

[COMMUNITY LETTERHEAD]

[DATE]

Daniel Sweeney
Deputy General Counsel for Economic, Statistical, and Regulatory Affairs
Office of the General Counsel
U.S. Department of Commerce
Washington, DC 20230

Re: Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (FR Doc. 2026-18481, RIN 0607-AA75)

Dear Mr. Sweeney:

On behalf of **[COMMUNITY NAME]**, we appreciate the opportunity to comment on the Census Bureau's proposed changes to residence criteria and demographic data collection for the decennial census.

[COMMUNITY NAME] is home to approximately **[TOTAL POPULATION]** residents. Our community relies on accurate and detailed Census data to understand population change, plan infrastructure and public services, support economic development, and make informed decisions about the needs of our residents.

We are concerned that the proposed changes could result in Census population and demographic data that do not fully represent the people who live, work, study, contribute to, and depend upon services in our community.

[Choose from talking points below that makes most sense for your community]

Proposed Residence Criteria

Under the proposed rule, foreign citizens who are U.S. citizens or lawful permanent residents would be included in the apportionment population, while other foreign citizens would not. The proposal would also define a person's usual residence based on where the individual lawfully spent the greatest number of days during a January 3–April 1 census enumeration period.

Our community is home to approximately **[NUMBER]** of immigrant residents with lawful temporary or other non-permanent status who live, work, attend school, own or rent homes, purchase goods and services, and contribute to our local economy and tax base.

Individuals living in our community on work visas, student visas, and other lawful temporary statuses create real demand for housing, transportation, infrastructure, emergency response, and other community services. Excluding these residents from the apportionment population would

create a disconnect between the Census population count and the population our community must actually plan for and serve.

We are also concerned about defining usual residence using the January 3–April 1 period.

[OPTIONAL LOCAL EXAMPLE: Our community has residents who temporarily spend part of the winter elsewhere while maintaining their permanent home and ties to this community.] The residence criteria should ensure that temporary seasonal location does not outweigh an individual's established usual residence.

Potential Impact on Federal Funding

Accurate Census data are also important because Census-derived population and demographic information is used in the administration and distribution of funds for numerous federal programs.

If Census population measures underrepresent the number of people actually living in our community, programs that use Census-derived population or demographic data could potentially allocate resources based on a population that does not reflect the number of residents our community must serve.

For **[COMMUNITY NAME]**, even a relatively small undercount could have financial consequences over the decade in which 2030 Census data are used, while the community would continue to bear the cost of providing infrastructure and services to residents who were excluded from the applicable Census population measure.

OPTIONAL COMMUNITY-SPECIFIC PARAGRAPH: [COMMUNITY NAME] currently receives approximately \$[AMOUNT] annually through [FEDERAL PROGRAM/PROGRAMS]. These resources support [TRANSPORTATION/HOUSING/COMMUNITY DEVELOPMENT/INFRASTRUCTURE/OTHER SERVICES]. Changes that result in Census-derived population or demographic measures that do not fully represent our community could affect the data used to determine future eligibility, allocations, or program needs.

For local governments, this creates a fundamental concern: **the population used to inform public investment should accurately reflect the population generating demand for those investments and services.**

Race and Ethnicity Data

Our community is increasingly diverse. Approximately **[NUMBER] residents, or [PERCENT] percent of our population, are people of color and/or Hispanic or Latino.** Accurate race and ethnicity data allow us to understand where populations live, how our community is changing, and whether programs and investments are effectively reaching our residents.

While these characteristics could continue to be collected through the American Community Survey (ACS) and other sources, the ACS is a sample survey and estimates for smaller communities, geographic areas, and population groups can have significant margins of error.

Reduced access to reliable, detailed demographic information could make it more difficult for our community to conduct neighborhood and housing analysis, plan transportation and infrastructure, understand changing community needs, conduct effective public engagement, and evaluate the impacts of public investments.

Requested Action

We respectfully encourage the Census Bureau to reconsider the proposed changes and ensure that the 2030 Census continues to provide an accurate and useful representation of the populations living in our communities. Specifically, we ask the Census Bureau to:

1. Preserve population measures that reflect the people who live in and contribute to our communities, including lawful non-permanent residents;
2. Further evaluate the January 3–April 1 residence period and its potential effect on seasonal populations;
3. Preserve reliable and geographically detailed race and ethnicity information needed by communities for local decision-making;
4. Maintain comparability with previous censuses so that communities can reliably measure demographic change over time; and
5. Evaluate and clearly communicate the impacts these proposed changes could have on Census-derived data used by federal programs and local governments.

An accurate Census is essential not only for representation, but also for understanding the communities that government serves. **[COMMUNITY NAME] must plan infrastructure, provide services, and make investments for the people who actually live here. Census population and demographic data should provide an accurate foundation for those decisions.**

Thank you for considering the concerns of **[COMMUNITY NAME]** as the Census Bureau evaluates these proposed changes.

Sincerely,

[NAME]

[TITLE]

[COMMUNITY NAME]