BEND METROPOLITAN PLANNING ORGANIZATION 709 NW Wall Street, Suite 102, Bend, OR 97703 www.bendmpo.org

March 16, 2021



Re: Standards for Delineating Metropolitan and Micropolitan Statistical Areas (OMB-2021-0001-0001)

Dear Acting Director Fairweather,

RITA SCHENKELBERG City of Bend Council

City of Bend Council

BARB CAMPBELL, CHAIR City of Bend Council

PHIL CHANG Deschutes County Commission

MEGAN PERKINS, VICE-CHAIR

ROBERT TOWNSEND ODOT Region 4

> TYLER DEKE, AICP Manager

JOVI ANDERSON Program Coordinator

ANDREA NAPOLI, AICP Senior Planner On January 19, 2021, the Office of Management and Budget (OMB) published a notice and a request for public comment on multiple recommendations from the Metropolitan and Micropolitan Statistical Area Standards Review Committee. We are writing in response to Committee's recommendations to increase the urban area population needed to qualify as a Metropolitan Statistical Area (MSA) from 50,000 to 100,000.

While we understand metropolitan area delineations are used for statistical purposes at OMB, these designations are also used by numerous federal agencies to establish eligibility for some federal programs and grant opportunities. The request for comment is incomplete as it does not fully describe or reference the potential list of changes to federal programs that could impact affected communities. Moreover, changes to federal programs and grams and funding.

We are requesting a delay in any action on this proposed change until a full disclosure of potential impacts to federal programs is known. Delaying action and generating a list of potential impacts will allow potentially impacted communities to make informed comments.

Please contact me if you have any questions.

Barb Campbell, Chair