



March 25, 2024

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

RE: Response to Completeness Review
Project No. P2023-057
1107 & 1119 Grant Ave | APNs 141-282-04 & -07

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

AMG's application materials indicate the owner of the Project Site is San Jose Housing and Land Investors, LLC. However, the preliminary title report submitted with the entitlement applications dates to 2020 and lists the owner as Bromich, LLC. Submit a current preliminary title report. Incomplete.

***AMG/CalHDF's Response:** Updated preliminary title reports are provided for both APNs.*

2. City Comment

Project Description: Page 1 of AMG's density bonus letter describes the Project as containing 173 dwelling units. However, the housing affordability table on the same page references a total of 350 dwelling units. Revise the density bonus letter to provide a consistent and accurate accounting of the dwelling units proposed in the Project and their proposed affordability level. Incomplete.

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

3. 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 outdoor 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 12,975 sq. ft. representing 50% of the total of 25,950 sq. ft. of private and common open space combined. 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.*

4. 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 reduction claimed in this concession request. Provide the Department with the grant deed listing the purchase price for the Project Site so that AMG's conclusions regarding costs can be verified. Incomplete.

AMG/CalHDF's Response: Property profile reports are provided for both APNs as an exhibit in our revised density bonus memo to confirm the land purchase price.

City Comment

TENTATIVE PARCEL MAP

AMG is requesting a tentative parcel map (TPM) to merge existing parcels into a single parcel for the purpose of developing the Project. The TPM application submitted by AMG is complete on the basis the TPM is not subdividing but merging two existing parcels. However, AMG may consider withdrawing its application for a TPM and submit a request for a lot line adjustment (LLA) to merge the subject parcels. Please see item No. 1 of the attached memorandum from the Novato Public Works Department - Engineering Division regarding the lot line adjustment option.

AMG/CalHDF's Response: Response provided to Public Works.

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

PACIFIC GAS & ELECTRIC: Plan Review Team, Land Management

1. PG&E Comment

Our review indicates the proposed improvements do not appear to directly interfere with existing PG&E facilities or impact our easement rights.

AMG/CalHDF's Response: Acknowledged.

2. PG&E Comment

Please note this is our preliminary review and PG&E reserves the right for additional future review as needed. This letter shall not in any way alter, modify, or terminate any provision of any existing easement rights. If there are subsequent modifications made to the design, we ask that you resubmit the plans to the email address listed below.

AMG/CalHDF's Response: Acknowledged.

3. PG&E Comment

If the project requires PG&E gas or electrical service in the future, please continue to work with PG&E's Service Planning department: <https://www.pge.com/cco/>.

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

4. 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.

1. City Comment

Submit a current preliminary title report for APN 141-282-04. The submitted preliminary title report was only for APN 141-282-07.

AMG/CalHDF's Response: Updated preliminary title reports are provided for both APNs.

2. City Comment

It appears that there are two existing parcels, not three. Merging of existing parcels can be accomplished by a lot merger or lot line adjustment, as an alternative to a tentative map and parcel map process.

AMG/CalHDF's Response: We have discussed the two options with our civil engineer and have opted to continue with the tentative map process.

3. City Comment

Indicate on the preliminary grading and drainage plan that the curb, gutter and sidewalk along the First Street frontage will be replaced with curb, gutter and sidewalk meeting current City standards.

AMG/CalHDF's Response: The design team is not proposing to include the suggested curb, gutter and sidewalk changes along the First Street frontage.

4. City Comment

Show proposed pedestrian curb ramps at the northwest and southwest corners of the intersection of Industrial Way and First Street.

AMG/CalHDF's Response: The design team is not proposing to include the suggested curb ramps at the northwest and southwest corners of the intersection of Industrial Way and First Street.

5. City Comment

Show all ground-level 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 bioretention basins BRs 1 – 3.

AMG/CalHDF's Response: Updated and shown elevation around the bio-retentions on C-3.

6. City Comment

Show grate and invert elevations for all proposed drainage structures.

AMG/CalHDF's Response: Updated and shown on C-2.

7. 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 in Table 1.

AMG/CalHDF's Response: Updated in the submittal.

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

AMG/CalHDF's Response: Updated in the submittal.

8. 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: Added hydrologic and hydraulic calculations report in the submittal.

NORTH MARIN WATER DISTRICT: Lia Solar

1. NMWD Comment

The North Marin Water District currently provides potable domestic water service to the above referenced property from four (4) 3/4-inch service laterals with four (4) 5/8-inch water meters, that serve the address of 1107 Grant Avenue. 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.

