

October 2, 2025

Permit Sonoma
Attn: Shaun McCaffery
Planning Commission Chair, District 4
2550 Ventura Avenue
Santa Rosa, CA 95403

Re: Project Comments on 21837 Geyserville Avenue - Permit Sonoma File No. PLP25-006

Dear Commissioner McCaffery:

The Geyserville Planning Committee recognizes and appreciates the contents of the letter below, drafted by a segment of Geyserville residents regarding the proposed residential project at 21837 Geyserville Avenue (APN 140-180-035, Permit Sonoma File No. PLP25-006). We support its central themes and share many of the concerns raised, particularly with respect to affordable housing needs. We therefore wish to offer an endorsement of the contents below and alignment with its call for affordable housing in Geyserville. The Geyserville Planning Committee also recognizes that the Geyserville Alexander Valley Municipal Advisory Council has endorsed the comments below in a previously submitted letter to your office.

Our intent is to assist the County in ensuring that any approval of this project is consistent with state housing statutes, policies, and the Sonoma County General Plan, while also protecting public health, safety, and infrastructure capacity.

We emphasize that the following comments are not in opposition to either the project or to meeting, the community's Regional Housing Needs Allocation (RHNA), including affordable housing objectives for this parcel. Rather, they are intended to ensure that the project is designed and conditioned in a way that fulfills the Housing Element commitments while safeguarding public safety and infrastructure in a manner that does not negatively affect the level of service or costs to existing rate payers.

Under California Housing Statutes¹ once a housing application is deemed complete, Sonoma County (County) is required to review it against objective and quantifiable development standards such as density, setbacks, open space, parking, wildfire safety, and infrastructure adequacy. Where proposals fall short of these standards, reasonable remedies may be required to bring them into compliance.

Our review of the applicant's materials indicates numerous areas of non-compliance with State regulations and County standards, including California Housing Statutes, the California Environmental Quality Act, the Sonoma County General Plan, density calculations, affordable housing requirements, parking, setbacks, fire safety, riparian corridor protections, scenic corridor setbacks, and infrastructure funding. These issues present risks both to the County's statutory obligations and to the community of Geyserville.

We have organized our comments into the following sections:

1. California Housing Statutes
2. California Environmental Quality Act (CEQA)
3. Affordable Housing Needs

¹ California Government Code, Title 7 Planning and Land Use, Division 1, Planning and Zoning §65589.5, §65915 et seq.

4. County Zoning Ordinance Regulations
5. Project Design and Development Standards
6. Wildfire Risks and Fire Safety
7. Public Infrastructure

In addition to an analysis of each topic, recommendations and remedies for how the identified project deficiencies can be addressed are identified in Attachment 1: *Proposed Remedies for City Venture Application PLP25-006*. Attachment 1 provides a detailed set of remedies addressing the deficiencies of the proposed 93-unit condominium project PLP25-006. These remedies highlight areas where the application fails to conform to the Sonoma County General Plan, Zoning Ordinance, County policies, Housing Element, and CEQA requirements.

Key recommendations include:

- Rejecting inappropriate reliance on SB 330, which does not apply to Geyserville.
- Requiring project-level CEQA review beyond the Housing Element EIR to evaluate site-specific impacts (traffic, water/sewer capacity, biological resources, wildfire, flood, and community character).
- Mandating on-site inclusionary affordable units rather than in-lieu fees, to ensure alignment with RHNA obligations and policies and to provide much-needed affordable housing units in Geyserville.
- Correcting zoning and development standard misinterpretations and inconsistencies, including density, setbacks, privacy, riparian corridor protection, and scenic corridor requirements.
- Requiring design revisions to the project's architecture to reflect Geyserville's small-town and agrarian character, including step-downs, roofline variety, contextual materials, and streetscape integration.
- Conditioning approval on equitable infrastructure contributions, including sidewalk frontage improvements, expanded bike facilities, public open space dedication, water supply assessments, and fair-share sewer capacity charges.

