

Certification Review of the Metropolitan Transportation Planning Process for the Rockford Transportation Management Area

Certification Review by:
Federal Highway Administration
Federal Transit Administration



March, 2008

Table of Contents

Forward	2
Executive Summary	2
Introduction	3
Regional Perspective . . .	3
Community History . . .	4
SAFETEA-LU . . .	4
2007 Transportation Planning Certification Review Process	5
Input from the Public, Elected Officials, and Staff from MPO	6
Process Review Elements	8
Organization of the Metropolitan Planning Organization . . .	8
Metropolitan Area Boundaries . . .	9
Agreements . . .	10
Responsibilities, Cooperation, and Coordination . . .	11
Unified Planning Work Program . . .	11
Metropolitan Planning Elements . . .	12
Eight Planning Factors of SAFETEA-LU . . .	12
Safety Conscious Planning . . .	12
Environmental Mitigation and Consultation . . .	14
Security . . .	16
Transit . . .	16
Non-Motorized Transportation . . .	18
Long Range Transportation Plan . . .	18
Congestion Management Process . . .	22
Intelligent Transportation Systems . . .	24
Transportation Improvement Program . . .	24
Project Selection . . .	25
Annual Listing of Obligated Projects . . .	26
Air Quality Conformity . . .	27
Public Participation . . .	28
Title VI . . .	29
Americans with Disabilities Act . . .	30
Coordinated Human Services Transportation Plan . . .	31
Self Certification . . .	31
Disposition of 2003 Review Findings	33
Finding and Recommendations	35
Appendices	
Definition of Acronyms	A-1
Site Visit Agenda	A-2
Site Visit Attendance	A-3
Public Meeting Notice	A-4
Public Meeting Attendance	A-5
MPO Staff Response to Advance review Materials	A-6

Forward

Pursuant to 23 U.S.C. 134(i)(5) and 49 U.S.C. 1607, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning in Transportation Management Areas (TMA) at least every four years. (A TMA is an urbanized area, as defined by the U.S. Census, with a population of over 200,000 persons.) In general, the reviews consist of three primary activities: a site visit, review of planning products (in advance of and during the site visit), and preparation of a report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the Metropolitan Planning Organization, State Department of Transportation, and transit operators in conducting the metropolitan planning process. Joint FTA/FHWA certification review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect local issues and needs. As a consequence, the scope and depth of the certification review reports will vary significantly.

The certification review process is only one of several methods used to assess the quality of a local metropolitan planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide both FHWA and FTA an opportunity to comment on the planning process, including the Unified Planning Work Program approval, Long Range Transportation Plan, Metropolitan and Statewide Transportation Improvement Program findings, as well as a range of other formal and less formal contacts. While the Planning Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “finding” of the certification review is based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare certification reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices and content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal findings of the review.

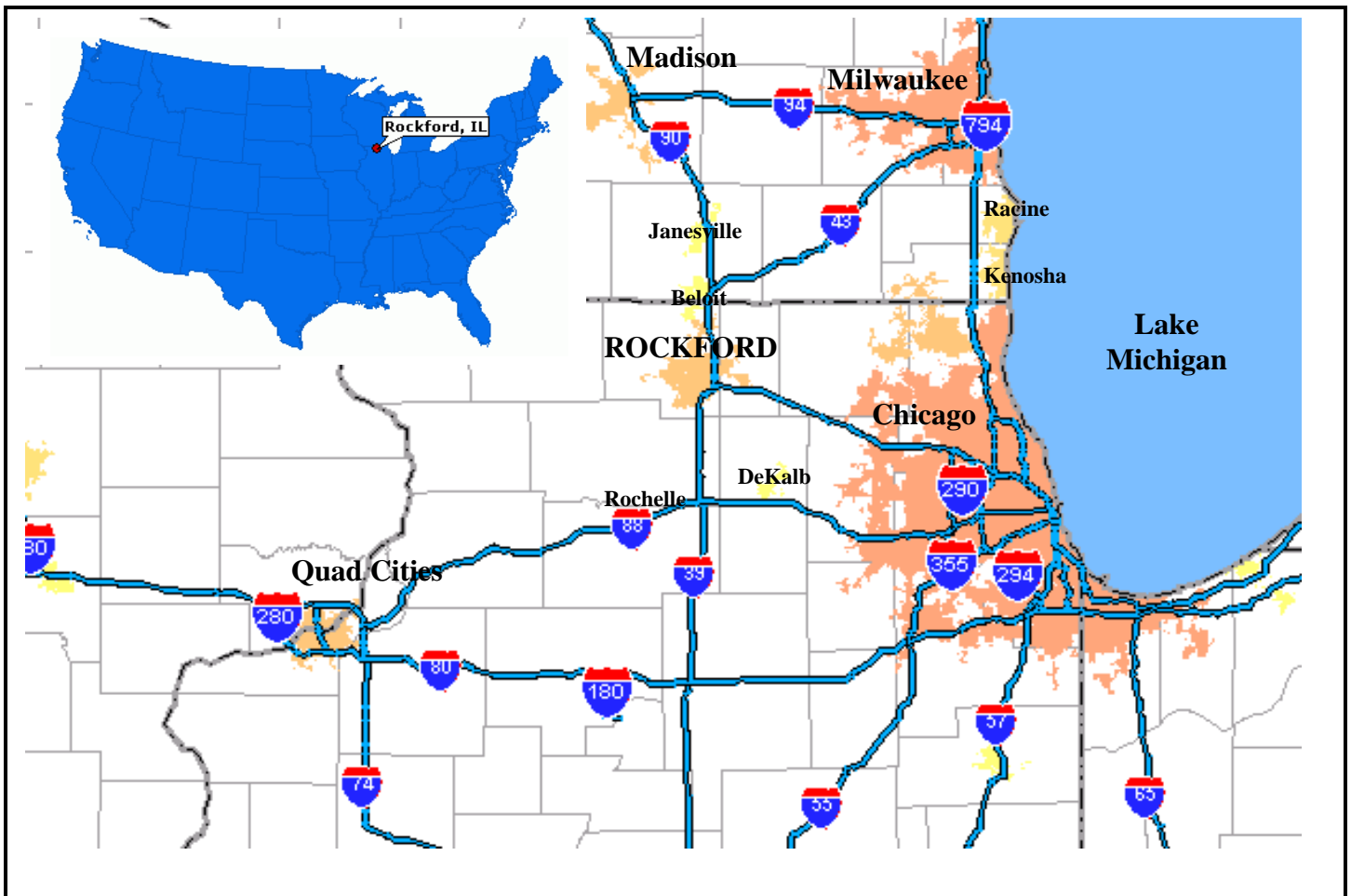
Executive Summary

Based on this review and ongoing oversight by the Federal Highway Administration and the Federal Transit Administration, the transportation planning process carried out in the Rockford Transportation Management Area is conditionally certified as meeting the requirements as described in 23CFR §450.334 pending satisfactory resolution of corrective actions identified on page 35 of this report. Additionally, a number of recommendations have been made throughout this report for enhancement of the planning process carried out in this region.

Introduction

Regional Perspective

The Rockford, Illinois metropolitan area is located approximately 90 miles northwest of Chicago and offers a full range of transportation assets. Highway access to the region is provided by Interstates 90, 39, 88, and 43 and by U.S. routes 20 and 51/251. Several national and regional railroads serve the freight hauling needs of Rockford area business and industry, as do numerous interstate and local trucking companies, many with terminals in the area. The Chicago-Rockford International Airport offers passenger service and is the 22nd largest cargo airport in the United States with much of its growth attributed to United Parcel Service, whose second largest sorting and heavy airfreight facility is located at the airport. Additionally, the Union Pacific Global III intermodal terminal is located approximately 25 miles to the south near the I-88/I-39 interchange. The Rockford Mass Transit District (RMTD) offers daily fixed route service, weekday night time service, and daily paratransit service to 39 locations in the city. The Van Galder Bus Company offers daily service from Rockford to downtown Chicago, Amtrak, and Chicago Midway and O'Hare airports.



Community History

Located in the northern Illinois Rock River watershed, the Rockford region is generally bound together by four rivers: the scenic Rock River and its major tributaries: the Kishwaukee, Pecatonica and Sugar. The name for the City of Rockford was inspired by the rocky ford across the Rock River.

The region first began to experience growth and develop in the 1850's as the Rockford Water Power Company and the Galena and Chicago Union Railroad introduced service to the area. The region became well known for the production of agricultural machinery as well as furniture produced by a large population of Swedish immigrants.

A Tacoma class frigate, the USS Rockford, was named after the city and earned two service stars during World War II. Additionally, a local training depot used for both World Wars I and II was converted in the 1950s and became the site of the Chicago-Rockford International Airport as well as the site for what is now known as Atwood Park. A private airport in Machesney Park used by the air corps in World War II later became a municipal airport before becoming the current site of the Machesney Park Mall.

Rockford is nicknamed the Forest City in part due to its history of abundant elm trees. However, an epidemic of Dutch Elm disease eliminated the vast majority of these trees in the 1950s. Nevertheless, Rockford is still heavily lined with trees particularly in parks and boulevards throughout older portions of the city.

The manufacturing base in the Rockford region was expanded in the 1960s by the development of a Chrysler car factory in the City of Belvidere and by the significant expansion of Sundstrand Company (now known as Hamilton, a division of United Technologies) that produces aircraft parts. Other industry thriving through most of the 20th century included machine tools, heavy machinery, fastener and cabinet hardware products, and packaging devices and concepts. The region's economy suffered from manufacturing industry restructuring in the late 1980s when many manufacturing companies either closed or were bought out by larger firms which often relocated operations to other areas of the country or overseas. Consequently, in order to survive and thrive in this kind of changing environment, the focus of the local economy was forced to evolve. The region's new focus relies on high-technology businesses, tourism driven by museums and the park system, and its strategic location relative to the Chicago metropolitan area and commercial market.

SAFETEA-LU

On August 10, 2005, President George W. Bush signed the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU). SAFETEA-LU authorizes the Federal surface transportation programs for highways and transit for the 5-year period from 2005-2009. SAFETEA-LU built on previous legislative efforts, provided new emphasis on certain initiatives, and identified new programs to improve safety, mobility, and environmental stewardship. SAFETEA-LU also mandated that MPOs implement changes to Metropolitan Planning requirements by July 1, 2007. This is the first certification review of the Rockford TMA under SAFETEA-LU regulations.

