

United States Senate

WASHINGTON, DC 20510

March 19, 2021

Mr. Dominic J. Mancini
Deputy Administrator
Office of Management and Budget
725 17th Street NW
Washington, DC 20006

RE: FR Doc. 2021-00988: Request for Comments on Recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee to the Office of Management and Budget Concerning Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas

Dear Deputy Administrator Mancini:

We write to express our concern regarding the Metropolitan and Micropolitan Statistical Area Standards Review Committee's proposed changes to the 2010 standards for determining metropolitan and micropolitan statistical areas and urge you to reconsider the Committee's recommendation.

The designations of Metropolitan and Micropolitan Statistical Areas have important ramifications for the counties, cities and towns that receive these designations. While the Office of Management and Budget (OMB) has stated that these designations are established solely for statistical purposes and are not intended to be used in program funding formulas, several federal programs and agencies rely on these designations for the allocation of funding and provision of services. For example, the statutory authorization for the Community Development Block Grant explicitly defines a "metropolitan area" as a standard metropolitan statistical area as established by OMB.¹

The Metropolitan and Micropolitan Statistical Area Standards Review Committee has recently recommended that the minimum urban area population to qualify as a Metropolitan Statistical Area be increased from 50,000 to 100,000. Because of the reliance on this designation by various federal agencies and programs, this change could result in the loss of federal programming for many small- and mid-sized counties, cities and towns across the country. Furthermore, these recommendations have been proposed without the ability to comprehensively understand the potential ramifications of such changes or an explanation as to what will trigger future threshold increases—potentially allowing future changes to be made in an arbitrary manner.²

Additionally, the coronavirus pandemic has also led thousands of people to temporarily migrate to new areas of the country outside of their permanent homes. According to data from the United

¹42 U.S.C. The Public Health and Welfare. Chapter 69 – Community Development. Sec. 5302 - General provisions.

<https://www.govinfo.gov/content/pkg/USCODE-2010-title42/html/USCODE-2010-title42-chap69-sec5302.htm>

² Williams, Jennifer. (June 6, 2014). Congressional Research Service. *Metropolitan Area Designations by OMB: History, 2010 Standards, and Uses*. https://www.crs.gov/Reports/R42005?source=search&guid=845966875653426a98cdf4445e8fd849&index=0#_Toc1487789

States Postal Service, nearly 16 million people changed addresses during the pandemic—an increase of almost four percent from the year before.³ This significant increase in people moving as a result of the pandemic demonstrates that population data based on the calendar years of 2020 or 2021 is likely to be misleading and inaccurate in predicting long-term trends about where Americans will choose to live.

Given the anticipated negative impact of this proposed change and the inability to accurately track where Americans will choose to permanently settle following the coronavirus pandemic, we respectfully request that you reconsider the Committee’s recommendation to increase the minimum urban area population to qualify as a metropolitan statistical area, and instead establish a comprehensive process to engage with relevant stakeholders to fully evaluate the impact of such a change on the distribution of federal resources and services to arrive at any future proposed change.

Thank you for your time and attention to this important matter.

Sincerely,

/S/ Amy Klobuchar
Amy Klobuchar
United States Senator

/S/ Kevin Cramer
Kevin Cramer
United States Senator

/S/ Charles Schumer
Charles E. Schumer
United States Senator

/S/ John Hoeven
John Hoeven
United States Senator

/S/ Tina Smith
Tina Smith
United States Senator

/S/ Patty Murray
Patty Murray
United States Senator

/S/ Tammy Baldwin
Tammy Baldwin
United States Senator

/S/ Angus S. King, Jr.
Angus S. King, Jr.
United States Senator

/S/ Chris Van Hollen
Chris Van Hollen
United States Senator

/S/ Jeffrey A. Merkley
Jeffrey A. Merkley
United States Senator

³ Bowman, Cynthia. (February 17, 2021). MyMove. *Coronavirus Moving Study: People Left Big Cities, Temporary Moves Spiked In First 6 Months of COVID-19 Pandemic*. <https://www.mymove.com/moving/covid-19/coronavirus-moving-trends/>

/S/ Elizabeth Warren
Elizabeth Warren
United States Senator

/S/ Sherrod Brown
Sherrod Brown
United States Senator

/S/ Robert P. Casey, Jr
Robert P. Casey, Jr
United States Senator

/S/ Dick Durbin
Richard J. Durbin
United States Senator

/S/ Tim Kaine
Tim Kaine
United States Senator

/S/ Benjamin L. Cardin
Benjamin L. Cardin
United States Senator

/S/ Ron Wyden
Ron Wyden
United States Senator

/S/ Mark R. Warner
Mark R. Warner
United States Senator

/S/ Raphael Warnock
Raphael Warnock
United States Senator

/S/ Debbie Stabenow
Debbie Stabenow
United States Senator

/S/ Jon Ossoff
Jon Ossoff
United States Senator

/S/ Joe Manchin III
Joe Manchin III
United States Senator