

## **Attachment 1**

### **Proposed Remedies for City Venture Application PLP25-006**

The following remedies as needed to improve, or condition, the City Venture Application for a 93-unit Condominium Project in Geyserville have been assembled by our local volunteers. In addition to the discussion of evaluation categories contained in the body of the letter related background information is included in subsequent Attachments.

#### **1. California Housing Statutes**

Over the past decade the State of California has passed legislation affecting local policy and discretion related to housing generally and affordable housing, in particular. As example, SB 330 has been referred to and relied upon by the Applicant. We do not believe the provisions of SB 330 apply in Geyserville. The following remedy is recommended:

- A. Reject the Applicant's reliance on the provisions of SB 330.

#### **2. CEQA Compliance and the Need for Project-Level Environmental Review**

The following Environmental Review is requested to address deficiencies in the programmatic Environmental Impact Report prepared for the General Plan Housing Element.

Sonoma County must not rely solely on the programmatic Housing Element EIR. Instead, CEQA requires that the County prepare additional environmental documentation (See Appendix A – CEQA Legal Authorities Supporting Additional Project Level Review). At minimum, additional environmental review should include an Initial Study to determine whether a Subsequent or Supplemental EIR is required. If significant site-specific impacts are identified that were not adequately mitigated by the Housing Element EIR, the County should prepare a Subsequent EIR for PLP25-006 that:

1. Analyzes site-specific traffic, parking, bicycle/pedestrian safety, and circulation impacts;
2. Evaluates the capacity of the Geyserville Sanitation Zone and water systems to serve the project;
3. Assesses biological resource impacts to Wood Creek and associated riparian corridors;
4. Provides a visual and community character analysis consistent with Scenic Corridor policies; and
5. Evaluates wildfire, flood, and dam inundation hazards with updated mitigation measures.

Reliance on the Housing Element EIR without such review would constitute piecemealing and deprive decisionmakers and the public of the meaningful disclosure CEQA requires. Courts have consistently held that where program EIRs do not adequately capture site-specific effects, supplemental CEQA review is mandatory.

### **3. Affordable Housing Needs**

The Project, as proposed, fails to conform to Housing Element policy and does nothing to address affordable housing needs in Geyserville. The following remedies to improve policy compliance and affordable housing production include:

- A. Do not allow the use of the In-Lieu Fee Provision of the Inclusionary Housing Ordinance as it does not generate affordable housing in Geyserville or Sonoma County proportional to the required 20 percent of market rate units.
- B. Required inclusionary units should be provided on-site, consistent with the terms of the County's Inclusionary Housing Ordinance; given the nature of the project we recommend that the inclusionary units include 10 'for sale' or rental units price restricted for moderate or middle income households and 9 'rental units' affordable for low-income households.
- C. Any shortfall in affordable units stated in the RHNA submittal to the State obligates the County to find site capacity elsewhere within the County in a limited period of time and to report these findings to the State.
- D. Carefully monitor the development proposal for consistency with Housing Element assumptions and policy.
- E. Engage proactively with the applicant and community to align the required on-site inclusionary units with both RHNA compliance and local Geyserville housing needs.

### **4. County Zoning Ordinance Regulations**

The Applicant's interpretation of the R-3 District is not correct or complete. The following remedies are recommended:

- 1. Revise the proposal to substantively comply with county's stated objectives for this site.
- 2. Reduce the number of units including but not limited to reduction of or elimination of "optional" 4 bedrooms; change the mix of units by substituting a mix of units with fewer bedrooms; increase the proportion of low income and moderate income units which would also align with the County's RHNA site capacity and designated affordable housing allocation for this parcel as submitted to the State housing authority. The County's *Housing Element/ Housing Site Inventory (Table 15 Rezoned Sites* approved by BOS 8-22-

23) indicates this parcel has a new dwelling unit capacity of 90 based on 4.5 developable acres vs an actual parcel area of 5.11 acres due to “site constraints.”

3. Revise the site plan to reflect the Riparian Corridor or conservation area requirements and any appropriate actions to mitigate the dam failure inundation potential noted in the Sonoma County Housing Element Site Inventory.
4. In accordance with Zoning Code §26-64-030(c) (20’ setback along Scenic Corridors) and General Plan Resource Element – Scenic Landscape Units Policy OSRC-3A 20 ft. setback is required. The project site plan does not indicate that this scenic corridor setback has been incorporated. This is separate from R3 zoning setback provisions.