2007 Transportation Planning Certification Review Process

The finding for the 2007 Transportation Planning Certification Review is derived from three activities: ongoing oversight of the planning process by the FHWA Illinois Division and FTA Region V offices; a desk review conducted by the Federal Review Team; and a site visit by the Federal Review Team.

Day to day oversight of the compliance with federal rules and regulations by those receiving federal highway and transit funds, is accomplished by the United States Department of Transportation. John Donovan, FHWA Transportation Planning Specialist, and Reggie Arkell, FTA Community Planner, are the federal staff responsible for planning oversight in the Rockford metropolitan region. Among other activities, they have responsibility for reviewing and approving the annual Unified Work Program (UWP); reviewing the Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP); reviewing amendments to the LRTP; approving amendments to the Statewide Transportation Improvement Program (STIP) and TIP; and making various eligibility determinations.

In addition to the ongoing oversight, the Federal Review Team conducted a desk review of the products of the planning process throughout the Summer of 2007. One goal of the desk audit was to determine what elements of the planning process needed further review during the site visit. The site visit interviews took place on September 18-19, 2007 and a closeout discussion concerning preliminary observations was held on September 27 as part of the regularly scheduled Rockford Area Transportation Study Policy Committee meeting. The Federal Review Team was composed of the following ten individuals:

Stewart McKenzie, FTA – Region V, Community Planner

Reggie Arkell, FTA – Region V, Community Planner

Jon-Paul Kohler, FHWA- Illinois Division, Planning and Program Development Manager

JD Stevenson, FHWA- Illinois Division, Planning, Environment, and Right of Way Team Leader

Chris DiPalma, FHWA – Chicago Metropolitan Office, Metropolitan Planning Engineer

John Donovan, FHWA – Illinois Division, Transportation Planning Specialist

Traci Baker, FHWA – Illinois Division, Civil Rights Specialist

Janice Osadczuk, FHWA – Indiana Division, Planning and Environmental Specialist

Theresa Claxton, FHWA – Texas Division, Environmental/Transportation Planning Coordinator

Ashley Settles, FHWA – Texas Division, Professional Development Program

Input from the Public, Elected Officials, and Staff from RATS Member Agencies

Providing opportunities for public participation is an essential cornerstone of the transportation planning process defined in Title 23 and Title 49. State DOTs, Metropolitan Planning Organizations, and transit operators are required to provide for public input and to consider the public's views when making decisions on the use of federal funding assistance. With the passage of the Transportation Equity Act for the 21st Century (TEA-21) in 1998, a public involvement component was statutorily mandated for the TMA certification review process.

The site visit consisted of soliciting input from the following sources:

1. Citizens and Community Groups; and
2. The staff of Rockford Area Transportation Study (RATS), Illinois Department of Transportation (IDOT), and the Rockford Mass Transit District (RMTD)
3. Members of the Rockford Area Transportation Study (RATS) Technical and Policy Committees.

A public hearing was held on Monday, September 17, 2007 in the lobby of Rockford City Hall from 4:00 PM to 7:00 PM. A continuous presentation on the TMA Certification process was provided while members of the review team discussed transportation and planning issues with citizens, city staff, and elected officials who were at City Hall for a variety of purposes including a regularly scheduled City Council meeting. While the majority of citizens were at Rockford City Hall to conduct business with the City, it is important to stress that numerous comments were received on several regional issues from individuals residing throughout the region. Forty-four individuals signed an attendance sheet and provided comment while several other individuals provided comment without signing in. Fifty-seven sets of comments were recorded. The most frequent comments included:

- Need for rail transit to the Chicago metropolitan region (22 comments)
- Inadequate provision of transit service (17 comments)
- Dissatisfaction with road conditions (8 comments)
- Persons generally satisfied with the transportation system (5 comments)
- Inadequate provision of bicycle and pedestrian accommodations (4 comments)

In addition to these issues, public comments covered a broad range of topics that included: access to federal and state funding, availability of taxi service, absence of landscaping, need for a western bypass, need for additional speed limit enforcement, using the river for ferry service, need for more interstate connections, lack of regional planning, ramifications of urban sprawl, access to the airport, need for expanded air service, engagement in the IDOT planning process, praise for the transit system, need for improvement to rural roads, and appreciation for a lack of congestion.

The majority of the site visit consisted of discussions with staff from RATS, IDOT, and RMTD. These agencies receive federal funds and are required to comply with federal planning laws and regulations. These agencies answered questions regarding specific requirements in the law.

Attendance sheets containing the names of participating staff are contained in the appendices of this report.

Public hearings were held during the regularly scheduled RATS Technical Committee meeting on September 20, 2007 and during the regularly scheduled RATS Policy Committee meeting on September 27, 2007. No comments from the general public were received at either of these meetings. The Technical Committee asked procedural questions of the review process and also discussed the inter-related nature of the Rockford economy in the regional, national, and international marketplace. The Policy Committee also asked procedural questions on the review process and additionally asked questions regarding air quality nonattainment, organization of MPOs, requirements for a human service transportation plan, and conformity with SAFETEA-LU.

Process Review Elements

A summary of the elements considered in this review is provided below. Each element will be discussed in the following format:

1. The background is given for the basis of each *requirement*,
2. A summary of the current *status* based on ongoing contacts, review of planning products throughout the year, and input provided in the discussions with the planning partners, and
3. The *findings* of the review team on the adequacy of the process.

Organization of the Metropolitan Planning Organization

Requirement: Federal legislation requires the designation of a Metropolitan Planning Organization for each urbanized area (UZA) with a population of more than 50,000 people. The voting membership of an MPO policy board designated after December 18, 1991 and serving a TMA must include local elected officials, officials of local agencies that administer or operate major modes of transportation within the area, and appropriate State officials. Existing MPO designations, made prior to December 18, 1991 remain valid until a new MPO is redesignated.

Status: In 1964, the Governor of Illinois designated the Rockford Area Transportation Study's Policy Committee as the MPO for the Rockford Metropolitan Area. The MPO operates under a 2003 Cooperative Agreement and also has standing Memoranda of Understanding with the RMTD and the Boone County Council on Aging (BCCA) for transit planning.

The RATS Technical Committee is the chief working committee of the MPO and reports directly to the RATS Policy Committee. The RATS Mobility Subcommittee is the only standing subcommittee although temporary working groups have been formed to assist MPO staff on a variety of planning issues. The Mobility Subcommittee has been charged with developing strategies and recommending actions required to improve the mobility of public transportation dependent populations in the regions. The following entities comprise the RATS Committee structure:

Policy Committee	Technical Committee	
	Voting Members	Non-Voting Members
City of Rockford	Rockford Public Works	Rockford Area Economic Development
City of Loves Park	Rockford Community Development	Boone County Council on Aging
City of Belvidere	Loves Park Public Works	Ogle County Highway Department
Village of Machesney Park	Loves Park Community Development	Rock River Water Reclamation District
County of Boone	Belvidere Public Works	Growth Dimensions
County of Winnebago	Machesney Park Planning	Stateline Area Transportation Study
IDOT, District 2	Roscoe Economic Development	Illinois Environmental Protection Agency
	Village of Cherry Valley	Illinois State Toll Highway Authority
	Village of Winnebago	IDOT, Bureau of Public Transportation
	Boone County Highway Department	IDOT, Bureau of Urban Program Planning
	Belvidere-Boone Planning	FHWA, Illinois Division
	Winnebago County Highway Department	
	Winnebago County Planning	
	Rockford Mass Transit District	
	Chicago-Rockford International Airport	
	IDOT District 2	

The City of Belvidere and the County of Boone joined the Policy Committee in 2003 after being included in the RATS urbanized area boundary for the first time in Census 2000. RATS staff have indicated that the RMTD may be considered for Policy Committee membership in the future. In recent years, the Technical Committee added the Rock River Water Reclamation District, the Rockford Area Economic Development Council, and Growth Dimensions as non-voting members.

The Executive Director of RATS is a part time position held by the City of Rockford Traffic Engineer, Mr. Steve Ernst. He is supported by two full time transportation planners who are located physically and administratively within the City of Rockford municipal government structure.

The organization of the MPO is currently being examined by the Policy Committee. There is general agreement within the Policy Committee that additional staff is needed to meet federal transportation planning requirements. Some members of the Policy Committee have also expressed interest in expanding work activities of the RATS staff. While some of these activities would be transportation based such as corridor planning and air quality planning, many are more related to regional comprehensive planning such as stormwater planning, fiscal impact planning, public facilities planning, telecommunications planning, and zoning. One model RATS is examining is the structure of the Chicago Metropolitan Agency for Planning which merged the federally designated MPO with the region's land use planning agency. RATS has indicated that financial resources from the Comprehensive Regional Planning Fund that was recently enacted through state legislation (Public Act 095-0677) would likely be the foundation of any expansion of MPO staff.

Finding: The current organization of the MPO meets the requirements of this section of regulation.

We recommend that the federal agencies remain engaged in reorganization discussions to advise on what organizational structures or actions may constitute the need for formal redesignation of the MPO. While the current structure of the MPO meets regulatory requirements, we encourage the Policy Committee to continue its examination of potential reorganization scenarios. The traditional RATS structure, staffing, and processes may not be sufficient to address the myriad of existing and emerging issues such as the evolving metropolitan planning requirements, the strategic location of the region relative to the Chicago metropolitan area and the I-39/90 corridor, the potential of additional required air quality planning activities, and the increasing role of the region in national and international freight movements.

Metropolitan Area Boundaries

Requirement: The metropolitan area (planning area) boundary should, at a minimum, cover the UZA and those areas likely to become urbanized within the twenty-year life of the Long Range Transportation Plan. Copies of the boundary maps must be submitted to FHWA and FTA, after their approval by the MPO and the Governor.

Status: Metropolitan planning area boundary maps have been developed and approved by the MPO and by the Governor.

