



May 1, 2018
Mr. Vincent Osier
Geographic Standards, Criteria, and Quality Branch
Geography Division
U.S. Census Bureau
Room 4H173
4600 Silver Hill Road
Washington, DC 20233-7400

Re:
Block Groups for the 2020 Census – Proposed Criteria (Docket Number 171005975-7975-01)
Census County Divisions and Equivalent Entities for the 2020 Census – Proposed Criteria (Docket Number 171002955-7972-01)
Census Designated Places for the 2020 Census – Proposed Criteria (Docket Number 171002956-7974-01)
Census Tracts for the 2020 Census – Proposed Criteria (Docket Number 171005976-7976-01)

To the U.S. Census Bureau:

The Association of Metropolitan Planning Organizations (AMPO) welcomes the opportunity to submit comments to the U.S. Census Bureau in response to the proposed updates to the boundaries and attributes of the block groups under the Participant Statistical Areas Program (PSAP) and the review and update of census tracts, census designated places, and census county divisions.

AMPO is a nonprofit, nonpartisan membership organization established in 1994 to serve the needs and interests of metropolitan planning organizations (MPOs) nationwide. Federal highway and transit statutes require, as a condition for spending federal highway or transit funds in urbanized areas, the designation of MPOs, which have responsibility for planning, programming and coordinating federal highway and transit investments. AMPO offers its member MPOs technical assistance and training, conferences and workshops, frequent print and electronic communications, research, a forum for transportation policy development and coalition building, and a variety of other services.

Since the passing of the Moving Ahead for Progress in the 21st Century Act (MAP-21), AMPO has been working diligently with its members and U.S. DOT to ensure that the performance-based planning framework established by Congress in MAP-21 and defined by U.S. DOT through the recently finalized performance measures is successfully implemented and integrated into the transportation planning and programming process.

The intent of establishing a performance-based approach is to ensure that the project selection process is data-driven and accountable. Together, MPOs and State Departments of Transportation (State DOTs) plan, maintain, and operate much of the nation's transportation network. As part of this process, MPOs and State DOTs develop federally required transportation plans and products using census data on employment, housing, and demographics to inform the selection of future transportation projects. In doing so, the MPOs and State DOTs seek to deliver a high-quality transportation network that is safe, reliable, and accessible for all.

The 2020 Census data and the subsequent American Community Survey (ACS) will provide critical information that allows for MPOs to make informed decisions about the future of our nation's transportation network. As the U.S Census Bureau reviews the boundaries and attributes of the block groups under the Participant Statistical Areas Program (PSAP), AMPO encourages the consideration of the following recommendations:

- Determine minimum employment thresholds needed to have an equivalent level of sampling validity as population thresholds have for both the block group and census tract levels;
- If population sample size requirements are a reasonable sample size proxy for employment sample size needs, the minimum employment thresholds could be the same thresholds as population: block group - 600; census tract - 1,200;
- Have no maximum employment threshold;
- Add these employment thresholds as alternative criteria of the standard block group type or census tract type;
- Allow PSAP participants to use their own local employment data to justify delineating within these thresholds;
- Allow employment number to be reflective of 2010 to current year data, or projections for growth by approximately 2020.

Employment data is a cornerstone of travel modelling therefore, it is critical that job locations as well as residences are accurately incorporated into the planning process. AMPO and its members believe that the adoption of these recommendations will improve the ability of MPOs to deliver a high-quality transportation network that is safe, reliable, and accessible for all. We are supportive of efforts to modernize the Census in ways that could provide potential cost savings, increase participation, and improve data quality. However, accurate information is critical as MPOs strive to best meet the needs of their regions and communities.

Thank you for your consideration on this important issue. Should you have any questions, please contact Bill Keyrouze at 202-624-3680 or bkeyrouze@ampo.org.

Sincerely,



DeLania L. Hardy
Executive Director
Association of Metropolitan Planning Organizations