



Title VI & Environmental Justice Considerations

for the Rockford Metropolitan
Planning Organization



Draft Report v.1
March 2022

Title VI & Environmental Justice Considerations for the Rockford Metropolitan Planning Organization

Draft Report

Version 1

Dated March 2, 2022

This document has been prepared by the Region 1 Planning Council in collaboration with its member agencies, partnership organizations, and local stakeholders.

This report was prepared in cooperation with the following:

U.S. Department of Transportation
Federal Highway Administration
Federal Transit Administration
Illinois Department of Transportation

The contents, views, policies, and conclusions expressed in this report are not necessarily those of the above agencies.



COLLABORATIVE PLANNING FOR NORTHERN ILLINOIS

127 North Wyan Street, Suite 100
Rockford, Illinois 61101
815-319-4180 | info@r1planning.org

For complaints, questions, or concerns about civil rights or nondiscrimination; or for special requests under the Americans with Disabilities Act, please contact: Julia Halsted, Deputy Director of Operations at (815) 319-4180 or info@r1planning.org.

Acknowledgements

MPO Policy Committee

Chairman Karl Johnson

MPO Chair, Boone County

Chairman Joseph Chiarelli

MPO Vice-Chair, Winnebago County

Mayor Clint Morris

City of Belvidere

Village President Steve Johnson

Village of Machesney Park

Mayor Tom McNamara

City of Rockford

Mayor Greg Jury

City of Loves Park

Pastor Herbert Johnson

Rockford Mass Transit District

Masood Ahmad

Illinois Department of Transportation- Region 2

MPO Technical Committee

Voting Members

Belvidere Planning Department

Belvidere Public Works Department

Boone County Highway Department

Boone County Planning Department

Chicago / Rockford International Airport

Forest Preserves of Winnebago County

Illinois Department of Transportation – District 2

Loves Park Community Development Dept.

Loves Park Public Works Dept.

Machesney Park Community Development Dept.

Machesney Park Public Works Dept.

Rockford Public Works Dept.

Rockford Community Development Dept.

Rockford Mass Transit District

Winnebago County Planning & Economic Development Dept.

Winnebago County Highway Dept.

Rock River Water Reclamation District

Boone County Conservation District

Rockford Park District

Winnebago County Soil & Water Conservation District

Non-Voting Members

Illinois Environmental Protection Agency

Illinois State Toll Highway Authority

IDOT, Division of Public & Intermodal Transportation

IDOT, Division of Urban Program & Planning

Ogle County Highway Dept.

Boone County Council on Aging

State Line Area Transportation Study

Federal Highway Administration, Illinois Division

Stateline Mass Transit District

MPO Alternative Transportation Committee

Voting Members

Boone County Health Dept.

I Bike Rockford

North Central Illinois Council of Governments

Rockford Mass Transit District

Rockford Park District

Rockford Road Runners

Stateline Mass Transit District

SwedishAmerican, A Division of UW Health

Winnebago County Health Dept.

Winnebago County Housing Authority

Workforce Connection

University of Illinois Extension

Table of Contents

Acknowledgements.....	i
Table of Contents	ii
List of Figures	iii
Introduction	1-2
Background	1
About the MPO	1
Legal Framework	2
Nondiscrimination Policy.....	3-4
Nondiscrimination Policy	3
Notice to the Public	3
How to File a Complaint	3
Title VI Investigation.....	4
Participation & Outreach.....	5
Monitoring Procedures & Efforts	6
MPO’s Responsibility	6
Considerations of Mobility Needs of Minority Populations	6
Demographic Profile.....	7
Environmental Justice Assessment	9
Assessing Impacts & Environmental Justice	9
Planning Threshold Areas	9
Limited English Proficiency Plan	10
Benefits & Burdens Analysis	11-14
Overall Findings	15
References	
Appendices & Attachments	
A Appendix A: MPO Structure	16-17
B Appendix B: MPO Policy Committee Title VI & EJ Considerations Document Approval Resolution.....	18-19
C Appendix C: Title VI Notice to the Public	20
D Appendix D: Title VI Complaint Form.....	21-22
E Appendix E: MPO Title VI Discrimination Complaint Procedure	23
F Appendix F: Previous Submittals & Documents for RMTD	24
G Appendix G: Recent Special MPO Changes, Improvements or Efforts	25
H Appendix H: MPO Public Participation Plan.....	26
I Appendix I: MPO Public Outreach Made Since Last Title VI Program Submission.....	27-33
J Appendix J: Limited English Proficiency Plan	34
K Appendix K: MPO Metropolitan Transportation Planning Process Certificate	35-36
L Appendix L: Public Comments and Notices	37
M Appendix M: Population Category Threshold Maps.....	38-42

List of Exhibits

List of Tables

Table 1. Minority Representation on Boards and Committees	2
Table 2. Transportation Improvement Program Planned Budget for AIC & PA Projects.....	12
Table 3. Benefits and Burdens Analysis	13-14
Table 4. Transportation Improvement Program Planned Budget by Population Category Area	14

List of Figures

Figure 1. Demographics Infographic.....	7
Figure 2. EJ Thresholds Infographic.....	9
Figure 3. Population Category Thresholds in Planning Area	10
Figure 4. Limited English Proficiency in Planning Area	11
Figure 5. Federal and State Funded Projects in Planning Area	12
Figure 6. Population Category Threshold by Senior Population	37
Figure 7. Population Category Threshold by Households without Vehicle Access.....	38
Figure 8. Population Category Threshold by Minority Population.....	39
Figure 9. Population Category Threshold by Population Below Poverty Line.....	40
Figure 10. Population Category Threshold by Hispanic/Latino Population	41

This page intentionally left blank.

Introduction

Background

Region 1 Planning Council (RPC), acting as the Rockford Metropolitan Planning Organization (MPO), is dedicated to an inclusive planning process that ensures residents are informed about and given meaningful opportunities to engage in regional planning efforts and decision making. RPC must be as inclusive as possible so it is able to serve the widest range of citizens and implement effective planning that uses federal funding to benefit the entire region represented by MPO. In order to accomplish this goal, the MPO has developed this Title VI Program in accordance with the federal laws, regulations, and guidance that govern nondiscrimination in its programs and activities.

The Title VI Program reflects the MPO's commitment to implementing planning processes that are designed to protect against discrimination and to ensure that it provides fairness and consideration of issues impacting disadvantaged residents. It also provides a clear process for resident to use if they feel that they have been discriminated against in one of RPC's programs or activities. This program also outlines the strategies and tools that the MPO utilizes to reach and involve all of its residents, including those who are historically harder to reach.

The following Title VI program will be discussed by the MPO Policy Committee on April 29, 2022 for adoption. A copy of the draft MPO Policy Committee resolution can be found in Appendix B.

About the MPO

By Federal law, all large census defined urbanized areas (over 50,000) are required to have an organization that plans for and coordinates the decisions regarding the area's region's transportation systems. The MPO transportation planning function is housed within RPC, which is also comprised of Winnebago County Geographical Information System (WinGIS), the Economic Development District (EDD), and Northern Illinois Land Bank Authority.

The MPO is empowered and governed by an inter-agency agreement known as the MPO Cooperative Agreement, developed and mutually adopted by the Cities of Rockford, Loves Park, and Belvidere; the Counties of Winnebago and Boone; the Village of Machesney Park; the State of Illinois, acting through the Illinois Department of Transportation (IDOT); and the Rockford Mass Transit District.

Boards & Committees

The activities of the MPO are directed by a Policy Committee that consists of the top elected officials from the above entities plus

the District Engineer from IDOT Region 2 and the Chairman of the Rockford Mass Transit District Board. Transportation planning is carried out through a continuing, comprehensive, and cooperative (3-C) planning process.

The Policy Committee receives technical recommendations and assistance from a 22-member Technical Committee comprised of entities listed below:

- Boone Co Conservation District
- Boone Co Highway
- Boone Co, Planning
- Chicago/Rockford International Airport
- City of Belvidere, Planning
- City of Belvidere, Public Works
- City of Loves Park, Community Development
- City of Loves Park, Public Works
- City of Rockford, Community Development
- City of Rockford, Public Works
- Forest Preserves of Winnebago County
- Four Rivers Sanitary District
- Illinois of Transportation, District 2
- Rockford Mass Transit District
- Rockford Park District
- Village of Machesney Park, Community Development
- Village of Machesney Park, Public Works
- Village of Roscoe
- Village of Winnebago
- Winnebago Co Highway
- Winnebago Co Planning & Econ Dev.
- Winnebago Co Soil & Water Conservation District

Additionally, the Policy Committee has the authority to establish and appoint members to other temporary or special purpose committees needed to carry out the duties of the Technical Committee. Membership on these committees may consist of individuals or organizations not otherwise represented on the Technical or Policy Committees.

The Alternative Transportation Committee (ATC) was created to act in an advisory capacity to the MPO Technical Committee on alternative transportation activities. Alternative transportation refers to any mode of personal transportation other than a single-occupant vehicle, such as biking, walking, carpooling, or taking public transportation. The ATC supports both the Coordinated Public Transit-Human Services Transportation Plan and the Bicycle and Pedestrian Plan for the Metropolitan Planning Area (MPA), as well as makes recommendations on priorities for funding and implementation of alternative transportation programs and capital transit projects. Members of the committee represent

local governments, public transportation agencies, non-profit organizations, public health organizations, and local advocacy groups.

More information on the MPO's committees can be found in Appendix A.

Minority Representation on Planning & Advisory Bodies

Title 49 CFR Section 21.5(b)(1)(vii) states that a recipient may not, on the grounds of race, color, or national origin, "deny a person the opportunity to participate as a member of a planning, advisory, or similar body which is an integral part of the program." Recipients that have transportation-related, non-elected planning boards or committees, of which membership is selected by the recipient, must provide a table depicting the racial breakdown of the membership of those committees, and a description of efforts made to encourage the participation of minorities on such committees.

Table 1-1 provides the demographic representation on the various MPO Committees. It should be noted that organizations or a position/title within an organization are identified as members of MPO committees, not specific individuals. As such, the MPO does not have control over the demographic composition of those committees. However, the MPO will continue to make efforts to promote diversity and encourages participation of all citizens in the transportation planning and programming process.

Further goals and strategies to actively engage minority populations are included in the Public Participation Plan and recent special MPO changes, improvements or efforts included later in this document.

Legal Framework

The following laws and regulations provide guidance regarding the MPO's Title VI and Environmental Justice Program.

A list of all general and transportation-related non-discrimination authorities include:

- Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq.)
- Section 162 (a) of the Federal Aid Highway Act of 1973 (23 USC 324)
- Age Discrimination Act of 1975
- Section 504 of the Rehabilitation Act of 1973
- Americans With Disabilities Act of 1990
- Civil Rights Restoration Act of 1987
- 49 CFR Part 21
- 23 CFR Part 200
- U.S. DOT Order 1050.2
- Executive Order #12898 (Environmental Justice)
- Executive Order #13166 (Limited-English-Proficiency)

Federal Non-Discrimination Acts

Title VI of the Civil Rights Act of 1964 stipulates that no person in the United States, shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal financial assistance. Title 49 CFR Part 21 outlines how agencies must ensure nondiscrimination in their programs and in their use of federal funds provided through the Department of Transportation. This Title VI Program is pursuant to this requirement.

Subsequent federal acts extended nondiscrimination requirements to gender (Federal Aid Highway Act 1973); disability (Rehabilitation Act of 1973 & Americans with Disabilities Act 1990); and age (Age Discrimination Act of 1975).

Executive Orders

An Executive Order is direction given by the President to federal agencies. As a recipient of federal revenues, the MPO assists federal transportation agencies in complying with these orders.

Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations. This Executive Order mandates that federal agencies or those receiving federal funds include environmental justice as part of their mission. The fundamental principles of environmental justice include:

- Avoiding, minimizing or mitigating disproportionately high & adverse health or environmental effects on minority and low-income populations;
- Ensuring full and fair participation by all potentially affected communities in the transportation decision-making process; and
- Preventing the denial, reduction or significant delay in the receipt of benefits by minority populations and low-income communities.

Executive Order 13166: Improving Access to Services for Persons with Limited English Proficiency. This Executive Order states that people who speak limited English should have meaningful access to federally conducted and federally funded programs and activities. It requires that all federal agencies identify any need for services to those with limited English proficiency and develop and implement a system to provide access to those services.

Table 1-1. Minority Representation on Boards and Committees

Nondiscrimination Policy

Nondiscrimination Policy

The MPO unequivocally seeks to provide fair and equitable access to the transportation planning process to all persons in the planning area. No persons shall be shorted, limited, or in any other way be discriminated against on the basis of race, color, national origin, sex, age, religion, physical or mental abilities or disabilities, ability to speak or understand the English language, or a financial wealth or the ability to earn financial income.

