

DANVILLE AREA TRANSPORTATION STUDY
METROPOLITAN PLANNING ORGANIZATION
DANVILLE URBANIZED AREA, VERMILION COUNTY, ILLINOIS



Danville Area Transportation Study
17 W. Main St.
Danville, IL 61832

October 14, 2010

Mr. Timothy Trainor
Chief, Geography Division
U.S. Census Bureau
Washington, DC 20233-7400

Dear Mr. Timothy Trainor:

We, the Committee members of the Danville Area Transportation Study Metropolitan Planning Organization (DATS MPO), submit the following comment and recommendation pertaining to the “Proposed Urban Area Criteria for the 2010 Census” as listed in the Federal Register Vol. 75, No. 163 on Tuesday, August 24, 2010.

The primary concern of the Committee members is in regards to the proposal under the heading *Maximum Distances of Jumps*. The document lists on page 52177 “the Census Bureau is considering reducing the maximum jump distance to 1.5 miles based on data users’ comments that the 2.5 mile distance adopted for the 2000 Census was too generous in some situations and resulted in the overextension of urban area territory”. According to our analysis, as confirmed by your department, the altered criterion would eliminate the Village of Catlin and the City of Georgetown populations from inclusion in the Danville urbanized area.

These populations are closely associated with the Danville urbanized area. These populations operate and function as part of the Danville urbanized area because the residents seek their employment, banking, medical services, professional services, post-secondary education, and retail shopping from the Danville urban core. As defined by the 2000 Census designations, geographically these populations are within 2.5 miles of other eligible areas. In this region of the country, a distance of 2.5 miles is a reasonable distance via roadway for a substantial economic connection to exist between communities. From an economic, social, and community perspective, these populations cannot be separated from the Danville urbanized area because these residents use the central urbanized area just as if it were within 1.5 miles or less.

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The work of the DATS MPO is vital for a coordinated transportation planning process to take place. Removing these populations from the urbanized area, based on a reduction in the maximum jump distance to 1.5 miles, would negate coordination and planning efforts implemented by the DATS MPO in these areas since 2003. Establishing and building a regional planning effort is a process which needs a sustained effort. The urbanized area status and MPO of the Danville area was dismantled following the 1990 Census, reinstated after the 2000 Census, and now facing uncertainty again due to a change in eligibility requirements. This turnover in MPO status undermines the consistency and effectiveness of the transportation planning process for the area.

If the maximum jump distance is altered to 1.5 miles, the Committee members recommend the “grandfathering” of existing designated urbanized areas. In this way, areas already determined as urbanized areas maintain their status. This approach mitigates the circumstances in which the regional transportation planning process starts or stops with each Decennial Census. In addition to preventing an incongruent planning process, the “grandfathering” approach assists in reducing the financial burden which would be placed on the region should urbanized area status not be achieved. The change in this criterion, which essentially disqualifies the region from urbanized area status, places a financial burden on area public and social agencies whose funds are tied to this designation. In addition to DATS, these agencies include but are not limited to the City of Danville Public Development Department, specifically Community Development Block Grant funding, Danville Mass Transit, and CRIS Senior Services.

In conclusion, we urge the Bureau of the Census to not adopt a reduction in the jump distance to 1.5 miles and to uphold the 2.5 mile distance from the 2000 Census designation. The proposed reduction of the maximum jump distance to 1.5 miles would define nearby populations as ineligible for inclusion in the DATS MPO. This action would endanger the continuation of a coordinated transportation planning process for the Danville region. The populations in these two incorporated places by way of the existing 2.5 mile jump definition are not an overextension of Danville urban area territory and should continue to be part of the DATS MPO.

Sincerely,

Mayor Scott Eisenhauer
Policy Committee Chairman
Danville Area Transportation Study

Adam Aull
Director
Danville Area Transportation Study