

Monday, July 31, 2023

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 Folake Oyegbola and I am an advocate with the Kent Community Development Collaborative organization (KCDC). KCDC is a community-led partnership that works alongside residents to create a more thriving and vibrant Kent. The collaborative focuses on equitable community development so that everyone can participate in and benefit from decisions that shape their neighborhood and the greater community, especially communities of color, immigrants, refugees and low-income residents. I am writing to share my experience working with our community 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.

In our work, KCDC focused on surfacing issues and opportunities in Kent. Through a series of community events we learned of shocking details residents were facing related to housing:

- a. Lack of knowledge around tenants' rights.
- b. Facing eviction without just cause.
- c. Significant increases in rent.
- d. Lack of accountability for unit maintenance issues.
- e. Retaliatory landlord practices.
- f. Displacement.
- g. Substandard housing.
- h. Need for affordable family-sized housing.

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,

Folake Oyegbola
Kent Community Development Collaborative