September 25, 2019

The Honorable Kevin K. McAleenan
Acting Secretary
U.S. Department of Homeland Security
20 Massachusetts Avenue NW
Washington, D.C. 20529

Re: Request for Temporary Protected Status on behalf of Bahamian Nationals

Dear Acting Director McAleenan:

The undersigned organizations write to urge the U.S. Department of Homeland Security (DHS) to immediately designate the Commonwealth of the Bahamas (Bahamas) for Temporary Protected Status (TPS) under § 244(b) of the Immigration and Nationality Act, as it is unsafe to return Bahamian nationals due to massive devastation caused by Hurricane Dorian.¹ Hurricane Dorian, a Category 5 hurricane and one of the strongest Atlantic hurricanes in recorded history, first made landfall on the Abaco Islands in the Bahamas on September 1, 2019. It slowly moved across the islands, languishing over Grand Bahama for days. With sustained winds of 185 mph, Dorian was the strongest hurricane on record to strike the Bahamas causing death and injury, widespread destruction, mass displacement of residents, and serious disruption of living conditions across the Bahamas; it affected over 76,000 people.² A grant of TPS would provide employment authorization and protection from deportation for approximately 14,000 Bahamian noncitizens in the United States.³

Countries may be designated for TPS “due to conditions in the country that temporarily prevent the country's nationals from returning safely, or in certain circumstances, where the country is unable to handle the return of its nationals adequately.”⁴ These circumstances include “ongoing armed conflict (such as civil war), an environmental disaster (such as earthquake or hurricane), or an epidemic, [or] other extraordinary and temporary condition[s].”⁵ With over 70,000 Bahamians displaced, hundreds missing, a death toll of at least 50 people and growing, and entire neighborhoods destroyed, DHS must grant TPS for the Bahamas under either of the latter two

² Email Interview with David Cronin, Government Affairs Specialist, Catholic Relief Services (Sept. 10, 2019) (on file with author).
³ Email Interview with Tom K. Wong, Associate Professor of Political Science, University of California, San Diego (Sept. 16, 2019) (on file with author). Professor Wong, in collaboration with CLINIC, utilized 2017 Census data to provide these estimates.
⁵ Id.
prongs of the TPS statute.\(^6\) Support for TPS for the Bahamas is widespread with members of Congress already introducing H.R. __, the TPS for Victims of Hurricane Dorian Act, demonstrating the broad constituency of support for a TPS designation.\(^7\)

The Bahamian government and international aid organizations acknowledged conditions are dismal. Across the Bahamas, search-and-rescue crews have only been able to search one-tenth of previously inhabited areas, and the Bahamian government has formally evacuated 3,500 people to Nassau. Half of the Great Abaco Island’s population—around 20,000 residents—fled to Nassau, and 4,000 have fled to closest large country, the United States, by air and sea.\(^8\) Initial figures from the Caribbean Disaster Emergency Management Agency estimate 18,000 children in the Abaco and Grand Bahama areas are in urgent need of humanitarian assistance.\(^9\)

Less than a week after Dorian hit, over 100 Bahamian evacuees were forced off a ship and barred from entering the United States after a last minute announcement by the ferry boat operator.\(^10\) It remains unclear what the next steps are for displaced Bahamians fleeing Hurricane Dorian’s wreckage. If granted TPS, Bahamian nationals would have the opportunity to live in safe conditions, secure employment, support their families, and be free of the fear of being prematurely returned to their devastated home.

There is substantial precedent for providing survivors of environmental disasters with TPS. After a 7.0 magnitude earthquake struck Haiti in 2010, and 7.8 magnitude earthquake struck Nepal, then DHS Secretary Janet Napolitano granted both Haitian and Nepali nationals TPS.\(^11\) Given conditions in the Bahamas, communities are already facing famine, untreated injuries, and disease; and we, members of the international community, must support our Bahamian neighbors

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to resettle as the islands rebuild.\textsuperscript{13}

Given the widespread devastating conditions in the Bahamas, precedent and congressional intent for DHS to grant TPS to nationals of countries experiencing environmental disaster, and the Bahamas’ status as a regional neighbors, we respectfully request that you immediately designate the Bahamas for TPS.

We would welcome the opportunity to engage with DHS about this request. Please do not hesitate to contact Jill Marie Bussey, Advocacy Director at the Catholic Legal Immigration Network, Inc., at jbussey@cliniclegal.org should you have any questions or require further information.

