

April 16, 2018

To: Vincent Osier
Geographic Standards, Criteria, and Quality Branch
Geography Division
U.S. Census Bureau

From: Kathleen Lomako
Executive Director
Southeast Michigan Council of Governments (SEMCOG)

Re: Census Tracts and Block Groups for the 2020 Census – Proposed Criteria

I am writing in response to the Federal Register Notice of February 15, 2018, 83 FR 6937 and 83 FR 6941, providing notices of the proposed programs for Census Tracts and Block Groups for the 2020 Census. We have two specific concerns with the proposed criteria.

First, Michigan is not marked with an “X” in the “all MCD boundaries” column in Table 1 in both notices.

Michigan is a **strong MCD state**. Townships in Michigan are MCDs. Townships are a prominent part of Michigan’s system of local government. There are **1,240** townships in Michigan which are all actively functioning governmental units. Townships govern the **96%** of Michigan’s land area outside of cities, in which over **58%** of Michigan's property values are located. Townships provide essential services to over **51%** of Michigan's citizens, according to the Michigan Townships Association.

The Michigan Constitution and state law provide for the authorities and responsibilities of Michigan counties, cities, villages, as well as townships. They are, in a very real legal sense, “creatures of the state.” Unlike townships in some other states that are referred to as “unincorporated units of government,” the Michigan Constitution designates townships in Michigan as corporate bodies with the right to sue and be sued. Thus, townships in Michigan have the authority of corporations provided in common law, while unincorporated townships elsewhere rely on state statutes for all of their powers to enforce contracts.

Currently, we have hundreds of census tracts drawn along township lines. Township boundaries are extremely stable and well-marked. Allowing township lines to form tract and block group boundaries is critical for effective delivery of census data to all municipalities in Michigan. Therefore, we believe that **Michigan should be marked with an “X” in the “all MCD boundaries” column in Table 1 in both Federal Register Notices.**

Second, the Census Bureau should allow employment tracts and block groups where there is zero or very low population but many jobs.

There are many areas in the nation, particularly in urban regions, where no or very few people live, but many people work. Understanding employment characteristics of these places and analyzing travel flows from these places are essential for such important work as planning for roads and transit. This is increasingly important because the Census Bureau has decided to terminate the use of Traffic Analysis Zones (TAZs) for data tabulation and dissemination.

We believe the Census Bureau should allow for tracts and block groups to also be created using employment thresholds as criteria. This is critical for analyzing place-of-work data provided by the census. Without such employment tracts or block groups, employment areas may be contained in tracts or block groups that are too geographically large for effective use in transportation planning, employment counts could be extremely high, or employment and population could be highly mixed which makes travel analysis very difficult.

Employment thresholds may be set as the same as population thresholds, e.g., minimum 600 jobs for block groups and 1,200 jobs for tracts. Employment numbers could be from LEHD (Longitudinal Employer-Household Dynamics). Local employment numbers should also be allowed for determining tract and block group boundaries. In summary, tracts and block groups may be delineated based on **either** housing unit/population thresholds **or** employment thresholds, but not both.