The MPO agrees to compile, maintain, and submit in a timely manner Title VI information required by FTA Circular 4702.1B and in compliance with the U.S. Department of Transportation's Title VI Regulation at 49 CFR Part 21. Furthermore, the MPO will make it known to the public that those person or persons alleging discrimination on the basis of race, color, or national origin as it, relates to the provision of transportation services and transit-related benefits, may file a complaint with the Federal Transit Administration, Federal Highway Administration and/or the U.S. Department of Transportation.

Title VI and Environmental Justice must be considered as MPO develops transportation proposals, plans, and projects. Specifically, the MPO must make concerted efforts to recognize the adverse impacts of its proposals, as well as the benefits. Second, the MPO must act to identify exactly who will be affected and to what degrees. Third, the MPO must inform and involve the public, especially those persons likely to be affected, in the planning and decision-making process. Fourth, the MPO must consider alternatives and choose carefully and fairly among those alternatives.

As the MPO proceeds through these steps, the MPO and participant member agencies must strive to:

- Direct fair shares of funding or assistance to minority and low-income persons and populations.
- Minimize the adverse impacts of all activities on all persons and groups, but especially on minority and low-income persons and populations.
- Make concerted efforts to determine what populations may be affected, before expenditure of any federal funds, implement any federal program, impose any federal regulations, or create or cause any adverse or harmful impacts.
- Periodically, review and analyze past actions to determine, to the extent possible, if all groups are being treated equitably.
- Make concerted efforts, as the MPO plans and programs its activities, to involve minority and low-income groups in the decision-making process.

- Promote Title VI & Environmental Justice efforts both within the MPO and by all the MPO participant member agencies within their respective jurisdictions, especially the local units of government with transportation responsibilities.
- Take into the account the diversity of the MPO participants and all the communities within the MPO Metropolitan Planning Area (MPA). Specifically, older central cities of Rockford and Belvidere, which have higher concentrations of minorities, should be given special consideration. Similarly, the older areas of Loves Park and Machesney Park that have some concentrations of low-income persons should not be neglected.

Care should be taken that all communities are represented when important transportation planning and transportation funding decisions are made, especially decisions that will affect minority or low-income person or groups.

The following policies and procedures in the duration of this document are intended to ensure that the MPO continues to adhere to the requirements of Title VI and Environmental Justice and provides an inclusionary transportation planning process.

Notice to the Public

The MPO's Title VI Notice is posted within the public reception area of RPC offices as well as on the RPC website. References to Title VI and Environmental Justice considerations, as well as its inclusion in the transportation planning process, are also contained within the various MPO documents.

To view a copy of the MPO's "Title VI Notice to the Public" see Appendix C.

How to File a Complaint

The MPO has developed a procedure for investigating and tracking any Title VI complaints that may be filed. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by MPO's administration of federally funded programs, as prohibited by Title VI of Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by MPO shall be referred immediately to the Title VI Coordinator. Verbal and non-written complaints received by MPO shall be resolved informally by the Title VI Coordinator. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the complainant shall be permitted to do so, and the complaint shall



follow the process for written complaints.

The RPC Executive Director will be informed of any written complaint within 10 days of receipt of the complaint. Within 30 days of receipt of the complaint the Title VI Coordinator will acknowledge receipt of the complaint and inform the complainant of proposed action to process the complaint. Within 120 days of receipt of the complaint the Title VI Coordinator will conduct and complete a full investigation of the complaint and provide a recommendation for action in a report of findings to the RPC Executive Director. Within 150 days of receipt of the complaint, the RPC Executive Director will notify the complainant of their right to file a formal complaint with IDOT's Equal Opportunity Office if they are dissatisfied with the final decision rendered by RPC. The Title VI Coordinator will also provide the MPO Policy Committee with a copy of this decision and summary findings.

A person may also file a complaint directly with the Federal Transit Administration, at:

FTA, Office of Civil Rights
1200 New Jersey Avenue SE
Washington, DC 20590

To view a copy of the MPO's Complaint Form see Appendix D. To view a full text copy of the MPO's Complaint Process see Appendix E.

Title VI Investigation

All FTA/FHWA funding recipients are required to prepare and maintain a list of any complaints alleging discrimination on the basis of race, color, or national origin. The MPO is pleased to report they have not received any Title VI complaints since the previously submitted Title VI and Environmental Justice document.

Participation & Outreach

The MPO is dedicated to providing access to the transportation planning process and associated MPO planning documents to all people, regardless of race, color, national origin, English proficiency, or disability. The MPO has prepared several documents to help guide the agency in ensuring that the transportation planning process is open to everyone. Many of the Title VI responsibilities are achieved through the implementation of the Public Participation Plan (PPP).

The PPP outlines the strategies developed to distribute information to the public on transportation planning and programing processes. This plan includes methodologies in which the MPO utilizes in its projects, studies and plans, as well as when gathering public feedback on these projects. The MPO recognizes that effective public participation, with an emphasis on traditionally underserved populations, is critical to ensuring that a comprehensive viewpoint and considerations are appropriately incorporated into the transportation planning process.

Some of the techniques that the MPO will utilize in its general outreach method may include, but are not limited to, the following:

- Websites and social media posts;
- Meetings and public forums, such as open houses;
- Policy, Technical, and Alternative Transportation Committee meetings;

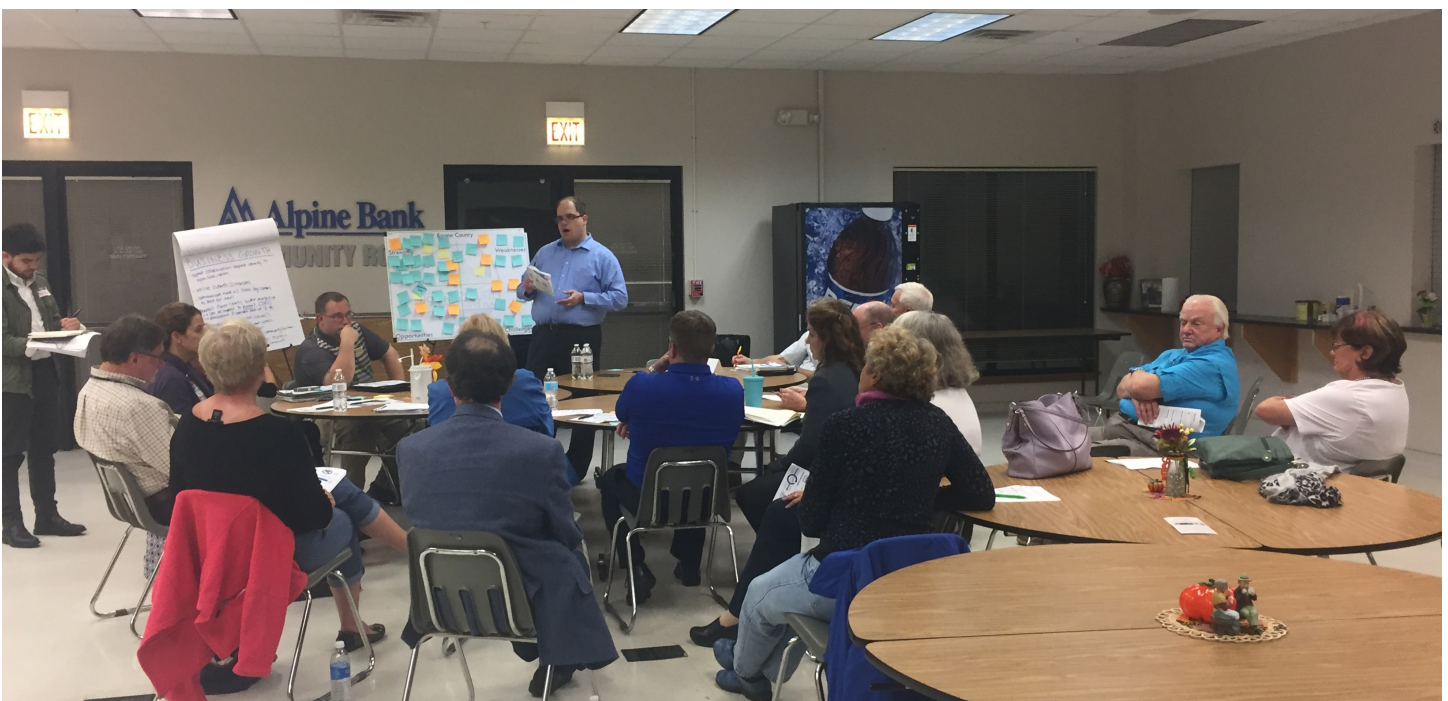
- Legal advertisement and legal notices;
- Materials distributed through the MPO email list;
- Newsletters; and
- Paper and electronic surveys.

Descriptions of the participation techniques employed by the MPO are detailed in the Public Participation Plan summary in Appendix H.

In addition to the general outreach techniques and resources previously described, the MPO will utilize the following additional resources in its targeted outreach activities:

- Communication with neighborhood organization representatives;
- Provide timely notices by email and informational posts on the RPC website;
- Flyers in high-volume locations;
- Outreach to specific organizations that represent and provide services for:
 - o Individuals with disabilities,
 - o Low Income,
 - o Elderly,
 - o Minorities, and
 - o Limited English Proficiency.

See Appendix I for MPO outreach efforts made since the last Title VI Program submission.



Monitoring Procedures & Efforts

Responsibility

The MPO is charged with the responsibility to direct, coordinate, and administer the continuing, comprehensive, and cooperative (3-C) transportation planning process. The MPO takes a comprehensive approach to monitoring population trends across the region and assembles detailed Census data to track demographic trends across the area. In addition to Census data, the MPO also develops detailed dwelling unit and employment forecasts encompassing Boone, Ogle, and Winnebago Counties, in addition to Rock County in Wisconsin. Longitudinal employment dynamics are also studied to determine the employment locations of minority and low-income groups in relation to their place of residence to help identify key transportation linkages.

The MPO works closely with the Rockford Mass Transit District (RMTD) to develop their required Title VI and Environmental Justice planning documents. A Memorandum of Understanding for Cooperative Transportation Planning, signed by RPC and the public transit agencies within its boundaries, including RMTD, denotes that RPC will:

- Assist the Public Transit Operators by periodically conducting a Title VI (Nondiscrimination) Assessment, in accordance with federal guidelines; and
- RPC will assist the Public Transit Operators by providing information that can be used to support visualizations, assist in the decision making and transportation planning process and aid in the public participation process for transportation planning.

On an annual basis, the Chair of the MPO Policy Committee and IDOT Bureau Chief of Urban Planning and Programming sign a self-certification which stipulates that the MPO agrees to assure compliance with all Title VI and Environmental Justice requirements. A copy of the most recently approved self-certification can be found in Appendix K.

The MPO will submit updated Title VI Program information to the regional FTA Civil Rights Officer every three years.

Considerations

Particular attention to mobility needs of minority populations as well as transit dependent populations is provided through the MPO Alternative Transportation Committee, which seceded the Mobility Subcommittee in the fourth quarter of Fiscal Year 2018. As previously described in this document, the MPO Alternative Transportation Committee has been charged with coordinating organizations from workforce investment, human services, public transit providers, members of the public and governmental entities

to determine gaps in transportation services and accessibility for low-income, minority, elderly and persons with disabilities.

Input received by this committee is essential as it provides for the consideration of transportation needs for minority and low-income populations with both regional and local transportation initiatives, plans, and projects.

Related to the public participation element, MPO open houses and other public events are held at or nearby public transit accessible locations.

Further information regarding the MPO Alternative Transportation Committee and the HSTP process can be found in the MPO Coordinated Public-Transit Human Services Transportation Plan. The plan can be accessed at www.r1planning.org.

Metropolitan Planning Area Demographics

The MPO has compiled a collection of data applicable to the assessment of Title VI program and conducting Environmental Justice evaluations. An understanding of community demographics is needed to ensure the MPO's planning and participation efforts reach all segments of the population. A demographic summary of the MPO has been included and provides statistics on the following: age, income, race/ethnicity, language, and access to vehicles. This data will be updated as new data becomes available.

Demographic Profile

According to the U.S Census's 2019 American Community Survey (ACS) 5-Year Estimates, racial minorities comprise 20.2 percent of the population within the Metropolitan Planning Area (MPA). African Americans alone represent 11.5 percent of the population. Those of Asian descent alone represent about 2.5 percent of population. American Indian and Hawaiian or Pacific Islander alone combined make up less than one percent of the population (0.30%). The remainder identify as either two or

Figure 1. Demographics Infographic

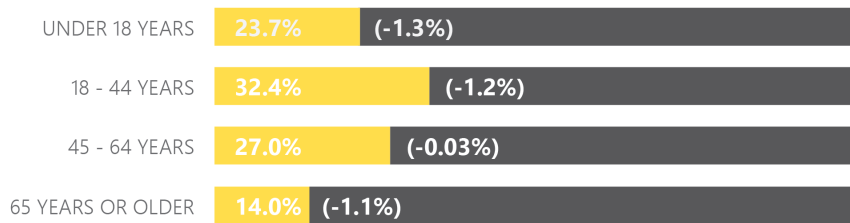
Poverty

The income levels has increased since 2000, and while previously the poverty rate increased to be equal to the state of Illinois's rate, it now exceeds it.

