



**PLEAGUE OF WOMEN VOTERS  
of the Los Altos-Mountain View Area**

May 28, 2019

Chair Baird and Members of the Environmental Planning Commission  
City of Mountain View  
500 Castro Street  
Mountain View 94041

Re: EPC Public Hearing, May 30, Agenda Item 5.1 – Below-Market-Rate Housing Program Phase 2  
Modifications

Dear Chair Baird and Members of the EPC:

The LWV commends the Staff once again for a comprehensive analysis of proposed changes to the below-market-rate (BMR) policies. Staff's recommendations following up on Council direction are once again thorough. We were impressed also by the breadth of the discussion of this important issue by both the EPC and Council in their most recent public hearings.

Generally, we support the Council's recommendations and the Staff responses to these recommendations. However, we were disappointed that Council proposes allowing so many developments to be exempted, as we agree with the Councilmembers who stated that developers have been aware that modifications were coming soon.

Staff has proposed a reasonable formula for allowing tenants at different income levels to be "over-income". The basic concept of allowing tenants to be over-income before being asked to leave is similar to the approach used in tax-credit projects, but the Staff's "graduated" over-income scale is creative and novel, we believe.

Upon seeing the comparison of market rents with rents at different income levels, we would now recommend, as one Councilmember suggested, that the maximum rent level for BMR rentals be 100% AMI, as currently the maximum median-income rents at 120% AMI are above the average market rents for studios, one-bedroom and two-bedroom units. If market rents decline, this differential will be even greater. Therefore, we urge the EPC to reconsider the range of incomes for BMR rentals now that this information has been presented by Staff.

We recommend flexible wording/formula to allow shifting the AMI percentage targeted, based on the impact of market rents, and also the five-year review to catch these changes.

Thank you for considering our input.

Donna Yobs  
Co-Chair, Housing Committee  
LWV of the Los Altos/Mountain View Area

cc: Wayne Chen

Dan Rich

Aarti Shrivastava