

Robin Carter
Chairperson, Board of Commissioners
Janet Abrahams
President | Chief Executive Officer



Memorandum

To: The Honorable President and Members of the City Council
C/o Natawna Austin, Executive Secretary

From: Janet Abrahams, Chief Executive Officer *JAS*

Date: July 11, 2023

Subject: City Council Bill 23-0357 – Strengthening Renters Safety Act

The Housing Authority of Baltimore City (HABC) has received the referral for comment on City Council Bill 23-0357, a bill that establishes a priority inspection; criteria for priority dwellings and priority inspections; requiring the Commissioner of the Department of Housing and Community Development to post certain notices; amending certain rental dwelling license application requirements; amending certain prerequisites for new and renewed rental dwelling licenses; amending license fees; updating inspection requirements; requiring the posting of license numbers; updating causes for denial, suspension, or revocation of a license; bolstering public access to information; authorizing the initiation of enforcement of the subtitle by complaint; providing for certain data collection; establishing the Baltimore City Rental Licensing and Inspection Task Force; providing for the composition, terms, and organization of the Task Force, establishing the duties of the Task Force, adding a civil citation fine for violating of licensing requirements; requiring annual reporting; amending certain definitions; providing a time period when the Task Force shall first convene; and providing for a special effective date.

HABC is Baltimore's largest provider of affordable housing opportunities and rental assistance, serving over 19,000 low-income households through our Public Housing and Housing Choice Voucher programs. HABC recognizes the importance of providing affordable homes that are safe sanitary, and in good repair.

In general HABC agrees with the intent of the proposed relief of the bill. However, we request amendments for the following:

There is concern about multi-family units in which Housing Choice Voucher Program (HCVP) participants reside and the impact this would have on them if the building had its license revoked. As a remedy, HABC recommends adding a provision that requires DHCD to inform HABC when it has "actual knowledge" of lack of license so that we can work with the landlord to make the necessary repairs or relocate any households residing in the property that receive assistance through HCVP.

Amend Section 5-1 of the bill to exempt HABC-owned properties from the definition of priority dwelling in reference to dwellings have a U.S. Department of Housing and Urban Development (HUD) Real Estate Assessment Center (REAC) inspection score equal to or less than 79. Amend Section 5-10 of the bill to exempt HABC-owned properties from being subject to priority inspections, as these properties already undergo regular inspections and is required to repair any defects that threaten life, safety or health as regulated by HUD. These amendments are consistent with the license requirements of Section 5-4 of the bill which states that a license is not required for any rental dwelling owned and operated by HABC.