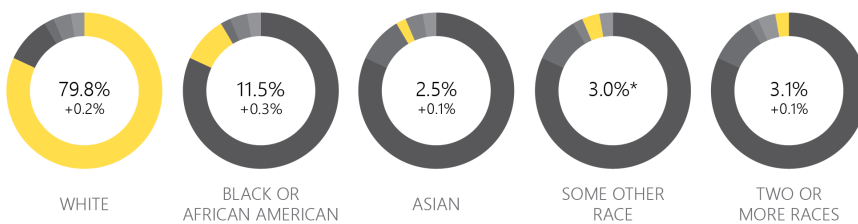


Age

Youths under 18 years of age compose just under 24% of the MPO's planning area, working age adults (18-64) make up 59.4%, with 14% of residents living in the MPA being over the age of 65.



Race



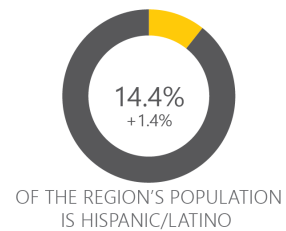
*Some Other Race includes American Indian and Pacific Islander (0.30%)

Total Population

326,988 residents
^{-3,911}

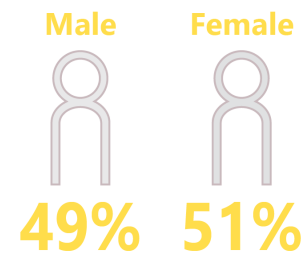
Ethnicity

The largest and fastest growing minority population in the region is Hispanic and Latinos, at 14.4% of the total population.



Gender

The male to female ratio of residents is closely balanced with 49% of the residents being male & 51% being female.



more or some other race.¹ The Hispanic ethnicity comprises the largest minority population in the planning area at 14.4 percent.¹ In 2010, Caucasians represented 77.6 percent of the population and in 2019 rose to representing 79.8percent of the metropolitan planning area population. Considerable growth has also occurred in both the African American and Hispanic populations between 2010 and 2019, with Black populations seeing an increase in 0.2percent and Hispanic populations seeing an increase of 1.6 percent. The growth of the Hispanic population since 2000 in particular can partially be explained by the addition of the City of Belvidere to the MPA.

1 The U.S. Census considers race and ethnicity to be two separate and distinct concepts. The Census defines race as a person’s self-identification with one or more social groups while ethnicity determines whether a person is of Hispanic origin or not.



Environmental Justice Assessment

Assessing Impacts & Environmental Justice

Establishing a demographic baseline is a vital step in conducting a Title VI and Environmental Justice (EJ) assessment. The MPO has calculated thresholds for the Metropolitan Planning Area (MPA) to determine areas with Traditionally Underserved Populations (TUP) that may be impacted by a transportation infrastructure project or a transit service change. A threshold represents the overall concentration of a population across the entire metropolitan planning area. To calculate the threshold, a regional average for each targeted population was used.

The thresholds are then applied to all the Census block groups within the planning area in order to identify areas with higher than average minority densities. To comply with Environmental Justice criteria, thresholds were calculated for TUP, including low-income, racial/ethnic minorities, Limited English Proficiency, elderly (aged 65 and above), and zero car households.

Planning Threshold Areas

Using the thresholds established, the Census block groups were then categorized by how many Title VI and EJ thresholds they exceeded. This allows the Census block groups to be mapped showing the concentration of the identified populations. Darker areas on the map indicates a greater concentration of TUP.

Figure 2 shows the percent of Census block groups that may have reached multiple thresholds.

All updates to the 2050 Metropolitan Transportation Plan (MTP) and short-range Transportation Improvement Program (TIP) will include a map of proposed projects overlaying these concentrations to assess any benefits and burdens they may have on TUPs. The presence of these population groups is also used as a weight in the selection process and programming of the Surface Transportation Block Grant (STBG) and Transportation Alternatives Program (TAP) funds allocated to the region.

Visualizations of TIP Projects and thresholds may change slightly as the TIP is updated.

Traditionally Underserved Populations Definitions:

Total Racial Minority - A person of African, Asian, Native American, Hawaiian and Pacific Island descent or those identifying themselves as having a multi-race or other background.

Hispanic Minority - A person of Mexican, Puerto Rican, Cuban, Central or South American descent, regardless of race.

Limited English Proficiency - This is a measure of households in which no one over the age of 14 understands English well.

Low Income - A person whose median household income is at or below the Department of Health & Human Services (HHS) poverty guidelines for a household of 4, which is \$25,100.

Zero Car Household - Measured as households without access to an automobile.

Seniors - A person aged 65+.

Figure 2. EJ Thresholds Infographic

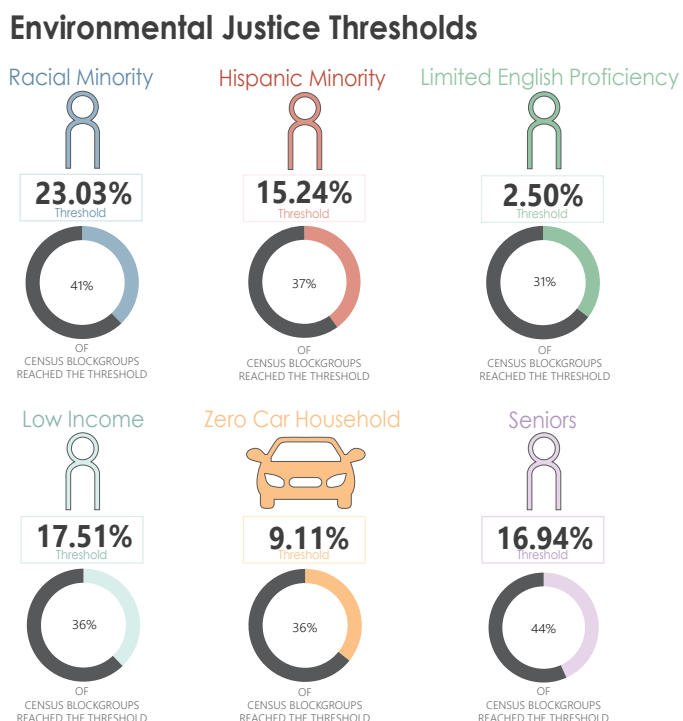
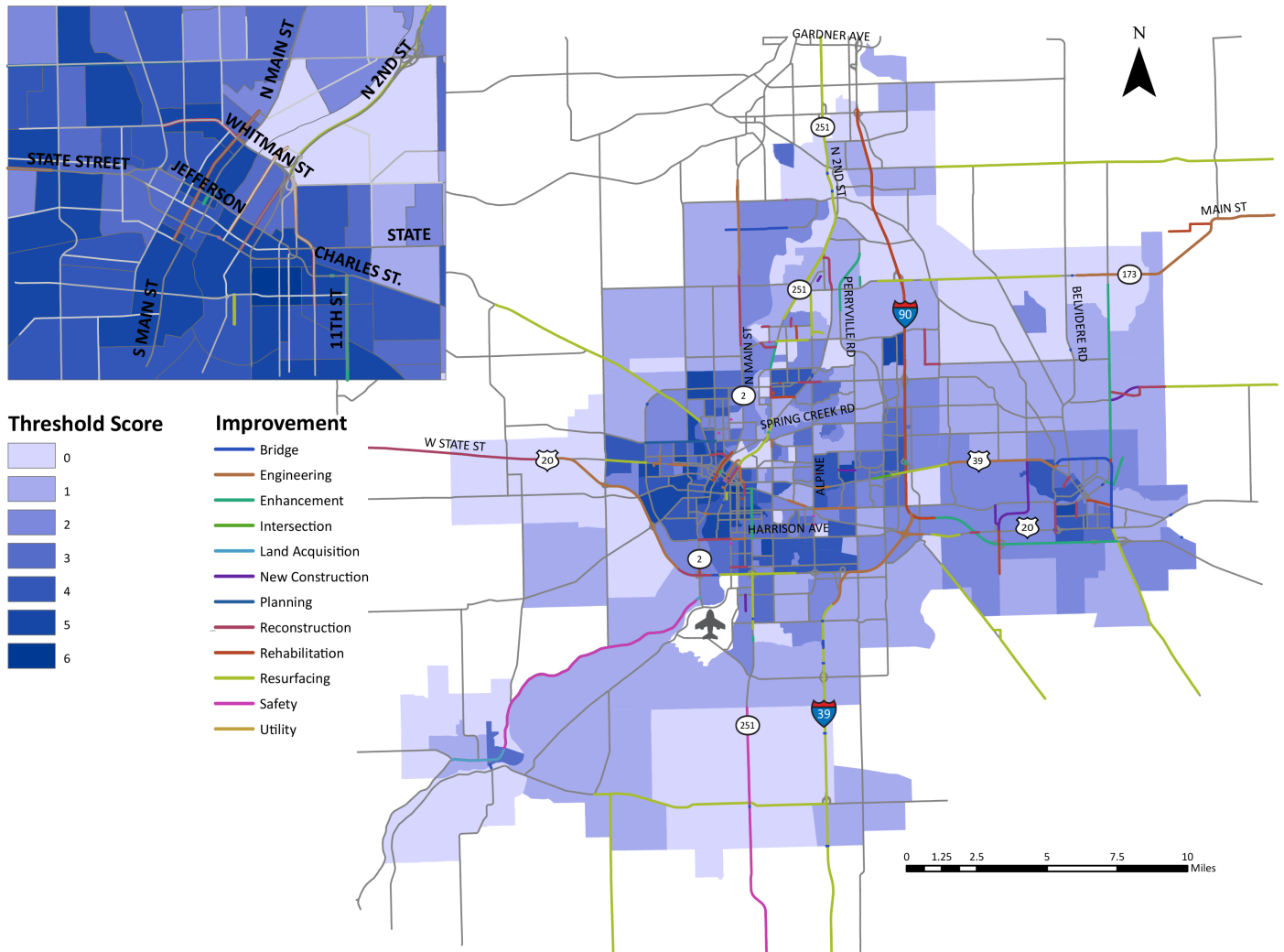


Figure 3. Population Category Thresholds in Planning Area

Downtown Rockford



Transportation four factor LEP analysis.

