



City of Santa Barbara

Office of the Mayor

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Submitted via Regulations.gov

Randy Rowse

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Office of the General Counsel
Rules Docket Clerk
U.S. Department of Housing and Urban Development
451 7th Street, SW, Room 10276
Washington, DC 20410-0500

RE: Docket No. FR-6524-P-01, Mixed Status Household Proposed Rule

To Whom It May Concern:

I am writing on behalf of the City of Santa Barbara, California, regarding Docket No. FR-6524-P-01, the proposed rule concerning Verification of Eligible Status under the Housing and Community Development Act of 1980. The City opposes implementation of this rule, as it is duplicative of existing law and represents a novel interpretation of current statute.

Existing Department of Housing and Urban Development (HUD) regulations and federal law already prohibit federal housing assistance from benefiting undocumented immigrants. Under current rules, assistance is pro-rated based on the number of eligible US citizens or otherwise eligible individuals within a household. The proposed rule would expand this prohibition to the entire mixed-status family unit. In doing so, it would threaten the housing stability of mixed-status households while imposing significant new administrative requirements on local governments and housing authorities responsible for administering these programs, without providing any additional funding or resources to support implementation.

In our community, implementation of the proposed rule would prevent 148 currently supported households from accessing federal housing assistance and threaten their housing stability. Among these households, 56 contain no qualifying adults, and 252 children would face an increased risk of housing instability or homelessness if the rule were implemented as proposed.

Mixed-status families are our constituents and neighbors, federal law already contains the policy the proposed rule is attempting to codify, and implementation would be costly for local governments like ours. For these reasons, we urge HUD to withdraw the proposed rule. Thank you for your time and consideration.

Sincerely,

Randy Rowse
Mayor
City of Santa Barbara

