DATE: December 16, 2025

TO: Honorable Mayor and City Council

FROM: Mathew Reed, Housing Officer

Julie Barnard, Affordable Housing Manager

Wayne Chen, Housing Director

VIA: Kimbra McCarthy, City Manager

TITLE: Low- and Middle-Income Homeownership Strategy





PURPOSE

Receive Council input on staff's recommended scope of work and timeline for the Fiscal Years 2025-27 Council Work Plan project to develop a Low- and Middle-Income Homeownership Strategy.

BACKGROUND

On June 24, 2025, the City Council adopted its two-year Fiscal Year 2025-26 and Fiscal Year 2026-27 Council Work Plan (FYs 2025-27 Work Plan), which includes the following project:

"Low- and Middle-Income Housing: Identify funding support, City properties, and partnership opportunities and address barriers to condominium development to create a strategy for supporting low- and middle-income homeownership."

This project was refined and rolled over from the prior two-year Council Work Plan cycle. Additionally, Council appropriated \$50,000 as part of the Fiscal Year 2025-26 budget to procure a consultant to support this project, referred to as the development of a Low- and Middle-Income Homeownership Strategy (Strategy).

To expeditiously advance the development of the Strategy, the following steps were taken immediately after the adoption of the Council Work Plan:

- Procurement of the joint consultant team of Community Planning Collaborative (CPC lead consultant) and ECONorthwest (sub-consultant) (collectively termed "Consultant"). The Consultant has expertise in economic and financial modeling for residential development projects. Additionally, they are leading a regional process for Santa Clara County to evaluate middle-income housing strategies for several participating cities, including Mountain View.
- Development of a scope of work (discussed below).

Conducted initial market analysis, and review of barriers and challenges.

Evolution of the Council Priority

Over the past few two-year Council Workplan cycles, Council has included a project that involves advancing middle-income housing efforts. This Council priority mirrors a widespread interest in the region to address housing needs for the "missing middle." This interest is shared across sectors, including other public sector agencies, the private sector, large technology employers, and philanthropic organizations.

For the FYs 2025-27 Council Work Plan, the goal of advancing middle-income housing efforts evolved in a manner that refined the goal relative to prior Council workplans: it narrowed the goal by focusing middle-income housing efforts specifically to advance homeownership instead of rentals, and it broadened the goal by expanding the interest in homeownership to include low-income households.

Council's interest in homeownership is underscored by the fact that Mountain View has long had more rental units (approximately 60% of total housing units) than ownership units (approximately 40% of total housing units). In most other jurisdictions, the proportion is generally inverted, i.e., of the total housing supply, 60% is ownership and 40% is rental. The total housing supply across Santa Clara County itself is composed of 55% ownership and 45% rental, inclusive of Mountain View.

Additionally, there is an imbalance in the types of housing produced in the City, whereby new rental production significantly outpaces ownership production. Between 2021 and 2024, over 2,400 new rental units were added to Mountain View's housing supply, but only approximately 270 ownership units were added in the same time period.

DISCUSSION

Framework for Developing the Strategy

Defining the Income Categories

For the purposes of this memo and the ultimate Strategy, staff recommends using the established definition of "low-income" as a household earning between 50% and 80% of the Area Median Income (AMI), adjusted by household size.

However, "middle-income" is a more general term whose specific meaning depends on the context in which it is used. For example, "middle-income" is often used synonymously with the term "moderate-income," which is defined as a household earning between 80% and 120% AMI by both the federal Department of Housing and Urban Development and the State Housing and

Community Development Department (HCD). Table 1 provides the income levels associated with the low- and moderate-income categories.

Table 1. Low- and Moderate-Income Categories and Income Levels*

AMI/Category	1-Person HH	2-Person HH	3-Person HH	4-Person HH
80% AMI (Low)	\$111,700	\$127,650	\$143,600	\$159,550
120% AMI (Moderate)	\$164,000	\$187,400	\$210,850	\$234,250

^{*}Based on 2025 State income limits published by the HCD

However, particularly in high-cost areas like the Bay Area, "middle-income" is also often used to denote a higher income range needed to purchase a home – such as up to 150% or even 200% AMI – to reflect the economic reality that households earning 120% AMI generally cannot afford to purchase a home.

