

April 11, 2024

Xiaoqing Zeng
Stetson Engineers Inc
2171 E. Francisco Blvd, Suite K
San Rafael, CA 94901

RE: CUI Family Trust ETAL Pre-Application
Vacant Lots 11680 State Route 1, Point Reyes Station
Assessor's Parcel 119-050-04, -09, 119-140-03, -09
Project ID P4403

Dear Xiaoqing Zeng,

In response to your pre-application, I have reviewed the above-referenced property and proposed subdivision concerning conformance with the standards in the Marin Countywide Plan (CWP), the Local Coastal Program (LCP), the policies in the Point Reyes Station Plan Area, and the Zoning Regulations applicable to the project sites. This letter provides the Planning Division's comments regarding zoning and permit requirements, plan consistency, environmental consideration, and development issues associated with the conceptual tentative parcel map and submitted. These comments relate to the general information provided with your pre-application; other issues may arise after more specific materials are submitted with the application. The pre-application submittal was transmitted to the California Coastal Commission, North Marin Water District, Marin County Fire Department, County of Marin Department of Public Works - Land Development, Community Development Agency (CDA)-Environmental Health Services, CDA-Environmental Planning, and CDA-Housing. The comments received from those agencies are attached for your review.

PROJECT SUMMARY

Based on your pre-application materials, I understand the project would entail subdividing approximately 82.32-acres into 27 lots in Point Reyes Station. The 82.32-acres are contained within Assessor's Parcel 119-050-04, -09, and 119-140-03 and -09. The proposed lots could potentially range in size from 1.49 acres to 5.89 acres. Development associated with the subdivision could include roadway improvements, driveways, utility installation and maintenance areas, vegetation removal, and general grading to accommodate site improvements.

PROJECT SITE BACKGROUND AND EXISTING CONDITIONS

The subject property is located within the unincorporated area of Marin County, within village limit boundaries of the community of Point Reyes Station. The project site is undeveloped and some portions of the property appear to contain informal hiking and equestrian trails. Historically the

property may have been used for agricultural purposes, and some agricultural use (e.g., grazing) could still be occurring. Properties adjacent to the project site are developed with single family residences and accessory structures. Adjacent lots to the north and east are undeveloped and used for agricultural purposes. To the south is Point Reyes Petaluma Road and rural residential lots, mostly over an acre in size, are located to the west of the site. The project site also appears to include multiple water courses, ponds and/or wetlands, which could potentially be considered Environmental Sensitive Habitat Areas (ESHAs) under the County's Local Coastal Program (see discussion below).

The County GIS Database provides the following information:

1. The project site is located within an Urban Wildland Interface;
2. The project site is located within the Coastal Zone;
3. The project site is located within the Point Reyes Station Village Limit Boundaries;
4. The project site includes water courses;
5. The project site may include terrestrial and wetland ESHAs;
6. The project site is not located within the Ridge and Upland Greenbelt (RUG);
7. The project site includes small portions of high archaeological sensitivity;
8. The project site is in Zone 2 for moderate seismic shaking; and,
9. The project site is in a moderate fire hazard severity zone.

MARIN COUNTYWIDE PLAN DESIGNATION AND POLICIES

The Marin CWP is the governing general plan for the unincorporated areas of the County and establishes goals, policies, and programs that govern existing and future land uses and developments. The CWP also includes adopted community area plans as they pertain to specific unincorporated communities. The property is within the Coastal Corridor, which is primarily designated for open space, recreational uses, agriculture, and the preservation of existing coastal communities.

Existing CWP Land Use Designation

The project site is subject to the CPW's C-AG3 (Agricultural 3) land use designation. The C-AG3 land use category was established for residential use within the context of small-scale agricultural and agriculturally related uses. According to Map 7.5 Point Reyes Station Land Use Policy Map the density associated with C-AG3 is 1 unit per every 1 to 9 acres.

The CWP contains numerous environmental quality and community development policies which will apply to future development of the project site. The CWP includes policies that are intended to protect existing vegetation and animal habitats, maintain unique geological, ecological, and archaeological sites, and preserve native trees and oak woodland habitat, streams and riparian systems, and shorelines. The policies encourage development to be designed and sited to preserve agriculture and protect natural resources. In addition, community development policies specify that new structures should be designed to avoid environmental constraints, such as wetlands and streams.

