CITY OF LONG BEACH

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April 15, 2026

U.S. Department of Housing and Urban Development
Regulations Division, Office of General Counsel
451 7th St SW, Room 10276
Washington, DC 20410

RE: Opposition to Docket No. FR-6520-P-01 Establishing Flexibility for Implementation of Work Requirements and Term Limits

Dear Office of the General Counsel,

On behalf of the City of Long Beach, (City), this comment is provided in opposition to the Department of Housing and Urban Development's (HUD) proposed rule change published in the Federal Register on March 2, 2026, Establishing Flexibility for Implementation of Work Requirements and Term Limits (FR-6520-P-01). We ask that HUD withdraw the proposed rule in its entirety.

The City's Housing Authority provides support and rental assistance to individuals and families in need, expanding access to affordable and safe housing through the effective use of government resources and community partnerships. This work provides us with unique insight on how work requirements and term limits will impact renters in Long Beach.

Congress has not delegated the legal authority to implement work requirements and term limits to HUD. Currently, only certain federally assisted housing providers that participate in the Moving to Work program can establish work requirements and term limits. HUD's proposed rule is a huge departure from how most HUD programs are currently administered by local Housing Authorities and owners of HUD multifamily housing.

Decades of research on work requirements and term limits suggest they do not lead to self-sufficiency. Housing is currently unaffordable even for workers making an average wage across the country. California has the highest housing wage in the country, where workers must, on average, earn $49.61 per hour to afford rent for a 2-bedroom home. Work requirements and term limits will create more administrative burdens for public housing authorities, private owners, and the communities they serve. Creating a patchwork of different work requirements and different term limits for various types of subsidized housing in different locations dramatically increases confusion for both renters and property owners. These policies will be costly for property owners to implement, leading to more bureaucracy and additional stress on the nation's affordable housing stock.

The City urges HUD to withdraw this proposed rule. Allowing work requirements and term limits does not promote HUD's mission of providing affordable housing and will only result in vulnerable renters losing their housing. Thank you for the opportunity to comment on these proposed rules. Please contact Sarah Patterson, Manager of Government Affairs, at Sarah.Patterson@longbeach.gov for any questions or further information regarding these comments

Sincerely,

THOMAS B. MODICA
City Manager