## **5. Project Design and Development Standards**

The project design and compliance with development standards are deficient. Overall, the design lacks any contextual reference to Geyserville. The following design remedies are recommended:

### **1. Design Remedies**

- A. Following adjustments to other objective development standards, revise the site plan and recalculate the proposed open space in accordance with Zoning Code §26-08-050(i) **\*\***(Open Space Standard for R3 Zone) and General Plan Land Use Element Policy LU-4.1 (services and infrastructure capacity).
- B. The developer is required to request a waiver of and provide justification for the reduction of the number of guest parking spaces. A parking demand study may be appropriate to lead to a more rational determination for guest parking focusing on the impact of ‘poaching’ off-site parking along Geyserville Avenue, Canyon Road, or neighboring properties (e.g., Geyserville Inn).
- C. Stagger housing blocks or validate other privacy solutions; revise site plan accordingly to ensure consistency with Zoning Code §26-08-050(h) (Privacy between multifamily units).
- D. Revise building setback dimensions and site plan to comply with the objective standard in Zoning Code §26-08-040(J.2) (Front and street-side setbacks in R3 Zone) described above.
- E. Step-Down Heights: Transition building heights at the Geyserville Ave frontage to two stories with articulated rooflines; keep three stories internal to the site.
- F. Shorter Building Lengths: Break up long blocks into smaller modules (4–6 units per building) to avoid a “superblock” look.
- G. Roofline Variety: Condition the project to Incorporate false fronts, parapet treatments, and shed roof forms to echo the town’s historic rhythm.

### **2. Architectural Design Refinements**

- A. **Material Palette:** Integrate board-and-batten siding, corrugated metal accents, wood trellises, and stone base elements referencing wine country barns and tasting rooms.

- B. **Façade Articulation:** Use balconies, recessed entries, varied window patterns to create a rhythm more consistent with Geyserville’s human scale.
- C. **Color Scheme:** Avoid uniform beige/gray tones; draw from natural tones (rust red, deep greens, off-whites, weathered wood) found in the surrounding landscape and downtown buildings.

### 3. Streetscape & Connectivity

- A. **Frontage Activation:** Orient a portion of buildings to face Geyserville Ave with porches, stoops, or small live/work units, giving the street an active edge.
- B. **Pedestrian Linkages:** Create mid-block paseos and walkways that connect directly to Geyserville Ave rather than isolating residents behind parking courts.
- C. **Public Realm Enhancements:** Provide a public facing plaza, pocket park, or shared open space node at the project’s frontage to integrate residents with the town.

### 4. Parking & Circulation

- A. **Reduce Dominance of Parking Courts:** Push some garages behind units or consolidate into shared parking clusters screened by landscaping.
- B. **Green the Drives:** Plant tree allées and use permeable paving to soften internal drive lanes.
- C. **Bicycle & Pedestrian Amenities:** Expand bike parking near Geyserville Ave, and add shade trees, benches, and lighting to foster walkability.

### 5. Design Process Options

- A. **Design Guidelines Check:** Apply Sonoma County Design Guidelines for Scenic Corridors and Small Town Character to massing and material selection.
- B. **Community Input Workshops:** Require the developer to host visual preference surveys with the GAV/MAC and Geyserville Planning Committee and community (showing barn-style townhomes, agrarian lofts, or storefront-fronted rowhouses) to refine aesthetics.
- C. **Pattern Book Approach:** Require the Developer to submit a “pattern book” of acceptable details (roof types, materials, porches, windows) tied to Geyserville’s vernacular.

## 6. Wildfire Hazard and Fire Safety

The Project Site is partly within the Calfire-designated ‘Extreme Wildfire Hazard Zone’. In addition, the Applicant has not interacted with the Northern Sonoma County Fire Protection District regarding their review and requirements for providing structural fire protection. Subject to review by the Fire District, the following remedies are recommended:

- A. Revise the site plan to provide a second means of emergency vehicle access and evacuation to comply with this critical life-safety standard.
- B. Assure adequate ‘fire flow’ storage is provided on-site to augment public water supplies.

- C. Assure that building setbacks and spacing of buildings allow for internal access by emergency vehicles.
- D. Assuming that there may be special fire-fighting equipment needed to provide structural fire protection provide funding to the Fire District to obtain the needed equipment.

## **7.Public Infrastructure**

There are a range of public infrastructure issues that must be addressed either by changes to the Project Application or as mitigation or conditions of approval.

### **A. Geyserville Sanitation Plant**

The Geyserville Sanitation Plant operated by the Water Agency is insolvent as documented in a recent Water Agency report. Therefore, a full analysis of the situation should be conducted along with a recommendation for addressing the existing revenue shortfall and the impact of the 93 new connections associated with the Proposed Project. The increase capacity service charge rates for new developments in the Zone to pay a fair share for infrastructure upgrades. The need to increase capacity service charge rates is supported by a report Sonoma Water recently commissioned: Sonoma Water Waste-Water Capacity Charges Study Final Report dated April 21, 2025, prepared by Bartle Wells Associates, Independent Public Finance Advisors.

