



April 21, 2022

Dear Petaluma City Council:

We are writing on behalf of **YIMBY Law** and **Greenbelt Alliance** regarding Petaluma's 6th Cycle Housing Element Update. **YIMBY Law** is a legal nonprofit working to make housing in California more accessible and affordable through enforcement of state law. **Greenbelt Alliance** is an environmental nonprofit working to ensure that the Bay Area's lands and communities are resilient to a changing climate.

We are writing to remind you of Petaluma's obligation to include sufficient sites in your upcoming Housing Element to accommodate your Regional Housing Needs Allocation (RHNA) of **1,910 units**.

In the Annual Progress Reports that Petaluma submitted to HCD, we observe the following trend of housing units permitted in the last three years:

| Year | Housing units permitted |
|---------------------------|-------------------------|
| 2018 | 112 |
| 2019 | 163 |
| 2020 | 265 |
| Average, 2018-2020 | 180 |

To meet the 6th cycle RHNA target, the rate of new housing permits in Petaluma would need to increase from **180 units per year** in 2018-2020 to **239 units per year** in the next 8 years. This is a 33% increase from recent years. **If the current pace were to continue, Petaluma would meet only 75% of its new housing target.**

Based on these trends, it is unlikely that Petaluma's existing realistic zoning capacity is sufficient to meet its 6th cycle RHNA target. According to HCD's Housing Element Site Inventory Guidebook, housing elements must analyze the realistic capacity of their sites, which may include considerations of "[l]ocal or regional track records", "past production trends", and "the rate at which similar parcels were developed during the previous planning period". A housing element that does not include a significant rezoning component is therefore unlikely to be compliant with state law.

We urge Petaluma to include a major rezoning component in its Housing Element—a rezoning large enough to close the gap between recent housing production trends and the RHNA target. The rezoning should be within existing communities and should comply with the city's obligation to Affirmatively Further Fair Housing. We also urge Petaluma to ease any other constraints, such as discretionary approval processes or impact fees, that may impede the rate of development on your city's housing sites.

Thank you,

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