The Honorable Sandra Thompson

Federal Housing Finance Agency

Washington, D.C.

Director Thompson,

Thank you for the opportunity to provide feedback on the Federal Housing Finance Agency (FHFA) Request for Information on tenant protections. My name is Delaney Davis and I am a tenant in the St. Clair-Superior neighborhood of Cleveland, Ohio and an advocate with The Northeast Ohio Coalition for the Homeless (NEOCH). NEOCH is an advocacy, outreach, and education organization dedicated to breaking the cycle of homelessness while loving our diverse community. I am writing to share my experience and to urge FHFA to take bold action to create clear, strong, and enforceable renter protections for households living in rental properties with federally backed mortgages. Given the broad reach of FHFA’s work, any renter protections created by FHFA should cover a significant share of renters across the nation and put America on a pathway towards stronger protections for all renters.

Federal renter protections are critically needed to address the power imbalance between landlords and renters that puts renters at greater risk of housing instability, harassment, and homelessness and fuels racial and gender inequity.

To help ensure greater housing stability, FHFA should create new renter protections for households living in properties with federally backed mortgages, including:

1. **Source of income protections** to prohibit landlords from discriminating against households receiving rental housing assistance such as Section 8 Housing Choice Vouchers, or Supplemental Security Income (SSI), or local rental assistance, so that families can have greater choice about where to live.

2. **“Just cause” eviction standards**, which limit the causes for which a landlord can evict a tenant or refuse to renew a tenant’s lease when the tenant is not at fault or in violation of any law.

3. **Rent gouging protections** to stop landlords from dramatically and unreasonably raising rents.

4. **Requirements to ensure housing is safe, decent, accessible, and healthy** for renters and their families.

I have seen what happens in communities without strong, enforceable tenant protections.

I have been a tenant throughout my childhood and my adult life. It has been an experience filled with frustration, grime, and a pervasive feeling of being unsafe. I have moved to a new rental property almost every year of my life, fleeing terrible landlords and drastically raised prices with the expiration of every lease. I've lost so many small comfort items, my favorite comic books, art, family photos, clothing that makes me feel good, and more that got lost or broken in the chaotic shuffle of moves. Those items become immensely more important than any material value they hold when everything around you is constantly new and different and almost always a new shade of wrong. There's a constant anxiety in my body that I will lose everything I have, the sum of my worldly possessions ground down a bit finer every year. And as much as those same possessions bring me comfort, I cannot look at my books and furniture without remembering how heavy they are to carry or my blankets and thinking how bulky they are to pack. It's difficult to feel comfort in a home that is full of reminders of how the objects contained within will almost inevitably be lost or destroyed at some point. Each moment of comfort is conditional because of the glaring expiration date. My current apartment has a 20% rent increase built into my current lease. 11 months from now, I will move again. It's expensive and stressful. But as always, I can't afford to stay either.

The idea of moving is not the only element of renting in the city that is uncomfortable, of course. I have lived alongside most common household pests: roaches, ants, mice, fruit flies, though blessedly, no bed bugs. Yet. To this day, I am obsessively clean. I come home from a double shift to scrub down the apartment walls or douse the floors with Fabuloso. I don't want to ever be that 11-year-old little girl again who would shoot up in her bed because she could feel the ants crawling up her neck and across her face and stomach. The little girl who would walk through school, smacking her arms and legs and neck in a panic because she felt the ghosts of all the ants crawling across her body while she was trying to learn Pre-Algebra. In some ways, I still carry vestiges of that little girl with me, with skin rubbed raw from constant scrubbing and washing. It feels like you're never clean enough and no one ever believes you when you try to argue that the mice or roaches or ants or any other living form of filth isn't your fault. Convincing yourself that you're clean is probably the hardest of all when you have constantly lived amongst infestation. One of the first things I noticed while scrubbing down my current apartment after moving in were the roach and mice traps, both left behind by the last tenant.

Each new apartment or quadruplex brings a new type of filth to be afraid of. The rental I lived in during high school felt like the air was constantly palpable. Maybe it was my imagination that you could feel the particles of grime as you moved through. It was not my imagination that the bedroom my sister and I shared had walls stained yellow from cigarette smoke. The family room would frequently flood from the back porch anytime it rained. In the hot summer months especially, the lack of air conditioning combined with the cat urine-soaked carpet, and a new wave of hot summer water flowing across the septic tank outside combined into a horrible potion of smells that suffused through the entire house. The splash of water has a way of bringing smells to life, so when the kitchen ceiling started leaking as well, the stench of the mice also became readily apparent.

Some of the worst treatment from the landlords came when my father left and it was just my mother fending for herself and her kids. Years later, it still makes me want to cry and fight, thinking of how she was bullied and mistreated by the people she had to supplicate for a home. The landlord would show up at all hours the day and night to harass her. He would find any reason to jack up rent, threatening to evict her if she didn't comply. While there had not been any mandatory pet deposits when signing the lease, he still demanded more money for the therapy dog she was training for her classroom at Cleveland Public Schools. The landlord knew about Lucy, our very sweet black lab mix who was due to work in a special-ed Kindergarten class. He approved of her ahead of time, before we adopted her at age two. Yet, when there was no longer a broadly built man in the house anymore, Lucy was suddenly a liability and one of many reasons to increase the rent for his own protection.

Protection and safety were never an issue for him in other contexts. Like the way my sister and I would have probably felt a lot safer if he didn't climb onto the roof outside of our windows unannounced, looking in on us as we were changing. Protection also didn't seem to be an issue when the pipes burst in January, flooding the basement with cold water. The ensuing mold from that water being left for three months was also not much of a worry for him. Ultimately we left there too. With that move, my mother lost (among other things) her garden statue of St. Joseph, the patron saint of her father. It was a beloved grieving gift she had received when he passed. She still sometimes drives through that old neighborhood, eyeing the old house in hopes of recovering her dad’s effigy, staving off the reality that it’s just as gone as he is.

I have a lifetime of the landlord and rental property horror stories. Far too many to put in a public comment. The experiences left me with lasting anxieties that I know will only grow worse the older I get and the longer I have to rent and collect new horror stories every year. I'm worried about my own health. I worry about my mother who is quickly approaching her 60s and still has regular nightmares about finances and bursting pipes. I'm scared for my sister whose multiple chronic health conditions are constantly worsened by her terrible rental conditions and those she endured as a kid. I'm scared for my neighbors and my community. Because I am not the only one constantly being driven away from home and suffering through unsafe living conditions. Almost everyone around me is as well. That's not how we build a healthy community. That's how we traumatize people and reduce life expectancy. For the sake of myself, my family, and my community, basic protections for renters would go so far to making life a little less hard and scary.

We urge FHFA to take bold action to implement mandatory, standardized protections – paired with strong enforcement – for all households living in properties with federally backed mortgages, including larger developments and smaller properties. FHFA must continue to engage tenants and directly impacted people throughout its process of establishing and implementing renter protections, and protections must be centered on racial and social equity as explicit goals. These protections– along with to large-scale, sustained investments and anti-racist reforms – are necessary to ensure that everyone, including the lowest-income and most marginalized renters, have a safe, quality, affordable, and accessible place to call home.

Sincerely,

Delaney Davis

Northeast Ohio Coalition for the Homeless