The report recommends a “System Buy-In Approach” for new sewer connections wherein new developments “buy-in” for their proportional share of costs for capacity usage in existing systems. Simply put, the equitable funding will place “the costs of growth on growth rather than placing the cost of growth on existing ratepayers.” The current capacity charge in the GV ZONE is one of the lowest in the entire County. The report recommends a significant increase (3X-7X) over the existing capacity charge to cover anticipated updates in the system. The Sonoma Water board addressed this matter just recently, in May and decided to defer any capacity charge adjustments at this time.

While this matter was considered on a Countywide basis, a timely resolution is required (consistent with the Land Use objective standard) so that the proposed new development project would be charged at an approved adjusted new rate as needed to avoid impact on existing ratepayers. This would help to close the gap in operating deficits and capital improvements and not burden existing ratepayers with costs for growth.

### **B. Water Supply**

The Applicant has proposed that domestic water supply be provided by the California American Water Company who owns and operates a water supply system to some 330 customers in Geyserville. There has been no analysis of the capacity of the current system, plans for improvements needed for the existing customer base, or the impact of a 30 percent increase in customers. This concern is amplified by the fact that the Alexander Valley groundwater basin, the source of local water supplies, will be greatly affected by the loss of the interbasin flows from the Eel River as the result of the closure of the Potter Valley Power Plant and the decision by PG&E not to relicense Scott Dam (Lake Pillsbury). The following remedy is recommended:

1. Consistent with CEQA and SB 610, formal Water Supply Assessment should be conducted. Water supply assessment (WSA) requirements are legally mandated in California under the [California Environmental Quality Act \(CEQA\)](#) and [Senate Bill 610](#), requiring water suppliers and lead agencies to determine if projected water supplies can meet a project's demand, including normal, single-dry, and multiple-dry water years over a 20-year horizon. These assessments evaluate water sources, treatment, storage, and distribution to link land use planning with water supply reliability. Beyond project-specific WSAs, California also mandates annual water supply and demand assessments by large water suppliers to ensure proactive drought preparedness.

### **C. Other Infrastructure**

The Proposed Project has been evaluated against the Sonoma County General Plan. Modifications to the design and infrastructure plans are necessary to ensure full consistency with County policies. Outlined below is a summary of design and infrastructure issues that are key to address as part of the development and design review process.

Key areas requiring attention include the lack of frontage improvements on Geyserville Avenue, insufficient public-facing bicycle facilities and open space, limited pedestrian connectivity to the town center, and project massing and architectural design that are out of character with Geyserville's small-town, agrarian identity. Incorporating streetscape enhancements, multimodal connections, and context-sensitive architectural refinements will be critical to achieving compliance with the General Plan and integrating the project into the community.

#### **1. Sidewalks and Streets**

The Project Application indicates an internal private drive network with sidewalks within the project, but frontage improvements along Geyserville Avenue are not fully detailed. For consistency, the project should require the following to ensure consistency with the General Plan and design standards:

This work (sidewalk development) should be coordinated with the current planning and design work being let by Sonoma County Public Infrastructure. Current planning efforts extend to Geyserville Community School. The project should be responsible for design and improvement of public sidewalk from the project frontage south to Geyserville Elementary School. This infrastructure is necessary to ensure the safety of pedestrian and school age children walking to and from the project site to School and Downtown Geyserville. Roadway and sidewalk improvement work that is getting underway.

#### **2. County General Plan (Circulation & Transit Element)**

The General Plan requires new development in Urban Residential designations to provide urban street standards with sidewalks and pedestrian connectivity.

- a. A continuous public sidewalk along Geyserville Ave frontage;
- b. Street trees/landscaping in planting strips; and
- c. Curb, gutter, and ADA-compliant ramps at intersections and driveways.

### **3. Bicycle Facilities**

The Project Application proposed two bike spaces per unit (garage or racks), but no detail on public-facing bicycle infrastructure. General Plan Policy supports multi-modal connections and safe bicycle facilities. For compliance, additional bicycle facilities should be required:

- a. Short-term bike racks near common open spaces and along the frontage,
- b. Connectivity to any existing/planned bike routes on Geyserville Avenue.

### **4. Public Open Space**

The Project Application proposes a Mix of private patios, balconies, and common landscaped areas all largely internal to the site, functioning as semi-private amenities rather than public open space accessible to the wider community. The General Plan & Zoning Standards require 200 sf of open space per unit; the project exceeds this (44,392 sf provided vs 18,600 sf required). While the project may meet zoning, the General Plan encourages integration with community amenities. The lack of a publicly accessible parklet, plaza, or trail connection at the Geyserville Ave frontage is not in alignment and inconsistent with small-town integration goals contained in the adopted Sonoma County General Plan. The following remedy is recommended:

- a. Require the Project to make modifications to the design to ensure consistency with the General Plan.

