



June 26, 2019

Regulations Division
Office of the General Counsel
Department of Housing and Urban Development
451 Seventh Street SW, Room 10276
Washington, DC 20410-0001

Re: Comments Regarding Proposed Rule, Docket Number: HUD-2019-0044

Dear Secretary Carson,

Los Angeles prides itself on being a city of belonging, in a country defined by access to opportunity for all, regardless of zip code, background, faith, or place of birth. In every generation, our leaders have tried to extend the reach of dignity and possibility to an ever-expanding number of people — to open the door a little wider to anyone willing to work hard, play by the rules, and pursue the American dream.

Your department's latest proposal betrays that tradition by punishing immigrant parents and their children, and threatening to deny the safety and security of stable housing to tens of thousands of families in Los Angeles and across our nation.

I write in strong opposition to the proposed rule by the U.S. Department of Housing and Urban Development (HUD) implementing section 214 of the Housing and Community Development Act of 1980 (Docket Number: HUD-2019-0044). Its sole purpose isn't about smart immigration policy, public safety, or fiscal responsibility. Its goal is to spark fear in immigrant households, and its effect would target U.S.-born children and their families.

The fact is, the proposed rule breaches HUD's mandate to create strong, sustainable, inclusive communities and quality affordable homes for all.

For more than 20 years, HUD has met that charge, in part, by allowing mixed-status families to live in federally subsidized affordable housing, as long as one member of the household has eligible immigration status as a legal permanent resident or U.S. citizen. But under this proposal, every member of a household receiving assistance would need to be a legal permanent resident or citizen, injecting uncertainty into the lives of any affected home and denying many families the aid needed to afford their rent.

What's more, under the current standard, housing benefits are prorated so that only those family members who are lawfully present and eligible for benefits receive them. But the new rule specifies that individuals who lack eligible immigration status may not reside in publicly subsidized housing, no matter who else lives with them. Any impacted family choosing to stay together as a single unit would be displaced as a result, and children, even those who are lawful citizens, would find themselves at risk of homelessness if one parent is undocumented or ineligible for citizenship. This could turn into another form of the heartless, unnecessary, and ineffective policy of family separation.

For Los Angeles, the repercussions of this rule are not abstract or distant: they would be felt firsthand in our neighborhoods and our economy. The proposal would threaten the housing security of approximately 2,587 households, or 11,600 people, all of whom have followed HUD rules in effect for the past 25 years. On top of that, the Housing Authority of the City of Los Angeles (HACLA) — one of the nation's biggest public housing authorities that provides the largest supply of quality, affordable housing to L.A. residents — would face dire, negative financial consequences, given changes to Section 8 programs and considering that nearly one-third of all public housing occupants would be at risk of potential eviction.

As Mayor of this great city, I will not stay silent on this matter. I cannot support this rule, and I urge HUD to withdraw it from consideration. The attached resolution shows where the Los Angeles City Council stands on this issue and reflects what our history, values, and interests demand: fierce opposition to this proposal and a firm commitment to policies rooted in compassion for immigrants and all Americans.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Garcetti", with a horizontal line extending to the right.

ERIC GARCETTI
Mayor

CC: Senator Dianne Feinstein, Senator Kamala Harris, Rep. Maxine Waters