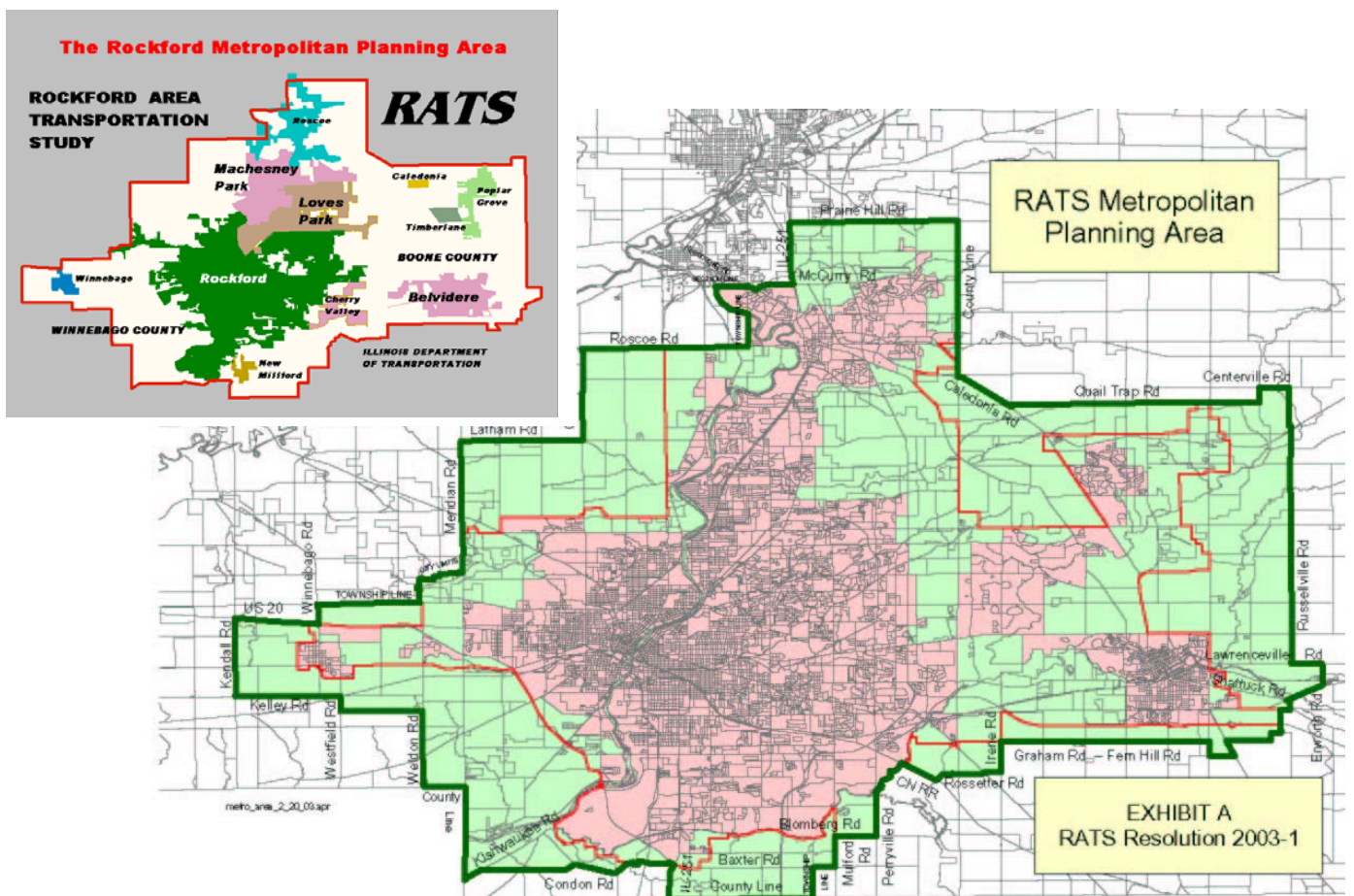
Finding: The metropolitan planning area map, which meets the criteria of this section of regulation, is on file at the FHWA Illinois Division.

Agreements

Requirement: At a minimum, cooperative agreements are to be in place between the MPO and the State DOT, and between the MPO and public transit operators. These agreements should describe how these parties work together to accomplish specific tasks.

Status: The MPO operates under a 2003 Cooperative Agreement between the members of the Policy Committee. The relationship between the MPO and RMTD is governed by RATS Resolution 2000-9, Public Transit Agencies/RATS Cooperative Agreement.

A Memorandum of Understanding between RATS, RMTD, Boone County, BCCA, and the City of Belvidere allows BCCA to provide demand response transit service under contract to RMTD. This agreement was initially executed in 2004 and has been extended through 2009. The agreement was necessitated when a portion of Boone County was added to the TMA through Census 2000 which resulted in service being provided in both designated urban and rural areas.



At the conclusion of this current agreement, responsibility for operation of this service and its corresponding funding mechanism(s) will be required to be resolved. Updates to the planning agreement or creation of a new planning agreement will likely be necessary.

RATS may be a party to a pending cooperative agreement with the Stateline Area Transportation Study (SLATS), Stateline Mass Transit District (SMTD), IDOT, and possibly the Beloit Transit System (BTS). This agreement would outline the understanding among all parties regarding operation of the new SMTD demand response service for northern Winnebago County. This agreement would document coordination of transit service between the RATS area and the adjacent SLATS jurisdictional area to the north.

Finding: The existing cooperative agreements discussed in this section meet federal requirements. We encourage the continued cooperation and coordination by RATS in completing the pending SMTD cooperative agreement. As these agreements require updating, we encourage the MPO to pursue a single agreement with the State and all public transit providers.

Responsibilities, Cooperation and Coordination

Requirement: Federal legislation requires the MPO, in cooperation with the State DOT and transit operators, to be responsible for carrying out the transportation planning process. These entities must cooperatively develop the UPWP, LRTP and TIP. The MPO must coordinate the development of the LRTP and TIP with other transportation providers such as regional airports, maritime port operators and rail freight operators.

Consultation means that one party *confers* with another identified party, and prior to taking action(s), *considers* that party's views. Cooperation means that the parties involved in carrying out the planning, programming and management systems processes *work together* to achieve a common goal or objective. Coordination means *the comparison of* the transportation plans programs and schedules of one agency with related plans, programs and schedules of other agencies or entities with legal standing, and adjustment of plans programs and schedules *to achieve general consistency*.

Status: The MPO, transit operators, and State develop the products of the planning process in a cooperative manner. The RATS Policy Committee approves the final UPWP, LRTP, and TIP after consideration of public input and providing other modal operators the opportunity to review and comment on these products. These products are then transmitted to the federal agencies via IDOT for appropriate action. Concerns continue to be expressed by local staff on the process of providing meaningful input into the development of the IDOT Multi-Year Highway Program.

Finding: The participants in the planning process fulfill the requirements for this section of the planning regulations.

The Review Team recommends that the MPO works with IDOT and the newly formed Illinois MPO Association to devise a schedule so that the MPO annually has a formal opportunity to

meet and discuss priorities with the State prior to the development of the Illinois Multi-Year Highway Program.

Unified Planning Work Program (UPWP)

Requirement: MPOs are required to cooperatively develop a Unified Planning Work Program, in cooperation with the State and transit operators, which discusses planning priorities and documents the transportation and air quality planning activities anticipated in the area for the next one or two years.

Status: RATS cooperatively develops an annual Unified Work Program (UWP) that discusses the transportation planning priorities, budget, and scope of work for the state fiscal year (July 1 through June 30).

Historically, the UWP has identified an agreed upon suballocation of Metropolitan Planning (PL) funds to member agencies of the RATS Policy Committee as well as to the Villages of Roscoe and Winnebago. These suballocated funds are designed to support staff and operations within these organizations that contribute to the RATS transportation planning process. In total, 25% of the total FY 08 federal transportation planning funds (PL and 5303) that are distributed by formula have been suballocated to non-RATS staff to contribute to work elements identified in the UWP.

Finding: The format of the UWP is acceptable, the description of the work to be undertaken is thorough, and funding is well tracked and documented. The requirements of this section of the planning regulations are satisfied.

Metropolitan Planning Process Elements

Requirement: SAFETEA-LU identifies eight planning factors that must be explicitly considered, analyzed as appropriate, and reflected in the planning process products. The eight planning factors are discussed collectively below with their status and the Review Team's findings. Subsequently, the Review Team is providing a separate review and analysis of the status of safety conscious planning, environmental protection and enhancement, security, transit, and non-motorized transportation.

The Eight Planning Factors

Status: The planning factors identified in federal legislation are visible in the planning products of the MPO. While all documents have not been updated since the passage of SAFETEA-LU in August, 2005 (previous legislation, TEA-21, identified seven planning factors) to explicitly reference these eight statements, the RATS planning process does provide consideration of projects and strategies that do address each of the factors. The factors form the basis of the goals in the LRTP, TIP, and UWP.

Finding: The planning partners are making satisfactory progress in addressing the eight planning factors of SAFETEA-LU. As appropriate, RATS is encouraged to further document the linkages between planning goals and the special studies identified in work element #2 of the UWP and the work activities of suballocated PL funded activities. RATS is strongly encouraged to seek ways to improve how all the factors are addressed throughout the planning process. This is outlined in recommendations in the findings sections of the subcategories below. In addition, the MPO should also attempt to improve how it addresses the factors emphasizing efficiency in terms of economic vitality and system management and operation.

Safety Conscious Planning

Status: The intent of safety conscious planning is to consider different aspects of transportation that can be impacted by early decisions regarding land use and site design, access management, transportation operations, traveler behavior, and modal requirements, such as roadway geometrics. By focusing on reducing or avoiding safety conflicts, future crashes may be prevented or the severity of future crashes may be lessened.

RATS has utilized PL funds within the individual highway agencies to compile traffic crash data. This effort, particularly in the City of Rockford, has resulted in a robust database. Each of the member agencies of RATS currently have the responsibility to collect and analyze safety data for their independent use. While RATS members have been satisfied with this arrangement and it has proven to be effective at mitigating spot safety issues. However, there has not been an effort to produce a regional strategy on safety nor has the MPO provided direction on setting safety priorities.

The availability and accuracy of crash data should continue to improve through the development of the electronic Mobile Crash Reporting (MCR) system. In October, 2007, the Rockford Police Department (RPD) submitted 52% of their crash reports through MCR. IDOT estimates that RPD could be submitting up to 90% of reports via MCR by the summer of 2008. It is anticipated that other RATS member agencies will be using MCR in the near future.

Statewide safety initiatives have included the development of a Comprehensive Highway Safety Plan (CHSP), implementation of the Highway Safety Improvement Program (HSIP), and the Safe Routes to Schools Program (SR2S). Furthermore, IDOT has contracted with MPOs throughout Illinois to geocode crashes on a countywide basis dating back to 2003. MPO staff have indicated that many of the statewide safety priorities such as education and enforcement are beyond the structure of RATS thus making a comprehensive approach to safety conscious planning difficult. While the MPO provides guidance on applications for HSIP, it does not provide actual data or assist in the analysis. Rather, individual member agencies are responsible for completing the application process. It should be noted that the member agencies of RATS have had success capturing a significant portion of funding available to local agencies through the HSIP and its predecessor program, the Hazard Elimination-Safety (HES) program.

