

April 14, 2009

Susan Schechter,  
Chief, American Community Survey Office,  
Room 3K276,  
Mail Stop 7500,  
Washington, DC 20233-7500

Dear Ms. Schechter:

The American Association of State Highway and Transportation Officials (AASHTO), with input from the Standing Committee on Planning and the Census Transportation Planning Products Oversight Board, strongly opposes the action proposed by the US Census Bureau as noted in the March 6, 2009 Federal Register to revise the American Community Survey 5-year data planning products.

The American Community Survey is a critical data source for transportation planning and related regional transportation investment. The Survey provides the backbone of detailed data necessary for transportation planning activities required under Title 23: Highways, Part 450 – Planning and Assistance Standards. In addition to severely hindering the abilities of state and metropolitan planners to meet Federal statutes and related guidance as developed and distributed by the US Federal Highway Administration (FHWA), US Federal Transit Administration, Environmental Protection Agency (EPA), and others, the proposed changes to data available under the American Community Survey (as posted in the March 6, 2009 Federal Register) will in fact hurt the very communities they are designed to protect: small rural communities, low income communities, and other environmental justice populations where English is not the primary spoken language.

The American Community Survey was fully implemented in 2005 with the support of Congress and replaces the long form of the Census. Through the American Community Survey, the US Census Bureau collects, “Detailed data for socioeconomic characteristics over the course of the decade providing yearly, up-to-date information to federal users and our nation’s communities.” The American Community Survey also provides, “Timely, accurate information for every county, city, and neighborhood—the level where the most crucial decisions affecting American communities are made.”<sup>1</sup>

For transportation planning applications, it is understood that the 5-year American Community Survey will produce data similar to that previously provided in the Census long form. A report published by the

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<sup>1</sup> According to the Prepared Statement of Charles Louis Kincannon, Director, US Census Bureau, before the Subcommittee on Federal Financial Management, Government Information and International Security Committee on Homeland Security and Governmental Affairs, US Senate, 6 June 2006.  
<http://hsgac.senate.gov/public/files/060606Kincannon.pdf>.

US General Accounting Office (GAO) notes that, “According to the (Census) Bureau, the 5-year averages, which would be available at the detailed long-form level of geographic detail, would be about as accurate as the long-form data.”<sup>2</sup> Because the American Community Survey was to serve as the replacement of long-form data, the national transportation community responded with a new set of Census Transportation Planning Products that rely on data from the 1-year, 3-year, and 5-year American Community Survey data tabulations.

By limiting the detailed tabulations as proposed, however, the American Community Survey will not, in fact, accomplish the goal in the March 6 Federal Register, which notes, “One Goal of the (American Community Survey) is to provide small area data similar to the data published after Census 2000, based on the long-form sample.” If the posted changes to the 5-year products of the American Community Survey take effect, Census data will be of limited value to the transportation community. To this end, AASHTO Standing Committee on Planning, with the Census Transportation Planning Products Oversight Board, has noted the following related limitations as they pertain to statewide, metropolitan, and local/community planning, where the proposed changes to the American Community Survey would:

- **Prohibit metropolitan areas from meeting planning requirements detailed in 23 CFR 450.322**, where data at the block-group level are required. This will primarily affect analysis of journey-to-work for most tracts and block groups. Additionally, detailed analysis for transit routes, enhancements, and New Starts will be greatly hindered, since data for these analyses is already limited.
- **Hinder the calibration and development of accurate travel demand models and regional performance metrics**. Proposed legislation for surface transportation reauthorization, while still in draft form, will likely mandate additional performance monitoring and reporting across states and metropolitan regions. Limits on data availability will curtail the usefulness and development of activity-based models and accessibility metrics which rely on these detailed data, as well as the calibration of current travel demand models. This will also greatly limit efforts related to emergency response planning for hurricanes and other disasters.
- **Limit the efforts of local, regional, and statewide efforts to minimize the impacts of transportation enhancements on environmental justice populations and to provide services for these populations**, including programs related to job access and reverse commute, mobility needs of transit-dependent populations and temporary assistance for needy families, improvements for American’s with disabilities, and others.
- **Limit the ability of the transportation community to evaluate transportation choices and land use patterns; a critical need in the context of national climate change strategies**. Those involved in the climate change debate have argued for more, not less, data availability to fully understand these relationships.

In sum, the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of state, metropolitan, and local planning organizations to deliver on goals and objectives mandated in Federal law as well as those supported under Executive Order by FHWA, FTA,

<sup>2</sup> The US Government Accountability Office, The American Community Survey: Accuracy and Timeliness Issues, 30 Sep 2002, <http://www.gao.gov/products/GAO-02-956R>.

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Allen D. Biehler, President  
Secretary, Pennsylvania Department of Transportation

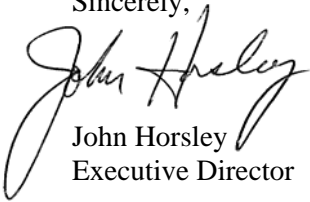
John Horsley, Executive Director

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and EPA, as critical for enhancing statewide, metropolitan, and rural quality of life. The transportation community needs more information from the US Census Bureau, as well as more time, to better assess the impacts of disclosure avoidance rules and to provide suggestions for solutions to meet the needs of the planning community. Understandably, some data from the American Community Survey may not be suitable for dissemination and use by the general public; however, providing these data, including caveats regarding reliability, to state and local governments to maintain and enhance decision-making is essential for the transportation planning activities required by Federal law and necessary for ensuring responsible transportation planning for all Americans in metropolitan and rural areas alike.

Sincerely,



John Horsley  
Executive Director