Sincerely,

\textbf{International Organizations:}
Caribbean Studies Association  
New Haven/León Sister City Project  
Refuge For Families

\textbf{National Organizations:}
Adrian Dominican Sisters  
African Communities Together  
Alianza Americas  
America's Voice  
American Friends Service Committee  
Boston University International Human Rights Clinic  
Catholic Legal Immigration Network, Inc.  
Center for Gender & Refugee Studies  
Church World Service  
Coalition on Human Needs  
Congregation of Our Lady of the Good Shepherd, U.S. Provinces  
CREDO  
Daily Kos  
Disciples Refugee & Immigration Ministries  
Evangelical Lutheran Church in America  
Families Belong Together  
Franciscan Action Network  
Freedom to Thrive  
Immigrant Defense Project

\textsuperscript{13} Id.
Institute for Policy Studies
Interfaith Worker Justice
International Institute of New England
LA RED
Law Office of Sabrina Damast, Inc.
League of Conservation Voters
Lutheran Immigration and Refugee Service
National Advocacy Center of the Sisters of the Good Shepherd
National Council of Churches
National Council of Jewish Women
National Immigration Forum
National Immigration Law Center
National Korean American Service & Education Consortium (NAKASEC)
National Network for Immigrant and Refugee Rights
National TPS Alliance
NETWORK Lobby for Catholic Social Justice
Office of Social Justice, Christian Reformed Church in North America
Our Revolution
Path With Heart
Priests of the Sacred Heart, US Province
Project South
Provincial Council Clerics of St. Viator
Quinnipiac University School of Law Civil Justice Clinic
Sisters of Mercy of the Americas - Justice Team
Sisters of St. Francis Justice, Peace and Care for Creation Committee
Sisters of St. Francis of the Neumann Communities
Sisters of St. Francis, Clinton, Iowa
Southern Poverty Law Center
The Black Alliance for Just Immigration (BAJI)
The Episcopal Church
U.S. Campaign for Palestinian Rights
Union for Reform Judaism
Unitarian Universalist Service Committee
UNITE HERE
Ware Immigration
Washington Office on Latin America (WOLA)
We Are All America
Win Without War
Working Families United
Regional, State, and Local Organizations:
AFSC Colorado
Arkansas United
Asylee Women Enterprise
Brooklyn Defender Services
Cabrini Immigrant Services of NYC, Inc.
Capuchin Franciscans, Province of St. Joseph
Casa Reina
Catholic Charities of SW Kansas
Catholic Legal Services, Archdiocese of Miami
Catholic Migration Services
Central American Resource Center
Connecticut Shoreline Indivisible
Corvallis Palestine Solidarity
DC-MD Justice For Our Neighbors
End Domestic Abuse Wisconsin
Faith Communities Organizing for Sanctuary
Family Action Network Movement (FANM)
Florida-Bahamas Synod, ELCA
Friends of Broward Detainees
Greater New York Labor Religion Coalition
Green Mountain Solidarity With Palestine
Haitian Bridge Alliance
Illinois Coalition for Immigrant and Refugee Rights
Jewish Voice for Peace New Haven
Jewish Voice for Peace, Atlanta Chapter
Justice for Our Neighbors-MI
Kentucky Equal Justice Center
Law Office of Sabrina Damast, Inc.
Lorain Ohio Immigrants rights assoc.
Metro Atlanta Democratic Socialists of America
Migrant and Immigrant Community Action Project
Mississippi Center for Justice
Nationalities Service Center
Network Against Racism and Islamophobia-Portland, OR
New Sanctuary Movement of Atlanta
New York Immigration Coalition
New York Legal Assistance Group (NYLAG)
NYU Immigrant Defense Initiative
Ohio Immigrant Alliance
OneAmerica
Pennsylvania Council of Churches
Poder Latinx
Progressive Leadership Alliance of Nevada
SIREN
Sisters of Saint Francis JPIC Commissioners
Sisters of St. Dominic of Blauvelt, New York
Sisters of St. Joseph of Boston
Southerners On New Ground
St. Andrew Lutheran Church
St. John's Presbyterian Church in Berk
The Door
The Legal Aid Society (New York)
United Methodists' Holy Land Task Force
University of Maryland Carey Immigration Clinic
Wayne Action for Racial Equality