Limited English Proficiency Plan

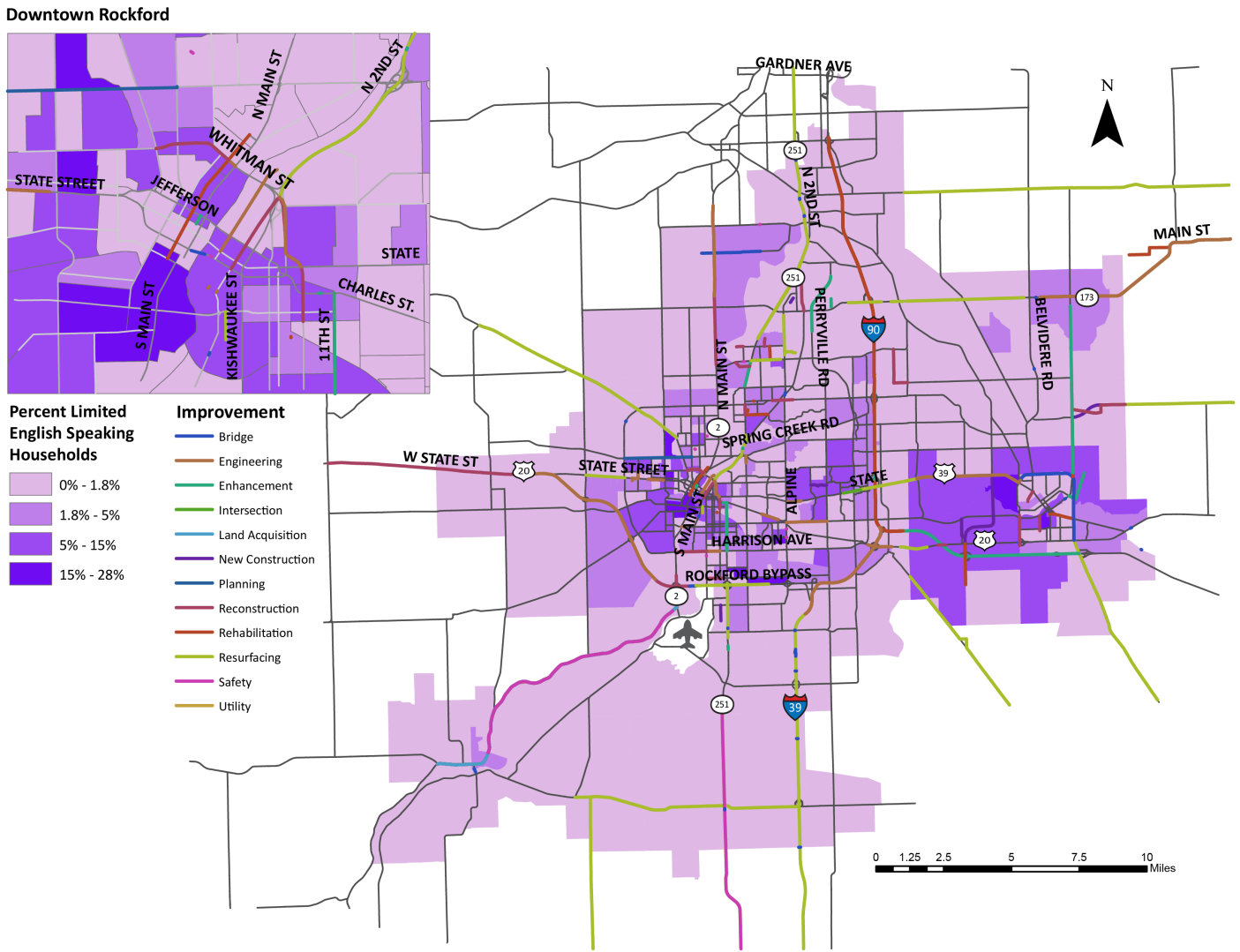
The MPO has developed a Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs as required by Executive Order 13166. The MPO defines persons with limited English proficiency to be those individuals who meet the following criteria: English as second language, having a limited ability to internalize the English language, and having a disability prohibiting full usage and understanding of the English Language.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan and determining the MPO's extent of obligation to provide LEP services, the MPO undertook a U.S. Department of

Typical measures will include but are not limited to providing translated documents, interpreters for MPO open houses and forums, and staff training for appropriate assistance.

To view further information regarding the MPO Limited English Proficiency Plan see Appendix J.

Figure 4. Limited English Proficiency in Planning Area



Benefits & Burdens Analysis

The benefit and burdens analysis assesses the equity of the projects, by examining the impact they may have on minority and low-income populations and identifies any disproportionate impacts.

Benefits are positive impacts from transportation investments in a particular area, such as enhancements in transportation service/options, increases in public safety, congestion relief, increased economic vitality, and reduced travel times.

Burdens, on the other hand, are the adverse effects of transportation investments, such as pollution (noise and air), disruption of community cohesion, displacement of persons or businesses, destruction or decrease of economic vitality, adverse employment effects, decline in tax base or property values, diminished aesthetics, disruption of businesses, parking/access to transit, congestion, or the denial, delay or reduction of receipts of

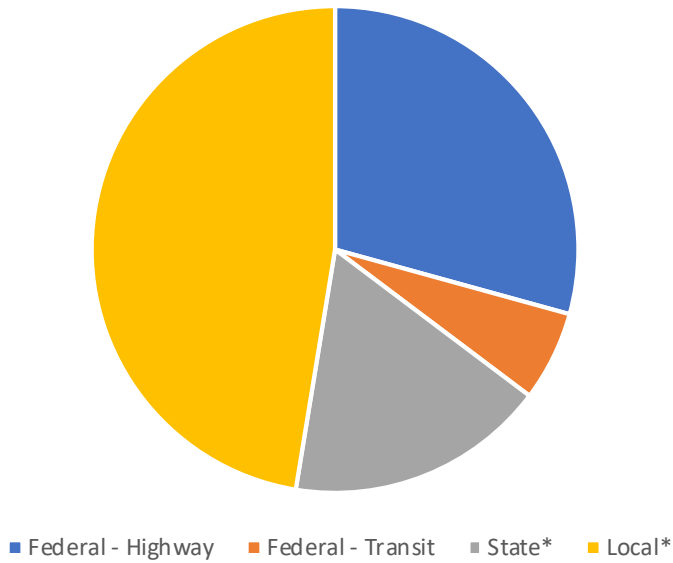
benefits. Table 3 provides examples of possible benefits, burdens, and mitigation strategies for various transportation project types.

This is a high-level overview of projects and are meant to serve as illustrative considerations. Project specific context is reviewed by the implementing partner agencies. The intent of the comparisons made in this analysis is to judge how well the benefits and burdens generated by TIP projects are balanced between areas with high concentrations of TIPs and other areas of the MPA.

Table 2 displays the financial breakdown of the Fiscal Year 2022-2025 Transportation Improvement Program projects by improvement type and population category. This data shows that majority of the programmed TIP projects are located in at least one of the block groups that has reached at least one of the thresholds.

Project planned during the next four years have a collective cost of \$214,867,717. Of these projects, 92.6 percent of the funds are used in areas that have reached at least one of the thresholds.

Figure 5. Federal & State Funded Projects in Planning area



The TIP also identifies projects that have been adopted in previous TIPs, but have not yet been to letting or have not been awarded. These projects are listed in the Previously Approved (PA) table. The TIP also includes an “Awarded, Initiated, or Completed Project” (AIC) table, which identifies highway projects that have been completed, construction has begun, or have been awarded via letting.

In the FY 2022-2025 TIP, there is a total of \$179,726,665 in 62 projects which have State or Federal funding that are listed in the AIC or PA tables. Of this total amount, 90%, or \$161,866,665 is within areas that have reached at least one or more of the thresholds.

The totals for each of the population categories for AIC/PA projects can be seen in Table 2. These projects are also included in the more detailed funding break down shown in Table 4.

A more in-depth explanation of the Transportation Improvement Plan on the R1 Planning website, www.r1planning.org/tip.

Table 2. Transportation Improvement Program Planned Budget for AIC & PA Projects

	Population Area Category							Region Total
	0	1	2	3	4	5	6	
Total AIC/PA Projects	\$90,453,409	\$129,682,909	\$138,762,697	\$59,181,629	\$34,924,400	\$23,765,600	\$0	\$179,726,665
	50.3%	72.2%	77.2%	32.9%	19.4%	13.2%		100.0%

*Due to some projects in multiple population area categories, the percentages will not add to 100%

Table 3. Benefits and Burdens Analysis

Bridges, New Construction, & Engineering Projects		
Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Enhance accessibility & mobility.	Benefits limited to populations with motor vehicles.	Signal synchronization, pedestrian crosswalks, bike lanes, bus routes additions, etc.
Promote economic development.	Increase in noise and air pollution.	Select right-of-way (ROW) for minimum impacts.
Improve safety.	Might impact existing neighborhoods.	Try to incorporate context sensitive design to maintain the neighborhood character.
Improve operational efficiency.		
Resurfacing, Rehabilitation, & Reconstruction Projects		
Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Promote system preservation.	Expansion of shoulder with may impinge on residential property, resulting in additional ROW acquisition.	Close large sections of roadways during non-peak hours to increase resurfacing productivity.
Improve safety.	Diverted traffic during project construction causes potential delays and congestion.	Reroute construction traffic, if needed, to nearby major roads.
Improve operations.	Noise and air pollution during construction.	
Enhancement & Multi-Use Path Projects		
Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Improve quality of life, health & environment by encouraging people to use the bike/pedestrian facilities.	Some traffic calming measures make commercial deliveries difficult.	Create improvement plans to accommodate both motor vehicle traffic & bike/pedestrian usage.
Improve safety to pedestrians & bike riders.	Bike routes takes space for passing turning cars at intersections and reduce on-street parking.	
Provide an alternative to motor vehicles.		
Public Transit Projects		
Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Enhance accessibility by transit for Traditionally Underserved Populations (TUP).	Temporary shelter/stop infrastructure may not be ADA accessible.	Increase service communication between operators and public.
Reduce reliance on motor vehicles and improve air quality.	Temporary bus route deviations may be burdensome.	Bus routes should be within walking distance of TUP.
Increase mobility and safety for TUP.		
Multi-modal Connections, ITS Improvements, CMS Strategies		
Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Enhance mobility & accessibility.	Funding for ITS implementation might not be available.	Multi-modal incorporates transit stations & other modes.
Improve safety		Have a comprehensive design phase before any ITS projects are implemented
Enhance system preservation & operational efficiency		

Table 4. Transportation Improvement Program Planned Budget by Population Area Category

Project Category	Population Area Category							Total
	0	1	2	3	4	5	6	
Bridge	\$4,020 13.6%	\$7,597 25.8%	\$6,854 23.3%	\$0	\$8,600 29.2%	\$2,400 8.1%	\$0	\$29,471 18.3%
Engineering	\$0	\$6,500 22.3%	\$4,130 14.2%	\$5,200 17.9%	\$5,300 18.2%	\$8,000 27.5%	\$0	\$29,130 18.0%
Enhancement	\$0	\$0	\$2,866 72.4%	\$442 11.1%	\$268 6.8%	\$385 9.7%	\$0	\$3,961 2.5%
Intersection	\$0	\$0	\$75 1.3%	\$5,738 98.7%	\$0	\$0	\$0	\$5,813 3.6%
Land Acquisition	\$0	\$0	\$0	\$3,000 43%	\$4,000 57%	\$0	\$0	\$7,000 4%
New Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Reconstruction	\$17,000 25.9%	\$0	\$44,780 68.2%	\$0	\$2,000 3.0%	\$1,843 2.8%	\$0	\$65,623 40.6%
Rehabilitation	\$202 3.6%	\$0	\$2,184 39.4%	\$0	\$3,159 57.0%	\$0	\$0	\$5,545 3.4%
Resurfacing	\$0	\$425 3.1%	\$4,600 33.8%	\$0	\$7,100 52.1%	\$1,500 11.0%	\$0	\$13,625 8.4%
Safety	\$0	\$0	\$0	\$916 100.0%	\$0	\$0	\$0	\$916 0.6%
Utility	\$0	\$0	\$250 100.0%	\$0	\$0	\$0	\$0	\$250 0.2%
Planning	\$0	\$0	\$0	\$0	\$0	\$120 100.0%	\$0	\$120 0.1%
Total Projects within the Region	\$21,222	\$14,522	\$65,739	\$15,296	\$30,427	\$14,248	\$0	\$161,454

Overall Findings

The above discussions, past assessments, and the included maps and charts serve to illustrate that Title VI and Environmental Justice have been long-standing considerations in the MPO transportation planning process. Information has been developed that identifies the location of minority groups and low-income populations in the Rockford Metropolitan Planning Area. Looking at transportation projects in the TIP, it appears there is an equitable balance of projects in minority and/or low-income areas compared to non-minority and upper income areas. Additionally, when the data is compared with the deployment of the public transit system there is strong evidence that the public transit operators are providing a majority of their services to minorities and low-income areas, thus effectively providing service to transit dependent populations.

Lastly, when the data is compared to the allocation of Federal transportation funds that are under the control of the MPO Policy Committee – low income and minority areas have received a

sizable share of these projects and funding.

The MPO will continue to monitor changes in planning area's demographics towards continuing equitable access to the transportation planning process and federal transportation funding. Additionally, the MPO will encourage its partner organizations to continue to ensure that new investments and facilities, service, and maintenance of existing infrastructure (state-of-good-repair) deliver equitable levels of benefits to these traditionally under-served and disadvantaged populations. This can be achieved through continuing to actively engage minority and disadvantaged populations in the transportation decision making process to avoid, minimize or mitigate any disproportionately high and adverse effects.



Photo Courtesy of Aaron Frey.

Appendices

A - MPO Structure

By Federal law, all large urbanized areas (over 50,000 persons) are required to have an organization that plans for and coordinates the decisions regarding the area's transportation systems. The MPO transportation planning function is housed within Region 1 Planning Council (RPC). RPC is comprised of the MPO, WinGIS, and Economic Development District of Northern Illinois. The MPO is empowered by an inter-agency agreement known as the MPO Cooperative Agreement that was developed and mutually adopted by the Cities of Rockford, Loves Park, and Belvidere; the Counties of Winnebago and Boone; the Village of Machesney Park; Rockford Mass Transit District; and the State of Illinois acting through the Illinois Department of Transportation (IDOT).

Policy Committee

The MPO's planning process is guided by the Policy Committee which has final authority over all matters within the jurisdiction of the MPO. The Policy Committee membership is representative of the general-purpose units of government in the planning area and particularly those in the Urbanized Area. The current membership on this Committee is listed in Figure A.1

The Policy Committee meets on the fourth Thursday of even months at 12:45 P.M. The Policy Committee meeting location is at the Region 1 Planning Council offices at 127 N Wyman Street, Rockford, IL.