Finding: While RATS and its member agencies strive for a safe transportation system, the Review Team recommends the MPO to strengthen efforts to incorporate safety into all aspects of the transportation planning process. Efforts should address safety solutions in Engineering (infrastructure improvements), Enforcement (red light running, speed limits), Education (bicycle

education, youth alcohol awareness), and Emergency Services (incident management, emergency access to incident locations). These four categories are commonly referred to as the “Four-E’s” of safety. In order to advance safety conscious planning, RATS is expected to serve in two capacities. First, RATS should provide leadership and facilitate dialogue of the Four-E’s within the MPO framework and with non-traditional safety partners. Second, RATS should serve as a regional clearinghouse for safety data, analysis, and performance monitoring.

The engagement of safety partners into the transportation planning process is critical to address safety objectives, particularly those related to Enforcement, Education, and Emergency Services. While there has been successful coordination with Emergency Services partners through the development of the ITS Regional Architecture, RATS has not historically been engaged in Enforcement or Education activities. One method many MPOs have used to engage these partners has been by participating in multidisciplinary safety teams. These teams are typically comprised of representatives of municipal/county engineering and planning departments, police and fire departments, hospitals and/or EMS operators, social services, transit operators, and other local interests that may be specific to that particular region.

Quality data is absolutely necessary to identify and understand the safety issues within the RATS metropolitan area. Examples of critical data sets include crash data, traffic data, and land use data. Other information such as sidewalk inventories, access management policies, and emergency services resources may be beneficial and worth investigating. With the ongoing conversion to MCR and several other statewide and local efforts, the Rockford area has the data necessary to provide useful regional analysis.

Analysis of regional data is another area where RATS can add substantial value to safety efforts. With improving crash data, quality roadway inventory data, and the excellent WinGIS system, the MPO is in the unique position to provide comprehensive investigation into system deficiencies and other characteristics that can contribute to safety problems. It is through this regional analysis that the MPO can assert itself into the planning and programming decision making process of its independent members so that regional needs are systematically identified, evaluated, and addressed.

By performing this valuable regional analysis, RATS can also provide leadership in the development of safety benchmarks and performance measures. Performance measures provide the ability for the MPO to monitor the operational characteristics of the transportation system and determine whether specific goals and objectives are being met. Some examples of common safety performance measure include:

- Number of crashes by crash type and severity (e.g. signalized and non-signalized intersections, pedestrians, bicycle, transit)
- Crash rates (per VMT or population)
- Unit costs (costs per incident)
- Percent of streets with sidewalks in good condition
- Percent of rail crossings with adequate crossing protection

RATS should select or develop appropriate performance measures based on predominant local safety concerns. A valuable measure is one that can be quantified and can be tracked over

extended periods of time. Currently, there is no entity within the Rockford region that has assumed responsibility for setting benchmarks and tracking these types of data. It is appropriate for the MPO to evolve into the regional entity that provides leadership on safety conscious planning.

Environmental Protection and Enhancement

Status: The RATS Greenways Plan is the primary tool that the MPO has utilized to advance environmental considerations in the transportation planning process. Initially produced in 1997 and updated in 2004, the Greenways Plan includes over 100 layers of geographic information based data that is illustrated in a series of maps. Numerous local resource agencies and the Illinois Department of Natural Resources contributed towards the development of this plan. RATS has since cross referenced projects from the LRTP to the Greenways Plan to provide an initial indication of areas that may warrant mitigation activities. RATS cites ongoing and positive interaction with local partners during the transportation planning process and the development of the Greenways Plan. As a result, RATS concludes that there have been few situations where mitigation activities would be likely. MPO staff are also currently working through WinGIS to help complete a countywide GIS based inventory and catalogue of environmental assets and sensitive areas.

RATS has made preliminary efforts to begin a larger discussion on linking the metropolitan planning and the National Environmental Protection Act (NEPA) processes. A brief discussion of this topic exists in the LRTP and notes that a disconnect between these processes resulting in duplicative efforts and delays in the implementation of transportation projects. Discussions with MPO staff during the site review suggest that there is limited experience and knowledge of the environmental review process at the program planning level of MPO and member agency staff.

Finding: RATS has demonstrated an acceptable underlying planning process concerning environmental requirements, including those resulting from SAFETEA-LU and the Final Planning Rule. To be fully SAFETEA-LU compliant, the MPO is required to formally amend the LRTP to include discussion of potential environmental mitigation activities at a policy and strategy level. Additionally, SAFETEA-LU requires the Public Participation Plan to reference interested parties including environmental resource agencies and to discuss how these agencies will be involved in the planning process.

The Review Team recommends the MPO assume a leadership role in advancing linkages between the metropolitan planning process and the NEPA process. Examples of transportation planning decisions and analyses that may be carried through to the project development and environmental review process include foundations for purpose and need statements, preliminary screening, evaluation and elimination of alternatives, planning level evaluation of indirect and cumulative effects, and regional or ecosystem level mitigation options and priorities. As an interim step in these efforts, RATS staff should work with State and Federal partners to secure appropriate training on the NEPA process and how it can be better integrated more effectively with the metropolitan planning process.

Security

Status: Security planning includes activities and products developed in response to identified criminal threats to high value, vulnerable elements of the transportation system. Preparedness planning includes activities and products developed in response to the threat of environmental hazards and natural occurrences.

RATS staff plays an indirect and supporting role to the Prairie Shield Regional Alliance, an association of police, sheriffs, fire, emergency management and other local government agencies. The mission of Prairie Shield is to collaborate and seek the most cost-effective and efficient means to allow first responders or related public entities to communicate on a voice, data, and video platform with interoperability capability. The MPO also assisted and helped fund a National Highway Institute (NHI) training course titled “Managing Traffic Incidents and Roadway Emergencies” which brought together law enforcement, highway, fire, towing, and other agencies. The RATS Executive Director, in his role with the City of Rockford Public Works Department, has received FEMA certification for the National Incident Command System.

Finding: Because of the widely varying political and institutional contexts for MPOs throughout the United States, there is no singular model that can best describe the most appropriate role for MPOs in security and disaster planning. As a small TMA, RATS has appropriately identified the roles and responsibilities for MPO security planning within the context of larger security planning initiatives. While an indirect role is fitting, the MPO is a forum for cooperative decision making and has responsibility for allocating financial resources to improving the performance of the transportation system. Consequently, there is a need for the MPO to stay engaged in security discussions. And while the immediate organizational response to security incidents and disasters will be the responsibility of public safety agencies, RATS is expected to promote coordinated planning in anticipation of unexpected events or natural disasters. Additionally, the MPO should be able to provide a centralized location of information on transportation system conditions and appropriate local and regional contacts that could be useful in an emergency. Therefore, RATS is encouraged to further their engagement with Prairie Shield and facilitation of security and preparedness issues amongst appropriate local staff as part of ITS, incident management, and congestion related initiatives. They are also encouraged to continued dialogue with officials from the State and the Chicago metropolitan area to help ensure that the Rockford region can contribute to any necessary relief efforts of incidents in northeastern Illinois.

Transit

Status: RMTD data indicates that transit ridership has consistently increased since the last certification review. However, the RMTD farebox recovery ratio had been in decline for several years until leveling off at approximately 11% during fiscal years 2005-2007. Transit planning activities have identified several causes for this trend including the lack of any fare increases since 1996 and the take over of operations of the Loves Park Transit System in 2000. Changes in routes and schedules have been implemented to improve efficiency. This has resulted in stable and balanced operations budgets. Substantial effort has also been expended in the planning of an eastside transfer facility near the interchange of I-90/39 with East State Street. It

is anticipated that this new facility will support new ridership within the existing RMTD route structure. It should also support the planned expansion of service into Boone County and intermodal connections for possible commuter service to the Chicago metropolitan area.

The Northern Illinois Commuter Transportation Initiative (NICTI) was formed several years ago to explore how to improve transportation of people between the Rockford/Belvidere regions and the Chicago metropolitan area. NICTI has secured FTA funding and is advancing a feasibility study with the goal of determining a locally preferred alternative for commuter transit service between regions. NICTI formally serves as a subcommittee of RATS and is comprised of representatives from county and municipal governments as well as representatives from the private sector. Additionally, a feasibility study is also currently being conducted regarding reestablishment of Amtrak intercity passenger rail service. This proposed route would extend from the Chicago metropolitan area through Rockford and further west to Dubuque, Iowa.

The RATS Mobility Subcommittee was also formally included in the MPO structure in 2007. This entity has responsibilities for many transit planning activities with focus on development and implementation of the Coordinated Human Services Transportation Plan (HSTP).

In 2007, RMTD successfully completed a FTA triennial review that examines grantee performance and adherence to current requirements. The agency received a perfect score.

Finding: Transit planning is integrated into the metropolitan transportation planning process and there is coordination between staffs of the MPO and transit providers. However it is not apparent that transit is considered a viable transportation choice in the region outside of public transit dependent populations. As a result, residents experience excessive or less than optimal household transportation expenditures. Empirical research has demonstrated that transport efficiency/balance and transit ridership gains are maximized through increased residential and employment densities. Significant changes in development patterns are critical to lowering transport costs and increasing mode choice for all residents. As the RATS Policy Committee debates the future structure and direction of the MPO, we encourage additional emphasis and resources to be dedicated towards investigation of how transit is interrelated with land use and socio-economic conditions so that policy makers can make the most informed decisions about the future direction of transit in the region. Results from the NICTI and Amtrak studies should also be used as a springboard for these types of discussions.

RATS is commended for the evolution of the Work, Welfare, and Families committee to the RATS Mobility Subcommittee and its formal inclusion in the MPO. The Subcommittee should fill an education and advocacy role that advances transportation issues among public transit dependent populations as well as facilitate public participation efforts for transit related issues. It also can be easily envisioned that this group may eventually assist public participation efforts on a variety of transportation issues.

RMTD and its partners are also commended on the outstanding performance rating achieved by the transit provider during its most recent FTA triennial review.

Non-Motorized Transportation

Status: The development of the RATS Bicycle-Pedestrian Plan originated during the preparation of the LRTP as it became apparent in the early stages of LRTP development that a more detailed study of bicycle and pedestrian needs was required. The Bicycle-Pedestrian Plan is designed to serve as a regional framework for local jurisdictions in developing regionally integrated bicycle and pedestrian facilities that can more effectively serve as a transportation alternative to single vehicle roadway travel. Future bicycle and pedestrian projects listed in the TIP and LRTP should be derived from and contribute to the integrated framework of paths proposed in the Bicycle-Pedestrian Plan.

