

TO: SAOR
FROM: Louie Lujan, GAD (Summit Government Affairs)
RE: Vallejo Housing Report | Counter Argument
DATE: August 6, 2026

INTRODUCTION:

Vallejo renters deserve safe, stable, and affordable homes. Property owners also need clear rules, fair returns, and the ability to maintain rental housing. The Right to Thrive gives voice to residents who report serious problems. Its survey, however, does not establish the prevalence of those problems across Vallejo or prove that rent stabilization, a new local just cause ordinance, universal right to counsel, and expanded private enforcement would improve the city's housing market. The City should treat the report as stakeholder testimony, not a representative market study. Before adopting permanent regulation, Vallejo should collect neutral data, enforce existing protections, measure costs, and focus on housing production and preservation. This approach addresses misconduct without reducing the supply and quality of rental homes.

CONCERNS WITH THE REPORT:

1. The survey does not support citywide conclusions

The report received 319 responses over nine months. It recruited participants through VHJC supporters, social media, advocacy events, a food pantry, a farmers market, and selected apartment complexes. This was a nonrandom convenience sample designed to reach residents already facing housing problems. No probability sample, response rate, weighting method, confidence interval, or comparison to Vallejo's renter population appears in the report. The authors acknowledge major limits. The survey mixed online and in person collection, included homeowners and respondents with unknown housing status, relied on self reporting, omitted race and ethnicity, omitted household size and number of earners, and recorded 16 to 30 percent nonresponse on some questions. Staff also helped explain questions and supplied verbal translation, while advocacy staff coded open ended answers. These choices serve community outreach, but they limit inference and introduce selection, measurement, and coding risks. Survey support for a policy is not evidence of the policy's effect. Questions framed around rights, protection, harassment, discrimination, and community power predict favorable responses. The report does not present the full wording and order of all questions beside each result, test neutral alternatives, measure tradeoffs, or ask whether respondents would support each program after learning its cost and possible housing supply effects.

2. Existing law already provides substantial protections

The report's claim that Vallejo lacks local protections should not be read as an absence of tenant rights. California's Tenant Protection Act already limits annual increases for covered units to 5 percent plus inflation, capped at 10 percent, and requires just cause after the statutory tenancy period. SB 567 strengthened owner move in and substantial remodel requirements and added enforcement remedies. State law also protects habitability, bars retaliation and discrimination, regulates entries and deposits, and provides eviction procedures. The policy question therefore should be: What documented gaps remain after existing law is enforced, and what local action addresses those gaps at the lowest cost? The report

does not quantify unlawful increases, improper notices, substantiated harassment cases, code violations by property type, eviction filings and outcomes, or repeat offenders. It also does not separate responsible local owners from large or chronically noncompliant operators.

3. Rent stabilization treats the symptom and risks worsening supply

Housing affordability reflects household income, demand, and the number of available homes.

California's Legislative Analyst's Office identifies insufficient housing construction as the most important driver of the state's high housing costs. A local cap may reduce increases for some current tenants, but it does not create a unit, rehabilitate an aging building, or help a renter who lacks access to a controlled unit. Local rent regulation also creates tradeoffs the report does not examine:

- Owners facing rising insurance, utilities, labor, security, financing, and repair costs have less revenue for maintenance and capital work.
- Small owners may sell, move units to owner occupancy, or leave long term rental use when risk and compliance costs exceed expected returns.
- Benefits attach to units and incumbent tenants rather than being targeted by income or need. Higher income tenants in covered homes may benefit while lower income newcomers face fewer choices.
- A new program requires registration, staffing, hearings, legal review, outreach, translation, data systems, and enforcement. Those costs need a public estimate and funding plan.

A serious feasibility study should model these effects using Vallejo specific data. It should identify the covered inventory, owner profile, operating cost trends, vacancy rate, deferred maintenance, likely program cost, and expected effect on new investment. It should compare several policy designs, including no new cap, instead of beginning with draft ordinances as the assumed outcome.

4. Duplicate just cause rules and broad harassment standards invite confusion

State law already requires just cause for many tenancies. A second local framework risks inconsistent notices, overlapping remedies, technical disputes, and higher legal costs. Those costs ultimately affect the operation of rental housing. Before layering on another ordinance, Vallejo should identify specific cases where state law failed and explain why education, enforcement, or targeted amendments would not solve the problem. Harassment, retaliation, utility shutoffs, unlawful entry, discrimination, and refusal to meet habitability duties warrant firm enforcement. Any local ordinance should define prohibited conduct objectively, require notice and an opportunity to cure when health or safety does not demand immediate action, penalize knowing or repeated violations, guard against duplicative recovery, and protect good faith communications and lawful property management. Vague standards or private action incentives create leverage in ordinary disputes without necessarily improving housing conditions.

