



*Legal Aid's mission is to promote social justice and
advance basic human rights for vulnerable people in our community.*

June 5, 2023

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Sent electronically to: cityclerk@cityofpetaluma.org

RE: Comment on Agenda Item #13 - Amendments to Petaluma's Mobilehome Park Rent Stabilization Program ("Ordinance")

To the Honorable Petaluma City Council and Staff,

Legal Aid of Sonoma County (LASC) thanks you for your dedicated work to improve housing stability in Petaluma, particularly for folks who are precariously housed. LASC represents low-income renters, mobilehome owners and unhoused folks in Petaluma and the surrounding County with numerous legal issues including eviction, tenant rights, rent increases and access to housing/benefits. LASC encourages City Council to take bold action to ensure the long-term affordability of mobilehome parks and stability for their residents. We are supportive of the amendments recommended in the Staff Report.

The same power imbalance between landlords and tenants, which has been exacerbated by the housing crisis, also affects mobilehome owners. Despite having the security of owning their home, their housing is tenuous as homeowners rent the very land underneath that home. The owners of that land are profit driven, and generally raise the rents to the maximum allowable amount regardless of the need for it. If there was a direct need for a higher rent amount, owners who claim they will do anything to stay in business, would be willing to release their profit and loss statements. So far, to our knowledge, no park owners in the

County have released that information, even in arbitration. If what the owners are saying about insolvency is true, as of their joint letter on June 5th, they should be willing to share information on their profit and loss with the City to prove it.

We are in a housing crisis and mobilehome parks are pretty much the last naturally occurring affordable housing left. Forward-thinking communities aim to preserve that affordability.

Legal Aid urges consideration of a cap which is consistent with historical trends in Petaluma, of no more than 3%, or 50% of the change in CPI (whichever is less). This will ensure that residents are able to afford to continue living in Petaluma's mobilehome parks. It is hard to imagine that the owners will not get a fair return, considering that over the last 21 years, the average annual allowable rent increase was 2.6 %. There was only one arbitration in that time frame that we are aware of, and the park owners lost.

We also urge the City to reject the demands and "concessions" being made by Park owners, as they do not appear supported by valid evidence. Legal Aid does not support loosening Petaluma's vacancy control, and would urge City Council to adopt Rohnert Park's approach and instill stronger vacancy control. This will ensure there are no loopholes that can be abused and prevent erosion of your naturally occurring affordable housing over time.

Please consider passing this Ordinance with urgency to take effect before rent increases go into effect for as many residents as possible. Windsor made the necessary findings for an urgency ordinance, and Petaluma could do the same.

If there are unintended consequences that financially harm park owners, you can always return to make amendments. But you cannot go back in time and restore community members, who are predominantly seniors, to their housing or their quality of life. Please stand with the many housing insecure community members that have bravely shared their stories and concerns with you, and with those who are afraid to come forward. Thank you for moving quickly to address this urgent need.

Legal Aid again thanks the City Council and Staff for their commitment to making needed changes to strengthen the Ordinance. We are available as always to provide support for Petaluma mobilehome residents.

Thank you!

Sincerely,

A handwritten signature in blue ink, appearing to read 'Margaret DeMatteo', with a stylized, flowing script.

Margaret DeMatteo, Housing Policy Attorney