



# CITY OF FLAGSTAFF

## OFFICE OF THE MAYOR

211 West Aspen Avenue, Flagstaff, Arizona 86001

Main Line: 928-213-2000

Website: <https://www.flagstaff.az.gov>

March 16, 2021

The Honorable Rob Fairweather  
Acting Director Office of Management and Budget  
725 17th Street Northwest  
Washington, D.C. 20503

Dear Acting Director Fairweather:

The Flagstaff City Council is writing to express our strong opposition to a recommendation made by the Metropolitan and Micropolitan Statistical Area Standards Review Committee (the Committee) to increase the urban area population needed to qualify as an MSA from 50,000 to 100,000. If implemented, this recommendation could have significant negative impacts on Flagstaff's eligibility to receive federal funding.

In the *Federal Register* Notice posted on January 19, 2021, the Committee notes that in its review and revision of metropolitan and micropolitan statistical area standards, it does not take into account any non-statistical uses for these areas. This is alarming as these area delineations are used by a variety of federal agencies to determine eligibility for federal funding. If this recommendation were to be implemented, the City of Flagstaff could potentially be excluded from multiple federal funding opportunities, including transportation improvement funding, rural economic development initiatives and Community Development Block Grants (CDBG), among other programs.

The City of Flagstaff annually receives approximately \$600,000 in CDBG funds and received a separate allocation in 2020 related to the CARES Act. In a typical year, the City then leverages these funds at a 4:1 ratio with other private or public funds to assist an average of five different non-profits every year, as well as fund internal projects for the City that benefit low and moderate income individuals and households. Made possible with funding from CDBG, the City of Flagstaff and these various partner agencies have increased community transitional housing units by 13, created seven new Permanent Supportive Housing beds, expanded the largest homeless shelter in Northern Arizona by 77 beds, rehabilitated over 80 low-income owner occupied homes with crucial health and safety improvements and provided funds for sheltering individuals experiencing homelessness in motel rooms for the past nine months to prevent the spread of COVID-19 amongst these high risk and vulnerable community members. This is a small snapshot of the impact the CDBG program has on our community.

In addition to the negative impacts on federal funding that the proposed recommendation would have, the Committee has not provided a compelling rationale of public benefit or improved statistical analysis that would be achieved by the proposed recommendation. Furthermore, robust coordination and collaboration with other relevant federal departments and agencies, such as the Departments of Agriculture, Health and Human Services, Housing and Urban Development and Transportation is necessary before the adoption of any changes to fully understand the depth of possible impacts.

For these reasons, the Flagstaff City Council requests that OMB maintain the current MSA population threshold and reject the proposed recommendation. Doing so will ensure that communities such as Flagstaff continue to receive the federal funding we rely upon to provide essential services and support programs to our residents

Thank you for your attention to this matter of critical importance, and please accept our best regards.

Sincerely,



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Paul Deasy  
Mayor of Flagstaff

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Becky Daggett  
Vice Mayor of Flagstaff

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Austin Aslan  
Flagstaff City Councilmember

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Jim McCarthy  
Flagstaff City Councilmember

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Regina Salas  
Flagstaff City Councilmember

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Adam Shimoni  
Flagstaff City Councilmember

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Miranda Sweet  
Flagstaff City Councilmember