Homeownership Affordability Gap

Initial market analysis was conducted to illustrate the economic reality that earning 120% AMI is not enough for homeownership in Mountain View. Table 2 provides a summary of market-rate sales prices between April 2025 and October 2025 for both condominiums and rowhomes/townhomes – two product types usually considered as more affordable ownership options.

Table 2: Market-Rate Condominium and Rowhome/Townhome Sales Prices in City*

Unit Size	Cond	ominiums	Rowhomes/Townhomes		
	Average	Price Range	Average	Price Range	
One bedroom	\$660,000	\$525,000 - 811,000	NA	NA	
Two bedrooms	\$972,000	\$550,000 - 1.7MM ¹	\$1.3MM	\$810,000 - 1.7MM	
Three bedrooms	\$1.2MM	\$965,000 - 1.3MM	\$1.6MM	\$1.1MM -2.3MM	
Four bedrooms	NA	NA	\$1.8MM	\$1.4MM - \$2.3MM	

^{*} Redfin reported sales between April 2025 and October 2025

By comparison, Table 3 summarizes the different AMI levels and the maximum price that a household could afford in each category. Households up to 120% AMI (shaded red) could not have afforded a market-rate condominium or rowhome/townhome based on the sales prices referenced in Table 2. It is only when AMI's reach 150% or 200% AMI (shaded green) that a household could afford a home in Mountain View.

¹ There was one outlier transaction for a 2-bedroom unit at \$1.7 million. This does not change the conclusion that condominium prices are not affordable for households earning up to 120% AMI.

Table 3: Maximum Purchase Price that Could be Afforded at Different Income Levels

	1-Perso	n Household	2-Perso	n Household	3-Perso	n Household	4-Persor	n Household
Percent AMI	Annual Income	Maximum Purchase Price*						
80%	\$111,700	\$255,000	\$127,650	\$311,000	\$143,600	\$366,000	\$159,550	\$432,000
100%	\$136,650	\$358,000	\$156,150	\$428,000	\$175,700	\$499,000	\$195,200	\$579,000
120%	\$164,000	\$470,000	\$187,400	\$509,000	\$210,850	\$643,000	\$234,250	\$740,000
150%	\$204,975	\$639,900	\$234,225	\$750,000	\$263,550	\$860,000	\$292,800	\$981,000
200%	\$273,300	\$921,000	\$312,300	\$1,071,000	\$351,400	\$1,222,000	\$390,400	\$1,383,000

^{*30} yr mtg, 6.5% fixed, 20% downpayment. Mortgage, property taxes, homeowner insurance, HOA fee, and utilities, equal to 30% of household income.

Based on this analysis, staff recommends that the Low- and Middle-Income Homeownership Strategy evaluate options for households earning between 50% AMI and 200% AMI.

Question 1: Does Council agree with staff's recommended framework to study the income range between 50% AMI and 200% AMI, or does Council have other direction regarding the income range?

Challenges

Despite the widespread interest in middle-income housing affordability generally and homeownership specifically in the region, there is also a shared consensus that facilitating these two housing goals can be challenging due to the following key factors:

- Market and external factors: Market and external factors such as consumer demand and preferences, the availability and cost of financing, labor, and materials, a developer's expected financial returns, and other variables drive the type of housing that is produced. Cities have little to no influence over those factors.
- **Limited local tools:** Cities do have some limited ability to facilitate the development of ownership housing, such as land use tools/zoning, regulations, review processes, and local requirements, such as below-market-rate housing programs. However, local jurisdictions ultimately cannot require developers to build homeownership products.
- Limited funding: Public funding including federal, state, regional, and local sources has primarily supported affordable rental housing for lower-income households as well as special needs populations because that is where the funding will help the people with the greatest level of need. The primary form of public funding to support homeownership has been in the form of downpayment assistance programs; however, these programs typically have limited funding and are not able to support a high number of home purchases, especially given the

size of the downpayment that is needed in high-cost areas such as Mountain View. There has also been limited funding made available by the private or philanthropic sectors.

Construction defect liability law: As noted in a recent report by the Terner Center:
 "Construction defect liability laws are intended to protect home buyers from bearing the cost
 of fixing defects in newly built homes. However, the scope of California's construction defect
 liability laws pose a significant disincentive for developers and contractors to build new
 condominiums."² The prospect of litigation over projects they have constructed have resulted
 in many developers choosing not to pursue common interest developments such as
 condominiums.

