



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

July 10, 2023

Board of Directors

*President
Chris Grabill
SRJC Wildfire
Resilience Program*

*Vice President
Jennifer Douglas
Dickenson, Peatman
& Fogarty*

*Secretary
Jacquelynne Ocaña
Private Fiduciary*

*Treasurer
Ann Hudson
Exchange Bank*

Directors

*Fernando Carrillo,
CPFA
Merrill Lynch Wealth
Management*

*Thomas Del Monte
Spaulding
McCullough & Tansil*

*Henry Huang, J.D.
CPA
Meridian Realty &
Mortgage Co.*

*Jack Sanford
Abbey Weitzenberg
Warren & Emery*

*Chris Smith
Retired Columnist*

*Glenn Smith
Smith Dollar PC*

*Executive Director
Ronit Rubinoff*

Mayor Kevin McDonnell
Vice Mayor Janice Cader Thompson
Council Member Mike Healy
Council Member Dennis Pocekay
Council Member Brian Barnacle
Council Member John Shribbs
Council Member Karen Nau
City Manager Peggy Flynn
Housing Director Karen Shimizu
City Attorney Eric Danly
Assistant City Attorney Dylan Brady

Sent electronically to: cityclerk@cityofpetaluma.org

RE: Comment on Agenda Item #10 - Introduction of Ordinance Amending Chapter 6.50 of the Petaluma Municipal Code Entitled Mobile Home Park Space Rent Stabilization Program ("Ordinance")

To the Honorable Petaluma City Council and Staff,

Legal Aid of Sonoma County (LASC) again thanks you for your dedicated work to improve housing stability in Petaluma, particularly for folks who are precariously housed. As you know, LASC represents low-income renters, mobilehome owners and unhoused folks in Petaluma and the surrounding County with 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 and Exhibit A thereto and have only a few additional suggestions.

Legal Aid has been receiving information regarding retaliatory behavior by park owners in Petaluma, Windsor and Santa Rosa after each municipality amended their ordinances. We are concerned that park owners will resort to wrongful evictions if that is the only possible "lawful space vacancy" that they can effectuate which allows them a higher rent increase.

We urge you to adopt complete vacancy control as they do in Rohnert Park, to avoid this potentially devastating consequence.

We continue to urge you to reject the demands and "concessions" made by Park owners, as they do not appear supported by valid evidence. This will ensure there are no loopholes that can be abused and prevent erosion of your naturally occurring affordable housing over time.

Please consider the following additional provisions:

- Adoption of a "Senior Park Overlay District" zoning designation for all the current senior parks. See Yucaipa, Huntington Beach, and San Juan Capistrano for examples. The owners of Youngstown Mobile Home Park have attempted to convert the park to an "all ages" park to increase their revenue.
- Add to "6.50.190 Penalties and remedies" a mandatory enforcement mechanism that includes penalties.

Please continue to stand with the 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!

Sincerely,



Margaret DeMatteo, Housing Policy Attorney