All of the policies and programs in the CWP are important and should be reviewed carefully. In particular, please note the following policies:

- **CWP Policy AG-5** calls for subdivisions of agricultural lands to maintain agricultural operations and the density may be reduced based on site characteristics such as topography, soil, water availability, and the capacity to sustain viable agricultural operations.
- **CWP Policies BIO-1.1, BIO-3.1, and BIO-4.1** calls for the protection of habitat for special status species, sensitive natural communities and wetlands.
- **CWP Policies WR-2.1, WR-2.2, WR-2.3, and WR-2.4** calls for reduction of runoff and avoidance of soil erosion and discharge of sediments into surface runoff. CWP Policies WR-2.2 and 2.3 require that projects are designed to avoid erosion and sedimentation and to comply with the standards and best management practices required by the Department of Public Works.
- **CWP Program DES-4.c:** Ensure that the mass and scale of new structures respect environmental site constraints and character of the surrounding neighborhood, are compatible with ridge protection policies, and avoid tree-cutting (especially on wooded hillsides) and grading wherever possible.

Point Reyes Station Community Plan

The subject property is located within the Point Reyes Station Community Plan area, which was first adopted in 1976 and amended in 1986 and in 2001. Point Reyes Station Community Plan sets forth goals and policies to guide decision-makers in evaluating development based on the unique concerns, characteristics, and challenges. The Point Reyes Station Community Plan includes the following key implementation policies pertinent to the proposed project:

- **Policy PA-3.5:** Diversity in Lot Sizes and Building Densities. Encourage diversity in lot sizes and building densities in the Planning Area as a whole and within each zoning district (subject to the district's minimum lot size requirements).
- **Policy PA-3.6:** Affordable Housing. Encourage development of additional affordable housing for persons employed locally.
- **Policy PA-3.7:** Compatible Design. New commercial or residential construction shall be compatible in scale (bulk and height), style and social character with the existing visual character of the community.
- **Policy PA-3.8:** Rural Improvement Standards. Improvements such as roads, driveways, parking areas and residential and commercial lighting should be compatible with the rural environment. For example, the use of gravel instead of asphalt as cover for parking areas is encouraged. Outdoor lighting shall serve the safety of ingress and egress but shall not detract from the enjoyment of the natural nightscape.
- **Policy PA-3.9:** Landscaping. Landscaping proposals should be evaluated carefully in terms of the long-range effect on the natural and built environment of the immediate neighborhood, especially in the Downtown Area, and on the Planning Area as a whole. The requirement of wind breaks shall be discontinued and the effect of any proposed wind breaks (at maturity) on sunlight, coastal views, and traffic safety (visibility) taken into

account. New wind breaks along Highway 1 should be prohibited to preserve coastal views.

- **Policy RL-3.2: General Criteria for New Development.** New residential development should meet the following general criteria: a) Minimize disturbance of the natural environment (including topography) of the site; b) Preserve existing views from public roads and surrounding properties towards major visual resources such as Tomales Bay, Inverness Ridge, Black Mountain and other open space lands surrounding the Planning Area; c) Protect the sun light, views and privacy of adjacent properties; and d) Preserve the existing rural community character.
- **Policy RL-3.3: Specific Criteria for New Development.** New residential development should meet the following specific criteria:

The Point Reyes Station Community Plan includes other policies and regulations that may effect the design and implementation of the proposed project. You should carefully read the Point Reyes Station Community Plan and should be used for information and as a guide.

MARIN COUNTY LOCAL COASTAL PROGRAM-LAND USE PLAN

The Marin County Local Coastal Program (LCP) is comprised of a land use plan and Coastal Zoning Code for the County's coastal areas. The LCP was mandated by the California Coastal Act of 1976 which established a statewide coastal management program to ensure that coastal resources are properly utilized and protected. The Marin County LCP-Land Use Plan contains policies that are intended to protect and promote public access to the County's coastal areas, promote and encourage recreation and visitor serving facilities, protect, maintain, and promote appropriate development and access to federal parklands, protect resources including streams and riparian habitats, wetlands and coastal dunes and agricultural lands, and ensure adequate and appropriate public services as well as land use and new development.

There are several policies contained in the Biological Resources section of the Marin County LCP Land Use Plan that likely apply to the project. The relevant policies are summarized below.