5. Right to counsel requires scope and cost discipline

Legal help improves access to the courts, but Vallejo should not assume that San Francisco's program results transfer directly to a smaller city with different rents, case volume, staffing, and finances. The report compares a legal case cost with the annual cost of one shelter bed. Those are different units of analysis and do not establish that every represented case prevents homelessness or saves the cited amount. Vallejo should first publish local unlawful detainer filings, default rates, representation rates, case outcomes, and the number of income eligible households. If an unmet need exists, the City should consider targeted legal navigation, mediation, emergency rental assistance, and income qualified counsel.

A universal entitlement regardless of income directs scarce funds to households able to retain counsel and may lengthen routine cases.

6. Housing quality calls for enforcement, not price regulation

Reports of pests, unsafe conditions, and delayed repairs deserve a direct response. Yet the survey does not verify conditions through inspections, link complaints to parcel or management data, or distinguish isolated incidents from repeat patterns. Rent regulation does not compel a repair and may reduce the funds available to complete one. Vallejo already operates code enforcement and a Housing Authority. The City should improve complaint intake, response times, multilingual education, interdepartmental referrals, and repeat offender tracking. It should publish anonymized performance measures and prioritize properties with verified health and safety risks. Responsible owners should receive clear correction timelines and access to rehabilitation financing where appropriate.

A BETTER POLICY FRAMEWORK

Vallejo should pursue housing stability through evidence, enforcement, and supply. The following steps respond to tenant concerns while preserving rental housing:

- **Commission an independent housing-market study.** Use a statistically valid renter survey and administrative data. Report vacancy, rents, operating costs, ownership type, code cases, eviction filings, outcomes, and displacement indicators by neighborhood.
- **Audit existing protections and enforcement.** Identify whether residents lack rights, knowledge, access, or enforcement. Publish service standards and outcomes before creating overlapping rules.
- **Target verified misconduct.** Use escalating penalties for serious or repeated violations, with objective definitions, due process, and coordinated code, fair-housing, and legal-service referrals.
- **Expand housing supply and preservation.** Advance the Downtown, Waterfront, and Mare Island plans, streamline infill and accessory dwelling units, reduce avoidable approval costs, and preserve naturally occurring affordable housing.
- **Support tenants based on need.** Prioritize emergency rental aid, mediation, housing navigation, and income-qualified legal help for households at the greatest risk of displacement.
- **Include all housing stakeholders.** Seat renters, nonprofit providers, small rental owners, multifamily operators, housing economists, fair-housing experts, and City staff in a transparent process. Publish draft assumptions and fiscal analysis before any ordinance hearing.
- **Require evaluation and sunset review.** For any new program, define goals, baseline measures, annual reporting, cost controls, and a scheduled review of housing supply, maintenance, rents, and displacement.

CONCLUSION

The Right to Thrive raises concerns that deserve respect and follow through. It does not provide a representative measure of Vallejo's rental market, establish causal links, or evaluate the costs and tradeoffs of its preferred policies. Its own limitations support a measured response. Vallejo should enforce existing law, address verified bad actors, assist tenants facing immediate hardship, and add and preserve homes. Permanent citywide regulation should follow independent data, legal and fiscal analysis, and



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meaningful participation from renters and housing providers. Housing stability depends on protecting tenants and keeping responsible owners willing and able to provide safe rental homes.

Louie A. Lujan
Founder & CEO
Summit Government Affairs



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Solano Association of REALTORS

1302 Springs Road Vallejo California 94591



September 24, 2026

Mayor Andrea Sorce
Vice Mayor Peter Bregenzer
Council Member Alexander Matias
Council Member Diosdado Matulac
Council Member Tonia Lediju
Council Member Charles Palmares
Council Member Helen-Marie Gordon

City of Vallejo
555 Santa Clara Street
Vallejo, CA 94590

Re: Opposition to Proposed Rent Stabilization Ordinance

Dear Mayor Sorce and Members of the City Council:

On behalf of the Solano Association of REALTORS® (SAOR), **I write to express SAOR's opposition to a local rent stabilization ordinance in Vallejo.**

SAOR recognizes the housing pressures facing renters and supports strong enforcement of existing tenant protections, safe and habitable housing, targeted assistance for households facing displacement, and policies that expand Vallejo's housing supply. SAOR does not believe additional local rent controls provide the best approach to achieving those goals. The central concern is straightforward. Vallejo needs more housing, more investment in its existing housing stock, and more owners willing to keep homes available as long-term rentals. Rent control risks working against each of those objectives.

