

August 22, 2016

Ms. Karen Humes
Chief, Population Division
United States Census Bureau
Room 6H174, Washington, DC 20233

By email to: POP.2020.Residence.Rule@census.gov

Dear Ms. Humes:

As a private citizen, a leader of the League of Women Voters of Lawrence Township, and a former member of the Steering Committee of the New Jersey Integrated Justice Alliance, I am submitting this comment in response to the Census Bureau's Federal Register Notice regarding the Residence Rule and Residence Situations, 81 FR 42577 (June 30, 2016).

I strongly oppose the Census Bureau's proposal to continue counting incarcerated people as "residents" of prison locations, rather than at their home address (which is almost always their legal address) in their home community. If made final, this proposed rule would mean another decade of public decision-making -- ostensibly for the public good -- based on inaccurate and misleading Census Bureau figures.

American demographics and living situations have changed drastically in the two centuries since the first Census, and the Census itself has evolved in response to many of these changes in order to continue to provide an accurate picture of the nation. The country's enormous prison population mandates that the bureau adapt once again. Counting incarcerated people as if they were residents of the facility where they happen to be located on Census Day ignores the transient and temporary nature of present-day incarceration.

By designating a prison facility as a residence in the 2010 Census, the Bureau concentrated a population that is disproportionately male, urban, and minority to just a few thousand Census blocks that are located far from the actual homes of incarcerated persons. When this data is used for redistricting, it artificially inflates the political power of the areas where the jails are situated and dilutes the political power of all other urban and rural areas without large prisons.

Furthermore, in 2015, when the Bureau asked for public comment on its proposed Residence Rules, the overwhelming majority of public comments regarding incarcerated people urged the Bureau to count incarcerated individuals at their home address. This level of consensus among stakeholders, based on a thorough understanding of the realities of modern incarceration, deserves far more consideration than it has thus far been given.

Please re-write your Bureau's 2020 Residence Rule to count prisoners at their home addresses!

Sincerely yours,

Nicole Plett