

Memo From: Robert Soltau, Manager
To: Stateline Area Transportation Study
Date: October 18, 2010
In Re: Analysis of the Census Bureau Notice of Proposed Rulemaking of August 24, 2010

After the national census, every ten years the Census Bureau classifies each area as Rural, an Urban Cluster, or an Urbanized Area (UA). Prior to doing this the Bureau issues a Notice of Proposed Rulemaking (NPRM) describing the rules to be used in making these determinations as was published in the Federal Register on August 24, 2010.

Urbanized Areas are regions of at least 50,000 in population with a central core of 1000 people per square mile (ppsm) and extending outward to areas of 500 ppsm. The Bureau proposes in their analysis using “hops” over distances up to .5 miles for uninhabited areas called “alternating land uses” such as industrial parks. The Bureau proposes “jumps” over uninhabited areas such as wetlands and rivers up to 1.5 miles. These jumps were up to 2.5 miles ten years ago after the last census. Multiple hops are allowed, but only one jump in reaching out to identify the boundaries of the UA.

Another interesting issue is the fact the Bureau uses a computer to identify each UA through automated analysis of US Geological Survey (USGS) maps. So the procedure to identify the UA is mostly computerized. Other techniques and procedures are also used in identifying a UA such as whether “block groups” or “census tracts” are the units of measure. The entire process is very technical and described in some detail in the NPRM. These points are mentioned because they cause some concern since it is not clear there is significant human review and oversight in carrying out these procedures.

One of the noteworthy issues identified in the proposed rulemaking is the fact the Bureau is proposing to merge UAs that in the past were separate. This could be done for UAs when the regions have grown together using the automated computerized methodology implementing the process described by the Bureau. When the Bureau proposes merging two UAs, they call it an “agglomeration”, which is the outcome of combining two or more UAs into a single new Urbanized Area. The Bureau in the NPRM identifies 52 potential new UA agglomerations. The Bureau in the NPRM proposes merging the Beloit and Rockford UAs with the merged UA having a 337,215 population estimate.

Some agglomerations are so huge they would need to be split such as New York-Philadelphia-Connecticut, and Los Angeles-Riverside-San Bernardino. The Bureau is proposing “splitting” large agglomerations when appropriate only when the population is at least 1,000,000, but will consider making splits at 500,000 and 250,000 populations.

Information just received from the census Bureau (see attached e-mail) raises two issues concerning how splits could apply to the Beloit-Rockford agglomeration. First, the Census bureau likely won't split the agglomeration because it is less than 1,000,000 in

population, but this limit is still to be determined. Second, in the unlikely event the Beloit-Rockford agglomeration is split, it wouldn't be at the state line because that would cause the Wisconsin area of SLATS to lose its UA/Metropolitan Planning Organization (MPO) status. The e-mail from the Census Bureau clearly makes this point.

When a UA is at least 200,000 in population the US Department of Transportation (USDOT) classifies it as a Transportation Management Areas (TMA). Merging the Rockford and Beloit UAs would result in the Stateline Area Transportation Study (SLATS) MPO becoming part of a TMA because it would be part of a UA over 200,000 in population. The merging doesn't present a major problem for SLATS as a stand alone agency, but it would likely result in two direct impacts on SLATS. First, SLATS would be required by USDOT to have a Congestion Management Plan which is manageable. Second, SLATS would go through an official formal certification every four years to review compliance with federal rules and regulations. This is manageable as well.

The significant difficulty with the merger of the Beloit and Rockford UAs is how the new TMA classification affects two SLATS transportation providing agencies. The merger changes the eligibility for use of Federal Transit Administration (FTA) funding for the two transit systems in SLATS. The Beloit Transit System (BTS) in Wisconsin and the Stateline Mass Transit District (SMTD) in Illinois according to federal rules would be restricted in the use of FTA funds for operating assistance. The funds would be mostly limited to capital expenditures. This could result in a significant reduction in operations and possibly a termination of services for the transit systems in the worse case scenario.

This would obviously have a major detrimental impact on the health, safety, and welfare of many people with the biggest impact on low-income groups and those without access to automobiles.

Therefore SLATS should make three recommendations to the Census Bureau:

- 1) It is recommended that a Task Force be organized to identify detrimental impacts that could result from the implementation of the proposed rulemaking and develop modifications to program rules to address those issues.
- 2) It is recommended the Census Bureau adopt the population threshold of 250,000 for splitting agglomerations.
- 3) It is recommended the Census Bureau split the Beloit-Rockford agglomeration south of Rockton or Roscoe so SLATS can maintain its independent MPO status.

In response to the NPRM SLATS staff recommends approval of the accompanying resolution to express appropriate concern.