These factors will be further analyzed as part of the scope of work below, which will include stakeholder input to identify other potential challenges and barriers.

Related City Efforts

Over the past few years, the City has undertaken related work to facilitate middle-income housing and homeownership in response to prior Council Strategic Priorities. These related efforts will inform and be incorporated into the Strategy as applicable.

- BMR Program Updates: In 2019, the City updated its BMR Program by expanding the definition of moderate-income from 80% AMI 100% AMI to 80–120% AMI. Additionally, for the rowhome/townhome product type, the City increased the BMR percentage requirement from 15% to 25% to increase the number of affordable ownership units, and included the requirement to provide units between 120% AMI and 150% AMI.
- Zoning Updates: Various recent and in-process planning efforts and rezoning actions increase allowed densities to allow a wider range of housing types, including condominiums, that are more attainable ownership options than single-family homes. These include the East Whisman Precise Plan (where several ownership projects have been proposed since the Plan was adopted in 2019) and the R3 Zoning District Update, which is currently underway and has included analysis to identify and implement higher densities at which condominium development may be economically feasible.
- Development of Homebuyer Assistance Program: The City has secured a five-year entitlement grant from the State for the Permanent Local Housing Allocation grant program. The City has allocated \$150,000 to create a pilot homebuyer assistance program for extremely low-, very low-, low-, and moderate-income residents. Staff is in the process of developing and implementing the pilot program. Due to the limited funding available, the program will offer financial assistance (up to \$10,000 per transaction) for closing costs for income-eligible homebuyers.

²Construction Defect Liability in California: How Reform Could Increase Affordable Homeownership Opportunities https://ternercenter.berkeley.edu/research-and-policy/construction-defect-liability/

- **2023-31 Housing Element:** The City's Housing Element contains several components that align with the Strategy, will be advanced as a separate work item, or will be directly incorporated into the proposed scope of work as discussed below:
 - Policy 1.8: Pursue innovative housing options, including middle-income housing and shared ownership models. (Aligns with Strategy)
 - Program 1.6: SB 9 Dual Urban Opportunities (DUO) Subdivision Updates to facilitate more ownership opportunities in residential neighborhoods. (Incorporated into the scope of work below)
 - Programs 2.1: Initiate programs to increase access to affordable rental and ownership units, including homeownership programs for lower- and middle-income residents. (Aligns with Strategy)
 - Program 2.2: Pilot an Accessory Dwelling Unit (ADU) & SB 9 Financial Incentives Program
 to promote the development of accessory dwelling units and dual urban opportunities
 (DUOs) on single-family sites. (Incorporated into the scope of work below)
 - Program 3.2: Community Ownership Action Plan (COAP). In September 2025, Council supported staff's recommended COAP framework and guiding principles. The information presented to Council focused on preserving rental housing for lower-income households. However, the intention of the COAP is that it supports different models, including homeownership. (Separate work item from the Strategy)

Scope of Work

There is no silver bullet for facilitating homeownership. Advancing this work will require policies and programs, funding, partnerships, and a review of other tools within the City's direct control, such as land use, zoning, and project approvals. Therefore, staff recommends a comprehensive assessment of options with the goal of producing a multi-pronged Strategy that includes various approaches.

To develop this Strategy, staff recommends the following scope of work comprising of seven tasks:

- Task 1: Review literature, comparable jurisdictions, and best practices
- Task 2: Conduct economic analysis and modeling
- Task 3: Conduct stakeholder outreach
- Task 4: Analyze policies, programs, and funding options

- Task 5: Evaluate affordable ownership development on City-owned site
- Task 6: Identify barriers to condominium development and approvals
- Task 7: Develop a Strategy document and implementation plan

The Housing Department will lead the overall process and the majority of the tasks. The Community Development Department will provide key support to the overall process and will lead Task 6. Below is a summary of each Task.

Task 1: Review literature, comparable jurisdictions, and best practices

Staff will conduct a review of current literature, comparable jurisdictions, and best practices that could inform Mountain View's Strategy. Upon initial review, it appears that many cities may have individual homeownership programs, but few have developed a comprehensive strategy similar to the one proposed for the City to undertake. Task 1 includes:

- Reviewing current literature and research.
- Identifying industry trends, innovative approaches, or best practices.
- Assessing how other jurisdictions design, fund, and administer homeownership programs, coordinating local funds to leverage Federal, State, and other resources.
- Evaluating programs with measurable outcomes and analyzing factors that have contributed to their success or limitations.
- Identifying strategies most applicable to Mountain View's market conditions, community needs, and resource constraints.
- Incorporating insights from the regional middle-income housing research that the Consultant is leading as part of the Santa Clara County Planning Collaborative.