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/.

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/ 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 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 SANITARY DISTRICT: Michael Brewer

1. City Comment

The applicant will be required to plumb the 1st floor in a manner that ensures all commercial units are connected to a grease interceptor as a proactive step in accommodating potential food service facilities within the commercial spaces. This approach aligns with the necessary infrastructure for such operations and indicates a well-thought-out design strategy.

AMG/CalHDF's Response: 30" X 30" grease interceptor provided at podium level. See sheet A2.0 Conceptual Building Plans for more information.

2. City Comment

Regarding the existing laterals, the matter of reusing or abandoning them is of importance to the project's overall functionality and adherence to District standards. At this stage, we would kindly request further clarification from the applicant or their design team to determine their intentions with respect to the existing laterals. By understanding whether these laterals are to be repurposed or abandoned, we can better assess the alignment of the proposed project with local regulations and the project's environmental impact.

AMG/CalHDF's Response: Existing laterals are not reused and abandoned.

1. NFD/BV Comment

F1. It is understood these are preliminary plans, but at the time of submittal for permit: All submitted sheets must be wet-stamped and wet-signed by the California licensed/registered professional responsible for the design (i.e., electronic signature will be permitted if acceptable by jurisdiction). Please provide a signature on the stamp on each page of the submittal. 2022 CFC §I 06.1 & CA B&P Code §6737.1, 7026.12, 7057 & 7058 Typ.

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

2. NFD/BV Comment

F2. Deferred submittals please add: Fire Sprinklers, Fire Alarm, Fire Pump, Underground Fire lines, etc. Please correct as needed and provide consistency throughout. 2022 CFC 106.

AMG/CalHDF's Response: Acknowledged.

3. NFD/BV Comment

F3. Please add type of construction for the podium & complete the type of construction for the units over the podium (III A or B), per the CA Building Code Ch. 6. Please correct as needed and provide consistency throughout. 2022 CFC 106

AMG/CalHDF's Response: Please see sheet CS-1. The construction type is Type III over Type I podium.

4. NFD/BV Comment

F5. C-2 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. & P1 Street, on the opposite corner from the building).

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

5. NFD/BV Comment

F6. C-2 Manning parking lot area (west side)- please show dimensions of clear path of travel between the parking stalls; and will this be a Fire Lane for Fire Department ladder access to the upper floors? 2022 CFC 503

AMG/CalHDF's Response: 4' wide pathway along the west property line is for hose pull access. Aerial fire apparatus access will be along Grant Ave.

6. NFD/BV Comment

F7. A2.0 (& all others showing the Generator)- please show access/egress from the generator area. Please correct as needed and provide consistency throughout. 2022 CFC 106, Ch. 10

AMG/CalHDF's Response: Please see sheet A1.0 showing access/egress from the generator room.

7. NFD/BV Comment

F8. A2. 1 Podium level Courtyard - Exit doors shall open in the direction of travel for the exit pathway (2022

CBC Ch. I 0). Note: These doors will require Exit signage & Emergency egress lighting. Please correct as needed and provide consistency throughout. 2022 CFC 106.

AMG/CalHDF's Response: Please see Level 2 on sheet A2.0. The doorways for the passageways from the podium courtyard now open in the direction of travel for exiting.

8. NFD/BV Comment

F9. 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.

9. NFD/BV Comment

F10. Note: 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.

10. NFD/BV Comment

F11. 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

F12. Section 403.1.1 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.

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

12. NFD/BV Comment

F13. 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.

13. NFD/BV Comment

F14. 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.

14. NFD/BV Comment

F15. Section 503.1.5 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 road 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.

AMG/CalHDF's Response: Acknowledged. Since the north and east side meet the requirements above, fire aerial apparatus access will be from First Street and Grant Avenue.

15. NFD/BV Comment

F16. Section 503.1.5.1 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.

AMG/CalHDF's Response: Acknowledged. Since the north and east side meet the requirements above, fire aerial apparatus access will be from First Street and Grant Avenue.

16. NFD/BV Comment

F17. Section 503.1.5.2 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.

AMG/CalHDF's Response: Acknowledged. Since the north and east side meet the requirements above, fire aerial apparatus access will be from First Street and Grant Avenue.

17. NFD/BV Comment

F18. Section 503.1.5.3 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.

AMG/CalHDF's Response: The existing overhead utility line adjacent to the property fire access road will be undergrounded for the project.

18. 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.

19. 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.

20. 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.

21. 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.