California already regulates rent increases for many rental properties. Under the Tenant Protection Act, covered units generally face annual rent increases limited to 5 percent plus the applicable change in the cost of living, with a 10 percent maximum. State law also establishes just cause protections for many covered tenancies. The framework currently being advanced would go substantially further. It proposes limiting annual increases to 60 percent of CPI or 2.5 percent, whichever is lower. It also proposes a rent registry, administrative hearings, restrictions on fees and utility charges, and use of December 31, 2024 rents as the base for future regulated increases. SAOR is concerned that imposing a substantially lower local rent ceiling would make it more difficult for housing providers to absorb increases in insurance, repairs, labor, utilities, financing, taxes, regulatory compliance, and major capital improvements.

This concern is especially significant in Vallejo because of the age of its housing stock. More than 80 percent of Vallejo housing is over 30 years old, and more than 40 percent is over 50 years old. Older housing requires continued investment. Roofs, plumbing, electrical systems, heating systems, foundations, appliances, and other components do not become less expensive to repair because rents are regulated.

If operating costs rise faster than permitted rents, owners face pressure to defer improvements, sell properties, convert units to another use, or leave the rental market. Those outcomes would undermine Vallejo's housing goals. Rent \

Solano Association of REALTORS

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control also creates a broader supply problem. It can provide short-term stability for some existing tenants while reducing incentives to invest in rental housing over time. If owners sell properties, convert units, or avoid future rental investment, the number of available rental homes can decline. That affects future renters, young families, workers, and others trying to enter the market. Rent control also does not produce new housing. Vallejo's affordability challenge is tied in part to a shortage of housing. A policy focused primarily on regulating prices does not create additional apartments, rehabilitate aging units, or increase the number of homes available to people searching for housing.

SAOR is also concerned about the disproportionate effect additional regulation could have on small property owners. A small owner with a duplex, triplex, or modest apartment property operates differently from a large institutional housing provider. A major roof replacement, insurance premium increase, plumbing failure, or financing change represents a substantial expense. Policies that restrict revenue while operating expenses continue to rise create greater risk for these owners and can encourage them to sell rather than continue providing rental housing. The proposed regulatory framework would also require a new local administrative system. Rent stabilization typically requires registration, billing, fee collection, hearings, appeals, investigations, legal support, enforcement, public education, software, and dedicated staff.

Comparable local programs show that these costs can be significant. Vallejo would need to determine how such a program would be funded and whether costs would ultimately fall on property owners, tenants, or the General Fund. SAOR believes Vallejo should focus resources on policies that directly address the underlying housing shortage and protect tenants experiencing genuine hardship. These include producing additional housing, preserving existing rental housing, enforcing habitability requirements, targeting repeat offenders, improving permitting and approval processes, supporting rehabilitation of aging properties, providing mediation and rental assistance, and helping tenants understand and enforce protections already available under state law.

The City's own housing policy framework calls for reducing displacement while avoiding unnecessary constraints on new housing development. SAOR believes that balance becomes harder to achieve when the City imposes additional price controls on existing rental housing. **SAOR therefore opposes adoption of a local rent stabilization ordinance.**

At a minimum, the Council should complete the Market and Feasibility Study already contemplated before deciding whether to proceed. The Council should have Vallejo-specific information regarding housing-market effects, property owners, maintenance, investment, fiscal impacts, administrative costs, and housing production before selecting a regulatory model. Vallejo faces a serious affordability challenge. The policy response should expand housing opportunities rather than risk reducing the supply of rental homes available to current and future residents.

SAOR looks forward to participating in the City's process and working with the Council on policies that support renters, responsible housing providers, private property rights, and the production and preservation of housing throughout Vallejo.

