



June 26, 2023

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The Honorable Sandra Thompson
Federal Housing Finance Agency
Washington, DC

**RE: Federal Housing Finance Agency's Request for Input on
Multifamily Tenant Protections**

Dear Director Thompson:

Thank you for the opportunity to respond to the Federal Housing Finance Agency's Request for Input on Multifamily Tenant Protections. My name is Santra Denis, and I am the Executive Director with Miami Workers Center located in Miami, Florida. Our mission is to build power with working-class tenants, workers, women, and families in Miami-Dade County. Through leadership development and grassroots campaigns, we seek to transform our workplaces and neighborhoods to win the respect, rights, and resources we all deserve.

Because of my experience organizing working-class tenants practice includes campaigns to make necessary changes that improve the lives of tenants and families. In doing so, I have become familiar with the landlord-tenant law in Florida, the challenges of enforcement, and the need for a minimum federal floor on tenant protections.

FHFA has an important opportunity to help establish a minimum federal floor of tenant protection as the Florida state legislature is hostile to tenant protection legislation; state preemption forecloses local avenues to strengthen tenant protections; local government lacks the staff, time, and/or resources to enforce local tenant protections

A federal minimum floor of tenant protections is also necessary with the growing number of properties in my jurisdiction with corporate landlords with multi-state portfolios. Tenants in Florida experience rent hikes, higher fees, and lack of responsiveness from owner or manager.

Tenant protections align with FHFA's statutory mandate to ensure that the GSEs fulfill their mission by operating in a safe and sound manner and to serve as a reliable source of liquidity and funding for the housing finance market. FHFA's strategic goals are to (1) secure the regulated entities' safety and soundness, and (2) foster housing finance markets that promote equitable access to affordable and sustainable housing.



Ensuring that tenants in properties with federally-backed mortgages have equitable access to affordable and sustainable housing fits squarely within FHFA's statutory mandate and strategic goals, and we applaud the FHFA for undertaking the RFI process to learn more about the challenges that these tenants face and to consider the role of FHFA and the GSEs in addressing these challenges.

FHFA should consider the following minimum tenant protections: Good cause, rent stabilization, protection against source of income discrimination, warranty of habitability, regulation of non-rent fees, notice requirement.

In conclusion, FHFA has an important opportunity to help set the foundation for a minimum federal floor of tenant protections, and we urge FHFA to act boldly.

Sincerely,

Santra Denis, Miami Workers Center