SEMCOG Comment Letter on Proposed 2030 Census Changes

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

The Southeast Michigan Council of Governments (SEMCOG), the metropolitan planning organization for Southeast Michigan, appreciates the opportunity to comment on the Census Bureau's proposed rule governing residence criteria and demographic questions for the 2030 decennial census. We are concerned that the proposed changes would reduce the accuracy of our region's population count and affect our access to federal and state resources along with limiting our ability to produce reliable data products necessary for us to function as an MPO and a regional council of governments.

SEMCOG urges the Census Bureau to retain a census that counts the full resident population, counts them where they usually live, and that produces consistent, reliable, and sufficiently detailed demographic data. Communities must plan infrastructure, transportation, housing, emergency services, education, and other public programs for

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every person who lives in and create demand within them, regardless of citizenship or immigration status.

Specific Policy Concerns

- **Exclusion from the apportionment population.** The proposed rule would limit the apportionment count to U.S. citizens and lawful permanent residents, excluding lawfully immigrated temporary workers, international students, refugees, and people with other temporary or humanitarian statuses. These residents live in and are served by their communities and excluding them would disconnect official population totals from the number of people who rely on transportation, housing, infrastructure, emergency services, and other local resources.
- **Reduces comparability and weakens forecasting.** Changing who is counted and where would disrupt historical trends and reduce our ability, as an MPO, to develop reliable demographic forecasts, travel-demand models, housing analyses, and long-range transportation plans.
- **Replacement of the established usual-residence standard.** The proposed shift to counting residents based on where they spend the most time during a January 3 - April 1 period, rather than their usual residence throughout the year, could affect our population count of seasonal residents such as retiree "snowbirds" / university students / part-time workers / other mobile population. Lower or geographically shifted counts could reduce representation and population-based funding for our region and communities that must still serve the full resident population.
- **Funding Impacts:** Census counts and Census-derived annual population estimates guide the allocation of federal and state resources, including transportation funds and state revenue sharing. An undercount could leave states, MPOs, and local governments with fewer resources to serve their full populations. Because decennial Census counts serve as the benchmark for the next decade, the resulting funding impacts could persist for years.
- **Reliance on legal presence and tax records.** The proposed framework would consider lawful physical presence and consistency with other administrative records. These sources do not reliably capture every resident or household arrangement and could misallocate students, non-tax files and children, seasonal residents, people with multiple residences, low-income households, and others with incomplete or conflicting records and make Census results harder to reconcile with other datasets.
- **Possible legal-status question on the short form.** The proposal seeks comment on adding a citizenship or immigration-status question or combining questionnaire responses with administrative records. Either approach could suppress self-response and increase costly follow-up in hard-to-count communities already at risk of undercount.
- **Removal of race and ethnicity questions.** The proposal would eliminate race and ethnicity questions on the short-form census questionnaire. Accurate block level demographic data is essential to local and small area planning

including equitable access to services, community outreach, economic development programs, environmental review, and transportation corridor analysis.

- **Permanent regulatory constraints on census design.** Codifying these changes in federal regulation would reduce the Bureau's flexibility to test, refine, and select methods based on evidence, stakeholder input, operational experience, and evolving data needs before 2030 and in future censuses.
- **Insufficient time for review of major changes.** The proposed rule provides less than a typical 90-day comment period for consequential changes to apportionment, residence criteria, questionnaire content, and data production. That period is inadequate for rigorous analysis by state, regional, local, and community stakeholders to assess the impacts and provide meaningful input.

Requested Action

SEMCOG respectfully requests that the Census Bureau withdraw or revise the proposed changes and:

- Count all people at their usual residence using a stable standard that remains comparable with prior census.
- Do not limit apportionment counts by citizenship or immigration status.
- Retain race and ethnicity questions and publish useful small-area demographic data with appropriate privacy protections.
- Evaluate the operational and data-accuracy impacts of the enumeration timeline of January 3-April1 and explain the rational supporting it.
- Use administrative records to supplement—not replace—direct enumeration, local knowledge, and field follow-up.
- Fully test and publicly document the geographic, fiscal, operational, and data-quality effects of any methodological change before implementation.

An accurate and trusted decennial census is foundational to representative government, fair distribution of public resources, and evidence-based decision-making. The proposed changes would make the 2030 Census less complete, less comparable, and less useful to the state, regional, and local agencies responsible for serving the public. SEMCOG therefore opposes these changes and urges the federal government to preserve a comprehensive, consistent, and transparent census.

Thank you for the opportunity to comment.

Sincerely,

Amy O'Leary
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Executive Director
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