Taken together, the remedies in Attachment 1 form the basis for conditioning or revising the project so that it is consistent with the County's adopted policies and statutory obligations while better integrating into the Geyserville community.

1. California Housing Statutes:

Gov. Code, §65589.5 and §65915 et seq.²

Under CA Housing Statutes (§65589.5, §65915 et.al) the County as the designated local agency must review this housing development application (once it's rendered complete) based upon objective and quantifiable standards for development such as but not limited to density, setbacks, open space and parking ratios, wildfire safety, public infrastructure, etc., and may reject proposals that adversely impact public health and safety. The current development proposal has numerous instances of non-compliance with development standards at both the State and County levels that adversely impact public health and safety. We respectfully request the County require revisions to the developer's application to comply with all objective development standards by implementing reasonable remedies.

² Ibid.

Furthermore, County ordinance requires the applicant to list and describe in detail all requested bonuses, incentives and waivers required in its proposed development. That information hasn't been furnished publicly based on the information published on the Permit Sonoma website. The positions stated below are based on the limited information that's been made available to the public. Further comments may be forthcoming based on additional information should it be made available to the community.

It is our contention that this project does not qualify for State affordable housing bonuses, incentives and waivers because Geyserville is exempt from SB35 streamlining and ministerial approval. If it's determined that SB35 is applicable, State affordable housing bonuses are not available because the applicant has not met the threshold percentages of Very Low, Low, and Moderate-Income housing unit percentages to qualify for bonuses and incentives under State mandates. County Inclusionary Housing Ordinance provisions are assumed to be the basis for any bonuses, incentives, and waivers.

SB 330 Housing Crises Act³

The project has requested that the County process the project in compliance with SB 330. However, Geyserville Census Designated Place (CDP) is *not* on the California Department of Housing and Community Development's (HCD) list of "affected" places for SB 330, so the Housing Crisis Act's "affected jurisdiction" provisions (hearing cap, 2018 standards freeze) **do not apply** to projects in Geyserville.

- HCD's official Affected Counties (CDPs) list shows which census-designated places in each county are covered. For Sonoma County, the affected CDPs include Boyes Hot Springs, Eldridge, El Verano, and Fethers Hot Springs—Agua Caliente—Geyserville is not listed.⁴
- HCD's Statutory Determinations page explains that "affected counties" coverage is defined at the CDP level—only CDPs wholly within an urbanized area are affected.⁵

Because Geyserville CDP is not on the affected list, the SB 330 "affected jurisdiction" constraints (e.g., limit of five hearings, prohibition on applying new non-objective standards, freeze on post-2018 down-zoning) do not control the County's review of the project at this location, nor is the project eligible for an automatic vesting tentative map. Normal State laws still apply—but the SB 330 affected-jurisdiction rules don't trigger to projects in Geyserville.

These comments should not be construed to mean anything other than full support of the RHNA appropriated to Geyserville including the affordable housing allocations for this site as stipulated in the Housing Element Sites Inventory for this site, 21837 Geyserville Avenue, APN 140-180-035, identified as GEY-1 (GEY-1). It is a concern to the community that this application puts a greater burden on other sites because its affordable housing count is well below the stated objective. Affordable housing, as expressed in the most recent survey of the Geyserville community, is a high priority need.

2. California Environmental Quality Act (CEQA)⁶

Permit Sonoma staff have indicated that the County intends to rely on the certified Environmental Impact Report (EIR) for the 2023–2031 Housing Element to satisfy CEQA for the proposed development at GEY-1. While the Housing Element EIR provides a programmatic analysis of housing capacity and

³ California Senate Bill No. 330 Housing Crises Act of 2019.

⁴ [California Housing Department](#)

⁵ Ibid.

