



# HOUSING AUTHORITY OF THE CITY OF LOS ANGELES

**AN EQUAL EMPLOYMENT OPPORTUNITY - AFFIRMATIVE ACTION EMPLOYER**

2600 Wilshire Boulevard • Los Angeles, California 90057 • (213) 252-2500  
TTY (213) 252-5313

May 13, 2019

**PRESIDENT AND CEO  
DOUGLAS GUTHRIE**

## TRANSMITTED VIA EMAIL

The Honorable Congresswoman Maxine Waters  
2221 Rayburn House Office Building  
Washington, DC 20515

The Honorable Congresswoman Lucille Roybal-Allard  
2083 Rayburn House Office Building  
Washington, DC 20515

The Honorable Congresswoman Karen Bass  
2059 Rayburn House Office Building Washington,  
DC 20515

The Honorable Congressman Tony Cardenas  
2438 Rayburn House Office Building  
Washington, DC 20515

The Honorable Congresswoman Nanette Diaz Barragan  
1030 Longworth House Office Building  
Washington, DC 20515

The Honorable Senator Dianne Feinstein  
331 Hart Senate Office Building  
Washington, DC 20510

The Honorable Congressman Jimmy Gomez  
1530 Longworth House Office Building  
Washington, DC 20515

The Honorable Senator Kamala D. Harris  
112 Hart Senate Office Building  
Washington, DC 20510

Dear Congressmembers/Senators:

I am writing to request that the proposed rule to U.S. Department of Housing and Urban Development's ("HUD") regulations implementing section 214 of the Housing and Community Development Act of 1980 be withdrawn. The proposed rule requires verification of the eligible immigration status of all recipients of assistance below the age of 62 who are under a covered program. The proposed rule also specifies that individuals who are not in eligible immigration status may not serve as the leaseholder, even as part of a mixed family whose assistance is prorated based on the percentage of members with eligible status. Third, a household would not receive housing assistance unless every member of the housing unit has eligible immigration status. These proposed rule changes to our public housing and Section 8 programs pose a devastating threat to the housing status of our most vulnerable residents and their families.

In conventional public housing, 6,546 household members or 31 percent of all residents of public housing in the City of Los Angeles live in mixed status households and face the strong likelihood of losing their housing. In our Section 8 Housing Choice Voucher program 3,971 household members face the same probability. Another 1,000 plus residents in project based rental assistance developments in Los Angeles administered by HACLA are also impacted. The net effect of the proposed rule, then, is to throw over 11,000 of our neediest residents out of their homes and, more than likely, onto the street. The vast majority of these residents are children who are US citizens living in a household with at least one adult that is not documented. All of these households have been abiding by current HUD rules that have been in effect for twenty five years.

This proposed rule not only creates profound difficulties for those individuals and families directly affected but also for HACLA as an affordable housing provider.

These difficulties are many and varied but I will cite the three most obvious. First, the rule changes impose huge adverse financial consequences for HACLA's public housing sites where nearly one third of all public housing occupants would be at risk of potential eviction. The cost of lost rent, tenant turnover, likely evictions that would be challenged in court, and rehabilitation of units to prepare for new residents would be millions of dollars in added costs that would not be funded. Second, it promises the severe dislocation of entire communities as well as exacerbating the already chronic homeless situation in the City of Los Angeles. And third, it significantly increases our administrative costs by requiring HACLA and private property owners to collect additional documents verifying the citizenship of assisted residents.

HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. Yet, the proposed rule changes run directly counter to this mission by inflicting fear, stress and harm on our most vulnerable populations. These proposed rule changes are unnecessary, untimely and mean spirited. Accordingly, HACLA unreservedly rejects the changes in the proposed rule and urges HUD to withdraw them from consideration.

Sincerely,



Douglas Guthrie  
President and CEO

Cc: Honorable Eric Garcetti, Mayor  
Honorable Herb Wesson, President City Council  
Honorable Councilmember Mike Bonin  
Honorable Councilmember Jose Huizar  
Honorable Councilmember Joe Buscaino  
Honorable Councilmember Curren D. Price, Jr.  
Honorable Councilmember Gilbert Cedillo  
Honorable Councilmember Monica Rodriguez  
Honorable Supervisor Janice Hahn  
Honorable Supervisor Mark Ridley-Thomas  
HACLA Commissioner Ben Besley