- The **Agriculture** section of the Marin County LCP Land Use Plan is intended to protect agricultural land, continued agricultural uses, family farming, and the agricultural economy by maintaining parcels large enough to sustain agricultural production, preventing conversion to non-agricultural uses, facilitating multi-generational operation and succession, prohibiting uses that are incompatible with long-term agricultural production or the rural character of the County's Coastal Zone, and other innovative means. Policies that could be applicable to your project are listed below.
 - **Policy C-AG-3 Coastal Agricultural Residential Planned Zone**
 - **Policy C-AG-6 Non-Agricultural Development of Agricultural Lands**
- The **Biological Resources** section contains numerous policies for the protection of biological resources. A Biological Site Assessment would be required to confirm the location and extent of ESHAs, document site constraints and the presence of other sensitive biological resources, recommend environmental buffers, development timing, mitigation measures including precise required setbacks, provide a site restoration program where necessary, and provide other information, analysis, and modifications appropriate to protect the resource. Use of the Biological Site Assessment and application

of these policies will aid in the appropriate creation and placement of lots, building envelopes and other associated development to ensure biological resources are avoided to the extent feasible. Please review all policies in this section of the LCP Land Use Plan.

- The LCP Land Use Plan's **Water Resource** policies aim to improve the protection of coastal waters by addressing all phases of development, including design, construction, and post-construction maintenance of facilities. LCP Land Use Plan policies incorporate the concept of Best Management Practices, in order to acknowledge continuing improvements in technology and development practices. The following policies are likely to apply to the project:
 - **Policy C-WR-1 Water Quality Protection and Biological Productivity**
 - **Policy C-WR-2 Water Quality Impacts of Development Projects**
 - **Policy C-WR-3 Storm Water Runoff**
 - **Policy C-WR-4 Grading and Vegetation Removal**
 - **Policy C-WR-15 Construction-Phase Pollution**
 - **Policy C-WR-16 Construction Non-sediment Pollution**

- The **Community Design** section of the LCP Land Use Plan includes policy to ensure compatible structure design, and to ensure significant views to and along the coast are protected, and the preservation of visually prominent ridgelines. The following policies are likely to apply to the project:
 - **Policy C-DES-2 Protection of Visual Resources**
 - **Policy C-DES-3 Protection of Ridgeline Views**
 - **Policy C-DES-4 Limited Height of New Structures**
 - **Policy C-DES-6 Underground Utilities**
 - **Policy C-DES-10 Prohibition of Gated Communities**

- The **Community Development** section of the LCP Land Use Plan provide for improved resource protection that will reduce impacts of the built environment on Coastal Zone resources. The following policies are likely to apply to the project:
 - **Policy C-CD-1 Location of New Development**
 - **Policy C-CD-2 Appropriate New Development**

- The **Community Specific Policies** section of the LCP Land Use Plan includes policies specific to Point Reyes Station as discussed above. Future development of homes on the created lots would be subject to these policies; therefore, lot creation should be mindful of all policies in this section.

- The **Housing** section of the LCP Land Use Plan provides several measures to address low- and moderate-income housing needs in the Coastal Zone, such as affordable housing provisions. LCP Land Use Plan **Policy C-HS-2** requires 20 percent of the total number of lots to be affordable, which is consistent with Marin County Code Chapter 22.22.

- The **Public Facilities and Services** section of the LCP Land Use Plan includes policies related to community services facilities including water, septic and roads. The following policies are likely to apply to the project:
 - **Policy C-PFS-1 Adequate Public Services**

- **Policy C-PFS-2 Expansion of Public Services**
 - **Policy C-PFS-4 High-Priority Visitor-Serving and other Coastal Act Priority Land Uses**
 - **Policy C-PFS-6 Sewage Disposal Systems and Protection of Water Quality**
 - **Policy C-PFS-8 Sewage Disposal Systems Requirements for New Lots**
 - **Policy C-PFS-9 Preference for On-Site Individual Sewage Disposal Systems**
- The **Transportation** section of the LCP Land Use Plan is intended to preserve the visual quality of the coast, by maintaining Highway One as a two-lane scenic road and to minimize the impacts of roads on wetlands, streams, and the scenic resources of the Coastal Zone. LCP Land Use Plan **Policy C-TR-6** encourages new development to provide trails or roadways and paths for use by bicycles and/or on-street bicycle and pedestrian facilities.
 - The **Historical and Archaeological Resource** section of the LCP Land Use Plan includes policies for the protection of archaeological and paleontological resources. While the subject properties are outside of the Point Reyes Station Historic Village area, the project would likely require an Archaeological Resources report identifying impacts and appropriate mitigation measures consistent with **Policy C-HAR-2**.