Task 2: Conduct Economic Analysis and Modeling

Economic analysis and modeling will be critical to developing strategy options. This work will assess market conditions, project feasibility, and both non-governmental and governmental constraints on development.

• Market Analysis: Assess macroeconomic factors such as supply, demand, and pricing, with site-specific analysis as needed. Examine differences across housing types, including condominiums, ADUs, and small-lot single-family homes (eg, SB 9 projects).

- Affordability Gap Assessment: Conduct more detailed assessment related to homeownership costs and what households at different affordability levels and household sizes can afford across different housing types. This will help estimate the total subsidy that may be needed to facilitate affordable homeownership as part of the Strategy.
- **Financial Analysis and Pro Forma Modeling:** Evaluate the feasibility of different ownership prototypes with a focus on condominium projects, including modeling for a City-owned site (see Task 5). This analysis will incorporate standard elements such as a comprehensive list of development costs, financing sources and costs, projected sales prices, sources and uses, detailed budget, etc.
- **Sensitivity Testing:** Perform sensitivity analyses to understand how changes in interest rates, construction costs, land costs, and other variables affect project viability for different product types and at different income levels.

Task 3: Conduct Stakeholder Outreach

Staff recommends the following outreach plan to receive input on opportunities and challenges of facilitating affordable homeownership, identifying housing demand and preferences, and informing potential program, policy, partnerships, or funding strategies:

- Up to five stakeholder meetings with the following groups:
 - Large-scale market-rate developers
 - Small-scale developers with perspective or experience developing small multi-plex projects, ADUs, or other infill housing types
 - Property owners interested in infill development
 - Financial institutions and real estate brokers
 - Employers/businesses
- One general, community-wide meeting
- One community survey
- Individual meetings (as needed), such as with community groups, research institutions, etc.

Task 4: Analyze Potential Policies, Programs, Funding, and Partnerships

Staff will evaluate existing and potential policies, programs, funding, and partnerships to be considered as part of the Strategy.

Policies/Programs such as:

- Best practices for homebuyer assistance programs, including implementing the City's pilot homebuyer assistance program discussed above, evaluating feasibility of a permanent program, and options to increase program funding, etc.
- Potential modifications to the City's Below Market Rate Housing Program that may be incorporated into the next review of the program (in 2028 as required by the City's Housing Element) to increase the production of BMR ownership units.
- Options to implement Housing Element Program 2.2 "Pilot ADU and SB 9 Financial Incentives Program" to facilitate the development of accessory dwelling units and SB9 dual urban opportunities (DUOs) and increase the density on single-family sites (as noted in above). This program will complement the actions in Task 6 below related to evaluating opportunities to condominium map ADUs and DUO duplexes, as well as supporting SB 9 lot splits.
- Limited- or shared-equity homeownership programs.
- Joint powers authorities focused on financing middle-income housing projects.
- Funding/Partnerships such as:
 - Public funding including Federal, State, City, and regional sources.
 - Private sector employers and philanthropic organizations.
 - Financial institutions, such as banks, credit unions, community development financial institutions, investment funds, etc.

<u>Task 5: Evaluate affordable ownership development on City-owned site</u>

In the past, the City has used a Request for Qualifications (RFQ)/Request for Proposals (RFP) process to select qualified developers to redevelop select City-owned sites into affordable rental developments. For the Strategy, staff recommends evaluating the feasibility of the City's next site – a 1.4-acre parcel in North Bayshore – for an affordable homeownership project, which would be an innovative use of public land.

Preliminary analysis of ownership housing on this site began under the Fiscal Year 2023–2025 Council Strategic Priorities through the Urban Land Institute (ULI) Technical Assistance Panel (TAP). In January 2025, a two-day TAP process was held to examine conceptual prototypes and conduct initial feasibility testing for ownership housing on the site. Results of the TAP can be

found <u>here</u>, and one of the recommendations included that the City conduct a more detailed study based on the TAP results.