RMTD has already started to implement recommendations included in the Plan with the installation of bicycle racks to their buses. They are also in the process of reconfiguring transit stops and stations to be more bicycle and pedestrian friendly. Integration of the transit system with existing and proposed bicycle and pedestrian facilities makes it easier for users to adopt alternative transportation modes. RMTD also has committed to updating their transit system maps to highlight bicycle and pedestrian transfer points. This will help riders reach their destinations more quickly and easily throughout the Rockford area.

On October 10, 2007, the Illinois Legislature passed the Complete Streets Bill (605 ILCS 5/4-220). This legislation requires that planning and development of transportation facilities, including their incorporation into State plans and programs, give full consideration to bicycle and pedestrian pathways. Implementation of the Bicycle-Pedestrian Plan should aid local jurisdictions in the planning area in meeting Complete Streets requirements. RATS is in the process of reviewing public comments and finalizing the new Bicycle-Pedestrian Plan.

Finding: Through the development of the Bicycle-Pedestrian Plan, RATS has demonstrated a concerted effort to properly include non-motorized transportation options throughout the metropolitan transportation planning process. Upon adoption, RATS staff should continue to monitor and support local adoption and implementation of the Bicycle-Pedestrian Plan and its recommendations. Periodic review of the effectiveness of the recommended measures will help identify necessary revisions to the plan and identify best practices for future planning efforts.

RATS, its consultant, and planning partners are commended on the production of a high quality Bicycle-Pedestrian Plan. They are also commended for the successful coordination with other government agencies and the public participation efforts associated with this plan. A wide range of interests were successfully captured including those from bicycle users, engineering and safety officials, transit providers, elected officials, and the general public.

Long Range Transportation Plan (LRTP)

Requirement: SAFETEA-LU requires that TMAs develop a Long Range Transportation Plan addressing a minimum twenty-year planning horizon and that this plan be updated at least every five years. The LRTP must be consistent with current and forecasted transportation/land use conditions and trends so that it can appropriately project transportation demand of persons and goods. In addition it must:

- Identify all transportation facilities that should function as part of an integrated metropolitan transportation system
- Reflect consideration of the eight planning factors of SAFETEA-LU
- Discuss types of regionally appropriate environmental mitigation activities
- Reflect consultation with Federal, State, land management, and regulatory agencies
- Include an acceptable financial plan
- Identify operational and management strategies
- Assess the investment necessary to maintain the existing and projected future transportation infrastructure
- Indicate transportation and transit enhancement activities
- Provide adequate opportunity for public official and citizen involvement

Beyond the first 10 years of the LRTP, the financial plan may reflect aggregate cost ranges/cost bands, as long as the future funding source(s) is reasonably expected to be available to support projected cost ranges/cost bands. The LRTP may also include “illustrative projects” that do not satisfy fiscal constraint requirements but can be included to provide for a more complete accounting of future transportation needs.

The Final Rule for Metropolitan Planning confirmed that any federal action taken on transportation plans and programs on or after July 1, 2007 are subject to adequately satisfying all updated SAFETEA-LU planning requirements. Additionally, after December 11, 2007, all amendments and updates to financial information in the LRTP are required to show that information in the year of expenditure of those funds.

Status: RATS adopted the FY 2005–2035 Long Range Transportation Plan on July 28, 2005 under the provisions and requirements of TEA-21. The LRTP covers the entire area within the metropolitan planning area boundary and will maintain at least a twenty year planning horizon until the next LRTP update in 2010.

The plan identifies and discusses different facilities and modes that comprise an integrated transportation system. The planning factors of TEA-21 heavily influence the overall goals and objectives of the LRTP. Additionally, the LRTP also attempts to focus on three forecasted strengths of the region: (1) the Chicago/Rockford International Airport, (2) the region’s strong labor force, and (3) the geographic position of the Rockford metropolitan area comparative to the expanding boundaries of the Chicago metropolitan area. Furthermore, the plan examines the continuous region from the RATS MPA to the north along the I-39 corridor through the Beloit, Wisconsin and Janesville, Wisconsin MPOs. Within this framework, it was an overarching goal of the LRTP to investigate the connection between transportation and regional economic development in a broader regional context.

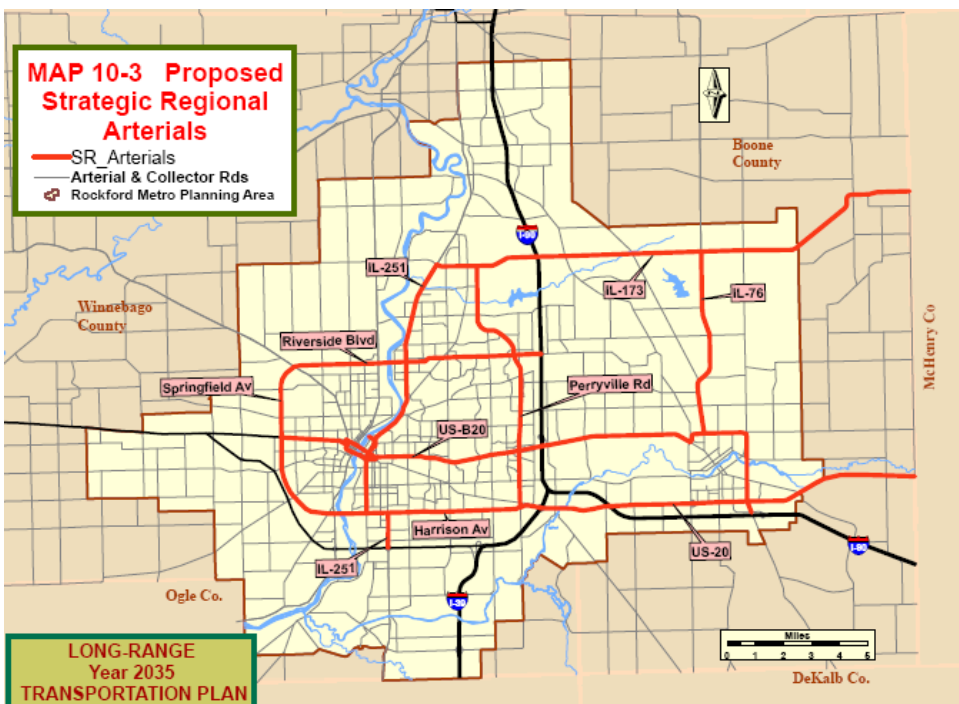
The land use forecast that is used in the RATS travel demand model was coordinated with land use planners of all the local jurisdictions in Winnebago County, staff from the Belvidere-Boone County Regional Planning Commission, and the staff of the Stateline Area Transportation Study (SLATS). Through this coordination, annual growth rates for employment and projected dwelling units by traffic analysis zones are calculated for Winnebago and Boone Counties. Information used in this process includes historical growth rates, available land planned for

development by land use category, different employment categories within the RATS area, and the existing and planned public sewer and water infrastructure. RATS staff acknowledge that this does not result in a matrix of different levels of projected growth, but rather results in a single forecast. The MPO maintains that this methodology has worked well in predicting annual growth rates.

The LRTP does not explicitly discuss potential environmental mitigation activities and potential areas to carry out these activities. As discussed earlier in this report, RATS identified all potential transportation projects in the LRTP and cross referenced those projects with data in the Greenways Plan that contains over 100 layers of GIS data. Wherever possible, planning level decisions on subject projects have made every attempt to avoid environmentally sensitive areas.

Financial forecasts for roadway funds are based on extrapolating averages from five previous TIPs (2001-2005) and are identified in Year 2005 dollars. Likewise, expenditure estimates are based on 2005 dollars and were derived by calculating averages for a multitude of work items and project types. An assumption is made that the increased cost of goods through inflation is balanced by increased funding levels. Total roadway revenues and project expenditures are estimated at \$2.2 billion through 2035. Preservation and maintenance of existing facilities accounts for approximately 50% of proposed roadway expenses over the life of the plan. A proposed northwest bypass route around the metropolitan area is included in the plan as an illustrative project. The LRTP does not contain a complete transit financial plan for the life of the plan. Capital needs are forecasted for RMTD but operational needs and revenues are not included. Likewise, forecasts for public transit services provided by BCCA are not included.

The LRTP does not contain discussion of operational and management strategies as required by the updated LRTP requirements in SAFETEA-LU. The MPO has begun the process of identifying future costs of operation and maintenance of the system and is currently producing a supplemental report to address these issues. The report will also include transit data and may reflect research into what performance monitoring could be useful for the region given currently available data.



The LRTP also discusses that the Rockford area may have historically lacked the roadway investment of regions of similar size and that it is no longer practical to begin to construct an internal freeway or expressway system in the region. Consequently, initial investigation and analysis is being conducted towards developing a Strategic Regional Arterial system

that would supplement the primary expressway system and is intended to enhance public transportation, accommodate commercial vehicle traffic, increase personal mobility, and reduce congestion.

Finding: While the 2035 Long Range Transportation Plan has been developed cooperatively, there are gaps in required information and opportunities to enhance the framework for transportation policy and investment decisions.

The current LRTP does not include revenue and cost forecasts for public transit operations and capital expenses for the entire planning horizon as required. RATS must amend the current LRTP to include an acceptable financial plan for all public transit service for the full 20 year planning horizon.

The current LRTP does not include a discussion on Management and Operational strategies as required by SAFETEA-LU. RATS must amend the LRTP to include this discussion in order to become SAFETEA-LU compliant. This could be accomplished by completing and adopting the draft Transportation System Management and Operations Plan as an amendment to the LRTP.

The current LRTP does not include the SAFETEA-LU required formal discussion on environmental mitigation activities at a policy and strategy level. RATS must amend the current LRTP to include this discussion in order to become SAFETEA-LU compliant.

The Review Team recommends that system-wide performance measures should be adopted by the MPO and applied to the regional transportation network to gain a better understanding of how the existing system is operating and what effect future transportation investments will have on the overall regional network. Ultimately these performance measures should be incorporated into the accepted criteria for project selection by not only the MPO in allocation of STU funds, but by member agencies as criteria that helps drive independent investment decisions.

The Review Team recommends that the next update of the LRTP should consider multiple population, household, and employment projections and their underlying assumptions in an effort to illustrate how the planning process evaluated and selected the preferred plan and forecasts. As part of these efforts, documentation of additional quantitative analysis techniques is encouraged so that the full impact of a multitude of variables that affecting transportation systems and land use patterns can be evaluated.

