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Sent: Friday, May 20, 2022 10:41 AM
To: nmhl.rhc@gmail.com; Rental Housing Committee <RHC@mountainview.gov>
Subject: Property Owner registry

Nicole Haines-Livesay, Chair, RHC Committee Members, and Staff

Date: 5/20/2022

Re: <u>CSFRA Registration requirements – let's get into compliance, or forego rent increases.</u>

In June of 2000, almost two years ago, the Rental Housing Committee (RHC) established a rental registry for apartments covered under the CSFRA. The registry was codified in Chapter 11 of the CSFRA governing document. At the time of adoption, property owners were given until February 1, 2021, to get into compliance, with an added 30-day grace period before non-compliance was considered "substantial."

The rationale for the registry is to gather timely data on occupancy and rental rates. That data promotes a shared and transparent look into the state of the covered units and enables all stakeholders (property owners, renters and the RHC oversight body – and the public) to better understand and operate in the rental housing environment.

Maintenance of the rental property registry is the responsibility of the RHC administrative staff. To facilitate data capture, the staff created both online and paper document options for property owner use.

As reported by the Voice in an April 7th article, 30-35% of property owners are currently in compliance with the registration requirement. Property owner objections to compliance point to the extraordinary events of the past two years and suggest that the RHC is burdening and "punishing landlords" by considering enforcement measures.

What, then, is the burden? The form requests data on occupancy and rental rates that are otherwise maintained as part of the normal course of business. To be specific the form requires (1) contact information for the owner and manager (if there is one), (2) property information about location and ownership dates and (3) unit information including unit number, number of bedrooms and bathrooms and current and last rent amounts. The first two items are done once per complex, the unit information is updated when rents change. The workload to complete this form is inconsequential, particularly when viewed in the context of each unit generating an average of $30,000 per year in rents.

I believe we can all agree that the housing market has been difficult for everyone, tenants and property owners alike, over the course of the pandemic. But as the recent RHC report details, vacancy rates are trending significantly down, and with that, rents are up. It is time for property owners to comply with the law and the attendant regulations. It is incumbent on the RHC to move on from merely publicizing non-compliance to tougher enforcement. In the interest of simplicity, let's use the same incentive as with non-payment of property owner fees: comply, or forego future rent increases.

S. Keating Rhoads