

May 15, 2018

Mr. Vincent Osier  
Geographic Standards, Criteria, and Quality Branch  
Geography Division, U.S. Census Bureau  
4600 Silver Hill Road, Room 4H173  
Washington, DC 20233-7400

Re: Block Groups for the 2020 Census – Proposed Criteria (Docket Number 171005975-7975-01) 171002956-7974-01) Census Tracts for the 2020 Census – Proposed Criteria (Docket Number 171005976-7976-01) (83 FR 6941)

To the U.S. Census Bureau:

The American Association of State Highway and Transportation Officials (AASHTO) welcomes the opportunity to submit comments to the United States Census Bureau in response to the proposed updates to the boundaries and attributes of the block groups under the Participant Statistical Areas Program (PSAP) and the review and update of census tracts.

AASHTO is a nonprofit, nonpartisan association representing highway and transportation departments in the 50 states, the District of Columbia, and Puerto Rico. AASHTO represents all five transportation modes: air, highways, public transportation, rail, and water. Its primary goal is to foster the development, operation, and maintenance of an integrated national transportation system. AASHTO works to educate the public and key decision makers about the critical role that transportation plays in securing a good quality of life and sound economy for our nation. AASHTO serves as a liaison between state departments of transportation and the Federal government.

The 2020 Census data and the subsequent American Community Survey (ACS) will provide critical information that allows for state departments of transportation to make informed decisions about the future of our nation's transportation network. As the Census Bureau reviews the boundaries and attributes of the block groups under the PSAP, AASHTO encourages the consideration of the following recommendations:

- Determine minimum employment thresholds needed to have an equivalent level of sampling validity as population thresholds have for both the block group and census tract levels;
- If population sample size requirements are a reasonable sample size proxy for employment sample size needs, the minimum employment thresholds could be the same thresholds as population: 600 for block group and 1,200 for census tract;
- Have no maximum employment threshold;

- Add these employment thresholds as alternative criteria of the standard block group type or census tract type;
- Allow PSAP participants to use their own local employment data to justify delineating within these thresholds, and;
- Allow employment number to be reflective of 2010 to current year data, or projections for growth by approximately 2020.

Employment data is a cornerstone of travel modelling therefore, it is critical that job locations as well as residences are accurately incorporated into the planning process. AASHTO and its members believe that the adoption of these recommendations will improve the ability of state departments of transportation to deliver a high-quality transportation network that is safe, reliable, and accessible for all.

We are supportive of efforts to modernize the Census in ways that could provide potential cost savings, increase participation, and improve data quality. However, accurate information is critical as state departments of transportation strive to best meet the needs of their stakeholders.

Thank you for your consideration on this important issue. Should you have any questions, please contact Penelope Weinberger at 202-624-3556 or [pweinberger@ashto.org](mailto:pweinberger@ashto.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Bud Wright", written in a cursive style.

Bud Wright  
Executive Director  
American Association of State Highway and Transportation Officials