ZONING REGULATIONS

The subject property is governed by the C-ARP-3 (Coastal Agricultural Residential Planned Zone) zoning designation, which permits a maximum density of one dwelling unit per three acres. The C-ARP district applies to lands adjacent to residential areas in the Coastal Zone that have potential for agricultural production but promote the concentration of residential development to maintain the maximum amount of land available for agricultural use. The C-ARP district provides flexibility in lot size and building locations in an effort to concentrate development to maintain the maximum amount of land for agricultural use, and to maintain the visual, natural resource and wildlife habitat values of subject properties and surrounding areas. The C-ARP district requires that proposed development be clustered in the most accessible portion of the site.

Coastal Zoning Code section 20.65.050.d includes the following standards for subdivisions in the C-ARP Zoning District that should be taken into consideration:

1. Land division applications shall include information demonstrating to the Director that the design of proposed parcels provides the maximum feasible concentration of clustering.
2. Clustered development shall be located both to provide for the retention of the maximum amount of land in agricultural use and to protect important wildlife habitat areas.
3. Development clusters shall also be located to maintain the visual resources and environmentally sensitive areas of the site and surrounding areas.
4. Open space easements or other restrictions shall be required to designate intended use and restrictions on the property being subdivided.

Coastal Zoning Code section 20.70.190.B includes the following standards for subdivision:

1. Land divisions shall be designed to minimize impacts on coastal resources. A land division shall not be approved if it creates a parcel that would not contain an identified building site that can be developed consistent with all policies of the certified LCP.
2. Land divisions outside existing developed areas shall be permitted only in areas with adequate public services, and where they will not have a significant adverse effect, either individually or cumulatively, on coastal resources. In addition, land divisions outside village limit boundaries shall only be permitted where 50 percent of the usable parcels in the area have been developed and the created parcels would be no smaller than the average size of surrounding legal parcels, except that lease of a legal parcel at a level of agricultural use that will sustain the agricultural capacity of the site is not prohibited, and lot line adjustments that do not increase potential development intensity are allowed.
3. Land divisions shall be designed to cluster development in order to minimize site disturbance, landform alteration, and fuel modification.
4. Land divisions are development that is not designated as the principally permitted use in any zoning district.

As noted above, the subject property is within the Point Reyes Station Village Limit boundaries. Subdivision requirements can be found in Marin County Code Chapter 22.80, and the project would be subject to the subdivision design standards also contained in Chapter 22.82.

Pursuant to section 22.22.090, twenty percent of the lots or units must be dedicated as below market rate units. Those units must be similar to the other units in the subdivision, including having a consistent number of bedrooms.

PERMIT REQUIREMENTS

Marin County has a rigorous process to evaluate proposed development that can be time consuming and expensive with no guarantee of the end results that the property owner may desire. The discretionary applications described below could result in approval of the project as proposed, approval of an amended project, or denial.

Several application types will be required for the proposed project or a project similar in scale. As the project involves the subdivision of the site, approval of a Tentative Map application, (and subsequent Final Map approval) would be required for the proposed project. The County's subdivision requirements can be found in Coastal Zoning Code section 20.70.190 and in Chapter 22.80 of the Marin County Development Code; please note that the County's subdivision design standards can also be found Chapter 22.82 of the Marin County Code.

The Marin County Coastal Zoning Code section 20.68.030 definition for "development" includes the "change in the density or intensity of use of land, including, but not limited to, subdivision pursuant to the Subdivision Map Act (commencing with Section 66410 of the Government Code), and any other division of land..." Therefore, a subdivision requires Coastal Development Permit approval.

Pursuant to Coastal Zoning Code section 20.62.040.C it is likely that a proposed subdivision would be subject to Master Plan approval because the project would not exhaust the residential development potential on the property. Upon submittal of your application, staff will determine if additional planning applications are required.

SUBMITTAL REQUIREMENTS AND REVIEW PROCESS

Please refer to the attached Planning Application Guide, Planning Application Submittal Checklist, and the following list of submittal requirements to help you prepare the required plans, materials, and information necessary to process the application. In general, any application submitted must include appropriate plans for the contemplated development of the entire site. Submitting a complete application is the key to being able to process your application quickly. This checklist describes all the plans, documents, and other information necessary to prepare a complete application. In addition to the items marked as “required” under Coastal Development Permit, Master Plan and Tentative Maps in the submittal checklist, the items listed in the section below will also be required for the proposed project.

As part of the initial application submittal, you will need to prepare an Affordable Housing Plan, which describes how the project will comply with Marin County Code section 22.22.020, which requires that 20 percent of the proposed lots or residential units be deed restricted as below market rate units.

ENVIRONMENTAL REVIEW

At this time, there is not enough information to determine whether an environmental document would be required for the project as proposed. The environmental review determination is made after a complete planning application has been submitted to the Planning Department, the appropriate staff have reviewed the relevant technical documents, and the Environmental Planning Manager has made a determination whether an environmental document would be required.

