

# KAMPO

Kansas Association of Metropolitan  
Planning Organizations

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April 17, 2009

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

Dear Ms. Schechter:

The Kansas Association of Metropolitan Planning Organizations (KAMPO) represents 5 Metropolitan Planning Organizations (MPOs) in Kansas, coordinating with state and federal agencies (please see list at bottom of the page). KAMPO members rely on relatively small geographic level demographic and related data from the Census Bureau to develop the many transportation programs and plans addressing growth in our regions. We are very concerned about the transition that the Census Bureau is making from the census long-form sample to the American Community Survey (ACS), specifically with the level of data detail that will be available through the ACS, as described in the March 6, 2009 Federal Register.

According to prior information on the ACS that we have seen from the Census Bureau itself and from other federal agencies, we have been led to believe that the data available from the ACS would be at the "county, city, and neighborhood" level, and at the "detailed long-form level of geographic detail." Based on statements such as these, we have been anticipating ACS data tabulations that would provide as much detail as prior Census products. However, the information discussed in the March 6, 2009 Federal Register notice, and particularly the restrictions on the release of data to meet disclosure requirements, will seriously impact the amount of data actually available for smaller geographic area analysis.

The limitation in small area data will make it much more difficult to address significant issues that are important for the country's future progress. It will also constrain decisions that must be made at a local level. It is vital that information be provided at a relatively small geographic level. The proposed changes, as we understand them, will impact:

- Metropolitan Planning Organization Federal Legislation Compliance –
  - Travel Demand Models are integral to the development of practical project programs, the reduction in information will dramatically limit the usefulness of the information these models provide.
  - MPOs' ability to efficiently produce accurate plans and programs that effectively addresses long-and short-range issues requiring precise and complete data.
- Land Use – to effectively address land use impacts on transportation, planners must have access to relatively small geographic level data that makes it possible to fully evaluate the relationship between land use and demographic patterns and transportation choices.

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- Social Equity – to effectively address social equity, planners must understand the composition of the population in terms of disabilities or other mobility impairments, transit-dependent populations, households receiving temporary assistance for needy families (TANF), limited English proficiency, and environmental justice status (low incomes and minority population concentrations) and be able to relate those individuals and households to job opportunities, and job access and reverse commute needs at a small geographic scale. Reports, plans, and programs would become next to impossible to do in any meaningful way.
- Effective Transportation – in an era of decreasing transportation funding, performance-based planning takes on greater urgency. To ensure that limited transportation resources are deployed as effectively as possible to support the nation’s economic activity, planners must have access to data that supports detailed analysis of a range of transportation options in the context of actual traveler behavior at a relatively small geographic level.

KAMPO is concerned that the proposed rules as detailed within the March 6, 2009 Federal Register will clearly and adversely affect the ability of our regional planning agencies to respond to local, regional, state, and national goals and objectives. KAMPO encourages the Census Bureau to consider additional, creative solutions that would provide data at the level of detail to support responsible planning and decision-making. Understandably some data may not be suitable for the dissemination to the general public; however, with caveats on confidentiality, this information should continue to be provided to states and MPO’s. Only with this information will states and MPO’s be able to continue to make efficient and effective decisions.

Please consider extending the comment period and using the national agencies available such as National Association of Regional Councils (NARC) and the Association of Metropolitan Planning Organizations (AMPO) to provide more insight into the ramifications of this decision.

## **Kansas Association of Metropolitan Planning Organizations**

Lawrence-Douglas County Metropolitan Planning Organization  
Mid-America Regional Council  
St. Joseph Metropolitan Planning Organization  
Metropolitan Topeka Planning Organization  
Wichita Area Metropolitan Planning Organization

cc: Governor of Kansas  
KDOT Secretary  
Kansas Secretary of State  
US Senators from Kansas  
US Congressmen from Kansas  
FTA Region 7 Administrator  
FHWA Kansas Division Administrator

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