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U.S. Census Bureau
4600 Silver Hill Road
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Subject: Urban Areas for the 2020 Census – Proposed Criteria (Docket Number 210212-0021)

On February 19, 2021, the Bureau of the Census (Census Bureau) requested public comment on the proposed criteria for defining urban areas based on the results of the 2020 Decennial Census. The Madera County Transportation Commission (MCTC) submits the following comments in regard to the proposed criteria.

MCTC serves as the Metropolitan Planning Organization (MPO) and the Regional Transportation Planning Agency (RTPA) for the Madera County region. MCTC is responsible for the development/coordination and adoption of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP). This includes overseeing funding programs for the region, of which MCTC programs tens of millions of dollars in transportation funding annually.

MCTC is concerned about the recommended changes to the urban area delineation criteria which would change how the Census Bureau identifies and designates urban areas. The proposal would define urban areas using housing unit density at the census block level and would utilize the 385 housing units per square mile density threshold. This threshold is based on the 2019 ACS 1-year data average of an estimated 2.6 persons per household for the entire United States. While this is representative of the population at a national level, this could misrepresent communities at regional and local levels. The urban area designation has become a standard for federal and state programs that provide services to communities of differing urban characteristics. Changing the criteria without proper analysis could potentially impact a community's access to fundamental programs and would also set a precedent that could have unintended consequences.

Misrepresentation of Communities

The proposed urban area delineation criteria uses the 385 housing units per square mile density threshold to replace the previous 1,000 persons per square mile density to identify initial urban area cores. The Census Bureau justifies the housing unit density threshold with the 2019 ACS 1-year data average of an estimated 2.6 persons per household for the entire United States, which would equate to a population of 1,000.

However, this would misrepresent the actual populations that reside in some communities. For the same 2019 ACS 1-year data, the average persons per household for Madera County is 3.35. This results in underestimating the actual population and would not fully represent the community within the census blocks. Even if numerically there is a small amount of housing units present in a particular census block, it does not necessarily mean that the population is just as small. Community characteristics vary widely between regions, especially when considering income levels and population demographics. One size does not fit all.

Impacts Federal and State Funding

There is a mention in the federal register notice that "...the Census Bureau recognizes that some federal and state agencies use the Census Bureau's urban area classification for nonstatistical uses such as allocating program funds, setting program standards, and implementing aspects of their programs...the Census Bureau is not responsible for the use of its urban area classification...it is that agency's responsibility to ensure that the classification is appropriate for such use."

While the Census Bureau at least recognizes the importance of its data in vital programs, it should be noted that any changes to the urban area delineation methodology ultimately affects communities. The methodology that identifies a community as urban or rural plays a large role in how services/funds are distributed and is more than just a statistical exercise for analysis.

A number of federal programs utilizes the Census Bureau's urban area designations. One example is the Federal Transportation Administration's (FTA) 5307 Urbanized Area Formula Program. It apportions these formula program funds for public transportation in urbanized areas (UZA) and the guidance specifically cites the Census Bureau's decennial urban area designations. UZAs are categorized by population classes and is used to determine apportionments and program eligibility.

Proper distribution of public transportation funds should rely on data that accurately represents the communities. Underestimating the population size could result in reduced public transportation opportunities and is especially detrimental to low-income communities. The use of housing units to represent population sizes based on a national average of persons per household to determine urban areas should be considered carefully and coordinated with agencies that heavily utilize the data.

Insufficient Data to Analyze Potential Impacts

This criterion was proposed while the 2020 decennial census block level data was not readily available for agencies to review making it difficult to properly assess the potential impacts. Agencies can only speculate on the impacts of the new methodology using 2010 census block data. Even with the 2010 datasets, this analysis does not provide any useful insights given that an entirely new dataset will be used to determine the final results. It has been noted at webinars by Census staff that there will be test locations for the proposed criteria to provide examples, but it would much more useful to stakeholders if this was performed for all of the urban areas.

Though the Census Bureau does not take into account the nonstatistical uses of the data, agencies that are impacted need to properly review the methodology in order to evaluate the effects it would have on its communities. The Census Bureau should consider how other federal agencies use their data or definitions. Metropolitan Planning Organization (MPO) status and federal funding levels are based on population data. The proposed criteria change the way population is determined in an urban area and could reduce population thresholds based only on the proposed methodology being utilized, while in fact, the actual population remains the same or has increased.

While in the past, the urban area criteria changes have been proposed prior to the publication of the decennial data, this should not be a reason to continue to move forward given how data-driven society currently is. Especially with the shift toward performance-based investment and policy decisions, accurate data is ever much more important to inform decision makers. It is difficult to give comments on a criterion when the data that is used to determine results is not available for analysis.

Setting a Precedent and Confusion on Aligning Threshold

With the proposed adoption of a housing unit density threshold, there is a concern that this will be setting a precedent for estimating populations. Many other agencies will follow suit with the adoption of this criteria. As mentioned above, there is potential to misrepresent communities with this methodology and communities could find themselves no longer qualifying for federal/state programs. This makes properly reviewing the proposed criteria even more important and should not be adopted so abruptly prior to exploring the actual results of the delineation methodology.

There is also confusion on which agency is setting the premise for defining an urban area. The register notes that “The proposed 10,000-person minimum threshold aligns with thresholds used by other federal agencies to distinguish between urban and rural areas as well as with the Office of Management and Budget’s minimum threshold for urban areas that form the cores of micropolitan statistical areas.”

While under the Office of Management and Budget’s (OMB) Draft 2020 Standards for Delineating Metropolitan and Micropolitan Statistical Areas and Key Terms, Section 1 cites the Census Bureau as the basis for qualifying for a Core Based Statistical Area

(CBSA) noting that “Each CBSA must have a Census Bureau-delineated Urban area of at least 10,000 population. (Urban Areas include both Urbanized Areas and Urban Clusters)”

It is as if both the Census Bureau and OMB are referring to each other as the source for their definition and threshold for urban areas. While the Census Bureau’s urban areas are used by agencies, the OMB’s metropolitan statistical areas (MSA) are also utilized in other agencies making this language confusing.

Covid-19 Impacts

MCTC is concerned with how the Covid-19 pandemic may have impacted the data relevant to the proposed changes of the proposed urban area designation methodology. 2020 was an atypical year in regards to where many people work and live. Dwelling and travel patterns were altered across the entire nation in ways that should be comprehensively understood in how they affect data that has been collected. There are varying degrees of short and long term migration or immigration to and from communities related to shelter in place or telecommuting mandates with potential to alter traditional patterns of residency location.

The proposed methodology does not reference what considerations were made regarding the state of communities as a result of COVID-19. Many areas are still analyzing the current conditions and prolonged effects related to the pandemic. This proposal for modifying urban area designation is ill-timed and overly hasty in light of the questions still remaining.

Recommendation

MCTC strongly recommends that the Census Bureau consider applying a methodology where local population characteristics are considered when designating urban areas, such as utilizing county level data for persons per household in identification of initial urban area cores. Generalizing population characteristics would be counterintuitive to the Census Bureau’s goal of delivering quality data products. The methodology should be further explored with test results presented to stakeholders for better clarification. Additionally, the impacts of the pandemic should be carefully considered over the upcoming years as part of any new proposed methodology. The Census Bureau should re-examine its methodology considering COVID-19 impacts and extend the comment period to provide stakeholders more time to review any methodology and calculation methods when the 2020 data is made available.

We appreciate your consideration of our comment and how this proposal could impact our region. If you have any questions, please contact me at patricia@maderactc.org or (559) 675-0721.

Sincerely,



Patricia Taylor, Executive Director
Madera County Transportation Commission