



TITLE VI & ENVIRONMENTAL JUSTICE CONSIDERATIONS

For the Rockford Metropolitan
Planning Organization



November 16th, 2018 Draft Version

Title VI & Environmental Justice Considerations

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MPO Policy Committee

| | |
|-------------------------------------|--|
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This report was prepared in cooperation with the U.S. Department of Transportation, Federal Highway Administration, Federal Transit Administration, and the Illinois Department of Transportation. The contents, views, policies, and conclusions expressed in this report are not necessarily those of the above agencies.

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INTRODUCTION

Background | About the MPO | Legal Framework

Background

The Region 1 Planning Council (R1PC) acting as the Rockford Metropolitan Planning Organization (MPO), is dedicated to an inclusive planning process that ensures that residents are informed about and given meaningful opportunities to engage in regional planning efforts and decision making. R1PC must be as inclusive as possible so it is able to serve the widest range of citizens and implement effective planning that uses federal funding to benefit the entire region represented by Rockford MPO. In order to accomplish this goal, the Rockford MPO has developed this Title VI

Program in accordance with the federal laws, regulations, and guidance that govern nondiscrimination in its programs and activities.

This Title VI Program reflects the Rockford MPO's commitment to implementing planning processes that are designed to protect against discrimination and to ensure that it provides fairness and consideration of issues impacting disadvantaged residents. It also provides a clear process that a resident may use if the individual feels that they have been discriminated against in one of R1PC's programs or activities. Finally, this Title VI Program outlines the strategies and

tools that the Rockford MPO utilizes to reach and involve all of its residents, including those who are historically harder to reach.

The following Title VI program was approved by the Rockford Metropolitan Planning Organization Policy Committee on (DATE OF POLICY COMMITTEE ADOPTION). A copy of the MPO Policy Committee resolution can be found in Appendix B.