⁶ CEQA: Public Resources Code 21000-21189 and CEQA Guidelines: California Code of Regulations, Title 14, Division 6, Chapter 3 §15000-15387.

potential environmental impacts countywide, CEQA is clear that reliance on a program-level document does not excuse the County from its requirement to undertake further review when site-specific impacts, some of which are discussed in this letter, were not sufficiently analyzed or mitigated in the Housing Element EIR.

Under CEQA Guidelines⁷, when a project presents new or more severe environmental impacts than previously analyzed, or where substantial changes in circumstances or the project itself occur, the agency must prepare either a Subsequent EIR or a Supplemental/Mitigated Negative Declaration (MND). Programmatic EIRs are intended to streamline, not substitute for, project-level review.

Courts have repeatedly emphasized that program-level environmental review does not excuse agencies from conducting site-specific analysis where later projects introduce new or more severe impacts. For example, in *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, the Court held that a program EIR cannot substitute for analysis of project-level impacts not previously studied. Similarly, in *Bay-Delta Programmatic EIR Coordinated Proceedings* (2008) 43 Cal.4th 1143, the California Supreme Court confirmed that programmatic EIRs must be supplemented with project-level review when later activities present site-specific impacts not addressed in the broader document. These precedents, together with CEQA Guidelines §15162(a), require Sonoma County to prepare a Subsequent or Supplemental EIR for PLP25-006 to evaluate traffic, infrastructure, biological resources, aesthetics, and public safety issues in detail.

The Housing Element EIR assumed that GEY-1 would accommodate 90 New Units with a mix of income levels, consistent with the rezoning action adopted in 2023. The current proposal, however, is for 93 Above-Moderate-Income units in a high-density configuration that departs substantially from the assumptions underlying the EIR. This change raises new and more severe environmental impacts that were only addressed in a generalized manner in the Housing Element EIR, including:

- Traffic and Circulation: Increased auto trips, inadequate guest parking, and lack of multimodal connectivity to schools and downtown Geyserville create potential safety and circulation impacts not addressed programmatically.
- Public Services and Infrastructure: The project relies on the Geyserville Sanitation Zone for sewer service and the California American Water Company for potable water supply; both entities have documented deficits and capital upgrade needs. The Housing Element EIR did not analyze the site-specific sewer and water capacity constraints in Geyserville.
- Biological Resources: The presence of a Riparian Corridor (RC Combining Zone) and potential streamside conservation area were not specifically evaluated for this parcel in the Housing Element EIR. Development adjacent to Wood Creek presents potential impacts to sensitive habitats and species requiring site-specific analysis.
- Aesthetics and Community Character: The proposed massing and architecture are inconsistent with General Plan “small-town character” policies. Visual and character impacts along Highway 128 and Geyserville Avenue were not addressed at a project-specific level in the Housing Element EIR.

⁷ California Code of Regulations, Title 14, §15162–15163.

- **Public Safety:** The parcel lies within a 100-year floodplain, dam failure inundation zone, and Very High Fire Hazard Severity Zone (VHFHSZ). These hazards necessitate site-specific evaluation of ingress/egress, fire protection capacity, and evacuation routes.

Requested Environmental Review

Sonoma County must not rely solely on the programmatic Housing Element EIR. Instead, CEQA requires that the County prepare additional environmental documentation. At a minimum, this should include an Initial Study to determine whether a Subsequent or Supplemental EIR is required. Please see Attachment 1 for a list of remedies to address significant site-specific impacts under CEQA that were not adequately mitigated by the Housing Element EIR.

Reliance on the Housing Element EIR without additional environmental review would constitute piecemealing and deprive decision-makers 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

Housing Element Compliance

The adopted 2023–2031 Sonoma County Housing Element assigns 3,824 housing units to unincorporated areas, with 42% designated for lower-income households. Within this framework, Geyserville sites GEY-1 through GEY-7 represent approximately 151 units, over half of which were credited toward lower-income RHNA obligations.