If the proposed project is found to have a potentially significant impact and is subject to environmental review under the California Environmental Quality Act requirements, the project will be evaluated via the following environmental topical areas of study as part of a larger document: Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards, and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities, and Service Systems, and Wildfire. Based on a preliminary and limited analysis of the project information contained in the pre-application materials, we would require at a minimum the following studies:

- Arborist Report
- Geotechnical Report
- Biological Site Assessment Report
- Cultural Resources Assessment Report
- Grading and Drainage Plan

- Development Envelopes
- Landscape and Vegetation Management Plan
- Evidence of Water Supply/Hydrology Report
- Traffic and Circulation Study
- Affordable Housing Plan
- Construction Program

Additional fees will be required as part of the environmental review study, and the County will hire a qualified environmental consultant to complete the environmental review document for the proposed project. The preliminary suggestions listed above regarding required technical reports are not meant to be all-inclusive, and additional reports may be necessary as part of the environmental review process.

CONCLUSION

As proposed, the project would require the submittal of Coastal Development Permit, Tentative Subdivision Map, and Master Plan application. The County reserves its right to determine if additional discretionary applications would be required upon receipt of the final application. Submittal of these applications with accompanying required submittal materials, plans, and studies as discussed above will provide Planning staff and other reviewing agencies an opportunity to understand the proposed development and land uses. To recommend approval, staff will need to make consistency determinations regarding pertinent LCP, County policies and zoning regulations.

County staff recognizes that the proposed project represents a unique opportunity to create housing in western Marin County. Therefore, we recommend that you carefully review the proposed project in light of the relevant policies listed above, in particular with those policies related to density and preservation of agricultural lands. The subject property is within the Point Reyes Station Village Limit boundaries and the proposed density would be below the density range allowed by the Countywide Plan Land Use Designation and the zoning.

We recommend that you carefully design the proposed project to cluster the residences away from sensitive coastal resources, in areas that minimize visual prominence, and allow a significant proportion of the site to remain in agricultural production. The proposed lots should be designed such that boundaries are easily discernible and respect environmental, topographic, and site conditions. Lots will not be approved unless they are developable and reasonably accessible.

Additional studies will be needed to further inform your proposal with regard to utility capacity and setbacks, which will in turn inform where development is feasible on the proposed lots. I have included attachments from other local agencies containing comments and requirements.

Please call me at (415) 473-6235 or send an e-mail to megan.alton@marincounty.gov if you have any questions regarding this letter or the application process for this proposal.

Sincerely,

Megan Alton

Megan Alton
Senior Planner

cc: {Via email}

Michelle Levenson, Principal Planner
Jeremy Tejirian, Deputy Director
Yan Cui

Attachments:

1. Response from the California Coastal Commission, February 22, 2024
2. Response from Marin County Fire Department, February 22, 2024
3. Response from the North Marin Water District, February 23, 2024
4. Response from the Department of Public Works, February 27, 2024
5. Planning Application Guide Link - https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/publications/planning-applications/planning-division-application-guide_v4.pdf
6. Planning Application Submittal Checklist - https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/publications/planning-applications/planning-division-application-submittal-checklist_v7_may-2023.pdf

From: Velasquez, Leslie@Coastal
To: Megan Alton
Cc: Martinez, Erik@Coastal; Rexing, Stephanie@Coastal; KoppmanNorton, Julia@Coastal
Subject: RE: Preapplication Transmittal - CUI Family Trust ETAL
Date: Thursday, February 22, 2024 11:26:27 AM

You don't often get email from leslie.velasquez@coastal.ca.gov. [Learn why this is important](#)

Hi Megan,

It's nice to virtually meet you, I'm the new coastal planner for Marin County at the Coastal Commission.

Thank you for sending this submittal along. From my understanding the project proposes to subdivide four lots into 27 new lots in Point Reyes Station and is asking to apply Categorical Exclusion Order E-81-6. I have taken a look at the information provided and have the following concerns/questions:

- 1. Sensitive Habitat Areas and Categorical Exclusion:** Figure 7 in the Preapplication Submittal packet shows that many of the proposed subdivided lots will be within sensitive habitat buffer areas. Condition 8 of the Categorical exclusion order states that the order does not exempt any development within 100 feet of any coastal body of water, stream, or wetland. Therefore, we don't believe this project qualifies for the exemption given that most, if not all, of the parcels proposed will overlap with sensitive habitat areas and aquatic resources and their related buffers.
- 2. Future development.** Additionally, please describe what use is being proposed for these parcels given their limited area for development.

