



330 Land Company LLC
16381 Scientific Way
Irvine, California 92618

March 13, 2024

VIA HAND DELIVERY

Immanuel Bereket-Principal Planner
County of Marin Planning Division
3501 Civic Center Drive, Suite 308
San Rafael, CA 94903

Re: Residences at Lucas Valley Affordable Housing Plan

Dear Mr. Bereket,

This memo details the revised affordable housing proposal for the Residences at Lucas Valley. As modified, the Project now proposes thirty-six (36) detached single-family residences, thirty-one of these would be market rate, three (3) would be affordable to very low-income households, and two (2) would be affordable to lower income households. By providing more than 11% of project units at prices affordable to very-low income households, the Project would qualify for a 35% density bonus under the state density bonus law, or ten (10) units.

In other words, the Project no longer proposes an alternative method of compliance with the County’s IHO and would meet the County’s applicable 20% inclusionary housing requirement – set forth in your January 18, 2024, letter to us - by including five units affordable to lower income households and paying an in-lieu fee of \$74,010 for a fractional unit of .20. (Marin County Code § 22.22.090(A)).

The following details the project’s proposed Affordable Housing Plan:

A. The below table provides the number of units, unit size, number of bedrooms, and affordability.

Bedroom Size	Unit Size	Number of Units Affordable to Very-Low AMI	Number of Units Affordable to Lower AMI	Total Number of BMR Units
4	1,930 SF	3	2	5

B. *Construction Schedule.* The Affordable Units shall be constructed in the same phase as the adjacent market rate units. By way of example, if the first phase of construction includes lots 1-6, then the affordable units on lots 1, 3, and 5 shall be constructed in the same phase.

C. *Income Restrictions.* All affordable housing units shall be sold to Income Qualifying Households, if they comply with the income occupancy restrictions after including all actual

- and/or imputed income from such assets calculated pursuant to the HUD Occupancy Handbook, Chapter 5, Section 7 “Calculating Income and Assets”.
- D. *Deed Restriction.* All affordable housing units shall be deed restricted in perpetuity, unless the review authority reduces the term of the affordability requirement to reflect the maximum term that is permitted by Federal or State law.
- E. *Household Size.* A household is defined as all persons who live in the Below Market Rate unit. Pregnant applicants are counted as two members of a household upon submittal of medical documentation. Under penalty of perjury the applicant(s) must execute a notarized affidavit stipulating the household size at the time of the application. Minimum occupancy is one person or the number of bedrooms, whichever is greater. Maximum occupancy of unit is determined as follows: each bedroom may have a maximum of two people; one additional person may live outside of a bedroom within the unit. Applying these standards, in order to purchase a four-bedroom unit, there must be a minimum of four people in the household and a maximum of seven.
- F. *Affordable unit cost.* The sales prices of the affordable units proposed by an applicant shall be offered at an affordable price such that the monthly payment including principal, interest, taxes and insurance does not exceed 50% gross household income for households earning up to 50% for the very low-income units and 80% of the lower income units adjusted for household size based on the Marin County Median Income as published by HCD. The housing unit sales prices shall be established by the County or its designee at the time of sale.
- G. *Location of affordable housing units.* The affordable units are located on lots 1, 3, 5, 8 and 11 of the Vesting Tentative Map dated March 8, 2024.
- H. *Design and character of affordable housing units.* All units will be compatible with the exterior design and consistent in appearance, materials, amenities, and finish quality.
- I. *Provisions for income certification and screening of potential purchasers and/or renters of inclusionary units, resale control mechanisms, and ongoing monitoring and administration.*
- The Applicant shall work with the Marin Housing Authority or another similar agency or company to provide for income certification, provide for the screening of potential purchasers and provide ongoing monitoring. Resale restrictions will be enforced through the deed restriction.
- J. *Any incentive requested pursuant to Chapter 22.24 (Affordable Housing Incentives), including*

the additional information specified in that Chapter.

The project site has a Housing Overlay Designation (HOD) and a Combining District of T3. The project will seek an incentive/concession to remove the requirement for story poles. The project will seek a waiver for the following applicable objective development standards in the T3 Transect. The justification for all the waivers below is that the development standards would physically preclude construction of the project at its proposed density.

Development Standard	T3 Min Requirement	Project Standard
Lot Width	50'	36'
Lot Depth	100'	66'
Front Setback	20'	3'
Rear Setback	20'	10'
Side Setback	10'	4'
Driveway Curb Cut Width	12'	18'
Retaining Wall Height	4'	15'
Main Building Depth	48'	53'

In addition to incentives, the project is entitled to receive the number of waivers or modifications of development standards that may be required in order to physically accommodate the development at the densities and with the incentives that are permitted under State Density Bonus Law [Government Code § 65915(e)]. The Applicant reserves the right to amend this request or add additional concessions and waivers, should such be required during staff's review or the public hearing phase of the project and the requested entitlements. The Applicant may make revisions to the Affordable Housing Plan should they be needed during the entitlement of the project.

330 Land is excited to work in cooperation with the County of Marin providing much needed housing to the community. The development team would be happy to discuss the project or this Affordable Housing Proposal with you at any time. I can be reached by e-mail at sreilly@330land.com, or by phone at (925) 368-3128.

Sincerely,



Steve Reilly
 330 Land Company, LLC

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