

United States Senate

March 16, 2021

Mr. Dominic J. Mancini
Deputy Administrator
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: Docket Number OMB-2021-0001

Dear Mr. Mancini,

I write to express serious concerns with a proposal by the Metropolitan and Micropolitan Statistical Area Standards Review Committee (the Committee) to alter the standards for delineating Metropolitan Statistical Areas (MSAs). The proposal, drafted during the previous Administration and noticed in the Federal Register by your office on January 19, 2021, would increase the minimum urban area population to qualify for MSA designation from 50,000 to 100,000.

Increasing the population threshold to qualify for an MSA would have serious negative impacts on a number of cities across the state of Alabama, including Florence, Muscle Shoals, Decatur, Gadsden, Anniston, Oxford, Auburn, Opelika, Dothan, Daphne, Fairhope, and Foley. A significant number of Federal grant programs are only accessible to cities designated as MSAs. Altering the existing standards in the manner proposed would prevent the aforementioned cities from utilizing these programs, many of which provide vital resources to underserved communities. The change in designation would also undermine the ability of these cities to recruit industry, as some companies maintain either a preference or a policy for locating new facilities only in MSAs.

Alabama cities are not the only jurisdictions that would suffer as a result of the Committee's proposed change to the MSA population threshold. Some 144 mid-sized cities across the nation would see their efforts to improve the healthcare, education, and employment opportunities of their citizens undermined as a result of this proposed policy change.

In addition to the negative outcomes the Committee's proposal would produce, I also have concerns about the proposal's underlying rationale. The Committee asserts a need to double the lower bound of the population range required to qualify as an MSA, but it makes no change to the lower bound required to qualify for a micropolitan statistical area. This underscores that the proposed change to the MSA threshold is both inconsistent and arbitrary.

I urge you to take these facts into consideration as you review the proposed rule, and I hope that the Committee will reverse its decision to double the population threshold required to qualify for MSA designation. Should you have questions about how this rule would impact Alabama, please do not hesitate to contact me or Emory Cox of my staff.

Sincerely,

A handwritten signature in blue ink that reads "Tommy Tuberville". The signature is fluid and cursive, with a large, sweeping initial "T" and a long horizontal line extending across the middle of the name.

Tommy Tuberville
United States Senator