

Comments in response to Federal Register Notice 83 FR 34111

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To: POP 2020 DataProducts <pop.2020.dataproducts@census.gov>;

TO: Karen Battle, Chief, Population Division, U.S. Census Bureau

FROM: Lane Council of Governments, Eugene, Oregon

RE: Comments in response to Federal Register Notice 83 FR 34111

Lane Council of Governments (LCOG) is a voluntary association of over 20 local governments in Lane County, Oregon, and is also the federally-designated Metropolitan Planning Organization (MPO) for transportation planning in the Central Lane County region. LCOG planners and analysts rely extensively on Census data in order to conduct work on behalf of member agencies and other regional partners. LCOG provides access to and analysis of Census data for cities, counties, school districts, rural fire districts, library districts, and other local units of government, as well as the real estate community, mortgage lending institutions, and economic development partnerships throughout the region. Any changes in the way Census data are collected, tabulated, or reported which would degrade the accuracy or the geographic specificity of the data would make LCOG's work more difficult and less effective.

Much of LCOG's work with Census data is critical for compliance with specific laws and regulations. For example, as part of its role as the MPO, LCOG relies on Census data to comply with federal requirements under Title VI of the Civil Rights Act of 1964. Compliance with those and other requirements relies in part on the geographic specificity of the data, down to the Block and Block Group levels. Any degradation of the accuracy, reliability, or specificity of Census information would make this important work more difficult.

Another example is the region-wide property research data warehouse and website which LCOG maintains in collaboration with partner agencies. The database is widely used at all levels of local government in the region, as well as by the real estate community, mortgage lending institutions, economic development partnerships, and the general public, and supports over 200,000 queries and reports each month. Data from the American Community Survey (ACS) provides important neighborhood-level and community-level context for the specific properties being examined. New limitations imposed on the accuracy or geographic specificity of the Census data would undermine the value of that tool, and would hamper local economic development efforts.

These are just two specific examples of the many ways that Census data are used and relied upon by LCOG and its member governments. At the state level, Census data are used to develop annual estimates of city and county population, which are then used by state and local governments for revenue sharing, funds allocation, and planning purposes. While much of the routine use of Census data is now focused on the ACS, the higher degree of accuracy inherent in the decennial Census products provides a critical check on the accuracy and reliability of the ACS estimates, and enables the correction of these postcensal estimates, which are produced locally as well as at the state and federal level.

