



November 18, 2010

Timothy Trainor, Chief
Geography Standards and Criteria Branch
Geography Division
U.S. Census Bureau
Washington, DC 20233-7400

Re: Docket Number 100701026-0260-02

Dear Mr. Trainor,

The Illinois MPO Advisory Council is writing in response to the Federal Notice of Proposed Rulemaking (NPRM) of the Urban Area Criteria for the 2010 Census. The Council represents thirteen MPOs (USDOT funded metropolitan planning organizations) statewide supports providing critical and sustainable resources to our MPOs and a few of the proposed rules would negatively affect rural transportation services. In essence the US Census Bureau would be creating an unsustainable planning environment thereby providing a detriment for regional mobility in our communities. The implementation of the proposed rule would have a disproportionate negative effect on low income, elderly and minority people and would be in conflict with the environmental justice provisions of the U.S. DOT. MPOs are required to identify such rule violations and take steps to prevent potential disproportionate and negative outcomes on disadvantaged populations.

Our recommendations are as follows:

- 1) We recommend the federal government establish a Task Force of relevant agencies to identify and address the negative consequences that would result before the implementation of the changes recommended through the NPRM.
- 2) We recommend the 250,000 populations threshold be chosen for splitting agglomerations.
- 3) We recommend maintaining the 2 ½ mile jump distance, instead of reducing it to 1 ½ miles jumps.
- 4) We recommend keeping group quarters to 1500 plus included in the count, and not raising the threshold to 2500.

More significantly, two transit systems operate within the Stateline Area Transportation Study and utilized federal funds for operating assistance. The Beloit Transit System has spent federal funds to build a new transit center in Beloit. The Stateline Mass Transit District has utilized federal funds to start operations in the communities of South Beloit, Roscoe, Rockton and Rockton Township in Illinois. If the Beloit (WI-IL) Urbanized Area is merged with Rockford Urbanized Area, these two transit systems would lose their ability to spend federal transit administration funds for operations. This would significantly reduce services and could even put them out of business. Local municipalities and townships do not have the capacity to make up for the reduction in federal operating assistance. The proposed change would have a severe detrimental effect on the lives of people in both Wisconsin and Illinois when they lose their ability to get to work, community college for education, and for trips to medical facilities for services such as life-saving dialysis.

Chairman, Cameron Moore (CUATS), Vice Chair, Randy Blankenhorn (CMAP); Secretary/Treasurer, Terry Kohlbus (PPUATS)

Bi-State Regional Planning Commission
Champaign Urban Area Transportation Study
Chicago Metropolitan Agency for Planning
Danville Area Transportation Study
Decatur Area Transportation Study

DeKalb-Sycamore Transportation Study
East-West Gateway Council of Governments
Kankakee Area Transportation Study
McLean County Regional Planning Commission

Peoria/Pekin Urbanized Area Transportation Study
Rockford Metropolitan Agency for Planning
Springfield Area Transportation Study
Stateline Area Transportation Study

Secondly, Danville Area Transportation Study has flipped in out and out of MPO status for the past four decades. In 1980, the Danville Area qualified for MPO status under USDOT and in 1990, their status was eliminated. In 2000, they became an MPO again and now, if the jump distance is reduced and group quarters are scaled up to 2500, they would again lose their MPO status for a second time. This has created an inconsistent and dysfunctional planning environment in an area suffering from economic difficulties. A reasonable level of continuity in planning is required from our federal partners. Please don't create a huge problem through changing federal rules.

A possible solution would be to grandfather in these MPOs such as Danville to provide a continuity of planning in this region and others in a similar situation. Another possible solution would be to identify and grandfather funding mechanisms, and to allow flexibility of program implementation in appropriate agencies where hardships would occur. It is not just enough for the Census Bureau to say it, "urges each agency to consider permitting appropriate modifications of the results of implementing the urban-rural classification for the purposes of its program."

Thank you for your consideration in this matter. Please feel free to contact me at 217.819.4129 should you require additional information.

Respectfully submitted,

Cameron Moore
Chairman
Illinois Metropolitan Planning Organization Advisory Council