements shall be prepared in coordination with Submittal Checklist Items 11 Stormwater Control Plans, 35 Preliminary Geotechnical Report, and 36 Hydrological Report.

Response. Comment noted. Please see revised Civil Sheets and Hydrological Report

Comment 8. In conformance with submittal checklist item No. 4, indicate the size of proposed extensions and location of existing service mains. Show the alignment of existing onsite well, water lines and septic to determine any conflicts or required modifications. Provide documentation to verify if project is currently in the service districts for each of the following service providers or if the property must be annexed into any service district. Also refer to MCC 24.04.24.04.840(f).

- a. Las Gallinas Valley Sanitary District (LGVSD)
- b. Marinwood Community Services District
- c. PG&E
- d. Marin Sanitary Service - Trash/recycling
- e. Marin County Fire

Sheet C7.0 indicates that there are no existing septic tanks or wells on the subject property. Clarify how service laterals to the home from the service mains are aligned and if an easement is required for them passing through the subdivision.

Response. Comment noted. Please see revised Civil Sheets

Comment 9. In conformance with submittal checklist item No. 7, a site survey must be prepared and signed by a licensed surveyor whose name, address and phone number are indicated. Surveys shall show all property lines, boundaries, rights-of-way, easements, locations of structures and other improvements. Also see submittal requirements for a Tentative Map beginning on page 9 of the Planning Application Submittal Checklist

Response. Comment noted. Please see revised Civil Sheets

Comment 10. In conformance with submittal checklist item No. 11, provide Stormwater Best Management Practice Plans, which must include the following information:

a. Provide a Stormwater Control Plan, as required by Marin County Code § 24.04.627 Permanent Stormwater Controls for New and Redevelopment. You may refer to the BASMAA Post Construction Manual which you can access at the County's website for post-construction stormwater management requirements, publications and resources at:

<https://www.marincounty.org/~media/files/departments/pw/mcstoppp/development/basmaa-postconstruction-manual.pdf?la=en> . Follow direction in Appendix D, Stormwater Control Plan Template for Regulated Projects, of the BASMAA Post Construction Manual, and provide correct reference to this Manual.

b. Provide documentation required to demonstrate the project meets the exceptions in the BASMAA Manual.

c. Provide a draft O&M Plan. Applicant shall clarify how the common stormwater controls will be owned and maintained.

d. Provide Hydrology calculations – also see Submittal Checklist Item 36.

e. Project will be subject to trash control/capture requirements (install and maintain certified full trash capture devices on private storm drain system). See MCC 22.20.100, also provided as ATTACHMENT 3.

Response. Comment noted. Please see Stormwater BMP Plans

Comment 11. In conformance with submittal checklist item No. 13, provide an Emergency Access and Evacuation Map for properties within the proposed development that shall include the following:

a. Width of the right of way, road prism and the paved roadway and curbs or shoulders.

b. All horizontal and vertical obstructions.

c. Alleyways and pedestrian access alignments.

d. Road profiles and sections for roadway segments exceeding a slope of 15% grade, that show centerline radii, vertical curves, superelevation and grades.

e. Road surface and structural section.

f. Turnarounds and turnouts.

g. Culverts.

h. Red curbs and areas where parking is restricted.

Response. Comment noted. Please see revised Civil Sheets

Comment 12. In conformance with submittal checklist item No. 36, a hydrological report shall be prepared by a qualified hydrologist, geomorphologist or engineer. Report shall provide calculations of pre-project and post-project amounts of stormwater runoff. The report shall assess whether the proposed project would increase the likelihood of downstream erosion, channel instability or flooding, or other potentially significant impacts to the environment. If the study finds that the project could result in a significant impact, then a further evaluation of potential mitigation measures may be required. Refer to the BASMAA manual and Marin County Code 24.04. section VI. Drainage Facilities. The Hydraulics Report shall include the following:

a. Develop a connected stormdrain model using a SWMM engine or equivalent. Model all hydraulic conveyance elements (i.e. pipes, culverts, open channels, basins, outfalls) as discrete entities.

b. Contributing watersheds shall be modeled with hydrologic rainfall-runoff transformation methods. The delineation of the contributing watersheds shall be in terms of significant drainage divides and significant differences in runoff characteristics. Roofs and impervious connected drainage areas shall be reflected explicitly in the model discretization.

