

Docket Number: HUD-2016-0063

Establishing a More Effective Fair Market Rent System; Using Small Area Fair Market Rents in Housing Choice Voucher Program Instead of the Current 50th Percentile FMRs

Comments prepared by Women In Need (Win)

Women In Need (Win) supports HUD's stated purpose of increasing voucher holder access to housing in high opportunity neighborhoods. However, reducing the payment standard amount for any voucher holder would be highly destabilizing for New York City's most vulnerable families, putting many at risk for homelessness. At a time when the number of homeless families in New York City has reached an all-time high and New York City's rental housing market is increasingly crowded, tight, and expensive, lowering the payment standard amount in any neighborhood would only exacerbate New York City's current housing and homelessness crisis. In order to mitigate the current crisis while also helping families move to areas of higher opportunity and lower poverty, the FMR must be increased across all of New York City's neighborhoods.

Moreover, FMR rules and accompanying efforts to promote upward family mobility can only be effective if they respond to the unique dynamics and characteristics of local housing markets and of poverty conditions. As proposed, the SAFMR rules do not respond to the low vacancy, low turnover, high crowding, and high cost realities of New York City's rental housing. Neither do they respond to the delineation of and dynamic rate at which New York City's neighborhood change, most notably the gentrification of historically affordable neighborhoods. The proposed SAFMR rules would displace low-income families who have achieved housing stability, putting them in a highly competitive, low vacancy market with a voucher that does not reflect real market rents anywhere in New York City. Responsible revision of FMR rules requires deliberate input from local consumers.