

07/25/2022



Good Evening Director Stricklin,

I'm reaching out on behalf of the St. Petersburg Tenants Union to urge you to draft a robust countywide tenant bill of rights & to reject the shameful attempts by corporate interests to weaken this measure.

I appreciate county staff putting so much hard work into drafting what was originally a strong protection against voucher discrimination. It was apparent you all wanted to see this measure pass with as little revision as possible during the meeting in June, which is why it was incredibly disappointing that the commission sent the ordinance back based on disingenuous objections raised by the Bay Area Apartment Association (BAAA).

I'll begin by addressing the claims of increased insurance premiums & denial of coverage for landlords who rent to voucher recipients, concerns which are grossly exaggerated & largely imaginary. Several lawsuits, including [one in Florida](#), have recently been filed & settled against a handful of insurance companies who maintain these sorts of policies, [establishing that](#) the denial of coverage to landlords who rent to voucher-holders has a disparate impact on several protected classes covered under the Fair Housing Act, & is therefore a violation of federal law.

Aside from the fact that few, if any, insurance providers in the county are penalizing landlords for renting to voucher recipients, my other concern is that this provision regarding insurance costs is vague & would be extremely difficult for county officials to verify in cases when income discrimination is alleged. Would the accused landlord be required to produce documentation or other proof that explicitly demonstrates increased insurance premiums or canceled policies as a direct result of renting to voucher-holders? I'm also curious as to what independent research county staff made on this issue outside of consultations with lobbyists at the BAAA and if so, what were your findings?

Next I'd like to address the 10 business day-limit for required inspections. While I was pleased to hear that staff actively consulted the Pinellas Housing Authority while considering this provision, it will still undoubtedly cause many families to fall through the cracks. In addition to the fact that the housing authority will be unduly expected to perform flawlessly within this parameter, what happens when a landlord – whether intentionally or not – is responsible for the delay of an inspection themselves?

My concern is that there is a possibility that landlords who don't want to house a voucher holder may intentionally obstruct the inspection process, whether through refusing to grant access to the property or by failing to communicate with the prospective tenant or housing authority staff. As a tenant organizer, I have witnessed countless incidents of unscrupulous & oftentimes unlawful actions taken by landlords; believe me when I tell you that any assurances of good faith from this industry should never be taken at face value.

Finally, I'd like to voice my opposition to allowing individual cities to opt out of the ordinance. With 24 incorporated cities in Pinellas, this would only cause confusion & greatly hinder the ability of voucher holders to secure the best possible housing options for their families, potentially limiting options closest to workplaces & schools.

With housing choice vouchers, time is of the essence. The whole point of this ordinance is to ensure recipients have the maximum opportunity to secure stable housing before the 60 day expiration, after which they can lose their voucher & be bumped from the waiting list entirely. Continuing to permit income discrimination in certain cases diminishes the purpose & intent of this policy. Just like laws which prohibit things such as racial discrimination, there should be zero exceptions with this as well.

I have never utilized a housing voucher personally, but our organization has struggled in solidarity with those who have. As a low-income worker & tenant myself, I have experienced the effects of housing insecurity & have been witness to countless others caught this devastating spiral. It's a mix of pain, humiliation, & other terrible feelings beyond my capacity to properly convey in writing.

I've also met & spoken with many landlords through my organizing work, & grew up around families who dealt in real estate & property investment during my upbringing in the affluent Palm Harbor suburbs. I can say with full confidence that any sort of hardship facing landlords, even the "small" landlords, comes nowhere close to the colossal struggle of low-income tenants.

The data certainly confirms my anecdotal experiences.

One [analysis](#) of the Fed's 2016 Survey of Consumer Finances found that more than 70% of households who earn income from rental properties had an annual income of \$90k or more. Compare this to the vast majority of [voucher households](#) through the Pinellas Housing Authority who are considered extremely low income, meaning they make \$25,000 a year or less; around 40% are Black & over half are non-White; over a third house children.

We tenants don't have a [heavily funded lobbying arm](#) like the BAAA to speak on our behalf. We don't have generational wealth. We don't have access to credit. We don't have the same

resources at our disposal that nearly every landlord does, including small-time investors. Between working long hours at low paying jobs, barely scraping by & raising our children, it seems like our voices are constantly drowned out, overlooked & not taken seriously.

Tenants should be considered the greatest stakeholders in any conversation surrounding the human right to housing. We have the least to gain from the incessant prioritization of business-friendly policies, & the most to lose as a result of indifference to our struggles.

Since the county has given ample space to the landlord lobby to voice their concerns, I am requesting consideration of additional proposals to bolster the tenant bill of rights, including but not limited to:

- **Establishment of a countywide Office of Tenant Advocacy to assist tenants with all housing-related issues**
- **Universal right to counsel in eviction cases for tenants**
- **6 month required notice of rent increase**
- **Rehousing requirements for tenants facing excessive rent increases & rent gouging**
- **Rehousing requirements for tenants facing displacement due to development & renovation**
- **Declaration of housing as a human right in Pinellas county**

I implore you to reject all provisions suggested by the Bay Area Apartment Association, and I look forward to discussing our proposals further with county staff & commissioners. In the meantime, I urge you draft a strong source of income protection to show that de-facto segregation & class discrimination have no place here Pinellas county.

Sincerely,

William S. Kilgore
St. Petersburg Tenants Union