



OFFICE OF MAYOR KEVIN L. FAULCONER

June 20, 2019

The Honorable Benjamin S. Carson
Secretary
U.S. Department of Housing and Urban Development
451 7th Street S. W.
Washington, DC 20410

Dear Secretary Carson:

On behalf of the City of San Diego, I am submitting comments on the proposed rule published in the Federal Register (Docket No. FR-6124-P-01) regarding the Housing and Community Development Act of 1980: Verification of Eligible Status and retain the current U.S. Department of Housing and Urban Development (HUD) regulations regarding household eligibility to receive housing assistance.

HUD's proposed rule would adversely affect vulnerable families with children in low-income households, including U.S. citizens and legal residents, by potentially ending the housing assistance they currently receive. This rule puts those households at risk of homelessness and would add to the "shelter crisis" that already exists in the City of San Diego.

Current HUD regulations ensure that HUD does not provide assistance to household members with ineligible immigration status. Existing regulations allow a household to receive housing assistance if at least one person in the household is a United States citizen or eligible immigrant. However, if a family includes both eligible and ineligible individuals, known as "mixed" households, the amount of assistance they may receive is prorated to the level of assistance for only the eligible members of the household.

In the City of San Diego, the eighth largest city in the nation, the San Diego Housing Commission (SDHC), the agency that administers the City's rental assistance vouchers, provides federal rental assistance to more than 15,000 low-income households. Of these households, 325 currently receive prorated assistance because they are mixed households. Of the 325 prorated-assistance households, which consist of 1,415 family members, 251 households have 553 children under the age of 18.

HUD's proposed rule should not be implemented because of the negative impact it would have on vulnerable families with children who are legally eligible for assistance and the overall quality and quantity of assisted housing, especially amid a shortage of affordable housing in areas across the country.

Please direct any questions or concerns regarding this letter to Patrick Bouteller, Director of Government Affairs at PBouteller@sandiego.gov or 619-236-6597.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Bouteller", with a stylized flourish at the end.

Patrick Bouteller
Director of Government Affairs
Mayor Kevin L. Faulconer
City of San Diego