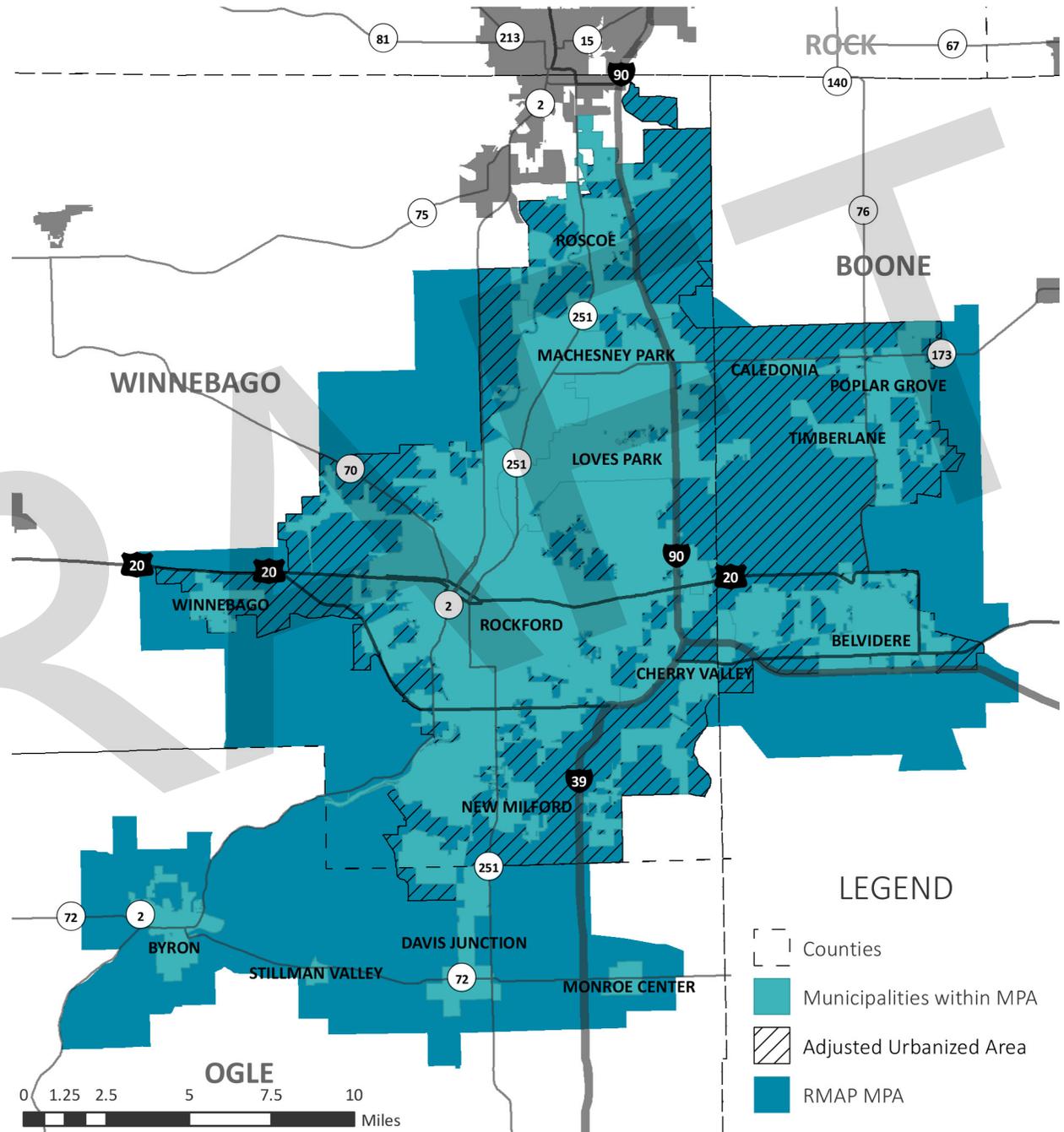
About the MPO

By Federal law, all large census defined urbanized areas (over 50,000) are required to have an organization that plans for and coordinates the decisions regarding the area's transportation systems. The MPO (previously known as Rockford Metropolitan Agency for Planning) transportation planning function is housed within R1PC. R1PC is comprised of the MPO, Winnebago County Geographical Information System (WinGIS), and the Rockford Region Economic Development District (EDD).

The MPO is empowered and governed by an inter-agency agreement known as the MPO Cooperative Agreement that was developed and mutually adopted by the Cities of Rockford, Loves Park, and Belvidere; the Counties of Winnebago and Boone; the Village of Machesney Park; the State of Illinois acting through the Illinois Department of Transportation (IDOT); and the Rockford Mass Transit District. The activities of the MPO are directed by a Policy Committee that consists of the top elected officials from the above entities plus the Deputy Director from IDOT Region 2 and the Chairman of the Rockford Mass Transit District Board. Transportation planning is carried out through a continuing, comprehensive, and cooperative (3-C) planning process.

The Policy Committee receives technical recommendations and assistance from

Figure 1 | MPO Planning Area



a 20-member Technical Committee comprised of voting entities listed below and non-voting members as well:

- Belvidere Public Works Department
- Belvidere Planning Department
- Boone County Conservation District
- Boone County Highway Department
- Boone County Planning Department
- Forest Preserves of Winnebago County
- Greater Rockford Airport Authority
- Illinois Department of Transportation, Region 2
- Loves Park Public Works Department
- Loves Park Community Development Department
- Machesney Park Planning Department
- Machesney Park Public Works Department
- Winnebago County Soil and Water Conservation District
- City of Rockford Community Development Department, Planning Division
- Rockford Mass Transit District
- Rockford Park District
- City of Rockford Public Works Department
- Rock River Reclamation District
- Winnebago County Highway Department
- Winnebago County Planning and Economic Development Department

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

The Alternative Transportation Committee (ATC) was created to act in an advisory capacity to the MPO Technical Committee on alternative transportation activities. Alternative transportation refers to any mode of personal transportation other than a single-occupant vehicle, such as biking, walking, carpooling, or taking

public transportation. The ATC supports both the Coordinated Public Transit-Human Services Transportation Plan and the Bicycle and Pedestrian Plan for the MPA, as well as makes recommendations on priorities for funding and implementation of alternative transportation programs and capital transit projects. Members of the committee represent local governments, public transportation agencies, non-profit organizations, public health organizations, and local advocacy groups.

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

Minority Representation on Non-Elected Planning and Advisory Boards Committee

FTA Title VI Circular 4702.1B requires that any recipients that have transportation-related, non-elected planning boards, advisory council or committees, or similar bodies, membership of these committees must be broken down by race, accompanied by a description of efforts

made to encourage the participation of minorities on these committees.