Let me know if you have any questions.

Best,
Leslie

From: Megan Alton <Megan.Alton@MarinCounty.gov>
Sent: Friday, February 2, 2024 11:13:51 AM
To: KoppmanNorton, Julia@Coastal <julia.koppmannorton@coastal.ca.gov>; Rexing, Stephanie@Coastal <Stephanie.Rexing@coastal.ca.gov>; Martinez, Erik@Coastal <erik.martinez@coastal.ca.gov>
Subject: Preapplication Transmittal - CUI Family Trust ETAL

Hello,

Please find the attached Transmittal for the CUI Family Trust ETAL Preapplication in Point Reyes Station.

Please note that I have requested comments by February 26, 2024.

Thank you,

Megan Alton
SENIOR PLANNER

County of Marin
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
415 473 6235 T
415 473 7880 F
megan.alton@marincounty.gov

Email Disclaimer: <https://www.marincounty.org/main/disclaimers>

From: [FireSubmittals](#)
To: [Megan Alton](#)
Subject: RE: Preapplication Transmittal - CUI Family Trust ETAL
Date: Thursday, February 22, 2024 1:57:18 PM
Attachments: [image001.jpg](#)
[image002.png](#)

Hi Megan,

There's not much for us to review and comment on...I will say that with the terrain there, it is going to be difficult to provide code-complying access to some of the parcels. Until they start providing details regarding the infrastructure (roadways, driveways, and water/hydrant distribution), there's not much for us to say.

Let me know if you have any questions.

Regards,

Scott D. Alber, PE, EFO, CFO, FM, MIFireE
BATTALION CHIEF/FIRE MARSHAL

Marin County Fire Department
PO Box 518/33 Castle Rock Avenue
Woodacre, CA 94973
415.473.6566 T
415.473.2969 F
415.717.1520 M
CRS Dial 711
scott.alber@marincounty.gov

****Please note my new email address scott.alber@marincounty.gov****

Follow us on Facebook and Twitter



From: Megan Alton <Megan.Alton@MarinCounty.gov>
Sent: Friday, February 2, 2024 10:11 AM
To: FireSubmittals <firesubmittals@marincounty.org>
Subject: Preapplication Transmittal - CUI Family Trust ETAL

Hello,

Please find the attached Transmittal for the CUI Family Trust ETAL Preapplication in Point Reyes Station.

Please note that I have requested comments by February 26, 2024.

Thank you,

Megan Alton
SENIOR PLANNER

County of Marin
Community Development Agency
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903
415 473 6235 T
415 473 7880 F
megan.alton@marincounty.gov



February 23, 2024

COUNTY OF MARIN
Community Development Agency – Planning Division
Attn: Megan Alton, Senior Planner
3501 Civic Center Drive
San Rafael, CA 94903-4157

Re: CUI Family Trust ETAL Preapplication
Project ID P4403
APN 119-050-04, -09, 119-140-03 & -09
Vacant Lots near 11680 State Route 1, Point Reyes Station

Ladies and Gentlemen:

Thank you for the opportunity to review and comment on the subject preapplication and planning division transmittal dated February 2, 2024. North Marin Water District (District) has reviewed the application material and has the following comments:

- 1) The District has verified that construction of new water distribution facilities is required before water service can be provided to the above referenced project.
- 2) The District requires the owner (or developer) to submit an application and advance funds prior to further analysis by the District. The advance funds cover District staff time for planning and engineering work associated with this project. Please visit <https://nmwd.com/business/engineering-services/> to apply with the District.
- 3) Prior to providing water service, the applicant will need to enter into an agreement with the District and complete financial arrangements for construction of new water facilities, as needed. Depending on final site improvement and their potential impacts to District facilities and operations, additional requirements and associated costs may be imposed or incorporated into the agreement. At a minimum, the following conditions will be required
 - a. The District will be given final building permit inspection hold for confirmation that all requirements of the project are satisfied; and
 - b. Occupancy approval shall not be granted until water service installation is complete and compliance with the Water Conservation requirements verified; and
 - c. Water service will not be furnished to any building unless it is connected to a public sewer system or to a wastewater disposal system approved by all government entities having regulatory jurisdictions.
- 4) The project must conform to the 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 17 (section e. and f.) at www.nmwd.com/about/regulations/.

- 5) Installation of above-ground, reduced pressure principle (RPP) backflow prevention devices may be required on this project in accordance with District Regulation 6 at www.nmwd.com/about/regulations/ and California Department of Health Regulations (Title 17).

