WHAT THE PROPOSED RULE SAYS Published Sept. 10, 2026 (91 FR 57524). Comments closed Nov. 2, 2026.

Who is counted, and where (Part 60). People who are not U.S. citizens or green card holders, including students, workers on visas, refugees, and asylum seekers, would not be counted for apportionment (§ 60.4). Everyone else would be counted where they spent the most days from Jan. 3 to April 1, matched to tax records (§ 60.2, § 60.6).

What the census asks (Part 70). The form could not ask about race, ethnicity, or sexual orientation, and only sex, date of birth, and household relationship would be required (§ 70.2). Demographic data could not be published if privacy protection would add any uncertainty to state or national counts (§ 70.3).

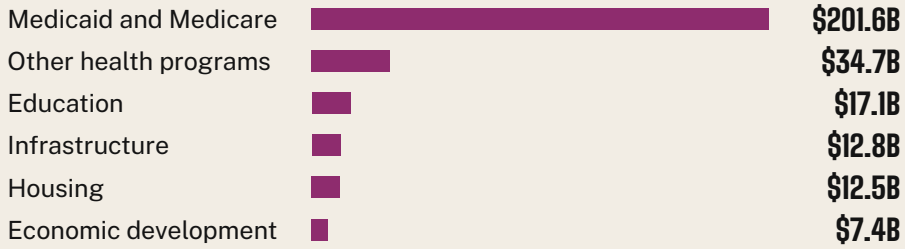
What it would mean: less accurate, less usable census data across the country.

WHAT IS AT STAKE FOR CALIFORNIA

$276.5 billion

of federal spending guided by census data went to California in fiscal year 2023, through 371 programs. That is the largest of 50 states and DC.

WHERE THAT MONEY WENT



POGO's rough rule of thumb: missing 1% of California's residents could shift about **$2.8 billion a year** until the next census. The real effect varies by program and by who is missed. Some programs count in more than one category. **SOURCES:** Sean Moulton and Janice Luong, "Census Matters: Why an Accurate Count Is Essential to Funding Our Communities" (POGO, Oct. 28, 2025) and its California fact sheet; Janice Luong and Sean Moulton, "How to Use POGO's Census Funding Data" (POGO, Mar. 19, 2026).

WHAT CALIFORNIA TOLD THE CENSUS BUREAU

11,959 comments came from California. **99% opposed the rule**. Of all comments that name a state, 97% opposed; of all comments, 88%.

11,959
COMMENTS
Most of 50 states and DC

99%
OPPOSED THE RULE
11,831 comments opposed; 125 supported

30
PER 100,000 RESIDENTS
21st highest of 50 states and DC; the median is 28

2,198
ASKED FOR MORE TIME
to comment on the rule

ISSUES CALIFORNIA COMMENTERS RAISED MOST

Share of comments raising each issue. California All comments that name a state



HOW TO READ THESE NUMBERS
Every published comment counts once, including each copy of a form letter. Position is inferred from each comment by the comment analysis. State is inferred from the comment text and is subject to error. About 62% of all 148,532 comments name a state, so state totals undercount. Most comments that support the rule (85%) name no state, so California is compared with all comments that name a state. The government and organization lists on page 2 are a sample, not everyone who commented; each was checked by reading the comment. Quotes are exact; individuals are described as they describe themselves.

A SAMPLE OF CALIFORNIA GOVERNMENTS AND OFFICIALS WITH OPPOSING COMMENTS

56 California governments and officials sent opposing comments, including the attorney general: 3 state agencies and officials, 10 tribal nations, 3 associations of local governments, and 39 local governments and regional agencies. Some of them:

ATTORNEY GENERAL

Signed multistate letters asking for more time (Sept. 21) and opposing the rule (Nov. 2)

STATE

California State Data Center (Department of Finance Demographic Research Unit)

TRIBAL NATIONS

Blue Lake Rancheria
Elk Valley Rancheria
Pechanga Band of Indians

ASSOCIATIONS OF LOCAL GOVERNMENTS

California State Association of Counties

LOCAL GOVERNMENTS AND REGIONAL AGENCIES

Alameda County Board of Supervisors
An Orange County supervisor (Second District)
Carlsbad City Council member
City of Fremont (mayor)
City of Fresno (mayor)
City of Garden Grove
City of Los Angeles (mayor)
City of Paramount
City of Sacramento (city manager)
City of Sunnyvale (mayor)
Contra Costa County Board of Supervisors
Los Angeles County (Board of Supervisors, Public Health, Consumer and Business Affairs)
Los Angeles County Office of Education (superintendent)
Public Health Alliance (11 Southern California health departments)
Sacramento Area Council of Governments (SACOG)

A SAMPLE OF CALIFORNIA ORGANIZATIONS WITH OPPOSING COMMENTS

Alianza
California Consortium for Urban Indian Health
California Immigration Project
Association of California Community and Energy Services
United Indian Health Services, Inc.
California Rural Indian Health Board
Southern Indian Health Council, Inc.
Native Directions, Inc.
California Dialogue on Cancer

IN THEIR WORDS: OPPOSING COMMENTS FROM CALIFORNIA

> *"Excluding undocumented residents from the population used for apportionment would fail to recognize the full population that lives and contributes to our community."*

City of Soledad, assistant city manager
rural agricultural community in Monterey County · Comment 147466

> *"As a physician, I cannot plan care around the assumption that some of the people living in my community do not count."*

Family physician, practiced for more than 30 years
started in San Bernardino County; writing as an individual · Comment 55892

> *"The proposed rule could result in undercounting the actual population that counties serve each day and that federal programs rely on to ensure services are delivered as intended."*

Marin County Board of Supervisors
population about 254,000, including rural West Marin · Comment 145572

> *"This experience has reinforced my conviction that everyone who lives in a community deserves to be seen and counted, regardless of housing circumstances or immigration status."*

Vietnamese American immigrant and photographer in San Jose
in San Jose 20+ years; writing as an individual · Comment 65898

> *"The new census rule would understate the population of California by the very people that help feed the nation."*

California resident
writing as an individual · Comment 106158

> *"The well-documented undercount of AI/AN people in 2020 and prior censuses has raised concerns about inadequate resources for Indian Country."*

Morongo Band of Mission Indians
reservation of nearly 40,000 acres in Riverside County · Comment 145493

Sources: public comments on docket USBC-2026-0628 at regulations.gov, as read and labeled by the analysts' comment analysis; position and state are inferred from each comment's text and are subject to error. Federal funding: Project On Government Oversight (POGO), Census Matters, Oct. 28, 2025 (fiscal year 2023 data). Prepared by Hands Off Our Census. Run Nov 23, 2026, 3:04 PM ET.

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