The table below provides detail as to the demographic representation on the various MPO Committees. It should be noted that as a result of the MPO Policy Committee membership consisting of locally elected officials and the MPO Technical Committee membership consisting of State and local planning and engineering staff (based on the individual’s position/title), the MPO does not have control over the demographic composition of those committees. The MPO however will continue to make efforts to promote diversity and encourages participation of all citizens in the transportation planning and programming process.

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

Table 1 | Minority Representation on Boards and Committees

| Minority Representation | Caucasian | Hispanic/Latino | African American | Asian American | Two or More Races | Other |
|--|-----------|-----------------|------------------|----------------|-------------------|-------|
| MPA Population | 80% | 13% | 11% | 2% | 3% | 4% |
| MPO Policy Committee | 100% | - | - | - | - | - |
| MPO Technical Committee | 74%* | - | - | - | 16%* | 5%* |
| MPO Alternative Transportation Committee | 62%* | 15%* | - | - | - | - |

* 5% of MPO Technical Committee preferred not to answer.

* 23% of MPO Alternative Transportation Committee preferred not to answer.

Legal Framework

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

Federal Non-Discrimination Acts

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

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

Executive Orders

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



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

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

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

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

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



NONDISCRIMINATION POLICY

Nondiscrimination Policy | Notice to the Public | How to File a Complaint | Title VI Investigation

Nondiscrimination Policy

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

The MPO agrees to compile, maintain, and submit in a timely manner Title

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

The following policies and procedures in the

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

Title VI and Environmental Justice must be considered as MPO develops transportation proposals, plans and projects. Specifically, the MPO must make concerted efforts to recognize the adverse impacts of its proposals, as well as the beneficial aspects. Second, the

MPO must take action to identify exactly who will be affected and to what degrees. Third, the MPO must inform and involve the public, especially those persons likely to be affected, in the planning and decision-making process. Fourth, the MPO must consider alternatives and choose carefully and fairly among those alternatives. As the MPO proceeds through these steps, the MPO and MPO participant member agencies must strive to:

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



decision-making process.

- F. Promote Title VI & Environmental Justice efforts both within the MPO and by all the MPO participant member agencies within their respective jurisdictions, especially the local units of government with transportation responsibilities.
- G. Take into the account the diversity of the MPO participants and all the communities within the MPO Metropolitan Planning Area (MPA). Specifically:

Older central cities of Rockford and Belvidere, which have higher concentrations of minorities, should be given special consideration.

Similarly, the older areas of Loves Park, and Machesney Park that have some concentrations of low-income persons should not be neglected.

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

Notice to the Public

The MPO's Title VI Notice is posted within the public reception area of R1PC offices as well as on the R1PC website. References to Title VI and Environmental Justice considerations, as well as its inclusion in the transportation planning process, are also contained within the various MPO documents.

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



How to File a Complaint

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

The R1PC Executive Director will be informed of any written complaint within 10 days of receipt of the complaint. Within 30 days of receipt of the complaint the Title VI Coordinator will acknowledge receipt of the complaint and inform the complainant of proposed action to process the complaint. Within 120 days of receipt of the complaint the Title VI Coordinator will conduct and complete a full investigation of the complaint and provide a recommendation for action in a report of findings to the R1PC Executive Director. Within 150 days of receipt of the

complaint, the R1PC Executive Director will notify the complainant of their right to file a formal complaint with IDOT's Equal Opportunity Office if they are dissatisfied with the final decision rendered by R1PC. The Title VI Coordinator will also provide the MPO Policy Committee with a copy of this decision and summary findings.