GEY-1 in the adopted Housing Element plays a particularly important role. The site was rezoned in 2023 to provide 90 units, with the County assuming 63 lower-income units, 9 moderate-income units, and 18 above-moderate units toward RHNA compliance⁸. This assumption is central to demonstrating adequate affordable housing capacity. However, the current proposal envisions construction of 93 above-moderate units only, eliminating the 72 affordable and moderate units that the Housing Element relies on. This outcome would:

- Undermine RHNA compliance by removing 63 Lower-Income and 9 moderate units from the County's affordable capacity.
- Expose the County to legal and policy risks, including potential Housing Element decertification and the application of the Builder's Remedy.
- Shift the housing balance in Geyserville, producing exclusively high-income units while failing to address workforce and community housing needs.
- Increase reliance on other rezoned parcels to meet affordable housing commitments, creating greater Housing Element and RHNA compliance pressure countywide.

Attachment 2: Affordable Housing Memorandum provides additional details on how the project site was evaluated as part of addressing the County's RHNA Zoning Regulations

4. County Zoning Ordinance Regulations

Rezoning Approved August 23, 2023, by Board of Supervisors

GEY-1 in *Housing Element Appendix D, Sites Inventory*, was rezoned to R3 20. *Table 15: Rezoned Sites* contains the following details: New Units 90, "Density reduced due to site constraints" broken down as:

⁸ Housing Element Appendix D, Tables 7 and 15

lower-income units 63, moderate-income units 9, above moderate-income units 18. It is clearly recorded that the intent of this rezoning was principally for lower-income and moderate-income housing. The RHNA objectives also confirm this. Similarly, *Table 7: Developer Panel Site Feedback*, the record of respondents to the question, “Which of the following housing types would be suitable for development of this site?” reads “Mixed-Income Housing, 100% Affordable Housing.” Tables 7 and 15 are consistent in that there was no stated intent that this site should be developed as market rate housing. The applicant’s proposal does not meet the stated objective standard for the rezoning and development of this site.

Consistency with Report to Board of Supervisors Aug 22, 2023

Permit Sonoma submitted its report to the Board of Supervisors at the BOS meeting dated August 22, 2023, pertaining to the rezoning of sites. As excerpted from that report, the following factors were evaluated:

“Other staff considerations for including sites as Recommended Rezone Sites in the Sites Inventory

Staff and consultants also considered the following local factors in evaluating sites to be included in the recommended Sites Inventory:

- ☐ Emergency Access and Fire Safety
 - Avoid adding significant new populations in Very High Fire Hazard Severity Zones (VHFHSZ).
 - Two points of access are available to the site.
 - Road widths either meet fire safe standards or can be realistically improved to meet applicable Fire Safe standards.
- ☐ Environmental Constraints, Including Flooding. These constraints are considered in the Draft EIR and addressed in responses to comments in the Final EIR. Additionally, the County performed a site-by-site analysis to assess constraints on individual sites and reduced the available acreage and realistic capacity assumptions on sites with constraints, such as flood zones and setbacks.”

It is clear from the developer’s application that these factors have not been adequately addressed as further described in the issues outlined below. It should be noted that this parcel, GEY-1, did not get designated VHFHSZ until 2025 so that factor was not a concern at the time the Site Inventory Report was presented in 2023.

R-3 Density Unit Equivalent

The project application states a density calculation of 18.19 dwelling units (DU) per acre. The allowable range for high density residential R3 zoning is 12-20 DU/acre excluding affordable housing density bonuses⁹. The developer’s calculation is faulty because in an R3 zone, the Zoning Code¹⁰ “Density Unit Equivalents” are calculated based upon the number of bedrooms per unit. The developer proposes that 88 of the 93 units (95% of total units) are “Optional 4-Bedrooms”; a Density Equivalent factor of 1.5X should be applied for each 4-bedroom residence. Therefore, the Density Equivalent is: $88 \times 1.5 = 132$ units plus 5 3-Bedroom units totaling 137 Equivalent Dwelling Units. This equates to 26.81 DU/acre which exceeds the allowable density (12-20DU) before any bonuses. There is no indication that the developer is requesting any waivers or reductions of development standards for density, and the applicant has not provided adequate information to the County to make a determination as to any waivers or reductions of development standards for density.