Task 5 will include the following:

- Detailed review of the ULI TAP results, which found that an affordable ownership project is
 potentially feasible on the site but will require further analysis to assess economic, legal, and
 other potential challenges and constraints.
- Procure an urban design consultant to conduct more detailed massing studies and prototype analysis to test a range of units, building types, and densities that may be achieved on the site.
- Conduct a detailed financial analysis to determine project feasibility based on the massing study, ULI TAP report, and the type and amount of funding sources (including public, philanthropic, etc) that may be required to support the project.
- Conduct other due diligence as needed.

If the analysis determines that an affordable ownership project is feasible, advancing the development of the site will be incorporated into the Strategy's implementation plan. Per the Next Steps section below, staff is targeting bringing the Strategy for Council adoption by December 2026. As such, the implementation for Task 5 would begin in 2027, including holding a Council Study Session to determine site goals and priorities, initiating an RFQ/RFP process, and selecting a qualified developer.

Task 6: Identify barriers to condominium development and approvals

For Task 6, staff notes that the term "condominium" is commonly used to refer to a specific type of development that generally includes medium- to high-density residential projects, often in the form of "stacked flats." However, "condominium" more accurately describes a type of subdivision that creates an ownership parcel from airspace, as opposed to land, regardless of the physical form. Thus, a condominium project can actually take many forms, from single-family residences to high-rises. Therefore, Task 6 will explore barriers affecting condominiums based on both meanings of the term: condominiums as a medium- to high-density housing product type (synonymously referred to as "condominium development" or "condo" for the remainder of the memo), as well as condominiums as a form of subdivision and the approval process associated therewith.

³ Note that single-family residential subdivisions traditionally include both land and airspace, which differs from a condominium subdivision which includes just the airspace.

The City is interested in facilitating condominium development for two key reasons:

- Condos are commonly viewed as a more attainable path to homeownership for a wide range
 of households. Condominium units are typically smaller in size and therefore have lower
 price points per unit relative to other product types such as rowhomes/townhomes and
 single-family homes.
- Condos advance City goals by promoting housing diversity, efficient land use, and transitoriented growth. They address diverse housing needs, including by providing younger
 workers with convenient, lower-maintenance, entry-level ownership options near jobs and
 amenities, while also offering older adults and seniors reduced upkeep, improved
 accessibility, and continued community connection.

The City has experienced limited development activity related to the condominium product type compared to other rental and ownership housing product types. In contrast, the City has experienced consistent development activity of the rowhome/townhome product type (another form of ownership housing), which in Mountain View has commonly relied on condominium subdivisions to create individual parcels.

While both product types provide ownership opportunities, the limited densities associated with the rowhome/townhome product type (typically no greater than 20 dwelling units per acre) have resulted in low housing unit yields relative to the land area such projects require for development. The scarcity of land within Mountain View necessitates the production of more efficient and denser product types, such as stacked flat condominiums, to meet the broader Regional Housing Needs Allocation targets assigned to the City, as well as to create sufficient lowand middle-income homeownership opportunities to address current needs.

Task 6a. Barriers to Condominium Development

Condominiums exist as a unique, hybrid form of housing, exhibiting characteristics of both multifamily rentals and single-family ownership development types. However, because condos and apartments appear physically similar due to their density and built form, the City's regulations have generally treated condominium developments in the same manner as rental housing projects, despite several key distinctions between condos and apartments. For example, condo developers often want to construct larger unit sizes and provide different amenities as compared to apartment projects, responding to the expectations of prospective owners. If the City's regulations do not allow developers to build condos that include features that the market prefers, developers will not build condos.

As noted previously, there are many barriers to condominium development that are outside the City's control (such as insurance requirements, construction costs, and construction defect liability, to name a few). Therefore, Task 6 will explore options that are within the City's control, including:

- Development standards and regulations, including zoning and precise plan standards, to
 evaluate whether they are presenting barriers to condominium development. For instance,
 staff will assess whether floor area ratio limitations should differ between condominium and
 apartment developments to allow larger unit sizes while still achieving higher densities.
- Review previous and ongoing actions for their efficacy at reducing these barriers, and identify potential additional City actions that may offset or reduce them.

Staff will also interview condominium developers (as part of the stakeholder outreach in Task 3) to gain their insights into what actions the City could take to increase the potential for condominium development in Mountain View. Potential condominium developers have shared with staff that certain requirements, such as private storage areas, as well as Regional Water Quality Control Board requirements that may differ between ownership and rental housing types, have impacted their abilities to design condominium projects compliant with City development standards.

