



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

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November 3, 2025

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Dear Mayor Zollman and Councilmembers,

I am writing on behalf of Legal Aid of Sonoma County to express our strong support for the proposed Just Cause Ordinance, which would extend essential protections to residents living in deed-restricted affordable housing in Sebastopol.

Legal Aid of Sonoma County provides free legal services to low-income and vulnerable residents throughout the county. We have been working closely with the families living at Woodmark Apartments, many of whom are families with children, seniors, and people with disabilities, all facing the imminent loss of their homes. These families have been living with profound fear and uncertainty over the past two months.

Woodmark Apartments was built as affordable farmworker housing and financed in part with USDA Rural Development Off-Farm Labor Housing funds, along with Low-Income Housing Tax Credits (LIHTC). However, after construction was completed, low-income, non-farmworker families were offered housing and moved in. In September of this year, residents were notified that they were no longer eligible to live at Woodmark and that the property was out of compliance with its funding obligation to provide housing for farmworkers. Not only did the developer fail farmworker families who were never offered the housing, but the consequences of the developer's attempt to correct that failure have now fallen squarely on low-income families who have made their homes at Woodmark.

The families at Woodmark, some of whom have lived in Sebastopol for decades, are now struggling to find new housing before their leases expire and are faced with a shortage of affordable options and years-long waitlists for affordable units. The actions of The Pacific Companies, the Central Valley Coalition for Affordable Housing, and Aperto Property Management undermine the very intent of our affordable housing programs, which exist not merely to provide affordability, but to ensure that those who rely on these homes can live with dignity and stability in their communities.

At Legal Aid, we witness daily the harm that eviction and housing instability have

on families. The impacts extend far beyond the immediate loss of housing. For families with school-aged children, it uproots them from their schools and support networks. For seniors and people with disabilities, it can mean the loss of vital community ties, access to medical care, and essential support.

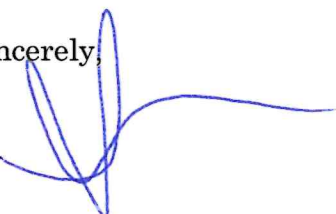
Sebastopol's Just Cause Ordinance very narrowly expands upon the protections that already exist for Sebastopol renters under the state's Tenant Protection Act. The ordinance removes the exemption for deed-restricted affordable housing properties, such as Woodmark Apartments, and requires relocation assistance equal to three months' rent only for tenants in deed-restricted affordable housing who are displaced through no-fault evictions. Importantly, it does not alter protections for renters in any other type of housing. The City's staff report, estimates that only about five deed-restricted, affordable housing complexes larger than 40 units would be covered by these new protections.

Deed-restricted affordable housing developments are already subject to regulatory and contractual agreements that require good cause for eviction and generally prohibit no-fault evictions. However, in very limited circumstances, a no-fault eviction may be permitted if necessary to bring a property into compliance with a regulatory or contractual agreement with a state or federal agency. Such situations are exceedingly rare.

The situation at Woodmark Apartments illustrates this gap in protections. Woodmark became noncompliant with its farmworker housing obligations only because the developer failed to conduct adequate outreach to eligible farmworker households and instead leased units to low-income, non-farmworker families. To correct this self-created compliance issue, Woodmark is now seeking to displace these families through no-fault evictions, without any current legal obligation to provide relocation assistance. Sebastopol's Just Cause Ordinance would close this critical gap in protections by ensuring that, in these rare cases, tenants receive relocation assistance to help them secure new housing and maintain housing stability.

Given the urgent and time-sensitive nature of the crisis at Woodmark, we strongly urge the Council to adopt the Just Cause Ordinance as an urgency ordinance, to take effect immediately upon adoption. Many households have leases set to expire as early as December 14. Because a regular ordinance would not take effect until December 18, many families with lease expirations prior to that date would remain unprotected by the Just Cause Ordinance.

We respectfully urge the Council to support the proposed urgency Just Cause Ordinance to provide critical protections for its most vulnerable residents.

Sincerely,


Sunny Noh
Executive Director



Patrick McDonell
Housing Team Supervisor