Technical Committee

The Policy Committee obtains input and technical recommendations on transportation matters from a wide variety of public and private sources but primarily through the Technical Committee. The Technical Committee currently consists of one voting representative from 20 local organizations.

The Technical Committee meets on the third Thursday of each month at 10:00 A.M. at the Region 1 Planning Council offices, 127 N Wyman Street, Rockford, IL.

Ad Hoc & Sub-Committees

The Technical Committee has the authority to establish and appoint members to other temporary or special purpose committees as needed to carry out the duties of the Technical Committee. Membership on these committees may consist of individuals or come from organizations not otherwise represented on the Technical or Policy Committees.

In the past, the Technical Committee has appointed special

subcommittees including the following:

STP/STBG Subcommittee

This subcommittee was originally created to focus on the selection and prioritization of candidate projects for the use of Federal Aid Urban (FAU) funds, a special category of funding used primarily for regional highway projects. Under MAP-21, the Federal Aid Urban category had been replaced with the Surface Transportation Program (STP) and the funds could be used for highway and transit purposes. The recently passed federal transportation law Fixing America's Surface Transportation (FAST) Act, converts the STP into the Surface Transportation Program Block Grant (STBG) Program under Section 133 of Title 23 of the United States Code. The STBG promotes flexibility in State and local transportation decisions and provides funding to best address State and local transportation needs. Approximately \$2.5-\$2.9 million dollars is allocated annually to the MPO Urbanized Area. The STP/STBG Subcommittee continues to meet on an as-needed basis to provide advice on the use of these funds. Project funds are programmed and adopted at the discretion of the MPO Policy Committee.

Greenways Planning Committee

The most recent greenways planning effort was led by staff under the direction and supervision of the Greenways Planning Committee, and the Technical Committee and Policy Committee. The Greenways Planning Committee was comprised of a representative from each of the major environmental planning and advocacy groups in our region, as well as citizens with environmental and greenways planning backgrounds.

The Greenways Planning Committee was made up of a representative from the following agencies:

- Illinois Dept. of Natural Resources
- Natural Land Institute
- Forest Preserves of Winnebago County
- Rockford Park District
- Belvidere Park District
- Boone County Soil & Water Conservation District
- Winnebago County Soil & Water Conservation District
- Winnebago County Geographic Information System
- Boone County Conservation District
- Local Residents

Bicycle & Pedestrian Advisory Committee

As part of the process of developing the vision statement, goals, and strategies for the Bicycle and Pedestrian Plan, a Bicycle &

Pedestrian Advisory Committee (BPAC) was created. This ad hoc committee was developed to ensure that the Bicycle and Pedestrian Plan would reflect the needs, interests, and concerns of the community. Members of the BPAC are representatives of various agencies, organizations, and individuals working to enhance active transportation in the region.

Environmental Committee

The Environmental Committee was formed in 2017 as a committee of Regional 1 Planning Council (RPC). The Committee is made up of technical experts and interested individuals from around the region with representatives from local governments, organizations, and private citizens. There are over 20 people who currently serve on this committee.

The overarching goal of the committee is to further the collaboration, implementation, and effectiveness of environmental planning throughout the Rockford Region. The committee will also provide advice, input, and support on environmental planning topics to the RPC board and other MPO committees.

The committee as a whole meet quarterly with smaller project-based working groups meeting on a more frequent basis. Members were able to choose which topic group they were most interested in from seven options: energy conservation/consumption, land use/growth management, water resources, education/culture, infrastructure, biodiversity, and health.

The Environmental Committee was formed in 2017 as a committee of Regional 1 Planning Council (RPC). The Committee is made up of technical experts and interested individuals from around the region with representatives from local governments, organizations, and private citizens. There are over 20 people who currently serve on this committee.

The overarching goal of the committee is to further the collaboration, implementation, and effectiveness of environmental planning throughout the Rockford Region. The committee will also provide advice, input, and support on environmental planning topics to the RPC board and other MPO committees.

The committee as a whole meet quarterly with smaller project-based working groups meeting on a more frequent basis. Members were able to choose which topic group they were most interested in from seven options: energy conservation/consumption, land use/growth management, water resources, education/culture, infrastructure, biodiversity, and health.

Alternative Transportation Committee

The Alternative Transportation Committee (ATC) was created to act in an advisory capacity to the MPO Technical Committee on alternative transportation policy, planning, and implementation activities. Alternative transportation refers to any mode of personal transportation other than a single-occupant vehicle. Alternative transportation modes include biking, walking, carpooling, and taking public transportation. The ATC supports the development of and maintenance of both the Coordinated Public Transit-Human Services Transportation Plan and the Bicycle and Pedestrian Plan for the Rockford Metropolitan Area, as well as makes recommendations on priorities for funding

and implementation of alternative transportation programs and capital projects.

Members of the committee represent local governments, public transportation agencies, non-profit organizations, public health organizations, and local advocacy groups. The committee as a whole meets at a minimum quarterly with smaller standing and ad hoc working groups meeting on a more frequent basis. Working groups include the following:

- The Mobility acts as a standing advisory working group to the ATC on the evaluation and recommendation of the FTA Section 5310 Program projects, as well as evaluate and prioritize Job Access and Reverse Commute (JARC) and New Freedom eligible projects.
- The Transportation Alternative Program (TAP) acts as a standing advisory working group to the ATC on the evaluation and recommendation of Transportation Alternatives Set-Aside eligible projects.

B - MPO Policy Committee Title VI & EJ Considerations Document Approval Resolution

C - Title VI Notice to the Public

The Rockford Metropolitan Planning Organization (MPO) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, Executive Order 12898 on Environmental Justice, and related statutes and regulations in all programs and activities.

Title VI requires that no person in the United States of America shall, on the grounds of race, color, sex, or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the MPO receives federal financial assistance. Any person who believes they have been aggrieved by an unlawful discriminatory practice under Title VI has a right to file a formal complaint with the MPO. Any such complaint must be in writing and filed with the MPO Title VI Coordinator within one hundred eighty (180) days following the date of the alleged discriminatory occurrence.

For more information on the MPO's Title VI Program or the procedures to file a complaint, contact the MPO at 815-319-4180 or e-mail the Title VI Coordinator at JHalsted@r1planning.org.

Es la política de la Organización de Planificación Metropolitana (MPO) pública para asegurar el pleno cumplimiento de lo dispuesto en el Título VI de la Ley de Derechos Civiles de 1964, los derechos civiles Ley de Restauración de 1987, la Orden Ejecutiva 12898 sobre Justicia Ambientales, estatutos y reglamentos en todos los programas y actividades.

Título VI establece que ninguna persona en los Estados Unidos de Norteamérica, sobre la base de la raza, color, sexo, origen nacional sea excluido de la participación en, ni se le negarán los beneficios de otro modo sujeta a discriminación bajo cualquier programa o actividad en la cual MPO reciba asistencia financiera federal.

Cualquier persona que cree que ha sido afectada por una práctica discriminatoria ilegal, bajo el Título VI tiene derecho a presentar una queja formal con la RMAP. Cualquier queja debe ser por escrito y presentada a la RMAP Coordinador de Título VI dentro de los ciento ochenta (180) días siguientes a la fecha de la presunta discriminación.

Para obtener más información sobre la MPO Título VI Programa o los procedimientos para presentar una queja, comuníquese con MPO en 815-319-4180 o envíe por correo electrónico al Coordinador de Título VI a JHalsted@r1planning.org.

D - Title VI Complaint Form

Name	Telephone (home)	Telephone (work)
Address:	City, State, Zip Code	
Name of MPO Staff Person that You Believe Discriminated Against You:		
Address:	City, State, ZIP Code	
Date of Alleged Incident:		
Cause of Discrimination:		
<input type="checkbox"/> Race	<input type="checkbox"/> Retaliation	<input type="checkbox"/> Sex
<input type="checkbox"/> Color	<input type="checkbox"/> National Origin (Language)	<input type="checkbox"/> Age
<input type="checkbox"/> Familial Status		<input type="checkbox"/> Religion
<input type="checkbox"/> Disability		<input type="checkbox"/> Other
<p>Explain clearly how discrimination occurred and who participated in discrimination. Include in your explanation any way that you feel you were treated unfairly. Attach any other writing that relates to your case.</p>		
Signature	Date	

Rockford Agencia Metropolitana de Planificación

Formulario de Quejas de Discriminación del Título VI y Estatutos Relacionados

Nombre	Número de teléfono (Residencia)	Número de teléfono (Trabajo)
Dirección de residencia (Número y calle, número de departamento)	Ciudad, estado, y código postal de residencia	

Nombre de la persona o agencia que usted cree que discriminó en su contra.

Nombre de la persona o agencia que usted cree que discriminó en su contra.

Dirección de la persona o agencia que usted cree que discriminó en su contra.	Ciudad, estado y código postal de la persona o agencia que usted cree que discriminó en su contra.
---	--

Fecha del incidente discriminatorio.

Causa de la discriminación:

<input type="checkbox"/> Raza	<input type="checkbox"/> Retaliación	<input type="checkbox"/> Sexo	<input type="checkbox"/> Estado Civil	<input type="checkbox"/> Religión
<input type="checkbox"/> Color de Piel	<input type="checkbox"/> Nacionalidad (Lengua)	<input type="checkbox"/> Edad	<input type="checkbox"/> Impedimento Físico o Mental	<input type="checkbox"/> Otro

Explique claramente como sucedió la discriminación y quienes participaron en la discriminación. Incluya en su explicación cualquier forma en que usted se siente que fue tratado injustamente. Adjunte cualquier otro escrito relacionado con su caso.

Firma	Fecha
--------------	--------------

E - MPO Title VI Discrimination Complaint Procedure

1. Alignment: Region 1 Planning Council (RPC) and its staff are responsible for operating within the parameters set forth by prevailing law and professional ethics.

2. Objective: The purpose of this policy is to establish a process for reporting complaints, investigating for violation of Title VI, and to determining appropriate relief should a violation be found.

3. Standard: Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color, and national origin for programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, RPC has adopted the following complaint procedure.

4. Procedure:

a. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by RPC's administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by RPC shall be referred immediately to the Region 1 Planning Council Title VI Coordinator. Written Complaints shall be sent to:

Region 1 Planning Council
Attention: Title VI Coordinator
127 N. Wyman Street, Suite 100
Rockford, IL 61101

b. Verbal and non-written complaints by RPC shall be resolved informally by the RPC Title VI Coordinator. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the Complainant shall be permitted to do so, and the complaint shall follow the process for written complaints.

c. The RPC Title VI Coordinator will advise the RPC Executive Director within ten (10) calendar days of receipt of the complaint(s). The following information will be included in every notification to the Executive Director (or designated human resource manager):

- Name, address, and phone number of the complainant
- Name, address, and phone number of RPC
- Basis of complaint
- Date of alleged discriminatory act(s)
- Date complaint received by RPC
- A statement of the complaint
- Other agencies (local, state, or Federal) where the complaint has been filed
- An explanation of the actions RPC has taken or proposed to resolve the allegation(s) raised in the complaint

d. Within thirty (30) calendar days of receipt of the

complaint(s), the RPC Title VI Coordinator will acknowledge receipt of the complaint(s), inform the complainant of action taken or proposed action to process the complaint(s), and advise the complainant of other avenues of redress available, such as the Illinois Department of Transportation's (IDOT) Equal Opportunity Office (EOO).

e. Within one-hundred twenty (120) calendar days of receipt of the complaint(s), the RPC Title VI Coordinator will conduct and complete a review of the complaint(s) and, based on the information obtained, will render a recommendation for action in a report of findings to the RPC Executive Director (or designee).

f. Within one-hundred fifty (150) calendar days of receipt of the complaint(s), the RPC Executive Director (or designee) will notify the complainant in writing of the final decision reached. The notification will advise the complainant of his or her right to file a formal complaint with IDOT's EOO if they are dissatisfied with the final decision rendered by RPC. The RPC Title VI Coordinator will also provide the governing board with a copy of this decision and summary of findings.

g. The RPC Title VI Coordinator will maintain a log of all verbal and non-written complaints received. The log will include the following information:

- Name of complainant
- Name of respondent
- Basis of complaint
- Date complaint received
- Explanation of the actions the MPO has taken or proposed to resolve the issue raised in the complaint
- A person may also file a complaint directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC, 2059.

5. Responsibility and Accountability: All employees and representatives of Region 1 Planning Council are responsible for abiding by Title VI as applicable to both internal and external parties. All RPC employees with supervisory responsibilities are accountable or ensuring employees access to this process.

6. Review Schedule: The document is recommended for review no less than every two years. The Executive Director (or human resources designee) will ensure this policy is maintained and approved by the applicable authority accordingly.