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

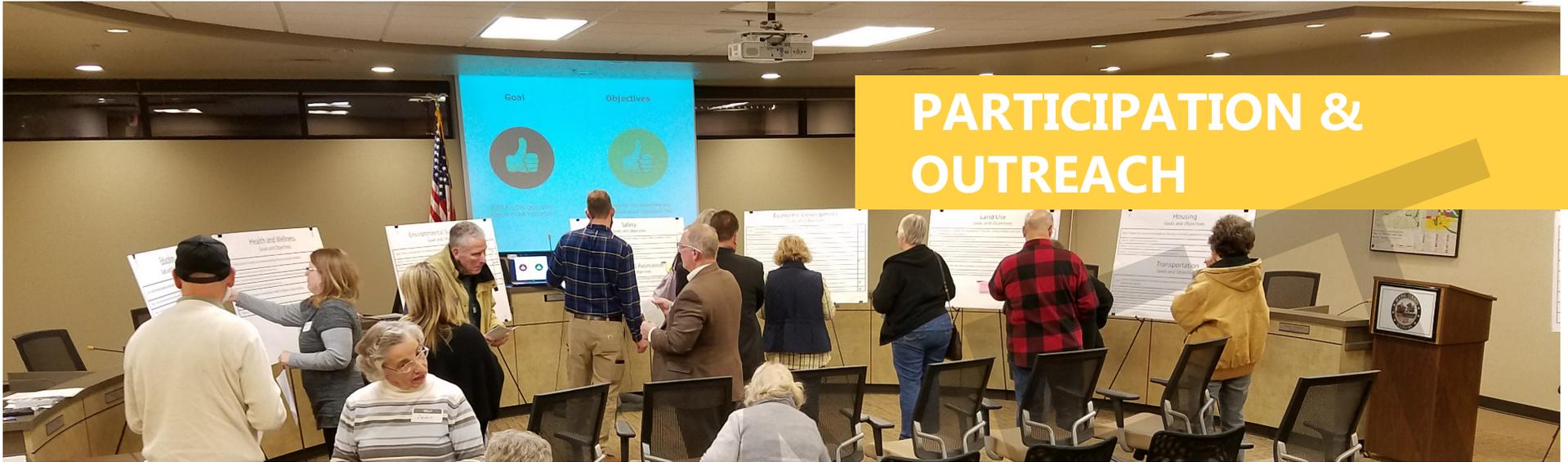
FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC 20590

To view a copy of the MPO's Complaint Form see Appendix D.

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

Title VI Investigation

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



PARTICIPATION & OUTREACH

Public Participation Plan

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

The MPO's PPP outlines the strategies developed to distribute information to

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

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

Public Participation Plan

- Websites and social media posts;
- Meetings and public forums, such as open houses;
- Policy, Technical, and Alternative Transportation Committee meetings;
- Legal advertisement and legal notices;
- Materials distributed through the MPO email list;
- Newsletters; and
- Paper and electronic surveys.

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

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

- Communication with neighborhood organization representatives;
- Provides timely notices by email and informational posts on the R1PC website;
- Flyers in high-volume locations;
- Outreach to specific organizations that represent and provide services for:
 - Individuals with disabilities
 - Low Income
 - Elderly
 - Minorities
 - Limited English Proficiency

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



Public Participation Plan

for the
Rockford Metropolitan Planning Organization



May 3rd, 2018



MPO's Responsibility with Title VI & EJ | Mobility Needs of Minority Populations

MPO's Responsibility with Title VI & EJ

The MPO is charged with the responsibility to direct, coordinate, and administer the continuing, comprehensive, and cooperative (3-C) transportation planning process. The MPO takes a comprehensive approach to monitoring population trends across the region. The MPO assembles detailed Census data to track demographic trends across the area. In addition to Census data, the MPO also develops detailed dwelling unit and employment forecasts encompassing Boone, Ogle, and Winnebago Counties, in addition to Rock County in

Wisconsin. Building and demolition permits are closely monitored to help determine the location and quantities of dwelling unit changes throughout the area. Longitudinal employment dynamics are also studied to determine the employment locations of minority and low-income groups in relation to their place of residence to help identify key transportation linkages.

The MPO works closely with the Rockford Mass Transit District (RMTD) to develop their required Title VI and Environmental Justice planning documents. A Memorandum of Understanding for Cooperative

Transportation Planning, signed by R1PC and the public transit agencies within its boundaries, including RMTD, denotes that R1PC will:

- Assist the Public Transit Operators by periodically conducting a Title VI (Nondiscrimination) Assessment, in accordance with federal guidelines; and
- R1PC will assist the Public Transit Operators by providing information that can be used

to support visualizations, assist in the decision making and transportation planning process and aid in the public participation process for transportation planning.

