



July 14, 2015

Karen Humes, Chief of Population Division  
US Census Bureau  
4600 Silver Hill Road  
Washington, DC 20233

Dear Ms. Humes:

Colorado Common Cause submits this comment in response to the Census Bureau's federal register notice regarding the Residence Rule and Residence Situations, 80 FR 28950 (May 20, 2015). For purposes of the census, we urge you to count incarcerated people at their last-listed home address, rather than at the particular facility where they happen to be incarcerated on Census Day.

Redistricting is a top issue for Colorado Common Cause. We believe districts should fairly represent their communities. When county populations include people incarcerated in area prisons, state legislators use inaccurate information when re-drawing Congressional and legislative districts. The Census Bureau, to which most states – including Colorado – refer when apportioning residents for redistricting purposes, has the power to change this practice.

As with many other states, the majority of people incarcerated in Colorado's prisons are convicted in urban counties but incarcerated in prisons located in rural counties. For example, fifty percent of the people admitted to prison in Colorado in 2012 were convicted in the urban counties of Denver, Arapahoe, Jefferson, and El Paso, but the great majority of incarcerated people in Colorado were housed in rural counties. Fremont County, Colorado, represents the most egregious example. Only 1.23% of the Colorado Department of Corrections' 2012 public prison population had a home address in Fremont County, but the county's six state prisons are the incarcerated address for 29 percent of the state's 2012 public prison population.

Since the African American and Hispanic/Latino populations are disproportionately incarcerated in Colorado, and these populations tend to live in the state's urban areas,

these populations are also misrepresented during the census by counting their prison cell as their residence. Votes cast in these prison districts carry more weight than others as a result of the artificial residency number, while the urban districts where the prisoners are from have less; this is a fundamental unfairness we seek to redress.

Thank you for this opportunity to comment on the Residence Rule and Residence Situations. Because Colorado Common Cause believes in a population count that accurately represents communities, we urge you to count incarcerated people as residents of their home address on Census Day.

Sincerely,

A handwritten signature in black ink, appearing to read 'ENUN', with a long horizontal flourish extending to the right.

Elena Nunez  
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