Should you have any questions regarding this matter, please contact our Engineering Services Representative at (415) 761-8935.

Sincerely,



Lia Solar
Engineering Services Rep.

Cc: Fire Marshal
Marin County Fire District
P O Box 518
Woodacre, CA 94973


Xiaoqing Zeng
Stetson Engineers Inc.
2171 E. Francisco Blvd. Ste. K
San Rafael, CA 94901Ple

Yan Cui
15906 Via Pato
Rancho Santa Fe, CA 92067

PLANNING APPLICATION REVIEW

DEPARTMENT OF PUBLIC WORKS

Inter-office Memorandum

<p>DATE: <u>2/27/24</u></p> <p>TO: <u>Megan Alton</u></p> <p>FROM: <u>Maurice Armstrong</u></p> <p>APPROVED: <u></u></p> <p>RE: <u>CUI Family Trust Etal</u> <u>Pre-Application P4403</u></p> <p>APN: <u>119-050-04, -09, 119-140-03, -09</u></p> <p>ADDRESS: <u>Vacant lots near 11680 State Route</u> <u>1, Point Reyes Station</u></p>	<p>DUE: <u>2/26/24</u></p> <p><u>TYPE OF DOCUMENT</u></p> <p><input type="checkbox"/> DESIGN REVIEW</p> <p><input type="checkbox"/> COASTAL PERMIT</p> <p><input type="checkbox"/> LAND DIVISION</p> <p><input type="checkbox"/> VARIANCE</p> <p><input type="checkbox"/> USE PERMIT</p> <p><input type="checkbox"/> ADU PERMIT</p> <p><input type="checkbox"/> ENVIRONMENTAL REV.</p> <p><input checked="" type="checkbox"/> OTHER: Pre-Application</p>
--	---

DPW has reviewed the Pre-Application Request and the accompanying documents and offers the following comments. As the plan presented is conceptual, the comments offered are general in nature. Forthcoming applications shall conform to the submittal requirements outlined in the Planning Application Submittal Guide, prepared by CDA. Note that all improvements shall conform to Title 24 of the Marin County Code (MCC) or as approved by DPW, and the Fire Department.

1. **Provide a Master Plan Exhibit:** if a master plan application is required provide a diagram that provides parameters for future development. Refer to item 22 of the Planning Application Submittal Guide for further information.
2. **Provide a site plan for the proposed development:** In addition to the information regarding the existing site such as watercourses and waterbodies, provide all details for all aspects of on-site development such as development envelopes, septic and leach field envelopes, driveways, hydrants, utilities, access paths, entry gate, fences, lighting, retaining walls, etc. Dimension all aspects of improvements for comparison with code requirements. Any proposed offsite development, such as signage or intersection improvements, shall also be presented.
3. **Geotechnical:** Provide a preliminary geotechnical report or evaluation prepared by a Registered Civil Engineer with soils engineering expertise or a Registered Geotechnical Engineer. The report must attest to the suitability and geological feasibility of the proposed construction and identify any drainage or soils problems that the design of the project must accommodate. Report shall comment on and depict areas of slides or other instability.

4. **Parking and Access:** Plans shall provide detailed information on access to the site from State Route 1 and Pt. Reyes Petaluma Rd. **Roadway Improvements shall conform to Marin County Code § 24.04 Section I. Roads** (Marin County Code § 24.04.020 – 24.04.230).
- a. Show the entire width of the State Route 1 and Pt. Reyes Petaluma Road right of way along the frontage of the subject property, including all roadway improvements (road surface, curb, gutter, striping, signage, drainage improvements), and road side drainage.
 - b. Identify improvements associated with connecting the road for the new subdivision to the travel way on State Route 1 and Pt. Reyes Petaluma Road, including striping, signage, intersection improvements, drainage improvements, etc.
 - i. Coordinate with Caltrans for improvements to State Route 1.
 - c. Identify frontage improvements along Pt. Reyes Petaluma Road for a class IIr Bicycle Shoulder.
 - d. Identify the width of the proposed right of way, width of the proposed travel way, curb, gutter and sidewalk; provide a typical cross section of the proposed road.
 - e. Identify the slope of the proposed roads and driveways.
 - f. Clarify potential connection to Water Tank Road via an easement on parcel 17.
 - g. Provide a sight line diagram for the proposed intersection at Pt. Reyes Petaluma Road.
5. **Fire Protection District shall review the plans:** Provide documentation that the road/driveway turnaround design has been reviewed and approved by the Fire Department.
6. **Provide a utility plan:** Show all existing and proposed utilities and indicate where these will tie into the existing services in the right of way. Plans shall clearly indicate the responding fire protection district.
7. **Easements:** all easements shall conform to Marin County Code § 24.05.
8. **Provide a grading plan:** Plan shall provide existing topography in at least 5-foot intervals, proposed grades, delineate the overall limit of site disturbance, list total acreage of site disturbance, label existing and proposed slopes in the areas of construction and provide the cut and fill quantities. Plan shall indicate approved disposal site of excess cut. In addition, natural features and human made improvement shall be shown trees, rock outcrops, slides, creeks, structures, improved driveways, etc.).
9. **Provide a drainage plan:** Plan shall provide existing topography, proposed grading, show and label all existing and proposed drainage improvements, and any drainage easements. Project shall maintain existing drainage patterns and all conduits shall conform to Marin County Code § 24.04.550. Plans must include method of water dispersal for existing and proposed drainage channels and facilities (discharge locations). Include areas of new impervious surfaces.
10. **Hydrology:** Provide a hydrology study that indicates the pre-project and post-project peak runoff rate. The study must demonstrate that drainage improvement will meet Marin County Code § 24.04.520, and 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 per Marin County Code § 24.04.530.