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

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

Considerations of Mobility Needs of Minority Populations

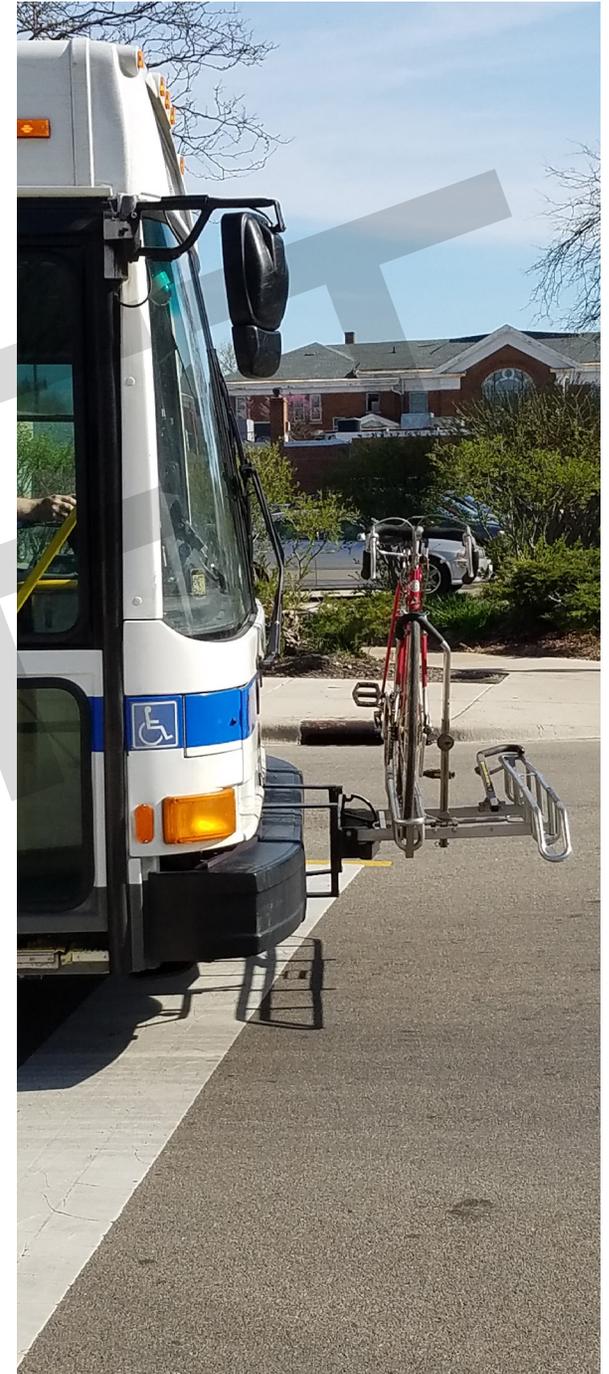
Particular attention to mobility needs of minority populations as well as transit dependent populations is provided through the MPO Alternative Transportation Committee, which succeeded the Mobility Subcommittee in the fourth quarter of Fiscal Year 2018. As previously described in this document, the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

investment, human services, public transit providers, members of the public and governmental entities to determine gaps in transportation services and accessibility for low-income, minority, elderly and persons with disabilities. Through working with the MPO committees, transportation services have been implemented that service regional employment locations such as the CherryVale Mall, Burden Loop Industrial Park and the first fixed route transit service to the City of Belvidere.

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

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

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





METROPOLITAN PLANNING AREA DEMOGRAPHICS

Metropolitan Planning Area Demographics | Demographic Profile

Demographic Profile

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

According to the U.S. Census's 2016 American Community Survey (ACS) 5-Year Estimates, racial minorities comprise 20% of the population within the MPO Metropolitan Planning Area (MPA). African Americans alone represent 11% of the planning area population. Those of Asian descent represent about 2.4% of the planning area. American Indian and Hawaiian or Pacific Islander combined make up less than 1% of the population. The remainder claim either two or more or other races. The Hispanic ethnicity actually comprises the largest minority population in the planning area at 13%. In 2010,

Caucasians represented 78% of the metropolitan planning area population and in 2016 rose to representing 80% of the metropolitan planning area population. Considerable growth has been seen in both the African American and Hispanic populations. The growth of the Hispanic population since 1990 in particular can partially be explained by the addition of the City of Belvidere to the MPO MPA.

Poverty

While the income levels have increased since 2000, the poverty rates have also increased and is equal to the state of Illinois's rate.