Sincerely,

Pre'jon Bynum
President

Hector Rojas

From: Dawn Abrahamson
Sent: Monday, September 28, 2026 5:46 PM
To: Kristin Pollot; Hector Rojas
Subject: Fw: City of Vallejo Rent Control Workshop Sept. 29th

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From: .
Sent: Monday, 28 September 2026 17:43:03
To: Dawn Abrahamson <Dawn.Abrahamson@cityofvallejo.net>; City Manager <City.Manager@cityofvallejo.net>; Alexander Matias <Alexander.Matias@cityofvallejo.net>; Andrea Sorce <Andrea.Sorce@cityofvallejo.net>; Charles Palmares <Charles.Palmares@cityofvallejo.net>; Harry Black <Harry.Black@cityofvallejo.net>; Helen-Marie Gordon <Helen-Marie.Gordon@cityofvallejo.net>; JR Matulac <JR.Matulac@cityofvallejo.net>; Peter Bregenzer <Peter.Bregenzer@cityofvallejo.net>; Tonia Lediju <Tonia.Lediju@cityofvallejo.net>
Subject: City of Vallejo Rent Control Workshop Sept. 29th

This Message Is From an External Sender

This message came from outside your organization.

My name is Theresa Karr. I have been a Vallejo resident, homeowner and rental property owner for over 50 years. My late husband and I invested in rental property as college investments for our children's education and continued to hold on to them for retirement income with the idea of eventually leaving our surviving family with a property inheritance.

Over the years we worked hard and made sacrifices to acquire and maintain our home and our rental properties. As the years have passed it has been increasingly more difficult and costly to maintain the rental properties. I have experienced the cost of evictions, lost rent, extreme property damages, increased insurance costs, the latest insurance increase was over three times the previous amount, property taxes including increased garbage and sewer charges and never ending increased property maintenance costs.

When cities implement stricter rental mandates, which include price fixing, what are the incentives to build and/or own rental property? I know I am a fair and reasonable landlord. I know from my past professional experience that rent control is not the answer for income property owners or tenants and a costly short term solution that adds nothing to the rental housing supply. Every qualified prospective tenant regardless of income can rent a rent controlled unit. More housing, market rate, affordable and a consideration of a rental assistance program in lieu of rent control are better choices for Vallejo.

I am sure you recognize that I am not uneducated about the rental housing industry in California. In my past professional life, which I am now retired, I worked in the rental housing industry and the state of California working with tenants and landlords during and after the COVID pandemic. The state of California has many rental housing laws including AB 1482 which is a statewide rent control and just cause eviction protections law; it is just one of many state laws that rental property owners must follow.

The question are the rents too high? Maybe they are but the operating costs keep increasing. Is rent control going to bring rents down or increase rents over time? Can the city afford the start-up cost for a rent control program? Who will administer and manage the program? Who pays for the cost of rent control at the end of the day? How do you calculate the gains and losses?

Because I was curious I looked up current rents in Vallejo and the surrounding cities. Vallejo looks like it is in a pretty good place (*Apartments.com current data*):

Vallejo rents (vary by size and layout)

- **Studio** apartments in Vallejo average \$1,338 per month.
- **One-bedroom** apartments in Vallejo average \$1,773 per month.
- **Two-bedroom** apartments in Vallejo average \$2,097 per month.
- **Three-bedroom** apartments in Vallejo average \$2,500 or more per month.

Fairfield rents (vary by size and layout)

- **Studio** apartments in Fairfield average \$1,744 per month.
- **One-bedroom** apartments in Fairfield average \$1,892 per month.
- **Two-bedroom** apartments in Fairfield average \$2,173 per month.
- **Three-bedroom** apartments in Fairfield average \$2,735 or more per month.

Vacaville rents (vary by size and layout)

- **Studio** apartments in Vacaville average \$1,867 per month.
- **One-bedroom** apartments in Vacaville average \$2,118 per month.
- **Two-bedroom** apartments in Vacaville average \$2,388 per month.
- **Three-bedroom** apartments in Vacaville average \$2,773 or more per month.

Dixon rents (vary by size and layout)

- **Studio** apartments in Dixon average per month.
- **One-bedroom** apartments in Dixon average \$1,447 per month.
- **Two-bedroom** apartments in Dixon average \$2,125 per month.
- **Three-bedroom** apartments in Dixon average \$3,353 or more per month.

Davis rents (vary by size and layout)

- **Studio** apartments in Davis average \$1,842 per month.
- **One-bedroom** apartments in Davis average \$1,937 per month.
- **Two-bedroom** apartments in Davis average \$2,219 per month.
- **Three-bedroom** apartments in Davis average \$2,761 or more per month.

