

DANNY JOWERS, MAYOR  
CHARLES CROUSON, CITY JUDGE  
SHAYNA JACKSON, RECORDER

**CITY OF KENTON**  
KENTON, TENNESSEE 38233  
(731) 749-5767

ALDERPERSONS:  
HAROLD BANKS, JR.  
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WADE SIMPSON  
SARAH SKINNER  
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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 Kenton, 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 several discrepancies between the city's adopted boundaries and data published by your agency. The area in question is primarily related to an annexation that occurred in 2001. On first reading, the Board of Mayor and Alderman annexed three areas into the Town of Kenton through its adoption of Ordinance 2001-07 on December 17, 2001. The annexation was codified after a third reading at the board's meeting on December 28, 2001 and immediately came into effect upon passage. The entirety of the area annexed in Ordinance #1120 remained in effect on January 1, 2020. The ordinance was recorded as required.

In addition to the areas marked I, II and III on the maps included with Ordinance 2001-07, our review also identified a second discrepancy on Kenton's northern boundary. Because the area was already within Kenton's corporate limit at the time Ordinance 2001-07 was adopted, it is shown as a correction on the boundary maps and within the shapefiles included with our submission.

To fulfill the supporting documentation requirement for the boundary changes we are submitting, we have included a copy of the annexation ordinance. The naming of this file corresponds to the 'DOCU' field in the 'cqr20\_Kenton\_14700039140\_changes\_incplace' shapefile. These files can be found in the 'Supporting Documentation' and 'Shapefile' folders within our submittal zip file.

In total, we identify 36 housing units that were impacted by the omission of these properly annexed areas within the Town of Kenton. Addresses for each of these living quarters 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 serve 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 11 and September 17, 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\_Kenton\_14700039140\_changes\_incplaceshp
  - b. cqr20\_Kenton\_14700039140\_WholeEntity\_incplaceshp
4. Supporting Documentation
  - a. Housing Unit Map Series.pdf
  - b. Ordinance\_2001-07.pdf
  - c. Vexcel 2020 Access Distribution Letter -Education.pdf
  - d. Vexcel\_BlueSky\_FlightDatesMap\_2020.pdf

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,



Danny Jowers  
Mayor