It is recommend that as the next update of the LRTP reviews transit and roadway congestion issues, additional discussion is provided on transportation demand management strategies and possible impacts on single-occupancy vehicle trips; increasing mode choice, enhancing transit ridership and farebox recovery ratio, and improving economic conditions.

RATS is commended for initiating analysis of a Strategic Regional Arterial system and further strategic planning with regional partners, particularly IDOT, to determine how modernization of the existing arterial roadway network is encouraged.

Congestion Management Process

Requirement: The National Highway System (NHS) Act of 1995 made the ISTEA requirement for all management systems optional, except for the Congestion Management System (CMS). SAFETEA-LU has redefined this requirement so that the planning process in a TMA includes a congestion management “process” instead of a “system”. The intent of this change is to reiterate the importance of the Congestion Management Process (CMP) to transportation planning and programming and to fully integrate this requirement into the TMA planning processes. The expectation is that the CMP should be an integral part of developing a transportation plan and TIP for TMAs. FHWA and FTA also seek a common set of performance measures and a common set of goals and objectives among the CMP, the LRTP, and transportation systems operational and management strategies. Additionally in air quality non-attainment areas, federal funds cannot be programmed for any project that will significantly increase carrying capacity for Single Occupancy Vehicles (SOVs) unless the project results from a CMP meeting the requirements of the law. The CMP must include:

- Methods to monitor and evaluate the performance of the transportation system,
- A definition of parameters for measuring the extent of congestion and evaluating the effectiveness of strategies,
- A program for data collection and system performance monitoring,
- Identification and evaluation of operational and management strategies as well as travel demand reduction strategies,
- A schedule, identification of responsibilities, and funding source for implementation of strategies, and
- A process for periodic assessment of the implemented strategies.

Status: RATS adopted a CMS in 1997 but has failed to incorporate the formal CMS document as a part of the regular transportation planning process. However, many of the principals and strategies in the CMS report have been carried forward in the MPO’s operation including development of various planning documents. These efforts define the status of the CMP for the region. The region has established an Arterial Management Group (AMG) that consists of system operators including IDOT, ISTHA, and others to monitor operation of the road system. Level of Service (LOS) has been determined to be the performance measure for the regional roadway system. The Regional network is analyzed to identify “congested” links according to LOS.

The AMG has developed an alternate route guide for the I-90 corridor and the group annually reviews and updates the guide as necessary. The AMG is currently in the process of converting the guide to an electronic format. RATS has sought funding through the Illinois Tomorrow grant program to attempt to create a communications link throughout the region to obtain real-time signal data. Additionally, the MPO is currently working with Northern Illinois University to investigate a regional communications network.

It is unclear if or how member agencies utilize the CMP data within their independent project programming practices. Furthermore, transit has not historically been included in any meaningful way in CMP efforts.

The FY 08 UWP has identified funding for a two year effort, the RATS Regional Transportation Freight Study and Model Conversion, to analyze freight in the region for improved information on mode split. Emphasis is placed upon determining the current and projected interaction between the different modes of transportation in the RATS MPA. In particular, special interest is shown related to the airport, the Global III facility in Rochelle, and locally known commercial, industrial, and manufacturing employment areas.

Finding: The RATS CMP meets the minimum requirements for SAFETEA-LU compliance.

However, US DOT retains concerns over the applicability of the congestion management-related documents to the larger planning process, specifically project selection. In order to alleviate those concerns, it is strongly recommended that the MPO formally adopts an updated CMP document as part of their planning process. This updated CMP document should include evaluation of all of the items within the existing Congestion Management Activities report as well as appropriate consideration and evaluation of:

- Demand management measures
- Traffic operational improvements
- Public transportation improvements
- ITS technologies
- Where necessary, additional system capacity

The updated CMP should document relevant performance measures and identify how the preferred strategies are chosen and how they can be implemented as part of the various project programming processes in the region. Examples of potential performance measures are listed and described in the National Transportation Operations Coalition (NTOC) report titled NTOC Performance Measurement Initiative. The revised CMP should also consider strategies to manage demand and reduce single occupant vehicle (SOV) travel, including growth management and congestion pricing. Examples of potential transportation demand management techniques are available via the Victoria Transport Institute web site at www.vtpi.org/tdm/. Once complete, project selection criteria should be updated to reflect the information described in the CMP report. Future transportation projects within the region should be selected with the results of the CMP document considered. Furthermore, the members of the MPO Policy Committee should strive to program their regionally significant projects, regardless of funding source, according to the accepted project selection criteria.

The Review Team recommends that prior to the completion of an updated CMP document, stronger emphasis should be placed on coordinating current project selection with the results of the regional transportation network LOS analysis. There appears to be little, if any, correlation between the identified congested links and projects selected by member agencies for improvement. The MPO should be providing leadership in advancing regional CMP goals within the framework of individual member's project programming processes.

RATS is commended for its efforts in coordinating and facilitating the development of the Alternate Route Interactive Guide. The guide is an excellent example of how nonrecurring congestion can be accounted for in the planning process, and should provide a valuable tool for highway system operators within the region. The Rockford region should build on the successful

deployment of the Alternate Route Guide on the remaining primary highway systems within the region, as well as begin to incorporate transit as a key component of system operations and congestion management.

Intelligent Transportation Systems (ITS)

Requirement: In 2001, the Final Rule on ITS Architecture and Standards Conformity (Final Rule) and the Final Policy on Architecture and Standards Conformity (Final Policy) were enacted by FHWA and FTA respectively. The Final Rule/Final Policy ensure that ITS projects carried out using funds from the Highway Trust Fund including the Mass Transit Account conform to the National ITS Architecture and applicable ITS standards. This is to be accomplished through the development and maintenance of regional ITS architectures and using a systems engineering process for ITS project development

Status: On March 24, 2005 the MPO adopted the North-Central Illinois Architecture report as the Regional ITS Architecture for the Rockford Area. This report involved input from regional stakeholders that have roles and responsibilities in traffic management, emergency management, information service providers, transit management, operations and management, and parking management. While RATS and IDOT have assumed roles for coordinating the implementation of ITS in the region, few ITS related projects have advanced due to a lack of dedicated ITS funds. Efforts to establish a regional fiber optics communications network and to obtain real time signal information are the foundations of future ITS plans.

Finding: The North-Central Illinois Regional ITS Architecture satisfies the Final Rule and Final Policy. RATS and its member agencies are encouraged to ensure projects conform to the architecture. The continued use of this framework should be utilized in making cooperative ITS investment decisions. It is anticipated that updates to the architecture will be needed as ITS technologies and policies evolve.

Transportation Improvement Program (TIP)

Requirement: Federal legislation requires that an MPO cooperatively develop a TIP consistent with the LRTP and that it be financially constrained. The TIP must cover at least a four-year program of projects and must be updated at least every two years. The TIP must list all projects in sufficient detail as outlined in the regulations. Effective December 11, 2007, cost and revenue estimates must be produced in “year of expenditure dollars” to reflect the time-based value of money. The TIP must reflect public participation and identify the criteria for prioritizing projects. The MPO must have an approved process for making changes to the TIP. FHWA and FTA must jointly find the TIP to be based on a continuing, comprehensive, and cooperative transportation process. Only after an MPO TIP is amended into the Statewide Transportation Improvement Program (STIP), can funding for projects be authorized.

Status: FHWA and FTA amended the current FY 2008-2011 TIP into the STIP on June 29, 2007.

Finding: The FY 2008-2011 TIP (and the other TIPs approved since the last certification review) meets the requirements in the planning regulations.

While historical listing of projects in the TIP can provide useful information for readers, descriptions for previous years of transit projects need to be revised and annually updated so that the comments accurately reflect the current condition of those projects.

It is recommended that the next TIP provides additional mapping and/or other visualization techniques to more clearly convey the vast amount of information that is included in the document. If multiple maps are required to minimize confusion between types of projects, then we would encourage a series of maps to illustrate the different types of projects. The Review Team also supports MPO staff efforts to investigate web-based tools to potentially provide some form of interactive mapping.

It is recommended that the next TIP clearly articulates and documents the differences between an “amendment” (major revision) to the TIP versus an “administrative modification” (minor revision). Amendments require public review and comment, demonstration of fiscal constraint, and an air quality conformity determination (when applicable). Administrative modifications allow minor changes without such actions.

Project Selection

Requirement: All projects except those funded by NHS, Bridge, Interstate Maintenance, and Federal Lands Highway programs must be selected by the MPO in consultation with the State and transit operator from the approved metropolitan TIP. Projects from the NHS, Interstate and Bridge programs are selected by the State in cooperation with the MPO. The first year of an approved TIP constitutes an agreed list of projects and does not require further action from a project implementer. If the implementer desires to proceed with a project in the second, third, or fourth year, they must follow procedures agreed to by the MPO, State and transit operators.

Status: Projects are selected for implementation from the first year of the TIP in accordance with the provisions outlined above. Projects implemented from the second, third, or fourth year of the TIP have been acted upon as necessary.

RATS has a documented application process for the programming of Surface Transportation Program Urban (STU) funds that are discretionary to the MPO. The MPO has dedicated all STU funding for the past 13 years to the completion of the Harrison Avenue project. A second section of Harrison Avenue is in Phase I engineering and is anticipated to require several more years of STU allocations for completion.

Staff has indicated that if more discretionary federal funding was available to the MPO, it could then take a lead role in shaping regional priorities. To advance this position, MPO staff have published a paper entitled “The Burden of Transportation Investment on Local Agencies: A State of the Practice in the Midwest” that proposes a change in State funding allocations to Illinois MPOs.

Finding: While RATS has fulfilled the requirements of this section of regulation, there are opportunities to improve the regional transportation investment decision making process.

Regardless of total funding amounts or the sources of those funds, the MPO has a responsibility to work aggressively to develop regional consensus on transportation planning priorities and to see that efforts are made to implement those priorities. RATS is not responsible for producing capital improvement programs of member agencies but the MPO should ensure that those programs are in concert with each other and advancing agreed upon priorities. Likewise, the MPO should be able to provide analysis to its members individually and collectively on the effects that their independent capital improvement programs are having on system performance. And with finite financial resources, it is critical that the MPO provides an independent analysis on the efficiency and effectiveness of investment strategies throughout the region.

As part of these efforts, it is recommended that IDOT increase efforts to ensure the MPO is provided ample opportunity to communicate local goals and priorities in early stages of the development of the IDOT Multi-Year Highway Program. Similar to its role for coordinating with local members, the MPO should provide a collective voice that resonates in the programming processes of the IDOT District 2 office. Likewise, MPO and IDOT performance data should be coordinated so that it can be determined if priorities are being adequately pursued. Furthermore, any discussions between the MPO and the State concerning the appropriate funding allocations should use performance data as a baseline to identify system performance deficiencies that may warrant redirected resources.

