



December 9, 2018

Samantha Deshombres, Chief, Regulatory Coordination Division
Office of Policy and Strategy
U.S. Citizenship and Immigration Services
Department of Homeland Security
20 Massachusetts Avenue NW
Washington, DC 20529-2140

RE: DHS Docket No. USCIS-2010-0012

Dear Ms. Deshombres:

On behalf of the Portland Community Chamber of Commerce in Portland, Maine, I would like to submit these comments in opposition to the Department of Homeland Security's proposed rule change regarding inadmissibility on public charge grounds. The Department is effectively proposing to deny citizenship to individuals and families who use public assistance of which they are eligible.

A key mission of our organization is to promote prosperity in our region. Achieving prosperity requires a vibrant economy made up of healthy businesses and a robust labor market. Maine is the oldest state in the nation by median age and recent projections indicate that deaths are outpacing births. By 2034, Greater Portland will see its labor force decline by 5,000 unless extraordinary steps are taken to reverse this trend. Our state is in desperate need of more workers, and an educated workforce, in order to meet the current needs of our region.

A critical component of addressing this crisis and building a growing, vibrant and educated workforce is welcoming immigrants to the state and specifically, the Portland region. The recent actions by the Trump Administration to limit a pathway to citizenship runs counter to this goal. It creates a barrier to citizenship and ultimately, a barrier to growing our workforce with foreign-born individuals.

The Portland City Council recently submitted a resolution opposing this proposed rule change by the Department of Homeland Security. We support the position and resolution of the Portland City Council and further submit these comments in opposition to the stated rule change. These changes will have a direct impact on the Portland region's ability to grow our workforce and meet our needs of prosperity and therefore strongly encourage the Department to rescind this proposal.

Sincerely,



Jack Lufkin
Board Chair



Quincy Hentzel
CEO