



# COLLIN COUNTY

Office of the County Judge  
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May 29, 2018

Department of Homeland Security  
U.S. Citizenship and Immigration Services (USCIS)  
California Service Center  
24000 Avila Road  
Laguna Niguel, CA 92607-0526

RE: EB-5 Designation of Targeted Employment Area

To Whom It May Concern:

As County Judge for Collin County, TX, by the authority granted to me by the State of Texas (letter attached), the following contiguous Collin County, Texas census block groups compose a Targeted Employment Area (TEA):

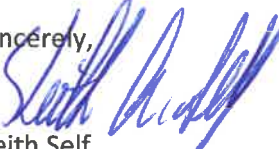
Block Group 4, Census Tract 309, Collin County
Block Group 2, Census Tract 310.01, Collin County
Block Group 2, Census Tract 310.04, Collin County
Block Group 2, Census Tract 314.07, Collin County
Block Group 3, Census Tract 314.07, Collin County

The site at the southwest corner of W. Princeton Dr., and Ticky Dr., Princeton, TX 75407 is located within Block Group 2 of Census Tract 3105.01, Collin County, Texas and is included in the TEA described above.

The determination of eligibility is based on analysis of labor force data and the application of the census-share method, as described in the U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics Program Manual. The unemployment calculations were made using the American Community Survey 2012–16 data for the purpose of establishing ratios of block group-to-county shares of employment and unemployment. Furthermore, county-level unemployment was obtained from the Bureau of Labor Statistics 2017 annual Local Area Unemployment Statistics. These data sets were used to determine the qualifying subareas with unemployment meeting or exceeding the current required threshold of 6.6%.

The 2017 unemployment rate in the area composed of the block groups described above is 7.4%, which exceeds the threshold rate of 6.6%, or 150% of the 2017 average national unemployment rate of 4.4%, according to the Bureau of Labor Statistics.

Sincerely,

  
Keith Self  
County Judge

Enclosure



May 17, 2018

Judge Keith Self  
Collin County Commissioners Court  
2300 Bloomdale Road, Suite 4192  
McKinney, TX 75071

Dear Judge Self,

My firm, Impact DataSource, studied the labor market and calculated block group unemployment rates to determine if the site at the southwest corner of W. Princeton Dr., and Ticky Dr., Princeton, TX 75407 is located in a geographic or political subdivision that meets the "high unemployment area" definition, 8 CFR 204.6(e) and (j)(6), ("HUA" or Targeted Employment Area "TEA"), thereby qualifying for the \$500,000 minimum investment threshold as a non-rural TEA for EB-5 program purposes. Impact DataSource has determined that the site at the southwest corner of W. Princeton Dr., and Ticky Dr., Princeton, TX 75407, which is located in Block Group 2 of Census Tract 310.01, Collin County, Texas, is located within an area that qualifies as a TEA.

Impact DataSource, an Austin, Texas economic consulting firm, is experienced in TEA calculations and the various TEA methodologies employed by states and accepted by the USCIS. In our consulting experience, we have prepared dozens of EB-5 job creation reports and assisted numerous clients obtain TEA certifications from states that meet USCIS requirements. In addition, Impact DataSource regularly assists cities in Texas prepare USCIS-compliant data and TEA certification letters.

The determination of eligibility is based on analysis of labor force data and the application of the census-share method, as described in the U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics Program Manual. In our census-share calculations, we relied on the most recent data from the American Community Survey produced by the U.S. Census Bureau to determine the proportion of county employment and county unemployment existing in specific census block groups. We also used the 2017 BLS annual average civilian employment and unemployment data for the county. These data sets were used to determine the qualifying census block groups with unemployment meeting or exceeding the current required threshold rate of 6.6% as described below.<sup>1</sup>

The proportion of county employment and the proportion of county unemployment existing in a specific census block group are calculated with the following formulae:

$$\text{Employment Factor} = \frac{\text{Census Block Group Employment}}{\text{County Employment}}$$

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<sup>1</sup> The qualifying high unemployment rate threshold is 150% of the 2017 national unemployment rate of 4.4%. Therefore, the qualifying high unemployment rate when using 2017 annual unemployment data is 6.6%.

$$\text{Unemployment Factor} = \frac{\text{Census Block Group Unemployment}}{\text{County Unemployment}}$$

The above calculations utilize county- and census block group-level data from the American Community Survey 2012–16.