Riparian Corridor (RC Combining Zone) and Streamside Conservation Area

The County GIS Zoning map and database indicate that a riparian corridor exists partially within the entire western side of the parcel from north to south extending westerly beyond the property line. Has

⁹ Sonoma County Code (SCC) §26-08-040 (F)(2). Development Standards, R3 Density Equivalents.

¹⁰ Ibid.

the County made a determination regarding a streamside conservation area in this location? If so, Zoning Code §26-65-030 (Riparian Corridor Combining District standards) and General Plan OSRC-8 (Riparian Corridor protection) prohibit structures, roads, utility lines, and parking within any designated conservation area. The application documents do not indicate the existence of the RC or conservation area so it can't be ascertained if there are any encroachments. Certain exceptions apply but would require a use permit and approval of a conservation plan. Permit Sonoma should review the site plan for any site plan adjustments of buildings, structures, roads, utility lines and parking.

Furthermore, a recent County ordinance approving rezoning changes includes a revision to the RC designation for this parcel from RC50 to RC/25. If the RC does not exist on this parcel why would the County approve a zoning change stipulating this designation?

In addition, the Sonoma County Housing Element notes that this parcel is in a 100-year floodplain and dam failure inundation zone. The application should address this in terms of creating a resilient site plan.

Scenic Resource and Scenic Corridor

Zoning Code SCC §26-64-030 (c) states, *"A building setback of twenty feet (20') shall be applied along Highway 101 scenic corridor to properties which are within the urban service area boundaries shown on Figures LU-5b{sic}.... of the general plan use element, to be reserved for landscaping.* (The correct map is LU-2b for Geyserville.) The western property line falls within a Scenic Corridor boundary according to the County GIS parcel maps.

5. Project Design and Development Standards

Open Space Standard¹¹ & Allowable Lot Coverage

The project's allowable lot coverage is 60% plus a discretionary 10% increase if the project provides sufficient on-site open space and recreation areas. What is the lot coverage percentage in the application?

The project's calculation for open space is based on 93 DU X 200 sf per unit. Using the Density Equivalent (137 from above instead of 93) results in a higher open space area requirement. The calculation is 137 X 200 sf = 27,400 sf vs 18,600 sf stated in the application documents. The amount of open space and recreational area (excluding private open space) seems minimal for the number of Equivalent Dwelling Units.

Parking Standards and Required Parking

Sonoma County Parking Regulation § 26-86-010 and General Plan Circulation & Transit Element Policy CT-2c (adequate parking with multimodal balance) require ½ uncovered guest parking space for each dwelling unit plus an additional ½ parking space for each dwelling unit having more than 2 bedrooms. Since all units in the proposal are 3 bedrooms or more, the required uncovered guest parking is 93 spaces. The proposal includes 18 uncovered guest parking spaces. Based on the proposed site plan there doesn't appear to be room for the code-required guest parking. This is an example of the high density and lot coverage impacting required parking standards in the proposed plan. While there are two-car garages for each unit, this should not offset the required number of uncovered guest parking spaces. Furthermore, the American Community Survey conducted by the US Census Bureau (2023) indicates the average number of vehicles per housing unit is 2.2 in Geyserville. Using these statistics, the current parking scheme would not meet the existing level of vehicle parking per housing unit in Geyserville.

Privacy

¹¹ SCC §26-08-050 (I). Multifamily development standards, Open/Recreational Space Requirement.

Zoning code § 28-08-050 H. 1. states “...buildings shall be placed such that privacy issues are minimized” in multifamily developments. Para H.2 states: “Building-to-building window placement shall be staggered, or otherwise designed to provide adequate privacy between the units, as determined by design and site plan review.” Non-staggered window placement exists in Building Blocks F, G, H, I, J, Q and P. This could be resolved by staggering the building blocks. How will the developer address this? A sightline diagram would be useful to understand the impact of window placement and privacy from proposed balconies and or decks.

