

Calvin Gladney
President & CEO
Smart Growth America
1152 15th St NW
Suite 450
Washington, DC 20005

October 22, 2021

Dr. Ron Jarmin
Acting Director
U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233
2020DAS@census.gov

SUBJECT: 2020 Census Data Products

Dear Dr. Jarmin:

We, the undersigned, represent advocacy organizations, government agencies at the state and local level, researchers at universities and think tanks, and other leaders in urban and regional research. We *strongly object* to proposed changes to 2020 Census Data Product availability¹ as the social costs (inability to conduct research or forcing researchers to conduct lower quality research) far exceed hypothetical concerns about privacy disclosure. Specifically, limiting the Demographic and Housing Characteristics (DHC) file, and its detailed version (Detailed DHC) to the county level would harm important research and analysis efforts.

We believe that previous Census Data Products (such as the 2010 Census) already did well to balance concerns over disclosure while empowering users, researchers, and communities with information for decision-making. Additionally, a recent paper by Ruggles and Van Riper² strongly deflates the Bureau's concerns about privacy disclosure, making this entire exercise into an unnecessary deprivation of useful public data in the DHC.

The DHC lets us see important categories of race, ethnicity, age, and household tenure (in addition to dozens of useful tables) at the Census block level (up to block group and tract). We

¹ 83 Fed. Reg. 34111-34112 (2018); U.S. Census Bureau (Sept. 30, 2021), available at: <https://content.govdelivery.com/accounts/USCENSUS/bulletins/2f179ae>

² Ruggles, S. and D. Van Riper (2021). The role of chance in the Census Bureau database reconstruction experiment. *Population Research and Policy Review* (aop). <https://doi.org/10.1007/s11113-021-09674-3>

need this detail to see our communities in their full light and to distinguish one part of town from another using data.

We can fairly say that significant research efforts conducted at our organization would be made impossible, or severely reduced in quality, should the Bureau move forward.

Here are just some examples of research questions and areas of inquiry that would be unavailable to urban and regional researchers if the DHC were limited:

- Environmental justice analysis (as otherwise required by the Environmental Protection Act) where transit projects are assessed based on their impact to protected classes of race, ethnicity, and age (seniors).
- Understanding patterns of homeownership and rental tenure as they differ within a city used to further goals of increasing homeownership in certain areas of a city; or to target services to renters.
- Real estate market demand analysis that identifies age patterns within a city to help cities and developers understand key market segments.
- Studies of multigenerational housing used to justify the provision of accessory dwelling units or to target social services.
- Identifying areas of the city where there are concentrations of same-sex couples in order to provide for LGBTQ positive services.

Research efforts would be made impossible without these tables in Decennial DHC provided at the block level. The alternative of using the American Community Survey (ACS) mitigates research efforts by forcing a block-group level analysis (rather than block) and introduces higher margins of error and statistical noise into such analyses. Further, not all DHC tables are equally paralleled in the ACS, making the ACS an imperfect alternative. Many tables will be eliminated.

Collectively, there are millions of dollars funding research in these important areas of inquiry across all our organizations because local communities and foundations see the value in knowing detail about our cities and towns. More importantly, there are millions of lives impacted by important decisions made as a consequence of this research.

Without these important Census Data Products our organizations cannot provide communities key insights that they use to make key service and funding decisions, or other decisions about the built environment. The Bureau would be purposefully blinding communities to their own data-based realities, and for very little benefit over a flawed concern about data disclosure.

We urge the Census Bureau to continue to release its Census Data Products at the same geography as it previously has in the 2010 Decennial Census. We find no reason for the Bureau to cause such research harm with these proposed changes.

Sincerely,

Calvin Gladney
President & CEO
Smart Growth America

Co-Signed:

Paul Owens
President
1000 Friends of Florida

Stacie Reidenbaugh
President and CEO
10,000 Friends of Pennsylvania

Kyle Whitehead
Managing Director of Public Affairs
Active Transportation Alliance

Beth Gibbons
Executive Director
American Society of Adaptation
Professionals

Roxanne Blackwell
Director of Federal Government Affairs
American Society of Landscape Architects

Jean Hamerman
Executive Director
Center for Creative Land Recycling

Dara Baldwin
Director of National Policy
Center for Disability Rights

Camille Manning-Broome
President & CEO
Center for Planning Excellence

Kate Múspell
Planner
CPEX

Dr. Myriam Igoufe
Vice President of Policy Development and
Research
Dallas Housing Authority

Catherine Califano
First Deputy
Department of Planning and Development
City of Philadelphia

Rob Bennett
CEO
EcoDistricts

Alison D Goebel
Executive Director
Greater Ohio Policy Center

Scott Wolf
Executive Director
Grow Smart Rhode Island

Barbara Deutsch
Chief Executive Officer
Landscape Architecture Foundation

Caron Whitaker
Deputy Executive Director
League of American Bicyclists

Veronica Hahni
Executive Director
Los Angeles Neighborhood Initiative

Marc Draisen
Executive Director
Metropolitan Area Planning Council, Boston

Morgan Turner
Program Officer
Mile High Connects

Chris Sandvigi
Executive Director
Mobilify Southwestern Pennsylvania

Kelli Refer
Advocacy & Communications Director
Move Redmond

Jennifer Dill
Director
National Institute for Transportation and
Communities

Liming Wang
Association Professor
Portland State University

John Kaehny
Executive Director
Reinvent Albany

Alex Posorske
Executive Director
Ride New Orleans

Ellie White
Senior Associate
RMI

Zeke Mermell
Senior Transportation Planner & Urban
Designer
Sam Schwartz Engineering

David Bragdon
Executive Director
TransitCenter

Alex Hudson
Executive Director
Transportation Choices Coalition

Elizabeth Beardsley
Senior Policy Counsel
U.S. Green Building Council

Dr. Arthur C. Nelson
Professor
University of Arizona

Dr. Vincent Reina
Associate Professor and Faculty Director
Housing Initiative at Penn
University of Pennsylvania

Dr. Ann Owens
Associate Professor of Sociology
University of Southern California

Dr. Stephen Mattingly
Professor of Civil Engineering and Director
of the Center for Transportation Studies
University of Texas at Arlington

Mike Kingsella
CEO
Up for Growth Action

W. Edward Walter
Global CEO
Urban Land Institute