

November 8, 2010

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

In Re: Docket Number 100701026-0260-02

Dear Mr. Trainor,

We are writing in response to the Federal Notice of Proposed Rulemaking (NPRM) for the Urban Area Criteria for the 2010 Census. The proposed rule if applied as recommended by the Census Bureau would merge the Beloit WI-IL Urbanized Area (UA) with the Rockford, IL Urbanized Area. The Beloit WI-IL UA would lose its distinction as a separate UA. This proposal represents a major threat to the general economy and economic well being of the Beloit WI-IL UA if the Bureau implements the proposed changes.

Merging the Beloit UA with the Rockford UA would result in the Beloit UA becoming part of an area of over 200,000 in population which the U.S. Department of Transportation defines as a Transportation Management Area (TMA). Being merged into a TMA would restrict the use of Federal Transit Administration (FTA) funds to capital costs for the transit operators currently in the Beloit UA and not allow the funds to be used for operating expenses as is now the case. The reason the proposed change is such a threat is because of the loss of the use of FTA funds for transit operations in the area by both the Beloit Transit System (BTS) in Wisconsin and the Stateline Mass Transit System (SMTD) in Illinois.

It should be pointed out that in the past few years federal funds were used to build a new transit center in Beloit, and to purchase busses so the SMTD could start operations in the communities of South Beloit, Roscoe, Rockton and Rockton Township in Illinois. It would not be in the interest of either the federal, state, or local governments to invest federal funds to improve transit operations and then shortly afterwards a federal rule was used to shut down those same operations.

Hard pressed local units of government do not have the financial capacity to replace the federal funds that would be lost. For BTS it could cause a 36%, \$600,000 shortfall in their annual budget. This 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.

Several additional points should be made:

First, we recognize that the Census Bureau is not the rule maker for FTA and other federal programs or agencies. Nevertheless, the Census Bureau in the NPRM states that the new rules need consideration if the outcome of the rulemaking could have a detrimental effect on “program funds, setting program standards, and implementing aspects of programs.” (See NRPM page 52174 Supplemental Information paragraph two) It is our suggestion that the Census bureau, in conjunction with other federal agencies, establish a task force to identify such large negative impacts and recommend appropriate “modifications” to use the Census Bureau’s own terminology.

A 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.” (See NRPM page 52174 Supplemental Information paragraph three) We suggest a Federal Agency Task Force be established to identify potential negative outcomes that could result from the Census Bureau rule making. The Task Force should also identify modifications that could be made to programs to correct those negative consequences.

We realize that a recommendation to establish a Federal Agency Task Force is thinking outside the box, but in these challenging times the federal government needs to make sure when making changes they are identifying and addressing negative consequences that could inadvertently be created. In fact the U.S. Department of Transportation (U.S. DOT) requires federal funded transportation planning agencies such as the Stateline Area Transportation Study (SLATS), the Metropolitan Planning Organization for the Stateline Area, to identify and address detrimental impacts such as this under the category called “environmental justice.”

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. Metropolitan Planning Organizations such as SLATS are required to identify such rule violations and take steps to prevent potential disproportionate and negative outcomes on disadvantaged populations.

Second, the Beloit UA is one of the 52 potential agglomerations of multiple and currently separate UAs that would be merged if the Census Bureau threshold of 1,000,000 persons is adopted for splitting of UAs. We think the detrimental results for the Beloit UA likely would be avoided if the Census Bureau would adopt a 250,000 minimum population threshold to identify agglomerations of large urbanized populations that could be split to maintain their separate Urban Area identities. The minimum population threshold of

250,000 is one of the levels being considered for the splitting of agglomerations. (See NRPM page 52180 Splitting Large Agglomerations paragraph one)

Unfortunately the Census Bureau is recommending the population threshold of 1,000,000. (See NRPM page 52183 Recommendation 7 Splitting Large Agglomerations paragraph one) We strongly oppose this and believe that regional and community identity in many cases is established within areas of lower population threshold such as the Stateline region. We also recommend the Beloit-Rockford agglomeration be split along the same boundary as used by the Census Bureau in 1990.

It should be pointed out in this regard the Beloit UA has its own unique residential, commercial, and infrastructure characteristics typically associated with a unique urban center. The Beloit UA has its own United Way, Economic Development Corporation, Chamber of Commerce, Boys and Girls Club, and YMCA. The communities share principle and minor arterials, bike and pedestrian paths, schools, and parks.

The Stateline Area is a distinct, well-established urban community where the units of government, corporations, charities, and recreational agencies work together. SLATS is operating effectively in bringing the units of government together on a regional basis. The BTS and SMTD are providing vital services to lower income persons and other people who do not have access to autos. In short, the local governments are working well together and providing important services so let's not artificially restrict funding. Let's identify problems that could inadvertently be created by the Census Bureau and address them.

In Summary:

- 1) The Beloit metropolitan socio-geographic area is a separate UA having its own identity and with greater connections to the Stateline Area encompassing the Wisconsin-Illinois border than to the Rockford UA.
- 2) 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.
- 3) We recommend the 250,000 population threshold be chosen for splitting agglomerations and that the Beloit-Rockford agglomeration be split along the same line as in the past.

It is a challenging time in the present economy for states to fund programs, for local governments to meet budget goals, and for businesses and citizens to get along financially. We feel the NPRM could create unnecessary difficulties for all these groups unless the federal government acts cautiously in making changes that impact programs and budgets. Please see the attached resolution passed unanimously by the Stateline Area Transportation Study supporting this position.

Thank you for providing the opportunity to address the proposed changes prior to implementation.

Robert L. Soltau
Manager
Stateline Area Transportation Study