7. Prevailing Authority" Title VI of the Civil Rights Act of 1964.

8. Internal Cross-Reference: Standard Operating Procedure: Policy & Procedure System; Personnel Policy: Anti-Discrimination and Harassment

9. Attachments and Forms: None

F - Previous Submittals & Documents for RMTD

Listed below are previous submittals as prepared pursuant to guidance from the U.S. Department of Transportation as provided in Circular 4792.1B of the Federal Transit Administration (FTA). The submittal of the Title VI and Environmental Justice assessment (June 28th, 2017) updates and supplements the following previously-prepared documents:

- The report entitled, “Title VI & Environmental Justice of the Public Transit Services provided by the Rockford Mass Transit District in the Rockford Urbanized Area”, March 2004, as prepared by RATS
- The letter dated March 29, 2007, regarding “Title VI and Environmental Justice Assessment for the Rockford Mass Transit District” addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Gary McIntyre (RATS)
- The letter dated March 27, 2008, regarding “Title VI and Environmental Justice Update for the Rockford Mass Transit District Reporting Requirements”, addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Jon Paul Diipla (RATS)
- The letter dated June 20, 2011, regarding “Title VI and Environmental Justice for the Rockford Mass Transit District Status Report”, addressed to Donald Allen, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Jon Paul Diipla (RMAP)
- The report entitled, “Title VI Program and Environmental Justice Assessment 2014-2017” provided by the Rockford Mass Transit District in the Rockford Urbanized Area, March 2014, as prepared by RMAP.
- The report entitled, “Title VI Program and Environmental Justice Assessment 2018-2020” provided by the Rockford Mass Transit District in the Rockford Urbanized Area, June 2017, as prepared by the MPO.

G - Recent Special MPO Changes, Improvements or Efforts

Since the adoption of the previous MPO Title VI and Environmental Justice document, the following significant changes have occurred in the MPO Planning process:

The Rockford Metropolitan Agency for Planning is now and part of the Region 1 Planning Council (RPC), a regional organization that combines key public sector operating entities into shared assets for planning, fund development, and research.

In 2015, Fixing America's Surface Transportation Act (FAST Act) was adopted for the guiding transportation law. The FAST Act, converted the Surface Transportation Program into the Surface Transportation Block Grant Program. The STBG promotes flexibility in State and local transportation decisions and provides flexible funding to best address state and local transportation needs. A specific percentage of funds used from the STBG must be set aside for transportation enhancement activities and transportation alternative projects.

As part of FAST Act, the former Transportation Alternatives Program (TAP) was replaced with a set-aside of funds under the STBG. The TA Set-Aside authorizes funding for programs and projects including on- and off-road pedestrian and bicycle facilities; infrastructure projects for improving non-driver access to public transportation and enhanced mobility; safe routes to school projects; and projects for planning, designing, or constructing boulevards and other roadways largely in the right-of-way of former divided highways. While FHWA administers the TA Set-Aside, states and MPO's that represent urbanized areas with populations over 200,000 such as MPO, are involved in the project selection.

The Alternative Transportation Committee originated as an expansion of the Mobility Subcommittee, which was created to assess needs, develop strategies and recommend actions required to improve the mobility of public transportation dependent populations in the region. During the development of the Bicycle & Pedestrian Plan for the Rockford MPA (September 27, 2017 version), it was recommended that an Active Transportation Committee be created to advise and provide recommendations to the MPO Policy Committee and the MPO Technical Committee on active transportation policy, planning, and implementation activities, and related bicycle and pedestrian planning initiatives. Due to the need of an integrated and coordinated multimodal system of connecting bicycle and pedestrian facilities to the existing public transportation services, the MPO Policy Committee determined that a single committee of the MPO, should be established and created the Alternative Transportation Committee to focus on addressing planning issues related to improvements to accessibility, connectivity, and ease of multi-modal mobility including active and public transportation modes.

H - MPO Public Participation Plan

The purpose of the MPO Public Participation Plan is to set forth the policies, procedures, methods and details for involving the general public and area transportation stakeholders in the transportation planning (3-C) and programming activities of the MPO.

The MPO will continue to ensure that there are sufficient opportunities for public participation regarding the transportation planning process through the strategies shown on the following page. The MPO will also continue to apply the following planning principles:

- Recognizing the rights of citizens to participate in planning decisions.
- Strive to give citizens (including those who lack formal organization or influence) full, clear and accurate information on planning issues and the opportunity to have a meaningful role in the development of plans and programs.
- Strive to expand choice and opportunity for all persons, recognizing a special responsibility to plan for the needs of disadvantaged groups and persons.
- Assist in the clarification of community goals, objectives and policies in plan-making.
- Ensure that reports, records, and any other non-confidential information which is, or will be, available to decision makers is made available to the public in a convenient format and sufficiently in advance of any decision.
- Strive to protect the integrity of the natural environment and the heritage of the built environment. Pay special attention to the coordination of decisions and the long-range consequences of present actions.

Further information regarding the public participation activities of the MPO can be found in the MPO Public Participation Plan (PPP). This document in its entirety can be accessed via the MPO's website www.r1planning.org.

I - MPO Public Outreach Made Since Last Title VI Program Submission

Outreach Effort	Date	Time
Executive Committee		
Executive Committee	25-Sep-18	8:00 am - 8:46 am
Executive Committee	13-Dec-18	2:30 pm - 3:24 pm
Executive Committee	28-Feb-19	2:46 pm - 3:32 pm
Executive Committee	9-May-19	2:38 pm - 3:45 pm
Executive Committee	17-Jul-19	11:04 am - 12:26 pm
Executive Committee	10-Oct-19	7:33 am - 8:36 am
Executive Committee	13-Nov-19	4:06 pm - 4:56 pm
Executive Committee	20-Dec-19	8:05 am - 9:10 am
Executive Committee	31-Jan-20	7:35 am - 8:37 am
Executive Committee	28-Feb-20	7:35 am - 8:35 am
Executive Committee	15-Apr-20	1:34 pm - 3:03 pm
Executive Committee	24-Apr-20	7:31 am - 7:53 am
Executive Committee	18-Jun-20	7:31 am - 8:24 am
Executive Committee	28-Aug-20	7:37 am - 8:39 am
Executive Committee	23-Oct-20	7:32 am - 7:59 am

Executive Committee	5-Dec-20	9:00 am - 11:15 am
Executive Committee	29-Jan-21	7:39 am - 8:10 am
Executive Committee	12-Feb-21	9:30 am - 9:44 am
Executive Committee	16-Apr-21	9:03 am - 10:07 am
Executive Committee	25-Jun-21	7:30 am - 8:27 am
Executive Committee	29-Oct-21	7:32 am - 8:37 am

Alternative Transportation Committee

Alternative Transportation Committee	17-Apr-18	2:00 pm - 3:30 pm
Alternative Transportation Committee	12-Jun-18	2:03 pm - 3:31 pm
Alternative Transportation Committee	9-Oct-18	4:05 pm - 4:56 pm
Alternative Transportation Committee	9-Apr-19	2:00 pm - 2:32 pm
Alternative Transportation Committee	9-Jul-19	2:02 pm - 2:50 pm
Alternative Transportation Committee	15-Oct-19	2:01 pm - 3:45 pm
Alternative Transportation Committee	14-Jan-20	2:03 pm - 3:10 pm
Alternative Transportation Committee	10-Mar-20	2:03 pm - 2:46 pm
Alternative Transportation Committee	14-Jul-20	2:00 pm - 3:00 pm
Alternative Transportation Committee	8-Sep-20	2:05 pm - 2:39 pm
Alternative Transportation Committee	10-Nov-20	2:07 pm - 2:28 pm
Alternative Transportation Committee	12-Jan-21	2:03 pm - 2:59 pm

Alternative Transportation Committee	9-Mar-21	2:06 pm - 2:36 pm
Alternative Transportation Committee	11-May-21	2:07 pm - 2:29 pm
Alternative Transportation Committee	12-Oct-21	2:23 pm - 2:45 pm

MPO Policy Committee

MPO Policy Committee	13-Dec-18	1:05 pm - 1:27 pm
MPO Policy Committee	28-Feb-19	1:01 pm - 1:25 pm
MPO Policy Committee	9-May-19	12:56 pm - 1:22 pm
MPO Policy Committee	27-Jun-19	12:47 pm - 1:14 pm
MPO Policy Committee	29-Aug-19	12:45 pm - 1:25 pm
MPO Policy Committee	24-Oct-19	2:45 pm - 4:00 pm
MPO Policy Committee	19-Dec-19	12:49 pm - 1:03 pm
MPO Policy Committee	31-Jan-20	8:40 am - 9:12 am
MPO Policy Committee	24-Apr-20	8:33 am - 9:14 am
MPO Policy Committee	19-Jun-20	8:36 am - 9:03 am
MPO Policy Committee	31-Jul-20	8:31 am - 9:06 am
MPO Policy Committee	28-Aug-20	8:46 am - 8:59 am
MPO Policy Committee	23-Oct-20	8:30 am - 8:47 am
MPO Policy Committee	11-Dec-20	8:31 am - 8:48 am
MPO Policy Committee	29-Jan-21	8:31 am - 8:56 am

MPO Policy Committee	26-Feb-21	8:31 am - 9:10 am
MPO Policy Committee	18-Mar-21	10:31 am - 10:38 am
MPO Policy Committee	30-Apr-21	8:32 am - 9:15 am
MPO Policy Committee	25-Jun-21	8:38 am - 8:47 am
MPO Policy Committee	27-Aug-21	8:32 am - 9:08 am
MPO Policy Committee	29-Oct-21	8:43 am - 9:00 am
MPO Policy Committee	3-Dec-21	8:31 am - 8:50 am
MPO Technical Committee		
MPO Technical Committee	18-Apr-19	10:05 am - 11:16 am
MPO Technical Committee	17-Jan-19	10:00 am - 11:38 am
MPO Technical Committee	21-Feb-19	10:11 am - 11:08 am
MPO Technical Committee	20-Jun-19	10:00 am - 11:13 am
MPO Technical Committee	22-Aug-19	10:00 am - 10:47 am
MPO Technical Committee	24-Oct-19	10:01 am - 12:27 pm
MPO Technical Committee	14-Nov-19	10:00 am - 10:28 am
MPO Technical Committee	23-Jan-20	10:05 am - 10:55 am
MPO Technical Committee	23-Apr-20	10:04 am - 11:03 am
MPO Technical Committee	18-Jun-20	10:05 am - 10:45 am
MPO Technical Committee	23-Jul-20	10:03 am - 10:45 am

MPO Technical Committee	20-Aug-20	10:04 am - 10:25 am
MPO Technical Committee	22-Oct-20	10:11 am - 10:58 am
MPO Technical Committee	19-Nov-20	10:02 am - 10:21 am
MPO Technical Committee	21-Jan-21	10:01 am - 10:42 am
MPO Technical Committee	18-Feb-21	10:01 am - 10:18 am
MPO Technical Committee	18-Mar-21	10:00 am - 10:15 am
MPO Technical Committee	22-Apr-21	10:02 am - 11:01 am
MPO Technical Committee	17-Jun-21	10:00 am - 10:34 am
MPO Technical Committee	19-Aug-21	10:01 am - 10:43 am
MPO Technical Committee	21-Oct-21	10:03 am - 10:44 am
MPO Technical Committee	18-Nov-21	10:00 am - 10:25 am

Round One Public Workshops (MTP)

Round One Public Workshops	24-Jan-19	3:00 pm - 6:00 pm
Round One Public Workshops	29-Jan-19	10:30 am - 1:30 pm
Round One Public Workshops	31-Jan-19	6:30 pm - 8:00 pm
Round One Public Workshops	12-Feb-19	4:00 pm - 6:30 pm
Round One Public Workshops	21-Feb-19	2:00 pm - 4:30 pm

Round One Pop-Up Outreach (MTP)

Round One Pop-Up Outreach	4-Feb-19	8:00 am - 10:00 am
---------------------------	----------	--------------------

Round One Pop-Up Outreach	4-Feb-19	4:30 pm - 6:30 pm
Round One Pop-Up Outreach	6-Feb-19	10:00 am - 12:00 pm
Round One Pop-Up Outreach	7-Feb-19	11:30 am - 1:30 pm
Round One Pop-Up Outreach	8-Feb-19	3:30 pm - 4:30 pm
Round One Pop-Up Outreach	11-Feb-19	1:00 pm - 3:00 pm
Round One Pop-Up Outreach	13-Feb-19	5:00 pm - 7:00 pm
Round One Pop-Up Outreach	20-Feb-19	11:30 am - 1:00 pm
Round One Pop-Up Outreach	20-Feb-19	11:30 am - 1:00 pm

NorthCOG

NorthCOG	27-Aug-21	10:00 am - 10:41 am
NorthCOG	15-Sep-21	9:00 am - 9:35 am
NorthCOG	17-Nov-21	9:13 am - 10:15 am

2021 Greenways Plan

2021 Greenways Plan	21-Oct-20
2021 Greenways Plan	12-Nov-20
2021 Greenways Plan	19-Jan-21

Passenger Rail Community Workshop

Passenger Rail Community Workshop	8-Feb-19
-----------------------------------	----------

Keith Creek Stakeholder Meetings

Keith Creek Stakeholder Meetings	1-Nov-21
----------------------------------	----------

Keith Creek Stakeholder Meetings	2-Nov-21
----------------------------------	----------

J - Limited English Proficiency Plan

The purpose of the limited English proficiency policy guidance is to clarify the responsibilities of recipients of federal financial assistance from the U.S. Department of Transportation (DOT) and assist them in fulfilling their responsibilities to Limited English Proficient (LEP) persons, pursuant to Title VI of the Civil Rights Act of 1964 and implementing regulations. It was prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations provide that no person shall be subjected to discrimination on the basis of race, color, or national origin under any program or activity that receives federal financial assistance.