### **5. Connectivity to Town of Geyserville**

1. **Challenge:** The project design orients inward around parking courts, limiting interaction with the main street.
2. **General Plan Expectation:** New residential in towns should reinforce main street character with front doors, porches, or pedestrian spaces facing the public realm.
3. **Required Mitigation:** Adding front-facing stoops/porches on Geyserville Ave buildings, a pocket park or plaza at the frontage, and pedestrian cut-throughs to the town core would bring the project into stronger compliance.
4. **Integration gaps:** Currently, the project treats open space and circulation as private amenities. To align with General Plan policies for small-town character and multimodal access, the design should be modified and conditioned to be more connected and reflective of Geyserville architectural styles.

### **8. Other Public Health and Safety**

1. **Hazardous Materials on Site**
2. **Earthquake Safety**
3. **Flood Protection**
- 4.



# Appendix A- CEQA Legal Authorities Supporting Additional Project-Level Review for PLP25-006

## CEQA Statutory & Guideline Provisions

- **CEQA Guidelines §15162(a):** Requires a **Subsequent EIR or Negative Declaration** when substantial project changes, changed circumstances, or new information show new or more severe impacts than previously analyzed.
- **CEQA Guidelines §15163:** Allows preparation of a **Supplement to an EIR** when only minor additions or changes are necessary to make the prior EIR adequate.
- **CEQA Guidelines §15168(c)(2):** When a **program EIR** is used, additional environmental review must occur if a later project has effects not examined in the program EIR.
- **CEQA Guidelines §15063:** An **Initial Study** is required to determine whether additional CEQA review is necessary.
- **CEQA Guidelines §15183:** Reliance on a General Plan EIR is permitted only where the later project is **consistent with the General Plan and zoning**; where inconsistencies exist, further CEQA analysis is required.

## Case Law

- **Friends of College of San Mateo Gardens v. San Mateo Community College Dist. (2016) 1 Cal.5th 937:** Agencies cannot avoid further CEQA review when substantial project changes create new impacts; whether a project is a “new project” or a “modification” depends on the nature of the changes.
- **Sierra Club v. County of Sonoma (1992) 6 Cal.App.4th 1307:** Reliance on a prior EIR is improper when the project differs significantly from what was originally evaluated, triggering new environmental effects.
- **City of Redlands v. County of San Bernardino (2002) 96 Cal.App.4th 398:** A program EIR does not excuse an agency from analyzing project-level impacts where specific details were not previously studied.
- **In re Bay-Delta Programmatic EIR Coordinated Proceedings (2008) 43 Cal.4th 1143:** Programmatic EIRs must be supplemented with project-level review when later activities present site-specific impacts not covered by the broader document.

- **Save Our Neighborhood v. Lishman (2006) 140 Cal.App.4th 1288:** CEQA prohibits “piecemealing” a project’s impacts; environmental review must account for the whole of the action.
- **Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412:** Agencies must demonstrate that **water supply and infrastructure capacity** are adequate; speculative or deferred analysis violates CEQA.
- **Stanford Ranch, Inc. v. County of Placer (1996) 41 Cal.App.4th 1353:** If significant site-specific impacts were not disclosed in the prior EIR, a subsequent or supplemental EIR is required.

## Appendix B: Development Project – Sonoma County General Plan Public Infrastructure Requirements Matrix

This matrix summarizes the Proposed project’s relationship to Sonoma County General Plan public infrastructure requirements for sidewalks, streets, bike lanes, and public open space. It identifies specific policy areas and associates the recommended conditions and remedies listed above necessary to ensure consistency with the General Plan.

Policy Area	General Plan / Policy Citation	Project Status	Recommended Condition
Sidewalks & Streets	Circulation & Transit Element (LU-UR policies; require urban street standards with sidewalks).	Internal private drives shown with sidewalks. Frontage improvements on Geyserville Ave not detailed.	Require continuous public sidewalk, curb/gutter, ADA ramps, and street trees along Geyserville Ave frontage.
Bicycle Facilities	Circulation & Transit Element: encourage safe bicycle facilities and multimodal access.	Provides ~2 bike spaces/unit (garages/racks). No frontage or public bike facilities shown on site plan.	Add short-term public racks near open spaces/frontage; connect to Geyserville Ave bicycle route network.
Public Open Space	Land Use & Recreation standards: 200 sf/unit (zoning); GP encourages integration with community amenities.	Provides 44,392 sf open space (private + common) vs. 18,600 sf required. All internal/semi-private.	Dedicate small plaza, pocket park, or trail connection at Project frontage along Geyserville Avenue for community-facing open space.
Connectivity to Town	General Plan small-town character policies: reinforce main street, orient buildings to public realm.	Project oriented inward around parking courts. Few direct connections to Geyserville Ave.	Reorient some units with stoops/porches to street; add pedestrian cut-throughs; enhance frontage plaza.