Benicia rents (vary by size and layout)

- **Studio** apartments in Benicia average \$1,830 per month.
- **One-bedroom** apartments in Benicia average \$2,140 per month.
- **Two-bedroom** apartments in Benicia average \$2,362 per month.
- **Three-bedroom** apartments in Benicia average \$2,135 or more per month.

Thank you for allowing me to comment. I received the meeting notice late regarding this meeting allowing me little time to prepare testimony and read and absorb all the agenda materials provided. On top of the late notice, I broke my leg and cannot attend in person but plan to attend in person in the future. I will try to join

online but since I expect there will be a lot of testimony at this meeting I submit this as my testimony. Feel free to contact me if you would like to discuss further or would like additional information.

Theresa M. Karr



January 30 - 31 2027

"We can only be ethical in relation to something we can see, understand, feel, love, or otherwise have faith in." Aldo Leopold

City Council Study Session; Rent Stabilization & Just Cause Eviction Control September 29, 2026

Good Evening Mayor Sorce and members of the City Council.

My name is Johnny Walker. I am a REALTOR® Property Manager with Momentum Realty Group here in Vallejo. I have been a local residential property manager for nearly 18 years and am a more than 27-year Vallejo resident.

I am struggling to summarize what I want to say in just 2 minutes, so I am forward this to you now.

First, I do want to acknowledge the issues brought forward by some of the Right to Thrive respondents. My comments tonight are in no way intended to minimize residents who have experienced difficulties with their individual tenant experiences, just as I strived to not do with the experiences of those residents of the Strawberry Hill and Holiday Gardens in 2019. We all recognize that there are bad actors in every industry and life situation.

Everywhere we turn, all of us are getting hammered with increases in transportation costs, groceries, insurance, building materials, appliances, PG&E, water and trash, you name it.

The same is just as true for rental property owners. Compare the cost of virtually anything in the past 10 years to now, everyone is affected, many to the point of suffering.

My business partner and I manage more than 100 units, most in the City of Vallejo. We only manage one 10-unit, modest apartment building while the majority of our rentals are single family homes with a small number of duplexes, triplexes and 4plexes mixed in.

We have no institutional rental property owners, all are individually owned, mostly by individuals with 1 or 2 rental properties, many of whom also reside in the City of Vallejo. These are not typically wealthy people but purchased rental property as a means to supplement their retirement when the time comes. Many have mortgages. These are not the 1% or 10% we hear about so often in the media.

I analyzed our portfolio and found that around 50% of our properties are currently at rental rates substantially below market. In most cases, we and our Owners, reward good long-term tenants with only modest rental increases, if any at all, in order to reduce the expense of unit turnovers. When a tenant does vacate, we then bring the unit to what we believe would be market rent. Many of my friendly competitors do the same.

The conversation we are having tonight, has me thinking that it may be time to begin a more robust and deliberate annual increase program as rent stabilization may impede us and our Owners from being able to keep up with inflationary pressures or to maintain their properties as well as they, their tenants, us and our friends at the City would all desire.

Similarly, just cause protections may sound great, but I am reminded of the proverbial road and good intentions.

This would be a further impediment to attracting and retaining rental property owners. Changing the game for the Owners with onerous relocation assistance requirements, which was not something Owners may have contemplated when they decided to purchase and provide this housing, is also an undue burden for the failure of adequate housing production and policy inadequacies in Washington and Sacramento.

These Owners are increasingly feeling the pressure to just dump their assets for less uncertainty and higher rates of return in the stocks and bonds markets.

Governments do not build, maintain nor operate the vast majority of rental housing residents count on to house themselves and their families. The private development community and investor community fill these roles.

The nation and California in particular have had a tremendous problem for years as there is not enough housing for all who need and want it. There hasn't been for decades. These problems will continue to get worse until more supply is added.

We already have the Tenants Protection Act of 2020 which placed nearly half of all of California's rental housing under rent stabilization with 10% annual increase caps and just cause eviction controls. The State Legislature also enacted legislation recently capping the amount of Security Deposits, which removed a tool we could use to accommodate those with less than ideal credit. We are also required to treat Section 8 housing choice vouchers as source of income protection and must consider those applicants while attempting to work with the Vallejo Housing Authority, an experience that has been no less than daunting in recent years.

The City of Vallejo cannot handle the workload already assigned regarding most aspects of housing. Please carefully consider the economic impacts and overall housing market impacts of rent stabilization and just cause eviction control to not only the residents but the actual providers of rental Vallejo housing before moving too far forward.

I respectfully thank you for your time and consideration.