Additionally, Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency that is subject to the requirements of Title VI to publish guidance for its respective recipients clarifying that obligation. Executive Order 13166 further directs that all such guidance documents be consistent with the compliance standards and framework detailed in the Department of Justice’s (DOJ’s) Policy Guidance entitled “Enforcement of Title VI of the Civil Rights Act of 1964--National Origin Discrimination Against Persons with Limited English Proficiency.” (See 65 FR 50123, August 16, 2000 DOJ’s General LEP Guidance). Different treatment based upon a person’s inability to speak, read, write, or understand English may be a type of national origin discrimination. Executive Order 13166 applies to all federal agencies and all programs and operations of entities that receive funding from the federal government, including state agencies, local governments and agencies such as the Rockford Metropolitan Planning Organization (MPO), private and non-profit entities, and sub-recipients.

The Metropolitan Planning Organization (MPO) for the Rockford Region, has developed a Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs as required by Executive Order 13166. A Limited English Proficiency person is one who does not speak English as their primary language and who has a limited ability to read, speak, write, or understand English.

The plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, training staff, how to notify LEP persons that assistance is available, and information for future plan updates. In developing the plan while determining the MPO’s extent of obligation to provide LEP services, the MPO undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

- The number or proportion of LEP persons eligible in the three-county area to be served or likely to encounter an MPO program, activity, or service;
- The frequency with which LEP individuals come in contact with an MPO program;

- The nature and importance of the program, activity or service provided by the MPO to the LEP population; and
- The resources available to the MPO and overall costs to provide LEP assistance.

Further information regarding the LEP populations and LEP integration within the MPO planning are can be found in the MPO Limited English Proficiency (LEP). This document in its entirety can be accessed via the MPO website www.r1planning.org.


K - MPO Metropolitan Transportation Planning Process Certificate

Metropolitan Transportation Planning Process Certification

In accordance with 23 CFR 450.334 (b), the planning process in the Rockford Metropolitan Planning Area was certified by USDOT – FHWA – FTA on **June 08, 2020** subject to the resolution of two corrective actions related to the administration of the Surface Transportation Block Grant program.

In accordance with 23 CFR 450.334, the Illinois Department of Transportation and the Region 1 Planning Council Metropolitan Planning Organization for the Rockford metropolitan planning area hereby certify the metropolitan transportation planning process is being carried out in accordance with all applicable requirements including:

1. 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR 450 subpart C;
2. (Only applicable to nonattainment and maintenance areas) Sections 174 and 176(c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 and (d)) and 40 CFR part 93;
3. Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C. 2000d-1) and 49 CFR part 21; Executive Order 13166 (Limited English Proficiency) and Executive Order 12898 (Environmental Justice);
4. 49 U.S.C. 5332, Section 324 of title 23 U.S.C. and the Older Americans Act (as amended 42 U.S.C. 6101) prohibiting discrimination on the basis of race, color, creed, national origin, sex, or age in employment or business opportunity;
5. Section 1101 (b) of the SAFETEA-LU (Pub. L. 109-59) and 49 CFR part 26 regarding the involvement of disadvantaged business enterprises in USDOT funded projects;
6. 23 CFR part 230, regarding the implementation of an equal employment opportunity program on Federal and Federal-aid highway construction contracts;
7. The provision of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 *et seq.*) and 49 CFR parts 27, 37 and 38, and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) regarding discrimination against individuals with disabilities.


Signature,
Boone County Chairman
Chairman – MPO Policy Committee or
Other Authorized Representative of the
Region 1 Planning Council MPO
August 27, 2021

Signature,
Bureau Chief, Urban Program Planning
Illinois Department of Transportation or
other Authorized Representative of the
Illinois Department of Transportation
Dated: _____



L - Public Comments and Notices

Public comments regarding the Title VI & Environmental Justice Considerations document and Limited English Proficiency Plan will be accepted from March 16th 2022 to April 15th 2022. Provided in this section are the public notices distributed for the draft documents review and comment. Comments received during this period are also included. In accordance with the procedures outlined in the MPO Public Participation Plan, Title VI & EJ Considerations, and Limited English Proficiency Plan, the MPO will utilize available services as needed to provide translation of transportation planning documents/information. Additional translation services will be continued to be evaluated and incorporated as potential resources for the MPO.

