



March 19, 2021

Acting Director Rob Fairweather  
Office of Management and Budget  
725 17<sup>th</sup> Street NW  
Washington, D.C. 20503

**RE: Recommendations From the Metropolitan and Micropolitan Statistical Area Standards Review Committee of the Office of Management and Budget Concerning Changes to the 2010 Standards for Delineating Metropolitan and Micropolitan Statistical Areas**

*Submitted electronically to Regulations.gov, Docket OMB-2021-0001*

Dear Mr. Fairweather:

On behalf of the Rural County Representatives of California (RCRC), we wish to express our concern with the Metropolitan and Micropolitan Statistical Area Standards Review Committee's recommendation to reclassify Metropolitan Statistical Areas (MSAs) and thereby double the minimum urban area population to 100,000 people. RCRC is an association representing thirty-seven of California's fifty-eight counties, and the RCRC Board of Directors is comprised of elected supervisors from each member county.

While we acknowledge the Office of Management and Budget uses these designations for statistical purposes, there will certainly be downstream effects that could potentially impact the affected communities and effectively preclude them from a variety of funding and/or economic activity from public and private sources. California has five MSAs which would be affected by the committee recommendation including Chico (Butte County), Hanford-Corcoran (Kings County), Madera (Madera County), Napa (Napa County), and San Luis Obispo-Paso Robles (San Luis Obispo County).

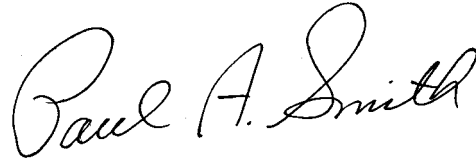
We caution the Office of Management and Budget from accepting these proposed recommendations at this time and urge the Metropolitan and Micropolitan Statistical Area Standards Review Committee to undergo a more in-depth review of the *non*statistical activities and effects of this change which will undoubtedly occur.

Thank you for your consideration.

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | Fax: 916.448.3154

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Sincerely,

A handwritten signature in black ink that reads "Paul A. Smith". The signature is written in a cursive, flowing style.

PAUL A. SMITH  
Senior Vice President Governmental Affairs

cc: Members of the Butte County Board of Supervisors  
Members of the Madera County Board of Supervisors  
Members of the Napa County Board of Supervisors  
Members of the San Luis Obispo Board of Supervisors