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Senator Dick Durbin
309 Hart Senate Building
Washington, DC 20510

Dear Senator Durbin,

It has been brought to my attention that after the 2010 census was taken it was recommended the maximum jump distance be returned to 1.5 miles from 2.5 miles which pertains 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. I am requesting that this change is not be made, that the distance should stay at the 2.5 miles. From an economical, social and community perspective, these populations cannot be separated from Danville urbanized area because these residents use the central urbanized area just as if it were within 1.5 miles or less.

This turnover in the MPO status undermines the consistency and effectiveness of the transportation planning process for the area. 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.

Please see the following information regarding this same point by John Dreher, Manager for the Community Development Division, in Public Development for the City of Danville:

There are seven changes to the criteria by which urbanized areas are determined being proposed, of which two are of the greatest concern to Vermilion County. They are as follows with my best rationale for their dismissal attached.

#1. Proposal is to return to a maximum jump distance of 1.5 miles, (it was increased to 2.5 in the 2000 Census criteria).

(This is the change that allowed us to become an urban statistical area in 2003.) A return to 1.5 would definitely eliminate Catlin and possibly Georgetown. The arguments for retaining the 2.5 jump are that we smaller populated and more "spread out" urbanized areas still operate and

function as urbanized areas because; the residents in those slightly more distant communities still must and do seek their employment, banking, medical services, professional services, post-secondary education and retail shopping from the central core. During the work and business day those populations are using the central urbanized area just as they would if their distance away was 1.5 miles or less.

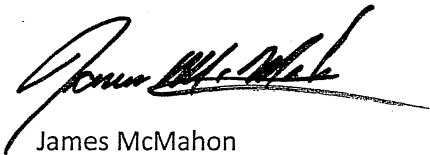
#2. Proposal is to *require that in addition to a minimum 2,500 population, an included area must contain at least 1,500 persons residing outside institutional group quarters for that area to qualify as urban.*

(This change would disallow the inclusion of the 1,600 individuals at the penitentiary.) The argument for not making this change is that persons residing in institutional group quarters are neither a static nor a non-impacting population. Those persons move to and from institutional to non-institutional living, more often than not within the same overall community. Those persons' needs in the areas of housing, employment, supportive services, transportation, etc. remain and persist upon the local community regardless of any number or ratio of non-institutionalized persons in their near proximity.

In summation, both of these proposed changes appearing above serve to favor the suburban tangles that surround major metropolitan areas and more densely developed northeast, at the expense of the smaller metropolitan areas of the more expansive Midwest and west where communities and facilities are less compacted, yet nonetheless urban in every other sense of the word and in function. Urban character is better defined behaviorally, using the 2000 criteria which provided for the broader set of regional geographic characteristics.

In conclusion, I urge the Bureau of the Census not to adopt the reduction in the jump distance to 1.5 miles and uphold the 2.5 mile distance from the 2000 Census designation.

Sincerely,



James McMahon
Vermilion County Board Chairman
Vermilion County, IL