M - Population Category Threshold Map

Figure 6. Population Category Threshold by Senior Population

Downtown Rockford

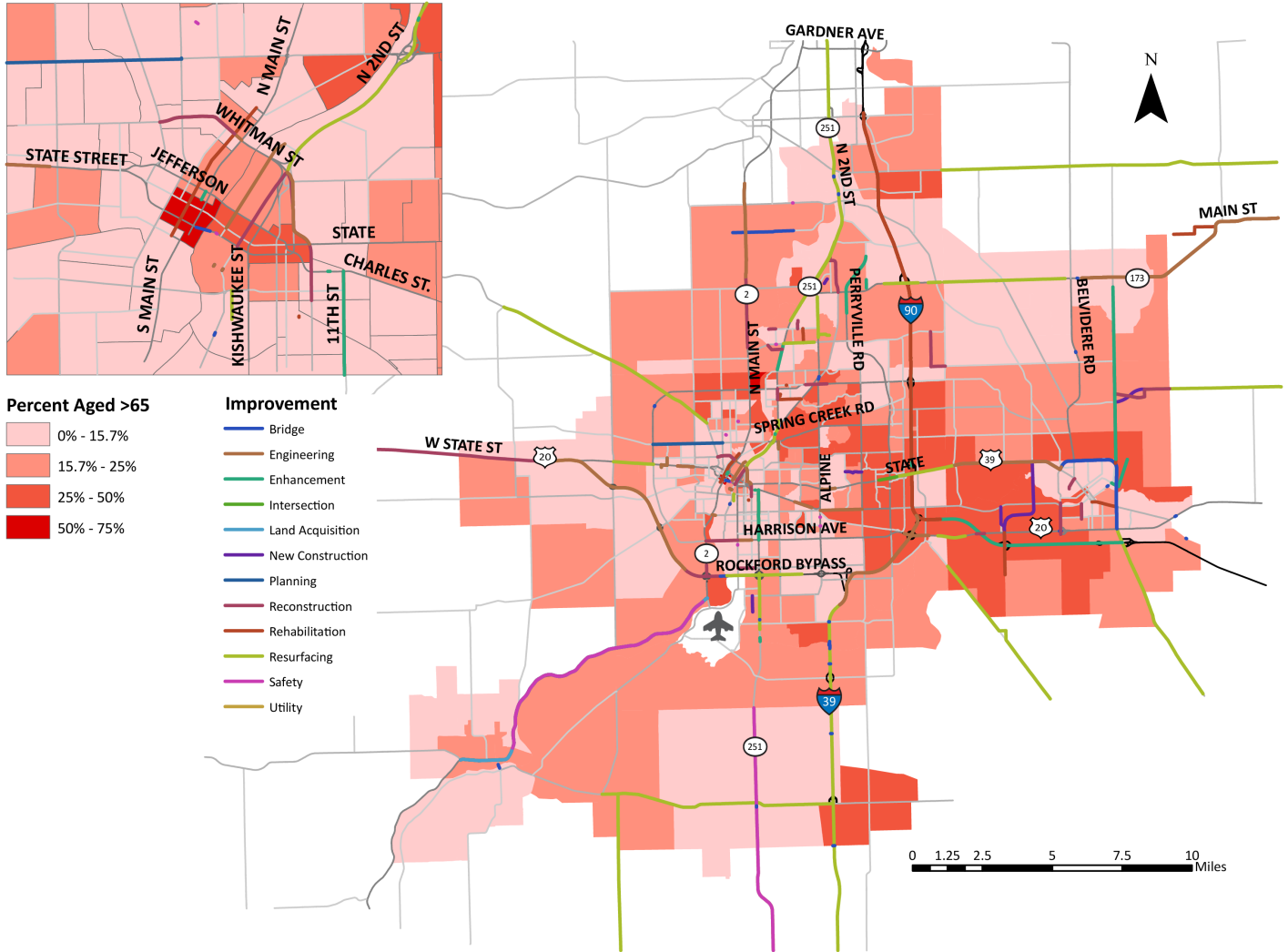


Figure 7. Population Category Threshold by Households without Vehicle Access

Downtown Rockford

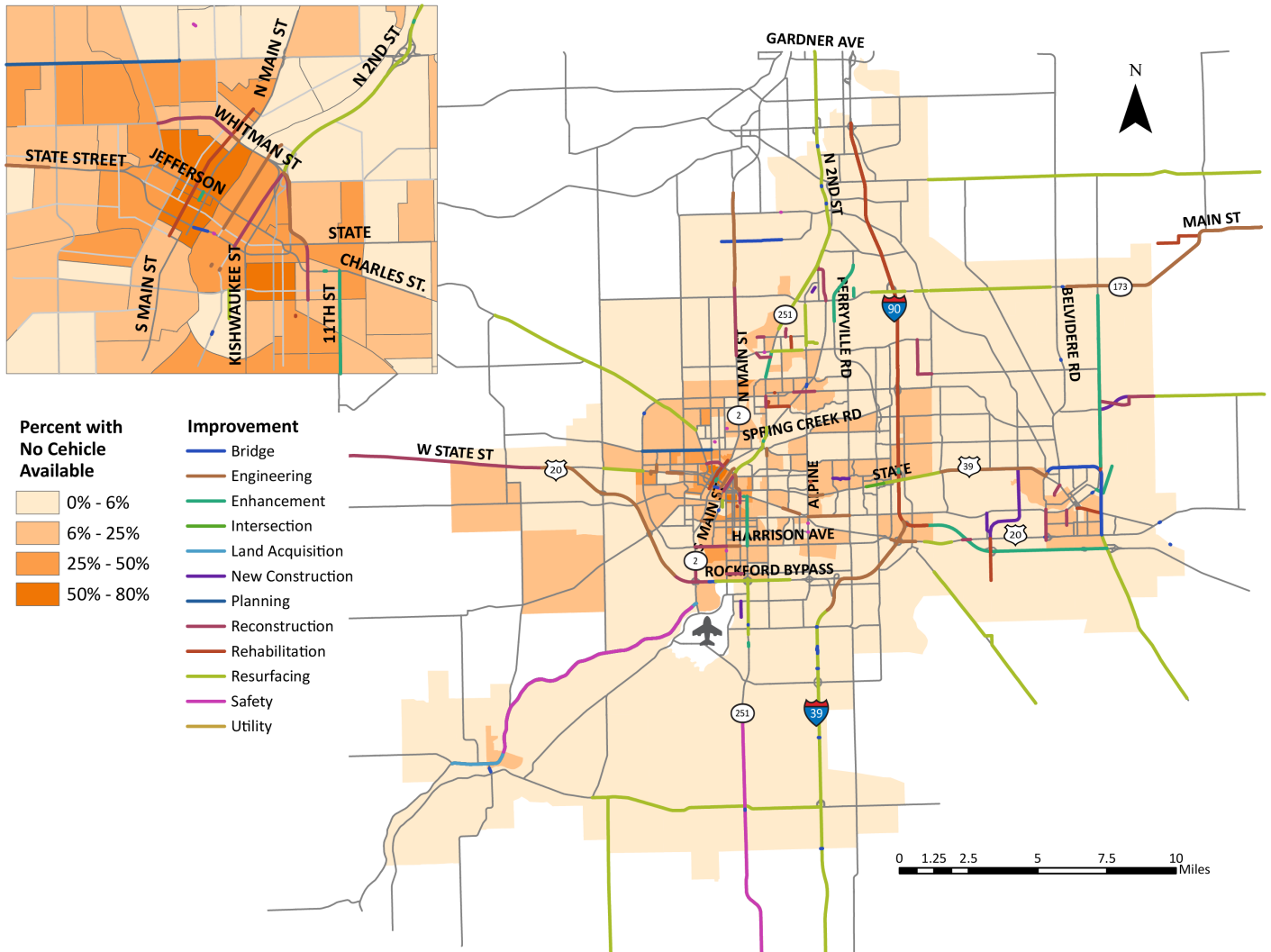


Figure 8. Population Category Threshold by Minority Population

Downtown Rockford

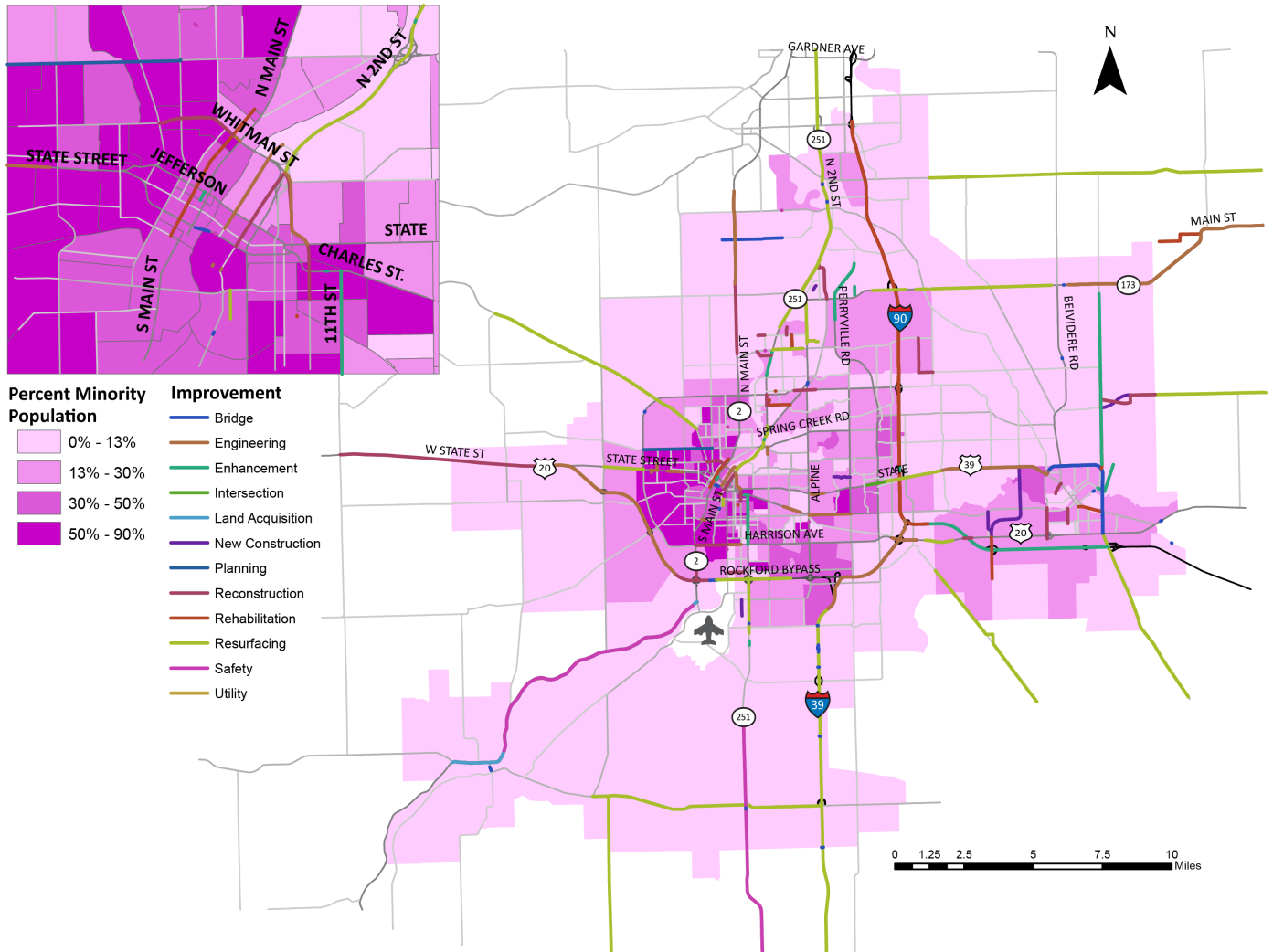


Figure 9. Population Category Threshold by Population Below Poverty Line

Downtown Rockford

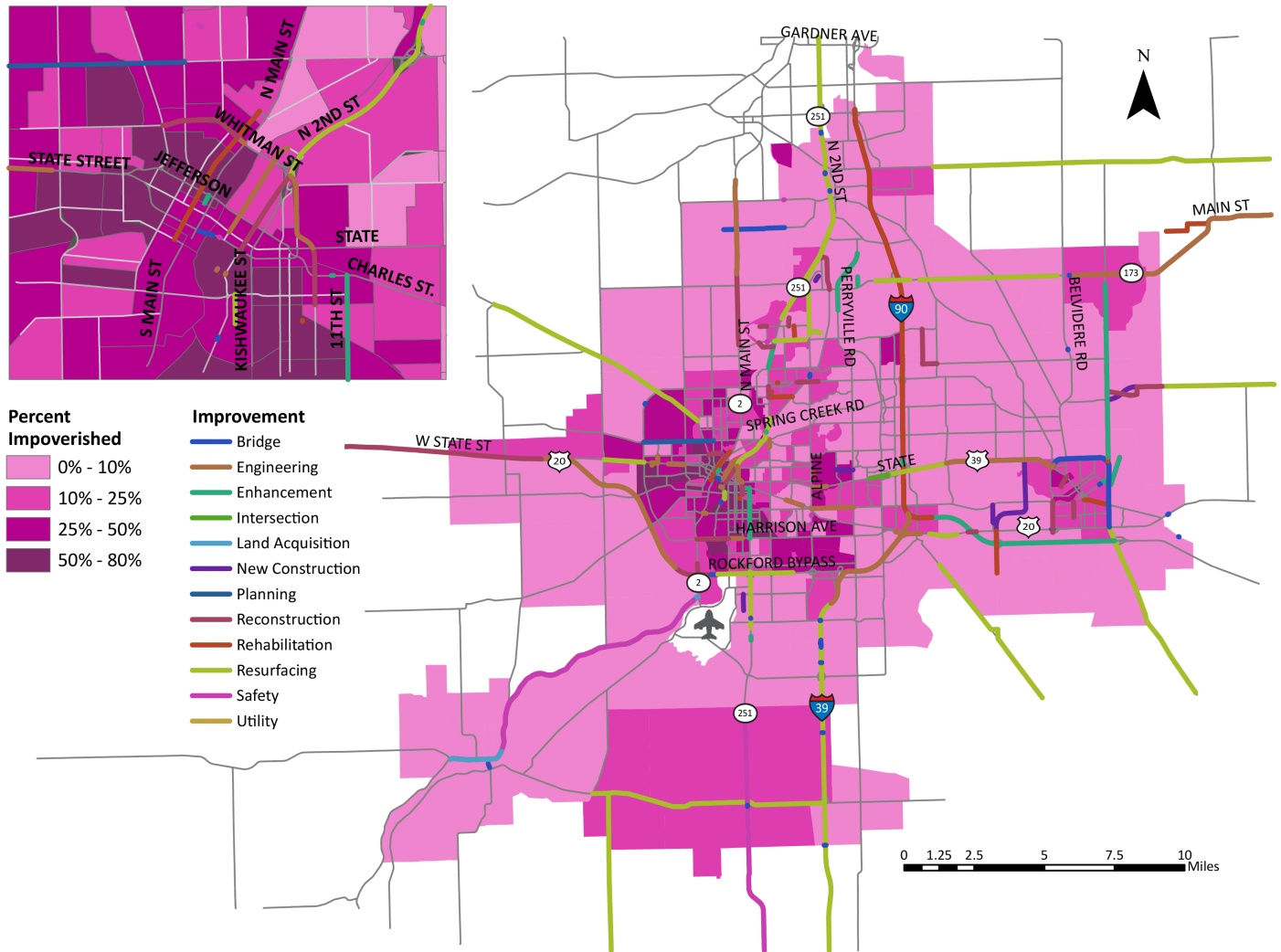
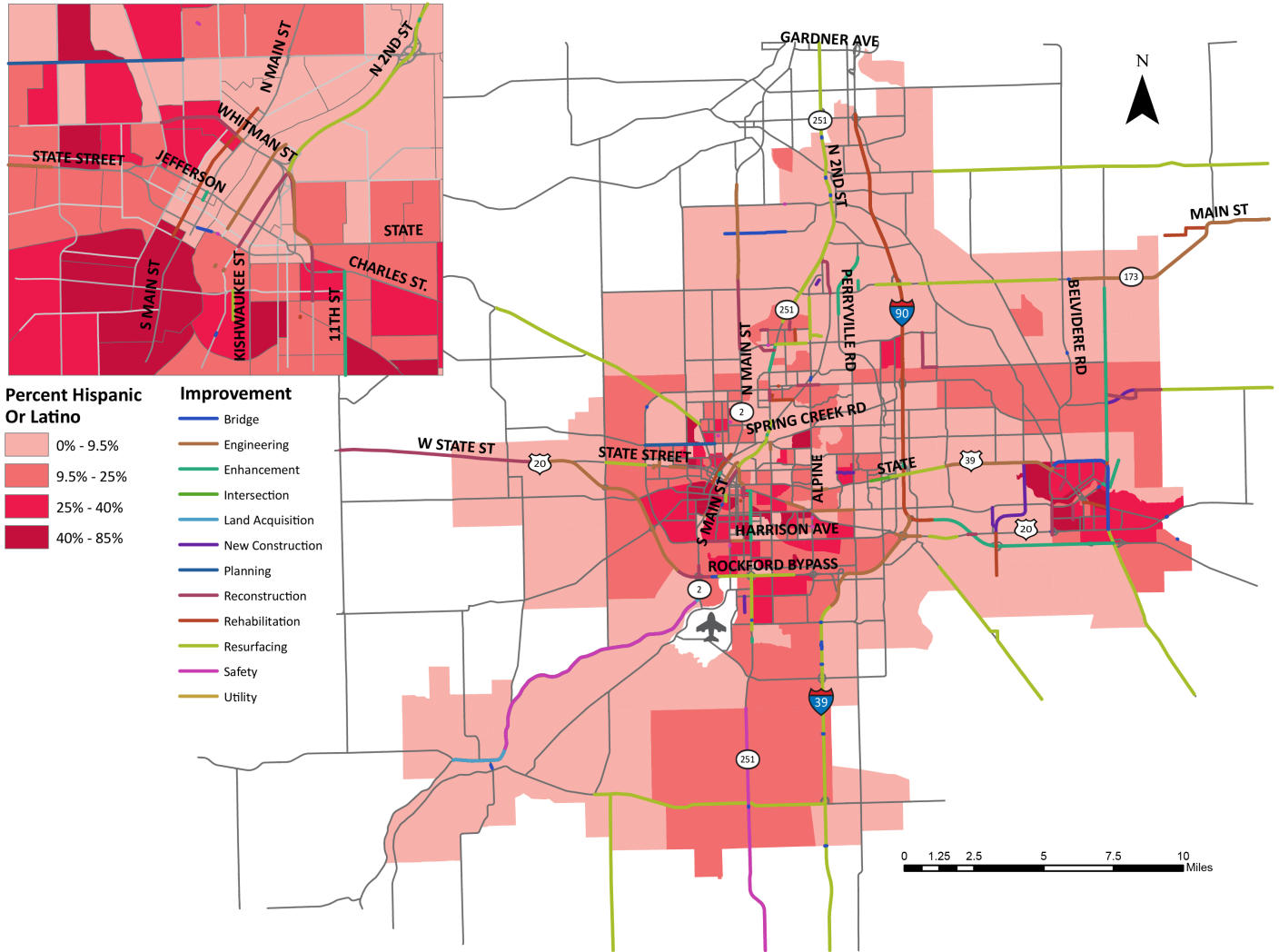


Figure 10. Population Threshold by Hispanic/Latino Population

Downtown Rockford



This page intentionally left blank.

Additional Resources

Region 1 Planning Council Website

<http://r1planning.org/>

2050 Metropolitan Transportation Plan Webpage

<http://r1planning.org/mtp>

2050 Metropolitan Transportation Plan for the Rockford Region

<http://r1planning.org/mtp>



COLLABORATIVE PLANNING FOR NORTHERN ILLINOIS

127 N Wyman St, Suite 100, Rockford, Illinois 61101 | 815-319-4180 | info@r1planning.org

www.r1planning.org