Annual List of Obligated Projects

Requirement: Federal law requires publication of an annual list of obligated projects. *Obligated projects* means strategies and projects funded under 23 USC and 49 USC for which the supporting Federal funds were authorized and committed by the State or designated recipient in the preceding program year, and authorized by FHWA or awarded as a grant by FTA. The annual listing must be a cooperative effort of the MPO, State, and transit operator and information must include an adequate description of project scope, the location and limits of the project, the original amount programmed and the amount actually obligated. It is also encouraged that visualization techniques be applied to this publication to promote an improved understanding of transportation programs. Emphasis has been added to the inclusion of investments in pedestrian walkways and bicycle facilities. The list must be published within 90 days of the end of the reporting year.

Status: RATS provides the Annual List of Projects as Table 26 in the TIP for highway, bicycle, and pedestrian elements and as a series of tables (each table representing a different funding program) in the TIP for transit projects.

Finding: The publication of the Annual List of Obligated Projects covers a twelve month period and provides adequate information for projects and their funding. While listed in several tables versus a single table, the Review Team appreciates individual transit tables that include historical expenditures, obligations in the preceding fiscal year, and programmed projects for each funding category. Likewise, the Team commends the highway listing for inclusion of projects beyond

those that received federal funding. Both of these techniques provide additional useful information that can be helpful in understanding and analyzing the use of financial resources.

As discussed previously in this report, it is recommended that the TIP document be augmented with additional mapping and/or other visualization techniques to help convey the substantial amount of information that is provided in the document. Specifically, projects identified in the Annual List of Projects (Table 26) and applicable transit projects should, at a minimum, be highlighted on a singular regional map to help provide a context for where resources have actually been committed.

Air Quality Conformity

Requirement: Under the 1990 Clean Air Act Amendments (CAAA), the US Department of Transportation cannot fund, authorize, or approve federal actions to support programs or projects, which are not first found to conform to the Clean Air Act requirements. With DOT concurrence, the US EPA has issued regulations pertaining to the criteria and procedures for transportation conformity. As it pertains to metropolitan planning, the conformity regulations require that in nonattainment areas there be a consultation process in effect involving appropriate local, state, and federal air agencies, and agencies charged with transportation planning. The FHWA and the FTA jointly make conformity determinations within air quality non-attainment and maintenance areas to ensure that federal actions conform to the "purpose" of State Implementation Plans (SIPs). The transportation conformity process is intended to ensure transportation plans, programs, and projects will not create new violations of the National Ambient Air Quality Standards (NAAQS); increase the frequency or severity of existing NAAQS violations; or delay the attainment of the NAAQS in designated non-attainment (or maintenance) areas.

Status: The Rockford Metropolitan Area is in attainment status with the Clean Air Act requirements.

The US EPA is currently leading a legislatively required review of air quality standards. As part of this review, there is a proposal to lower the threshold of the standard for acceptable levels of ground level ozone. Based on data from previous years, the Rockford region may not meet the proposed new ozone standard and if so, it would be considered to be in nonattainment with the 1990 Clean Air Act Amendments. Under nonattainment status, transportation projects can only be advanced and implemented if they successfully complete the conformity process that is designed to ensure that these transportation investments are not worsening air quality.

Finding: No action is required by the MPO under attainment status.

The conformity process can be a technically demanding and resource intense effort. If the proposed ground level ozone standard becomes law, it is likely that several MPOs and communities throughout the state will become nonattainment with the new standard. Therefore, it is critical for the Illinois Department of Transportation with assistance from the Illinois Environmental Protection Agency to provide leadership and technical support for regions

throughout this process. The Rockford MPO can also benefit from the experiences and lessons learned of its peer organizations throughout the nation including the Chicago MPO.

Public Participation

Requirement: Federal legislation requires that the transportation planning process include a proactive public participation process that provides complete information, timely public notice, full public access to key decisions and supports early and continuing involvement in plans and programs. This process is required to facilitate public participation for a list of interested parties that includes:

- Citizens
- Affected Public Agencies
- Representatives of Public Transportation Employees
- Freight Shippers
- Providers of Freight Transportation Services
- Private Providers of Transportation
- Representatives of Users of Public Transportation
- Representatives of Users of Pedestrian Walkways and Bicycle Transportation Facilities
- Representatives of the Disabled
- Other Interested Parties

Additionally, it is required that a documented public participation plan is developed in consultation with all interested parties. The participation process must demonstrate explicit consideration and response to public input and it must seek out and consider the needs of those traditionally underserved by existing transportation systems. Its effectiveness must be periodically reviewed and assessed by the MPO. The metropolitan public participation process must also be coordinated with the statewide public involvement process. In carrying out the public participation process, the MPO is expected to hold any public meetings at convenient and accessible locations and times, employ visualization techniques to describe plans and programs, and to make information available in electronically accessible formats and means, such as the World Wide Web.

Status: The current RATS Public Involvement Process plan was adopted in April 2003. Since the last Certification Review of the Rockford metropolitan planning process, RATS has successfully launched and maintained a MPO website which is hosted through the City of Rockford Public Works Department website. The website includes electronic copies of planning documents, a schedule of meetings, and an on-line comment form.

The MPO makes active use of local newspapers and an extensive mailing list for public outreach and includes email addresses for response in all newspaper notices and advertisements. RATS staff reports that the MPO has been receiving positive feedback through these email accounts. The MPO also has been hosting public meetings in alternative venues and has continued to “piggyback” transportation planning issues through attending meetings hosted by other groups. The MPO includes all responses from the public in each of their work documents despite the fact

comments on the metropolitan planning process are generally rare throughout the development process of these documents—particularly the UWP and TIP.

The MPO continues to seek new forums and outreach methods to reach groups underrepresented through more traditional public involvement methods. The formation of the Mobility Subcommittee for the production of the Coordinated Public Transportation Human Services Transportation Plan has expanded the groups with whom RATS routinely coordinates. RATS intends to continue to participate with these groups through the Mobility Subcommittee and may consider developing other subcommittees, time and resources permitting. RATS also participated in alternative venue public meetings and flyer distribution for the West State Street project. The MPO has the intention to produce “citizen-oriented” guides to the transportation planning process in the future, but believes that they currently do not have the staff and resources to focus on this effort.

Finding: RATS has historically made efforts to engage all potential planning stakeholders and has demonstrated success with project level public involvement efforts. However, RATS has not updated the 2003 Public Involvement Process plan to reflect SAFETEA-LU requirements or to document new and expanded methods of public or agency participation implemented since their development. In addition, the existing methods used to assess the effectiveness of the public participation process remain ambiguous. To become fully SAFETEA-LU compliant, RATS must complete a Public Participation Plan to reflect recent legislative changes, best practices, recently implemented methods of public and agency involvement, and a clear process for assessing the effectiveness of the public involvement conducted.

Title VI of the Civil Rights Act

Requirement: Title VI of the Civil Rights Act of 1964 states that no person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. Title VI prohibits intentional discrimination as well as disparate impacts on protected groups. The transportation planning regulations require consistency with Title VI and subsequent civil rights laws and regulations. For the purposes of the certification review, the products of the planning process must reflect compliance with this Act.

Status: Title VI certifications are made annually in the RATS TIP through the self certification process. Furthermore, individual transit operators are reviewed for Title VI compliance during their triennial reviews with FTA. There are currently no formal Title VI complaints related to transportation in the Rockford metropolitan region.

RATS adopted an Environmental Justice (EJ)/Title VI Considerations report in March, 2006 that is intended to provide an overall assessment of how the RATS planning process approaches and works towards compliance with relevant laws and executive orders. This is the second such report produced by the MPO with the original EJ/Title VI report adopted in May, 2000. This original report attempted to expand the traditional project by project Title VI assessment by providing a more comprehensive analysis of multi-year transportation investments.

The 2006 document extensively describes the inherent difficulties and complexities in evaluating Title VI protections. The report provides a series of maps based on Census 2000 that identifies different protected populations and Map 6 (not included in the report version available on RATS website) illustrates where RATS has historically spent discretionary STU funding. The report concludes that much of the funding has been directly beneficial to distressed areas and nearly all of the projects have produced at least indirect region-wide economic and employment benefits. The report also outlines public involvement techniques and discusses specific examples of successful involvement on various projects of regional significance or of particular interest to protected populations.

Finding: RATS is commended for the development of the EJ/Title VI Considerations report and is encouraged to make further efforts in the assessment and documentation of how transportation plans and investments affect these protected populations. Analysis should look closely at the distribution of planning funds in the metropolitan area and the distribution of major highway and transit projects with respect to the distribution of minority and low-income groups. Analysis should include, but not be limited to, investments directly controlled by the MPO. This analysis and assessment can be conducted for annual programs but should also continue to be reviewed on a multi-year basis. Further analysis of land use and transportation correlations will also be critical to providing a thorough review of investment impacts on protected populations. The planning process should be able to document the conclusion that traditionally underserved populations are not being neglected or discriminated against by the MPO directly, its individual members, or by the region collectively on a broader scale. As an example, RATS maps give an indication of a pattern of employment expanding to outlying areas of the region, primarily to the east of Rockford and along the I-90 corridor. This employment decentralization is common in many places throughout the country and has the effect of moving jobs further away from the inner urban core and protected populations. It is possible that RATS can build upon the substantial foundation in the current EJ/Title VI report by further examining these trends in development, their ties to transportation projects and their potential effects on jobs for protected populations.

Americans with Disabilities Act (ADA)

Requirement: The Americans with Disabilities Act (ADA) gives civil rights protections to individuals with disabilities. It ensures equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. In transportation, the fundamental issue is one of access to transportation services and facilities. ADA requires all public transit systems that provide fixed route bus and rail service to also provide paratransit (usually vans and small buses) service for people with disabilities who cannot use the fixed route bus and train service.

Status: The FTA has certified in their most recent triennial review that RMTD meets the requirements of ADA. The MPO routinely attempts to consider the needs of individuals with disabilities in the planning process, particularly as they relate to transit and pedestrian accommodations. The RATS offices are ADA accessible and all of their meetings, hearings, and public review sites in the region are ADA accessible.

Finding: The ADA requirements of the transportation planning process have been satisfied.

