



## Town of Huntsville

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### To Whom it May Concern

This correspondence pertains to a disagreement regarding the legal boundary used to tabulate the residents of the Town of Huntsville, Tennessee in the 2020 Census. The information that follows is provided in conjunction with our challenge of the 2020 Census results that were reported by your agency in the Public Law 94-171 Redistricting Data release on August 12, 2021.

Our detailed review of the corporate limits shown in the redistricting data identified numerous inaccuracies. These include boundary corrections for which territory should be both added and removed from the town's municipal boundary. They also include a series of 18 annexations which occurred between August 2010 and June 2019. Each area was properly annexed by the Board of Mayor and Alderman of the Town of Huntsville in accordance with Tennessee statutes. Ordinances and resolutions were recorded as required and copies of each are provided. Collectively these errors are the basis for the town's boundary challenge under the Court Question Resolution program.

To fulfill the supporting documentation requirement for the boundary changes, ordinances or resolutions for each affected annexation have been included. The naming of these files corresponds to the 'DOCU' field in the 'cqr20\_Huntsville\_14700036640\_changes\_incplace' shapefile. These files can be found in the 'Annexation Ordinances-Resolutions' sub-folder under the 'Supporting Documentation' folder in this submittal.

In total, we identify 169 housing units that were impacted by the errors. Addresses for each unit were obtained from the State of Tennessee's Strategic Technology Solutions Next Generation 911 data. This data was gathered by the State Data Center at the University of Tennessee in 2019 prior to the commencement of counting activities and serving as further evidence of the unit's availability for occupancy by April 1, 2020. These addresses are listed in the Address List Template (XLSX) obtained from your website and provided with the documentation materials which we have prepared.

As further evidence of the unit's availability for occupancy by April 1, 2020, a catalog of aerial photos was created showing the location of each housing unit, its address and the addresses of surrounding housing units. The photography was acquired by Vexcel Imaging between September 16 – 19, 2019 for the Strategic Technology Solutions – Geographic Information Systems (STS-GIS) group at the Tennessee Department of Finance and Administration. A flight

index and letter from the STS-GIS Director provides additional information about the acquisition and is also provided as part of our supporting documentation.

These records are provided to confirm the existence of units which your agency has previously enumerated in 2020.

The CQR Participants Guide provides instructions on completing a digital submission and we provide the following materials in accordance with that guidance.

1. Address List
  - a. Address-list-template.xlsx
2. PDF Maps
  - a. Boundary comparison.pdf
  - b. Boundary comparison with blocks.pdf
3. Shapefiles
  - a. cqr20\_Huntsville\_14700036640\_changes\_incplace.shp
  - b. cqr20\_Huntsville\_14700036640\_WholeEntity\_incplace.shp
4. Supporting Documentation
  - a. Housing Unit Map Series.pdf
  - b. List of annexation documents.docx
  - c. Vexcel 2020 Access Distribution Letter -Education.pdf
  - d. Vexcel\_BlueSky\_FlightDatesMap\_2020.pdf
  - e. Annexation Ordinances (folder)

For ongoing communication regarding this CQR submission I designate the following contact to be an authorized representative of the Town of Huntsville:

Tim Kuhn, Director, Tennessee State Data Center, Boyd Center for Business and Economic Research, University of Tennessee-Knoxville, [tkuhn@utk.edu](mailto:tkuhn@utk.edu), (865) 974-6070.

Thank you for your consideration,

Sincerely,

A handwritten signature in black ink, appearing to read "D. Jeffers". The signature is fluid and cursive, with a large initial "D" and a stylized "Jeffers".

Dennis Jeffers  
Mayor