

July 10, 2008

INTERAGENCY STAFF COMMITTEE RECOMMENDATION
THRESHOLD ANALYSIS OF RURAL/NONRURAL REVIEW RFR07-04

Oppose rural/nonrural review request for reconsideration RFR07-04.

Justification

The Board did conduct a systematic and thorough evaluation of communities based on changes in population in the 2000 census. The initial steps in the review process winnowed the number of communities and areas proposed for further analysis from the potential scope of about 300 to 10. Public comments and Council recommendations were taken from August through October, 2005. In December, 2005, the Board held a public meeting to decide upon an approved list of communities for further analysis. In June 2006, the Board developed a proposed rule to solicit public comments and Council recommendations on proposed changes.

The process was not selective in its use of the criteria. A report by OSM provided tables and graphics of historical and current population data and indicators for all five community characteristics identified in regulation. In addition, data was presented on population density, which is a characteristic not identified in regulation. Not all data types were available for all communities and areas, but relevant data were provided to the extent available. That report was not intended to address all communities or areas within which changes may have occurred, but rather those for which additional staff analysis was assigned by the Board.

The purpose of using the grouping indicators of proximity/road connectedness, shared high school attendance area, and 30% worker commuting level, as directed by the Board, was to evaluate the indications of whether a subject community under analysis should be considered integrated with another community or existing grouping. The three criteria the Board directed staff to apply to the evaluation of the grouping of communities for this decennial review were made known to the public in advance of their application. Although this does not represent the only way in which the grouping of communities could be evaluated, it is a legitimate approach that was subject to extensive public review and comment. The staff work was consistent with Board direction, and Board rule-making was in conformance with the requirements of the Administrative Procedure Act.