Coordinated Human Services Transportation Plan (HSTP)

Requirement: SAFETEA-LU requires that proposed projects under three FTA formula funding programs. Projects funded through Special Needs of Elderly Individuals and Individuals with Disabilities (5310), Job Access and Reverse Commute (5316), and New Freedoms (5317) must be derived from a locally developed public transit-human services transportation plan. This plan must be developed through a process that includes representatives of public, private, and non-profit transportation and human services providers, as well as the public. Local officials are to determine the appropriate lead for developing the plan which can be, but is not required to be, the MPO. Preparation of the plan should be fully coordinated and consistent with the metropolitan transportation planning process.

Status: The RATS Mobility Subcommittee assumed the local lead for the Coordinated Public Transit-Human Services Transportation Plan (HSTP). Coordination with IDOT and numerous local agencies has occurred as part of this effort including discussions with RMTD, Northwestern Illinois Area Agency on Aging, City of Rockford Human Services Department, City of Rockford Head Start, City of Rockford Housing Authority, Boone County Council on Aging, Careavan, Septran, the United Way, Rockford Public School District #205, and the Crusader Clinic. Data for both fixed route and demand/response paratransit services has also been incorporated into the plan. Pursuant to resolution 2008-2, the HSTP was formally adopted as an amendment to the LRTP by the RATS Policy Committee on January 24, 2008. The designated recipient for Section 5310, 5317, and 5317 funds for the Rockford metropolitan area is the RMTD.

Finding: The requirements for the HSTP have been satisfied. The appropriate transportation providers, stakeholders, and the public have been involved in the planning activities that led to the final HSTP document. The plan identifies the transportation providers and provides details of existing services. The HSTP also evaluates the adequacy of those services in relation to identified disadvantaged population and those with special needs. The plan provides strategies or activities concerning how transport deficiencies such as gaps and duplication of services can be addressed. The document provides a scoring system to evaluate proposed projects using a competitive selection process.

Self Certification

Requirement: The State and MPO must annually certify to FHWA and FTA that the metropolitan planning process is addressing the major issues facing the area and is being conducted in accordance with all applicable requirements. FHWA and FTA must certify the metropolitan planning process in TMAs at least every three years.

Status: The MPO submits its annual self-certification to the federal agencies near the beginning of each state fiscal year as part of the TIP submittal process.

Finding: FHWA and FTA have accepted each of RATS self-certifications since the last federal certification review.

It is recommended that the MPO strive to substantiate provisions of the annual self-certification and document the performance of the metropolitan planning process. Documentation can occur through the self certification process itself or if more applicable, through strategic planning and performance monitoring of safety, congestion, air quality, public participation or many other transportation planning issues.

Disposition of 2003 Review Findings

The report documenting the previous transportation planning certification review findings was issued on January 30, 2004. FTA and FHWA certified the planning process and issued no corrective actions and delivered seven recommendations for improvements to the planning process. The Review Team notes the status of these seven recommendations as follows:

1. *We recommend that more involvement should be sought from IDOT District 2 with a focus on involving the MPO in the development of the State's Five Year Program. The MPO should provide a leadership role in engaging staff at the IDOT District Level in order to further develop a cooperative planning and programming process.*

Through attendance and regular communication, the IDOT District 2 office has been more engaged in the formal MPO transportation planning process. However concerns persist regarding local input into IDOT programming processes. Therefore, this recommendation is continued as Recommendation #5 on page 36.

2. *We recommend that RATS and its member agencies further strengthen their efforts in safety conscious planning by adopting a proactive approach to the prevention of accident and unsafe transportation conditions in the region. The short-term objective is to integrate safety considerations in the transportation planning processes at all levels, specifically the Transportation Improvement Program and the Statewide Transportation Improvement Program. This step should be followed by the MPO placing an additional emphasis on incorporating safety conscious planning into the development of the next Transportation Plan.*

RATS has made strides in advancing safety conscious planning in the region. As discussed in this report, successful pursuit of safety conscious planning will consist of partnering, developing data, analysis, and performance monitoring. As such, this recommendation is continued as a part of Recommendation #1 on page 35 where we ask the MPO to assume a leadership role in transportation policy and investment decision making.

3. *We recommend RATS update the Public Involvement Process policy document as necessary to address developing local issues, identify best practices, and respond to changes in federal law. To improve future public involvement activities, several methods of assessment should frequently be applied to ensure effective public participation.*

Changes to federal regulations resulting from SAFETEA-LU require the implementation of a Public Participation Plan that is similar to the "public involvement plans" required under previous regulations. The most significant differences are that these Participation Plans shall be developed in consultation with interested parties and that these documents outline the approaches chosen by local officials for using electronic media and visualization techniques. While RATS continues to operate an open planning process that proactively seeks public input, the MPO has not completed a Public Participation Plan in accordance with federal regulations. Additionally, assessment of public participation techniques remains ambiguous. This recommendation is continued as Corrective Action #3 on page 35.

4. *We recommend RATS make every effort to ensure that a MPO website is operational by the stated goal of December 2004. We note that dedicated funding and time should be specifically illustrated in the FY 05 UWP for this activity.*

The MPO has an operational website that is utilized as a critical component of their public participation efforts. This recommendation is considered satisfied.

5. *We recommend RATS consider publishing “citizen-oriented” guides to transportation planning either independently or as companion pieces to common planning products.*

While some efforts have been made towards making MPO documents and processes more accessible and understandable to non-professionals, this recommendation is continued and expanded on by requesting additional emphasis on visualization techniques in recommendation #7 on page 36 of this report.

6. *We recommend that as the MPO develops the 2005 update to their transportation plan, emphasis is given to issues related to safety conscious planning, integrating planning environmental processes, and congestion mitigation.*

The LRTP was developed with these issues in consideration. In this review, this recommendation is continued by emphasizing the leadership role of the MPO in advancing planning priorities and the need to support these priorities with measurable goals and outcomes in recommendations #1 and #2 on pages 35-36.

7. *We recommend that RATS staff submit the draft EJ/Title VI Considerations report to the Policy Committee for review, analysis, and approval.*

The 2006 version of the EJ/Title VI Considerations report was adopted by the Policy Committee on March 29, 2006. This recommendation is considered satisfied.

Finding and Recommendations

It is the conclusion of the Federal Review Team that the Rockford, Illinois TMA has an underlying planning process consistent with the federal planning requirements in 23 U.S.C. 134(i)(5) and 49 U.S.C. 1607. Based on the information in this review and the ongoing federal oversight of the planning activities in the Rockford TMA, FHWA and FTA jointly act to conditionally certify the transportation planning process of this region subject to the following corrective actions:

1. Prior to any Federal approvals of STIP amendments for projects in the Rockford TMA, the Rockford MPO shall amend the LRTP to include an acceptable financial plan for all public transit services. The financial plan shall include complete revenue and expenditure forecasts for the full twenty year planning horizon.
2. Prior to any Federal approvals of STIP amendments for projects within the Rockford TMA, the Rockford MPO shall amend the current LRTP to
 - A. Include discussion on operational and management strategies to improve the performance of existing transportation facilities to relieve congestion and maximize the safety and mobility of people and goods.
 - B. Include a discussion on potential environmental mitigation activities at the policy and/or strategic levels.
3. Prior to any Federal approvals of STIP amendments for projects in the Rockford TMA, the Rockford MPO shall adopt a Public Participation Plan that satisfies all applicable regulations including:
 - Providing adequate, timely public notice and reasonable access
 - Listing of “interested parties”
 - Documenting processes of consultation with other agencies
 - Employing visualization techniques
 - Making information available in electronic formats
 - Holding meetings at convenient and accessible locations and times
 - Developing Participation Plan in consultation with interested parties
 - Providing a minimum forty-five day comment period before Participation Plan adoption

We also offer the following as recommendations to enhance the transportation planning process in this region.

1. The MPO should assume more of a regional leadership role in transportation policy and investment decisions.

The Review Team feels that elevating the role of the MPO in policy and investment decisions is intricately linked to MPO reorganization discussion being held by the Policy

Committee. Historically, the City of Rockford serving as the MPO Lead Agency has been efficient and effective for the MPO but may have also contributed to circumventing a true leadership role in order to avoid the perception of imposing the City's will on other member agencies. However the ever evolving complexities of the transportation system and the increasing challenges on the region from growth and development demand a more prominent role from the MPO that can champion a multitude of issues including safety, congestion, air quality, land use and transportation linkages, and environmental enhancement. While it is entirely the discretion of the RATS Policy Committee to define the organization of the MPO, it is unlikely that the current structure, organization, and culture of the MPO can continue to efficiently and effectively meet the needs of the region.

2. The MPO should commit to a strategic planning effort that sets benchmarks and monitors the effectiveness of the transportation system based on a series of performance measures. Regardless of organizational structure, the MPO is in a unique position to collect, analyze, and comment on regional data. A common set of data driven benchmarks should help guide project implementers throughout the region towards safety, congestion, financial, public participation, and Title VI goals.
3. The 1997 CMS document, Congestion Management Activities, should be updated to address SAFETEA-LU CMP requirements. These requirements include defining congestion, identifying methods to monitor and evaluate system performance, outlining a plan for data collection and performance monitoring, identifying and evaluating appropriate strategies, documenting implementation plans for strategies, and performing periodic assessment of implemented strategies.
4. The MPO should closely monitor potential changes to air quality standards that could result in a change in its conformity status with the CAAA. It would be appropriate for MPO staff to seek training in air quality conformity or to begin initial discussions with peer organizations of their experiences with conformity. Additionally we encourage IDOT to begin to develop a strategy to assist metropolitan areas such as Rockford with the affects on the metropolitan transportation planning process that would result from non-attainment designations.
5. The MPO should work with IDOT and the newly formed Illinois MPO Association to devise a schedule so that the MPO annually has a formal opportunity to meet and discuss priorities with the State prior to the development of the Illinois Multi-Year Highway Program.
6. The MPO staff should receive training on the National Environment Policy Act (NEPA) in order to better understand how planning level analysis and decisions can contribute to more streamlined and effective project implementation. FHWA and FTA will assist in locating appropriate training at the request of the MPO.
7. Further efforts should be made in conveying MPO information in clear and easily accessible formats such as through visualization techniques. Depending on the issue, the MPO may use anything from static maps to interactive GIS maps, from artist renderings

and physical models to photo manipulation and computer simulation. Visualization can be used to support plans, individual projects, or scenario planning where various scenarios are depicted to allow stakeholders to develop a shared vision for the future by analyzing various forces that affect growth. At a minimum, the current format of the TIP is ripe for the addition of visualization which could aid individuals and groups who seek a better understanding of programming and project implementation processes.