Task 6b. Barriers to Condominium Approval

There are other barriers to condominium development besides the physical limitations of the City's development standards. These include items such as fees, approval procedures, and other administrative processes associated with the approval of the subdivision map necessary to establish condominiums. Although the requirement for approval of a subdivision map to create condominiums stems from a state law called the Subdivision Map Act, the law affords the City local control over many aspects of the subdivision review and approval process.

Task 6b will evaluate various procedural requirements related to the approval of subdivision maps to determine whether and to what extent these requirements present barriers to condominium approval and, subsequently, development. The evaluation will, at a minimum, consider the following:

- The allowance and standards for condominium subdivisions as part of implementing Housing Element Program 1.6, which would allow condominium mapping of up to four units in an SB 9 project.
- Implementation of applicable State laws, such as SB 684 / SB 1123 ("Starter Home Revitalization Act"), State Density Bonus Law, and AB 1033 (which allows the City to permit condominium mapping of ADUs) to create new types of condominium development opportunities.
- City requirements for the covenants, conditions, and restrictions for condominium developments, including substantive requirements, review process, and timing of approval.

 Process improvements that streamline condominium review and inspections, including the appropriate level of review and approval for tentative subdivision maps (which currently require City Council approval).

Task 7: Develop a Strategy document and implementation plan

Drawing on Council input and the findings from Tasks 1–6, staff will develop a comprehensive Low- and Middle-Income Homeownership Strategy that will include the following:

- Actionable Recommendations: A suite of recommended policy, programmatic, regulatory, and funding actions tailored to the income ranges and ownership opportunities identified as most feasible. This may include updates to existing tools, new initiatives, or phased pilot programs.
- Roles, Responsibilities, and Resources: Clear identification of the City departments
 responsible for implementation, along with any possible financial resources and external
 partnerships needed to implement the Strategy's recommendations. The Strategy will
 include opportunities for cross-departmental coordination and implementation as needed.
- Implementation Plan: Staff recommends a five-year Implementation Plan summarizing the actions, timelines, responsible Department/agency, and goals.
- Indicators and Continuous Improvement: A set of measurable indicators and an evaluation framework to track progress, assess the effectiveness of the Strategy over time, and make adjustments as market conditions or community needs evolve.

Question 2: Does Council support staff's recommended scope of work to develop the Low- and Middle-Income Homeownership Strategy, or does Council have other direction?

SUMMARY OF QUESTIONS FOR COUNCIL

- Question 1: Does Council agree with staff's recommended framework to study the income range between 50% AMI and 200% AMI, or does Council have other direction regarding the income range?
- Question 2: Does Council support staff's recommended scope of work to develop the Lowand Middle-Income Homeownership Strategy, or does Council have other direction?

NEXT STEPS

Staff will incorporate Council feedback and initiate the strategy in accordance with the timeframes outlined below.

Table 4: Scope of Work Timeline

No.	Task	Timeline
1	Review literature, comparable jurisdictions, and best practices	Q3 2025 – Q1 2026
2	Conduct economic analysis and modeling	Q4 2025 – Q2 2026
3	Conduct stakeholder outreach	Q1 2026 – Q4 2026
4	Analyze policies, programs, and funding options	Q2 2026 – Q3 2026
5	Evaluate affordable ownership development on City-owned site	Q2 2026 – Q3 2026
6	Identify barriers to condominium development and approvals	Q2 2026 – Q3 2026
7	Develop a Strategy document and implementation plan	Q2 2026 – Q4 2026

Staff anticipates returning to City Council in December 2026 for the adoption of the Strategy.

LEVINE ACT

California Government Code Section 84308 (also known as the Levine Act) prohibits city officials from participating in any proceeding involving a "license, permit, or other entitlement for use" if the official has received a campaign contribution exceeding \$500 from a party, participant, or agent of a party or participant within the last 12 months. The Levine Act is intended to prevent financial influence on decisions that affect specific, identifiable persons or participants. For more information see the Fair Political Practices Commission website: www.fppc.ca.gov/learn/pay-to-play-limits-and-prohibitions.html

Please see below for information about whether the recommended action for this agenda item is subject to or exempt from the Levine Act.

EXEMPT FROM THE LEVINE ACT

☑ General policy and legislative actions

PUBLIC NOTICING

Agenda posting.