Next, we apply the above factors to 2017 BLS annual average employment and unemployment data for the county in order to obtain the 2017 employment and unemployment figures for the census block group.

$$\begin{aligned} \text{2017 Census Block Group Employment} \\ &= \text{Employment Factor} \\ &\times \text{2017 BLS Annual Average County Employment} \end{aligned}$$

$$\begin{aligned} \text{2017 Census Block Group Unemployment} \\ &= \text{Unemployment Factor} \\ &\times \text{2017 BLS Annual Average County Unemployment} \end{aligned}$$

Finally, we determine the census block group unemployment rate using the following formula:

$$\text{2017 Census Block Group Unemployment Rate} = \frac{\text{2017 Census Block Group Unemployment}}{\text{2017 Census Block Group Labor Force}}$$

where

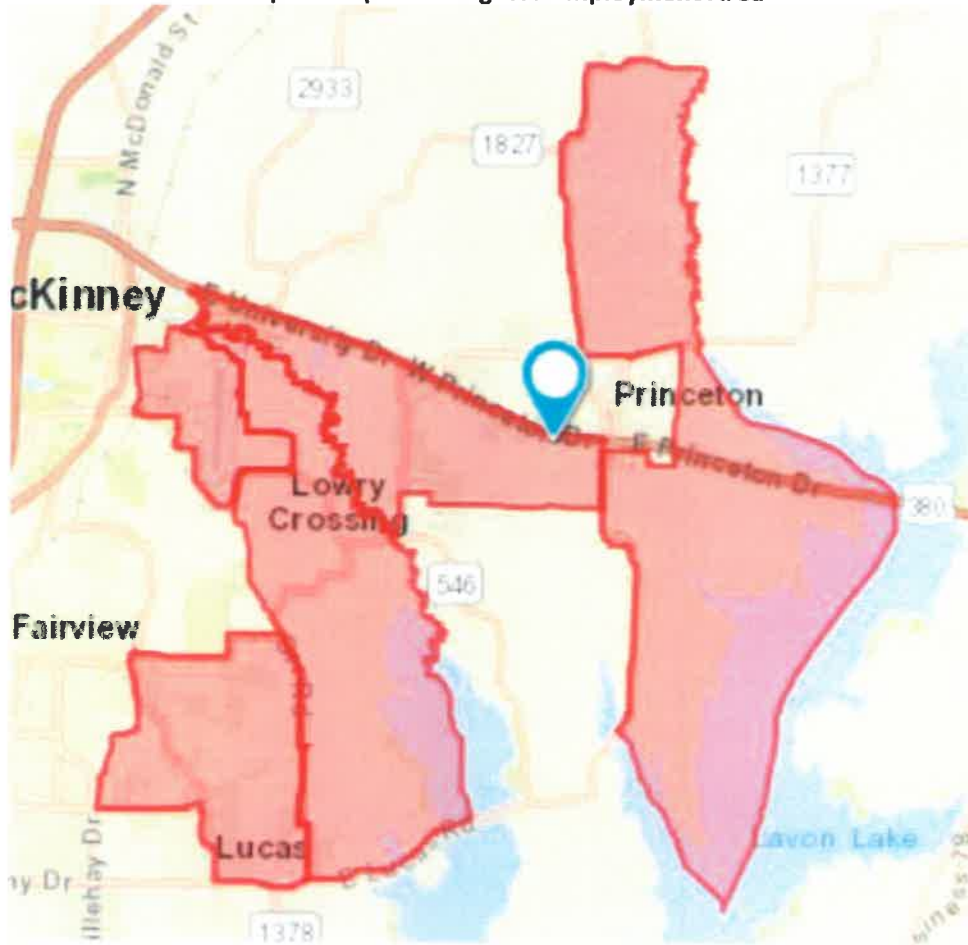
$$\begin{aligned} \text{2017 Census Block Group Labor Force} \\ &= \text{2017 Census Block Group Employment} \\ &+ \text{2017 Census Block Group Unemployment} \end{aligned}$$

The table below summarizes the census block group unemployment rate data for the TEA encompassing the site at the southwest corner of W. Princeton Dr., and Ticky Dr., Princeton, TX 75407.

<b>Unemployment Estimates for Selected Block Groups</b>				
<b>Based off of Census-Share Calculations Utilizing ACS 12-16 and BLS 2017 Annual Average</b>				
<b>Block Group</b>	<b>Labor Force</b>	<b>Employed</b>	<b>Unemployed</b>	<b>Unemployment Rate</b>
Block Group 4, Census Tract 309, Collin County	798	716	82	10.3%
Block Group 2, Census Tract 310.01, Collin County	1,448	1,414	34	2.3%
Block Group 2, Census Tract 310.04, Collin County	1,712	1,578	134	7.8%
Block Group 2, Census Tract 314.07, Collin County	2,423	2,196	227	9.4%
Block Group 3, Census Tract 314.07, Collin County	587	549	38	6.5%
<b>Combined Area</b>	<b>6,968</b>	<b>6,453</b>	<b>515</b>	<b>7.4%</b>

The census block group area is shown in the map below. The project locations are indicated by the pins.

### Map of Proposed Targeted Employment Area



Former Governor Rick Perry delegated authority to certify TEAs in Texas to County judges and City mayors (this authority is still valid as of the date of this memo under current Governor Greg Abbott). Based on that authority, I would like to formally request a TEA certification for the proposed site. Please let me know if you have any questions about this analysis.

Sincerely,

Michael Kester, Partner and Economist  
Impact DataSource, LLC