



November 29, 2021

Tom Morton

Director

U.S. Census Bureau Redistricting & Voting Rights Data Office/ADDC/HQ.

Department of Commerce

1401 Constitution Ave NW

Washington, DC 20230

RE: 2020 Decennial Census Count-City of Midland Comments

Dear Mr. Morton:

As I am sure you are aware, the importance of an accurate census count is integral to all communities. Census results have several high-profile applications: they are used to reapportion seats in the House of Representatives, to realign congressional districts, and as a factor in the formulas that distribute hundreds of billions of dollars in funds each year. An accurate census count is also integral to potential future revenue's which will leads to an increase in opportunities for businesses, health care improvements, and poverty abatement in our metro area. The City of Midland, therefore, would like to have this area reevaluated for accuracy.

The City of Midland and the Midland Metro area has been among the fastest growing regions in the United States, both in terms of its population and economy. Together with technological changes; increased energy productivity and other advances, we are combining our economic power to generate global significance. The City of Midland uses Census information to determine the "natural" changes in population and growth by age group, income and ethnicity. The most difficult segment of population to track in real-time is the low-moderate income census tracts, therefore, we are estimating a census undercount for our city-county to be between 10% to 20% in the 2020 decennial count. When you add the energy sector dynamics, we may also be underestimating the 2020 decennial.

Migration is treated as endogenous to our systems, thus allowing population to vary in extreme ways in accordance with energy performance (particularly employment). Oil and gas exploration and production and related activity are major drivers of the Midland and Permian Basin economies. We believe that the census count for City of Midland and Midland County grossly missed the mark and will cost our community vital federal, and state funding.

While the Census takers performed admirably, including counting people staying at campgrounds, RV parks, "man camps", hotels, people under bridges, in parks, group quarters etc., for enumeration, we think some citizens were missed. Early on, Census Bureau staff assisted our city to encourage online response, including \$80,000 in public service advertising. We worked with service providers at soup kitchens, shelters, and local food banks to include the people they serve. Finally, with the COVID-19 outbreak, the lack of or delay by the U.S. Census Bureau to deploy census takers forced our Midland Complete Count Committee to adapt or delayed some of our census operations to protect the health and safety of our staff and the public. The impact on specific communities and sectors that is distinct from what was captured must then be factored into the forecast analysis.

We have run preliminary reviews of what we feel were underrepresented census tracts for Midland. We will soon determine final housing unit count and occupancy, thereby populating any relevant data on household size into our population count and finalizing the results that we feel should be included in the apportionment count.

Thank you for hearing our preliminary appeal of the Census data report. The City of Midland remains committed to assisting the Census Bureau in determining an accurate count in our area.

Sincerely,

A handwritten signature in blue ink, appearing to read "Charles Harrington", with a stylized flourish at the end.

Charles Harrington  
Director of Development Services