

November 1, 2025

Geyserville Planning Committee

Attention: Benny Allen, President

Response to October 2, 2025 Project Comments on 21837 Geyserville Avenue - Permit Sonoma File No. PLP25-006

Thank you for your letter of October 2. I appreciate and share your concerns about the project and the desire to make it a better fit for Geyserville. Over the last month I have been communicating with staff over the concerns raised in your letter. At this point the project, as submitted, is under review with responses due mid-November. In this reply I hope to address each of the key recommendations included in your letter. For simplicity, I have them repeated here in bold followed by a response.

Rejecting inappropriate reliance on SB 330, which does not apply to Geyserville.

In asking County legal counsel about Geyserville and SB 330, I learned that all of the SB 330 statutes apply to residential projects in Geyserville, except for [Gov. Code § 66300](#). Section 66300 applies only in areas that meet the statutory criteria for “affected cities” and “affected counties.” Geyserville is not designated as an “affected county” area; the four designated “affected county” areas in the county are all in the Springs area of Sonoma Valley. For reference, the State Dept of Housing and Community Development (HCD) maintains a GIS [map of SB 330 Affected Cities and Counties](#).

If Geyserville was an “affected county” area under Sec. 66300, the County would be prohibited from taking actions to reduce or limit housing development, anywhere in Geyserville where housing is an allowable use. But because Geyserville is not an “affected county” area, Sec. 66330 is just irrelevant there.

For affected county areas, Section 66300(b) prohibits the County from taking any of the following actions on land where housing is an allowable use.

- Changing the land use or zoning to a less intensive land use or zone, or reducing the intensity of use allowed by the land use or zoning, compared to what was allowed as of January 1, 2018, unless the County concurrently changes the development policies, standards, or conditions applicable to other parcels in the County so that there is no net loss in residential capacity in the jurisdiction. “Reducing the intensity of land use” includes essentially any action that would individually or cumulatively reduce the site’s residential development capacity, such as reducing allowed height or density. (§ 66300, subd. (b)(1)(A), (h)(1).)
- Imposing a moratorium or similar restriction on housing development or mixed-use development, except if: (1) the moratorium/restriction is adopted specifically to protect against an imminent threat to the health and safety of persons in the moratorium area or immediate vicinity; and (2) HCD approves the moratorium.
- Imposing or enforcing any design standards that are not objective.
- Adopting or enforcing a cap or limitation on overall housing units, population, or the number of permits that will be issued for new development.

Because the project is subject to the SB 330 statutes (excluding sec. 66300), it is recommended that going forward, the GPC be the body to hold public meetings on the subject. It is my understanding that the GAV-MAC is County-affiliated and therefore subject to meeting limitations outlined in SB 330.

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).

I asked staff about this and understood that thresholds for additional CEQA analysis are not met. The number of units in the project (93) is within the number studied in the EIR (123). Traffic and other impacts were studied along with the associated level of residential development. Note that some of the EIR's findings were recognized as significant and unavoidable. Review of water, sewer, biological, wildfire, etc. are part of the application process and will have comments from staff mid-November. They are due 30 days from the date the application was deemed complete.

The EIR analysis for the project site (identified as GEY-1) was based on an assumed buildout of 123 units based on the proposed zoning density of 20 units per acre (See EIR Table 2-4 p. 2-25 of the DEIR; pp. 100 of the Draft EIR PDF.) The Draft and Final volumes of the EIR are available on Permit Sonoma's Housing Element page. Snip of relevant portion of Table 2-4 is below:

Table 2-4 Housing Unit and Population Buildout Potential for Rezoning Sites

Rezoning Site	Total Allowable Dwelling Units Under Current Designation	Total Allowable Dwelling Units Under Proposed Designation	Change in Total Allowable Dwelling Units (Buildout Potential)	Total Population Under Current Designation ¹	Total Population Under Proposed Designation ¹	Change in Buildout Population Potential
GEY-1	82	123	41	213	320	107
GEY-2	8	33	25	21	86	65
GEY-3	5	22	17	13	57	44
GEY-4	6	26	20	16	68	52

However, the Housing Element site inventory assumed that the GEY-1 site would build out to approximately 90 units. (See Housing Element Appendix D, Table 15.) The Housing Element is a policy document, and the project number of units for each inventory site was a conservative estimate that responded to HCD's stringent requirements for projecting inventory site development toward meeting RHNA.

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.

Some cities in Sonoma County have adopted mandates for on-site affordable housing, however Sonoma County currently has no such regulation. For this project, the process is still playing out. The design currently encroaches into a scenic corridor setback for Hwy 101. This will necessitate a change to the project design or a "density bonus" obtained from including on-site affordable housing. This density bonus can be used to obtain concessions on things like encroachment into setbacks.

Asking staff about affordable housing options and requirements, I found that the County can only require the applicant to comply with the County's affordable housing program (Sonoma County Code, Sec. 26-89-040). Which of the three compliance options the applicant chooses is solely the applicant's choice. The SB 330 preliminary application, together with provisions of Government Code section 65589.5, limit the County to applying only those objective standards that were in effect on the date the preliminary application is submitted. Here, the requirement is to meet the affordable housing requirement on-site, or pay the applicable in-lieu fee, or propose an alternative equivalent action. The applicant could voluntarily propose an alternative equivalent action under SCC Sec. 26-89-040, such as building affordable units off-site, or retrofitting and existing off-site units and deed-restricting them to affordable rents, but the County is prohibited from imposing discretionary conditions on the project

unless it can make the findings specified in Gov. Code sec. 65589.5, subd. (d). Those findings are not legally feasible for this issue.

Currently, the applicant is choosing to pay the In-Lieu Affordable Housing Fee. I asked staff about when the fee was last updated and why some choose to pay the fee. The last substantive amendment to the County's affordable housing in-lieu fee structure was in 2014-2015. The fee is adjusted each year for inflation. While in-lieu fees typically do not directly track the cost of building affordable housing on-site in any jurisdiction, due to wide variability of those costs. Many residential projects take advantage of a state density bonus, which requires affordable housing units to be built on-site. For example, the recent 175/245 Airport Blvd project (MJS23-0001), now in construction, has 57 total units, including 6 lower-income affordable units and 6 moderate-income affordable units.

Correcting zoning and development standard misinterpretations and inconsistencies, including density, setbacks, privacy, riparian corridor protection, and scenic corridor requirements.

Analysis of many of these items is underway in the review of the application and has a bearing on whether affordable housing will be included on site. I specifically asked about privacy, which is not considered an "objective standard" that would be enforceable. The County is limited to applying only those objective standards that were in effect on the date the preliminary application is submitted.

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.

There is room for modification and influence in this area. Materials, colors, roof type and landscaping are within the scope of design review. I am not sure about step-downs and streetscape, however because of the limit of applying standards that were in effect on the date the preliminary application is submitted.

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.

The report "Sonoma Water Wastewater Capacity Charges Study" from April 2025 indicated that there was insufficient data about the Geyserville sewer system. Since then, an additional sewer analysis has been performed, and the project is expected to obtain a "will serve" letter. A similar letter has already been obtained from Cal-American Water. I asked about water supply assessments and fair share sewer capacity charges, which are also limited to the application of standards in effect when the application was submitted. I understand that requirements for sidewalks and bike facilities fall under the same limitation. Open space is under review as part of the application process.

Please feel free to reach out to me any time with further questions or concerns. I am available to meet with you on this or any other issues that concern Geyserville.

Regards,



Shaun McCaffery

Planning Commissioner, District 4 (707) 206-2371 Shaun.McCaffery@sonomacounty.gov