c. All error message and internal modeling error analysis (i.e. continuity error percentage) shall be provided. Large continuity errors shall not be allowed (based on the judgement of the County engineer). Hand calculations using rational method is not preferred.

d. Downstream boundary conditions shall be fully described, and the model domain shall be extended downstream far enough to allow for convergence.

e. The design rainfall shall be based on Alternating Blocks hyetograph using values for NOAA Atlas 14 latest edition for depths. Other design rainfall approaches may be considered, the consultant shall submit their design rainfall plan prior to performing the analysis. Historic rainfall (i.e. NY 2005 flooding event) for model validation to known flooding patterns shall be conducted where anecdotal or high water marks are available. If applicable, more than one design storm shall be used – one small, more intense storm for stormdrain system sizing and one higher volume storm event for volume-based designs (i.e. detention storage). If hydromodification mitigation and/or water quality design is required, then refer to the Marin stormwater program guidelines (MCSTTOPP).

f. The resultant hydrograph shall not differ in impacts from the existing site runoff hydrograph.

g. All modeling assumptions and input parameters shall be fully described in an H&H report. The model of existing conditions shall be calibrated with any data (or highwater marks and local knowledge) if it exists or validated to any known patterns of flooding.

h. The H&H report shall contain results consisting of a plan of all proposed storm drain systems, with proposed pipe sizes and invert elevations, open channel sizes and invert elevations, contributing watershed areas, peak 10-year design flows, and peak 10-year hydraulic grade lines. The proposed 10-year peak hydraulic grade lines shall remain at least 0.5 ft below proposed and existing gutter grades.

i. The report shall also document 100-year peak design flows and overland flow paths with sufficient calculations to show that they 100-year flows stay in the streets with at least 1 ft freeboard to house pads, and show release points. Existing offsite drainage systems that serve as boundary conditions shall also be shown with peak flows and hydraulic grade lines.

j. The report shall also document the off-site 100-year floodplain if it encroaches on or near the property, and that the design protects the development from the floodplain and does not negatively impact it.

Response. Comment noted. Please see Hydrological Report

Comment 13. In conformance with submittal checklist item No. 40, provide a traffic study that evaluates the existing levels of service at intersections around the project site, the proposed level of service including the project, calculate existing peak PM trips and PM peak trips added by the project, and determine cumulative traffic conditions.

a. The applicant shall conduct a traffic study to determine the impact of the proposed project on the Lucas Valley Road corridor. In particular, the traffic study shall address intersection operations including at the intersections of Mt. Muir Ct., Mt. Lassen Drive and the Lucas Valley/ Highway 101 interchange, as necessary. The study shall include analysis of turning movements, level of service, acceleration lanes, and sight distance. Mitigation measures for any changes to safety or service along Lucas Valley Road shall be included in the traffic study.

b. In accordance with Section 24.04.030 of the Marin County Code, A Street is classified as a residential road and B and C Streets are classified as minor residential roads. In Accordance with Section 24.04.110 "A" Street shall have a paved width from curb face to curb face of 36-feet. Revise the plans and maps to show the minimum required road right of way and roadway width.

c. In accordance with Section 24.04.120 centerline road grades shall not exceed twelve percent on residential roads. Submit a request for an exception if this standard is proposed to be exceeded.

d. The AASHTO -A Policy on Geometric Design of Highways and Streets says "Closely spaced offset intersections should be avoided, whenever practical." The proposed road should align with Mt. Muir Court to provide a four-way intersection, as does the current access road to the property. The revised plans do not show the project connection to Lucas Valley Road.

e. In accordance with MCC 24.04.440 sidewalks shall be required on both sides of all roads within residential areas where densities will be equal to or exceed four units per acre. Street and sidewalk designs shall conform to the Marin County Bicycle and Pedestrian Plan, including the installation of a planting strip with street trees adjacent to new streets. Submit a request for Design Review approval if the standards are proposed not to be satisfied.

f. Per MCC 24.04.230 Private Roads shall connect to public roads by means of a driveway approach or alternative feature, approved by the agency, which shall clearly define the limits of each. Submit a request for an exception if this standard is proposed not to be satisfied.

With the submission of the revised plans in combination with the responses above, we respectfully request the Planning Department deem this application complete and move the project forward.

Sincerely,



Steve Reilly, Managing Member
330 Land Company, LLC

Cc: Travis Brooks, Miller Starr