Property Setbacks

According to the zoning code § 26-08-040 Development Standards (J.2) (front and street-side setbacks in R3 Zone) the following setback adjustments apply in the R3 zone:

- a. In a proposed project with multiple buildings, minimum front and street side setbacks for individual buildings may be reduced up to five feet (5') so that the average setbacks for all buildings are at least: ... (2) Fifteen (15') in the R3 zone to obtain an average of twenty feet (20') for all buildings in the proposed development.

The application documents indicate setback dimensions of 15' which does not comply with the development standard above (20 ft. average for the entire development).

6. Wildfire And Fire Safety

Very High Fire Hazard Severity Zone (VHFHSZ)

A sizable portion of the parcel is classified by Cal Fire as VHFHSZ, which requires conformance with *California Code of Regulations 14 CCR §1270* including minimum wildfire protection standards.

A local jurisdiction does not have the authority to apply exemptions to the standards unless the exceptions are enumerated in §1270 and elsewhere. Each exception must be specifically requested on a case-by-case basis by the applicant supported with material facts. The conformance with applicable minimum wildfire standards is a condition of approval for any development permit.

The following standards and General Plan policy set forth in California Code of Regulations, Title 14, §1270 et seq. (State Minimum Fire Safe Regulations) and General Plan Public Safety Element PS-1 are not being complied with in the project application:

- a. §1276.01 Building and Parcel Siting and Setbacks: all parcels shall provide a minimum thirty-foot setback for all buildings from all property lines and/or the center line of a Road except for reduction(s) based on practical reasons, and which provide an alternative method(s) to reduce structure to structure ignition.
- b. §1273.04 Road Radius: (a) no road radius shall have a horizontal road radius of curvature of less than fifty (50) ft. The entry and egress road to the project does not appear to meet this standard. Alternative methods require approval by the fire official.
- c. *Sonoma County Fire Safety Ordinance, Chapter 13 Article V* requires development parcels to have adequate ingress, egress and the capacity for concurrent evacuation and emergency response. The current site plan layout requires thorough review by the appropriate fire officials.

Sonoma County Fire Safety Ordinance, Chapter 13 Sec. 13-17 (b) (136) and Appendix D Fire Apparatus Access Roads D106.1: Projects having more than 50 Dwelling Units. Multiple-family residential projects having more than 50 dwelling units shall be equipped throughout with two separate and improved fire apparatus access roads.

Structural Fire Protection

The Applicant or Permit Sonoma have not yet solicited project review or comments from the Northern Sonoma County Fire Protection District. The following fire protection issues will need to be addressed given the current application and site design:

- a. There will need to be at least one emergency vehicle access point to the site, consistent with standards for emergency vehicle access if the primary access is blocked.
- b. Building location and access ways need to conform to standards for emergency vehicle access.
- c. The proposed buildings are higher than any existing buildings in the Fire District and may require additional fire fighting vehicles or equipment.

Sonoma Hazard Mitigation Plan

This site is located in a 100-year flood zone per FEMA, Figure 8.5 PUBLIC SAFETY ELEMENT. It is not clear how the development proposal addresses this hazard.

Sonoma County Dam Failure Inundation Hazard

Public Safety Element PS-1 map identifies Dam Failure Inundation Hazard Areas. It is not clear how the development proposal addresses this.

7. Public Infrastructure

General

The *Sonoma County General Plan Land Use Element* – Goal LU-4 addresses public services/infrastructure for rural and urban service areas.

The Goal is:

Maintain adequate public services....to accommodate projected growth. Authorize additional development only when it is clear that a funding plan or mechanism is in place to provide needed services in a timely manner.

Objective LU-4.1 states:

Assure that development occurs only where physical public services and infrastructure, includingwater and wastewater management systems ...are planned to be available in time to serve the projected development.

