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STEERING COMMITTEE**

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*We Bring Value-Added Census Data and Education to the User*

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May 9, 2018

Vincent Osier  
Chief, Geographic Standards, Criteria, and Quality  
U.S. Census Bureau  
4600 Silver Hill Road, Room 4H173  
Washington, DC 20233-7400  
Email: [geo.psap.list@census.gov](mailto:geo.psap.list@census.gov)

Dear Dr. Osier—

The Census Bureau has issued requests for comments concerning criteria for Census Tracts and Block Groups (Docket number 171005975-7975-01).

I am writing on behalf of the State Data Center (SDC) Steering Committee to offer our comments. The SDC network includes state government statistical agencies, research offices, and data-providing organizations from 56 states and territories. We partner with the Census Bureau to provide training, technical assistance, and extension of Census products in our states. The Steering Committee represents the interests of these organizations, and coordinates activities with the Census Bureau.

Our Steering Committee supports most of the criteria for Tracts and Block Groups that were published in *Federal Register*, February 15, 2018. The general principles and criteria are consistent with our understanding of the Tracts and Block Groups concepts and data users' needs for local, sub-county geographies and tabulation units.

The criteria are very similar to those published in 2008 for use in 2010-2019 data products. We appreciate and commend the Census Bureau for improving on the criteria, to prioritize the alignment of Census small area boundaries with American Indian Reservation boundaries and Trust Lands (ORTLs) boundaries, where such alignment is possible.

Most of our comments in this letter concern one aspect of the present *Federal Register* notice: "special use" Tracts and Block Groups.

We are aware of the comments posed by other stakeholders, requesting additional local flexibility in delineating Block Groups and Tracts. Specifically, we are aware that the CTPP

Program Board of AASHTO is commenting and requesting that the Census Bureau allow local employment centers with less than 600 population to be delineated as “standard” Block Groups, if such areas have employment concentrations.

The State Data Center Steering Committee understands the CTPP Board’s intent, but we disagree with their solution. We doubt that expanded eligibility for “standard” Block Groups would serve the purpose of Block Groups. Block Groups serve as the smallest unit of tabulation for American Community Survey (ACS), a survey of population and housing characteristics. An employment concentration does not aid sample sufficiency, as employers (and jobs) are not respondents to the ACS.

Having said that, we do support and recommend that PSAP participants be allowed expanded flexibility to designate parks or nature preserves, government-held lands, airports, large open water bodies, etc., as “special use” Block Groups and Tracts. It is useful to explicitly distinguish these areas with no population as their own geographic units.

An obstacle to designating “special use” Block Groups or Tracts though is the Bureau’s proposed requirement that spatial area (acreage) be comparable in size to adjacent “standard” Block Groups and Tracts. This is the last sentence of section 5.c. in the *Federal Register* notice. We find this an unneeded complicating hurdle, and we recommend that sentence be removed.

Also, we support the specific idea that the Census Bureau allow local employment centers with no housing and no population to qualify as an additional type of “special use” Block Group, with a *lower* spatial area (acreage) minimum threshold: 1/2 square mile in urban areas; 1 square mile in rural areas.

In the *Federal Register* notice, the last three sentences of section 5.c. were published:

If the special land use census tract/block group is delineated in a densely populated, urban area, the census tract/block group must have an area of approximately one square mile or more. If the special land use census tract/block group is delineated completely outside an urban area, the census tract/block group must have an area of approximately 10 square miles or more. Any resulting special use census tract/block group should be at least as large in area as the adjacent standard, populated census tracts/block groups.

The State Data Center Steering Committee proposes that this language be revised as follows:

If the special land use census tract/block group is delineated in a densely populated, urban area, the census tract/block group must have an area of **at least one square mile; or, if worksites there have employment totaling at least 600 jobs at worksites, then an area of at least 1/2 square mile.** If the special land use census tract/block group is delineated completely outside an urban area, the census tract/block group must have an area of **at least 10 square miles; or, if worksites there have employment totaling at least 600 jobs at worksites, then an area of at least 1 square mile.**

Employment centers such as central business districts and corporate campuses are often spatially compact and *less* than 1 square mile in urban areas. Again, we find the last sentence of

section 5.c. in the *Federal Register* notice is an unneeded hurdle, and that this restriction can be removed.

Thank you for your attention to our comments. The SDC Steering Committee considers PSAP a valuable and necessary program for ensuring that local geographic summarizations of Census data will address local needs.

Our network members are here to support the Census Bureau's work. Our steering committee can be reached at [todd.graham@metc.state.mn.us](mailto:todd.graham@metc.state.mn.us), or by US mail: Todd Graham, Metropolitan Council, 390 North Robert Street, St. Paul, MN 55101.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Graham".

Todd Graham  
Chairman, Census SDC Steering Committee

cc: Allen Barnes, Arizona State Data Center  
Gregg Bell, University of Alabama  
Michael Moser, Vermont State Data Center  
Suzan Reagan, Bureau of Business and Economic Research (New Mexico)  
Pam Schenker, Florida Office of Economic and Demographic Research  
Jenn Shultz, Pennsylvania State Data Center  
Melissa Stefanini, Tennessee State Data Center  
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