NSDA
NATIONAL SPECIAL DISTRICTS ASSOCIATION

November 2, 2026

U.S. Census Bureau
4600 Silver Hill Road
Washington, DC 20233

Re: Docket USBC-2026-0628, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions

To the Census Bureau:

On behalf of special districts across the country, the National Special Districts Association (NSDA) appreciates the opportunity to comment on the Census Bureau's proposed rule, Decennial Census of the Population of Americans; Proposed Residence Criteria and Proposed Regulations for Demographic Questions (Docket No. USBC-2026-0628). Special districts are independent units of local government, created by the people of a community, that provide essential public services including drinking water, wastewater, fire protection, emergency medical services, flood control, roads, bridges, ports, airports, public transit, healthcare, conservation, parks and recreation, libraries, irrigation, mosquito control and other critical infrastructure. NSDA submits these comments to explain how special districts use census data and why a complete and accurate count matters to them and to the counties, cities and towns they serve alongside.

Special districts are part of the intergovernmental system that works together with other local governments, tribes, states and the federal government. An inaccurate census count, either as a result of regulatory changes or lack of participation, hurts the whole community, not only the people missed. While NSDA appreciates the intent of reforming the definition of usual residence to count everyone only once, changing the way people who seasonally live in different places are counted could harm both communities where that person lives. Seasonal residents assigned to the wrong location inflate one area's figures and shrink another's. The Census' proposed method to count seasonal residents could affect special districts that serve rural, gateway communities, resort and agricultural areas.

Census Bureau data show that special districts numbered more than 40,000 in 2025, accounting for over four in ten of the over 91,000 local governments. Most are small, many serve rural communities, and nearly all have lean staff and no in-house demographers. Because special district boundaries are not part of census geography and the Bureau does not publish their populations, districts must calculate service-area populations using census block and tract data. Accurate decennial counts at every geographic levels are therefore essential to planning services, sizing infrastructure, and competing for federal funding. These counts also support the next step in understanding special districts as a growing segment of

local government: measuring the populations special districts serve. Changes that make block-level counts less accurate would hinder this work.

Special districts rely on census data to plan services. Water and wastewater districts use population data to assess system capacity and plan capital facilities financed over decades. Fire and emergency medical services districts use it to plan station locations and service coverage, and hospital districts use it to plan bed capacity. Emergency evacuation, disaster response and hazard mitigation plans all depend on knowing who lives where. Park and library districts also size their services to the number of people they serve.

Many programs that serve communities where special districts operate use population thresholds to set eligibility, grant rates or cost share. USDA's Water and Waste Disposal program is limited to areas of 10,000 or fewer residents, and its Community Facilities program to areas of 20,000 or fewer. FEMA's Assistance to Firefighters Grants set the local cost share based on the population a department serves. Many grant applications also require local governments, including special districts, to cite census population and income figures to show need and compete for funding.

As special districts continue their longstanding role in local government, consistent and comparable data from 2020 to 2030 will help everyone in the intergovernmental system distinguish real growth from changes in counting methods. Responsible stewardship of taxpayer resources requires accurate planning data.

NSDA asks the Census Bureau to state in the final rule that the population data it publishes for planning, funding and eligibility will reflect every resident at their usual residence, regardless of how the apportionment population is defined. NSDA also respectfully requests that the Census Bureau engage with all local governments, including special districts, as it finalizes its methods for the 2030 Census. NSDA offers itself as a resource for additional examples of how small and single-purpose governments use census data.

Thank you for considering NSDA's comments. We welcome continued dialogue on the practical effects of the proposed rule on special districts and the communities they serve.

Sincerely,



Ann Terry
President
National Special Districts Association