Sewer Service -- Geyserville Sanitation Zone (CSA 41)

In March 2025, Sonoma Water Financial Services Division Manager issued the Geyserville Sanitation ZONE FY2025/2026 Written Basis of Sewer Charge to Sonoma Water Management. That document which is a public record states Geyserville Sanitation Zone ("GV Zone" or "Zone") has an operating deficit each year and cannot self-fund the necessary capital improvements over the next several years and most likely beyond. *"The Zone faces an ongoing operation deficit and has a critical need for infrastructure upgrades."* Revenue from customer sewer charges covers only 45% of the total revenue needed to operate. As a result, the GV Zone is dependent on other funding sources such as grants and capacity service charges for new developments. Grant funding is not predictable in either the short or long term.

The updated Housing Element fails to acknowledge this "critical need". Appendix D Table 18: Water and Waste Availability by Service Area identifies Geyserville Sewer as "Category 2- Adequate, however some improvements are likely."

Water Supply

The Applicant has assumed that domestic water supply will be provided by the California-American Water Company, the successor to the original Geyserville Water Works. The system currently services

330 connections. While we understand that Cal American Water is pursuing a variety of system improvements it is not clear whether these improvements will support a near 30 percent increase in water delivery. In addition to the capacity of the current system there are broader concerns about the Alexander Valley Groundwater Basin due to the ongoing elimination of inter-basin flows at Potter Valley that have supported 'summer flows' in the Russian River for more than 100 years. During the recent drought the State 'curtailed' numerous wells in Alexander Valley and in the Cities of Cloverdale and Healdsburg. The future capacity of the Alexander Valley aquifer is in question, likely requiring new water conservation and water supply solutions.

Sidewalk Extension

A public sidewalk extension should be funded and constructed to connect the proposed development with the Geyserville Elementary School and the center of town. The existing sidewalk ends at Geyser Ridge Road to the south of the proposed project. Highway 128 passes over Woods Creek just south of the project site. The roadway structure does not have a roadway shoulder in this short section which means that pedestrians and bikes use the active road lanes.

In addition to extending sidewalks to connect the development with downtown Geyserville and the elementary school, it is critical that the project be integrated with existing public transit infrastructure. The Sonoma County Transit Route 60 bus stops at Canyon Road and Geyserville Avenue and serves as a vital connection for residents without automobiles. To ensure accessibility and safety, the project should fund and construct ADA-accessible sidewalks and marked crosswalks directly linking the development to these bus stops. Seating and shelters should also be considered in coordination with Sonoma County Transit. Relocating stops slightly farther from intersections should also be evaluated to improve pedestrian safety for transit users

Conclusion

In closing, the Geyserville Planning Committee (GPC) and the Geyserville/Alexander Valley Municipal Advisory Council (GAV-MAC) emphasize that our comments reflect the outcome of multiple public meetings and community input sessions and are intended to support Sonoma County's Housing Element goals while ensuring that new development proceeds in a manner that is consistent with the General Plan, protects public health and safety, and equitably funds required infrastructure.

We strongly urge Permit Sonoma staff and the Planning Commission to incorporate the recommendations outlined in this letter and in the supporting attachments as conditions of approval or as the basis for requiring revisions to the project application. Doing so will help ensure that the proposed development at 21837 Geyserville Avenue both advances the County's RHNA obligations and reflects the small-town, agrarian character of Geyserville, as well as helping to meet the community's significant needs for affordable housing.

We thank you for your careful consideration of these comments and look forward to continued collaboration on achieving balanced and sustainable housing solutions for our Geyserville community.

Respectfully submitted,

Geyserville Planning Committee (GPC)

By: _____
Benny Allen, President

Attachments:

Attachment 1 – Proposed Remedies for City Venture Application PLP25-006

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

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

Attachment 2 - General Plan Housing Element Analysis Memorandum

Copy:

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