11. **Stormwater Control Plan:** Provide a Stormwater Control Plan as required by Marin County Code § 24.04.627 Permanent Stormwater Controls for New and Redevelopment. Per proposed redevelopment it appears that over 5,000 sqft of impervious area will be created or replaced. 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/basmaapostconstruction-manual.pdf?la=en>. Refer to appendix D, Template for Regulated Projects
12. **Emergency Access and Evacuation Plan:** An Emergency Access and Evacuation Map shall extend from the subject property to an arterial road and 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
13. **Trash Management:** Indicate how new residences will be serviced by trash hauler.
14. **Mail Service:** Indicate where mailboxes serving the subdivision will be placed.
15. **Constraints Map:** Provide a map that shows the proposed site boundaries and improvements overlain by environmental constraints and adequate buffers surrounding significant environmental features. Refer to item 12 of the Planning Application Submittal Guide for further information.
16. **Preliminary Title Report:** Provide a current preliminary title report, prepared within the last 6 months and issued from a Title company that reflects the current status of the property and includes all recorded easements and proof of ownership.
17. **Irrevocable offer of a ten-foot strip contiguous with and paralleling State Highway One:** Work with Caltrans who is the appropriate public agency regarding requirements for the offer of dedication.
18. **General Survey comments related to map review:**
 - a. Items required for map review:
 - b. Subdivision Map Review Fee/Deposit pursuant to current review fee schedule for subdivision maps at time of map submittal (current fees attached)
 - c. Copy of a preliminary title report, dated within the past 6 months, identifying owner(s) names (updated title reports may be required during map review)
 - d. Copies of deeds of all exceptions listed in Schedule B of preliminary title report, as requested by County Surveyor
 - e. Copy of vesting deed(s)
 - f. Copies of all reference documents (maps and deeds, etc.) used to perform the field survey and create the subdivision map
 - g. Copy of approved tentative map
 - h. Copy of conditions of approval
 - i. Closure calculations for all lots, figures, etc. as requested by County Surveyor
 - j. Electronic submittal of documents acceptable pending approval by County Surveyor

- k. The above list is only applicable to the Survey Division, and applies only to map review. Additional costs (taxes, recording fees, etc.) to be paid by Applicant prior to map recording. Other fees may apply.

19. Comments have been provided by DPW Traffic Operations Division:

- a. The applicant shall conduct a traffic study to determine the impact of the proposed project on the project connection to Point Reyes Petaluma Road. 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 Point Reyes Petaluma Road shall be included in the traffic study. The traffic study shall also address any impacts to level of service at the intersection of State Route One at Point Reyes Petaluma Road.
- b. In accordance with Section 24.04.030 of the Marin County Code (MCC) the proposed project street that intersects Point Reyes Petaluma Road will serve three residents, so it is classified as a minor residential road. In Accordance with Section 24.04.110 a minor residential road shall have a paved width of 28-feet.
- c. All roadway improvements including cut slopes and retaining walls shall be contained in the road right of way. Show all cut slopes and retaining walls associated with the roadway improvements on the plans.
- d. Public utilities shall be placed in the road right-of-way or a public utility easement. Show that the proposed roadway easement and/or utility easements have adequate width for all proposed utilities on the plans.
- e. 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.

-END-