



March 26, 2021

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

RE: Response to Federal Register 2021-00988

Dear Mr. Mancini,

North Dakota strongly opposes the Office of Management and Budget's (OMB's) proposed criteria for Metropolitan Statistical Area (MSA) designation, which would increase the minimum urban area population from 50,000 to 100,000. Under this proposed increase, North Dakota would lose two of its current MSA designations, for Bismarck and Grand Forks, and put MSA designation further out of reach for the growing city of Minot. Removing the MSA designation from these cities would be detrimental to policymakers, private industry and our state.

The proposal does not consider the downstream impact to those communities that would be affected. Comments in the Federal Register state "... OMB does not take into account or attempt to anticipate any public or private sector nonstatistical uses that may be made of the delineations." However, numerous federal programs use these definitions to provide statistical information such as the Bureau of Labor Statistics' Current Employment Statistics (CES) and Housing and Urban Development's Community Development Block Grants (CDBG). Without defining the downstream application of this proposed change, those smaller MSAs will be at risk of losing funding from federal programmatic agencies as well as information from federal statistical agencies. This could put heavily rural areas of the country such as North Dakota at a disadvantage to those areas that retain more MSA designations under this proposal.

Without accounting for these impacts and defining how the change in MSA criteria will be implemented, the uncertainty and risk to smaller MSAs is unacceptable. We urge the Office of Management and Budget to abandon this course of action and retain its existing MSA designation criteria.

With Gratitude,

A handwritten signature in blue ink that reads "Doug Burgum".

Doug Burgum
Governor