49,055 

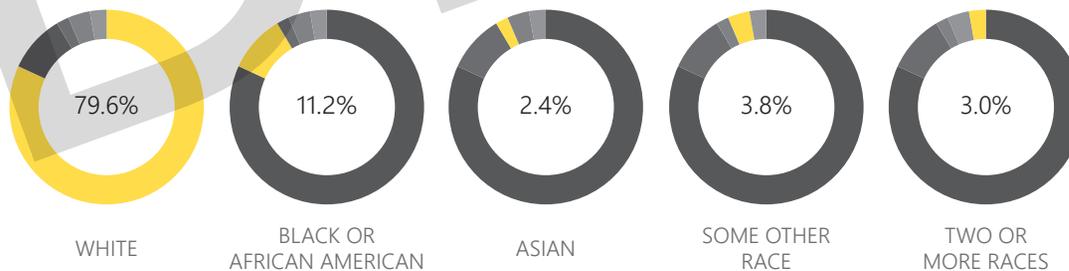
of the region's residents live in poverty (15%).

Age

Youths under 18 years of age compose just over 24% of the MPO's planning area, working age adults (18-64) make up 60%, with the remaining 15% of residents living in the MPA being over the age of 65.



Race

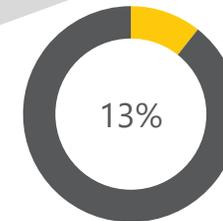


Total Population

330,899 residents

Ethnicity

The largest and fastest growing minority population in the region is Hispanic and Latinos, at 13% of the total population.



13% OF THE REGION'S POPULATION IS HISPANIC/LATINO

Gender

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

Male



49%

Female



51%



ENVIRONMENTAL JUSTICE ASSESSMENT

Assessing Impacts & Environmental Justice | Planning Area Thresholds | Limited English Proficiency Policy | Benefits & Burdens Analysis

Assessing Impacts & Environmental Justice

Establishing a demographic baseline is a vital step in conducting a Title VI and Environmental Justice (EJ) assessment. The MPO has calculated thresholds for the metropolitan planning area (MPA) which is useful for determining areas with Traditionally Underserved Populations (TUP) that may be particularly impacted by a transportation/transit service change or facility improvement. A threshold

represents the overall concentration of a population across the entire metropolitan planning area. To calculate the threshold, a regional average for each targeted population was used.

The thresholds were then applied to all the census block groups within the planning area in order to identify areas with higher than average minority densities. To comply with Environmental Justice

criteria, thresholds were calculated for Traditionally Underserved Populations, such as low-income, racial/ethnic minorities, Limited English Proficiency, elderly (aged 65 and above), and zero car households.

Traditionally Underserved Populations Definitions

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

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

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

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

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

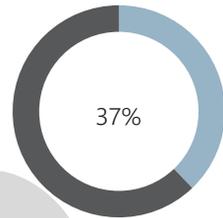
Seniors - A person aged 65+.

Environmental Justice Thresholds

Racial Minority



23.12%
Threshold

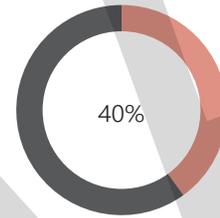


OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD

Hispanic Minority



13.9%
Threshold

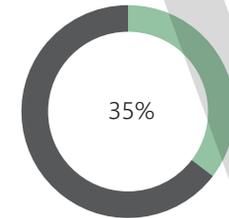


OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD

Limited English Proficiency



2.9%
Threshold

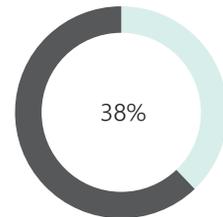


OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD

Low Income



18.3%
Threshold

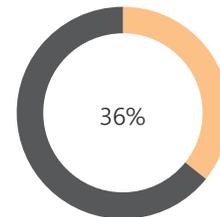


OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD

Zero Car Household

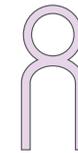


9.02%
Threshold

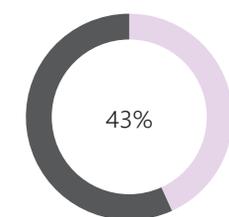


OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD

Seniors



15.7%
Threshold



OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD

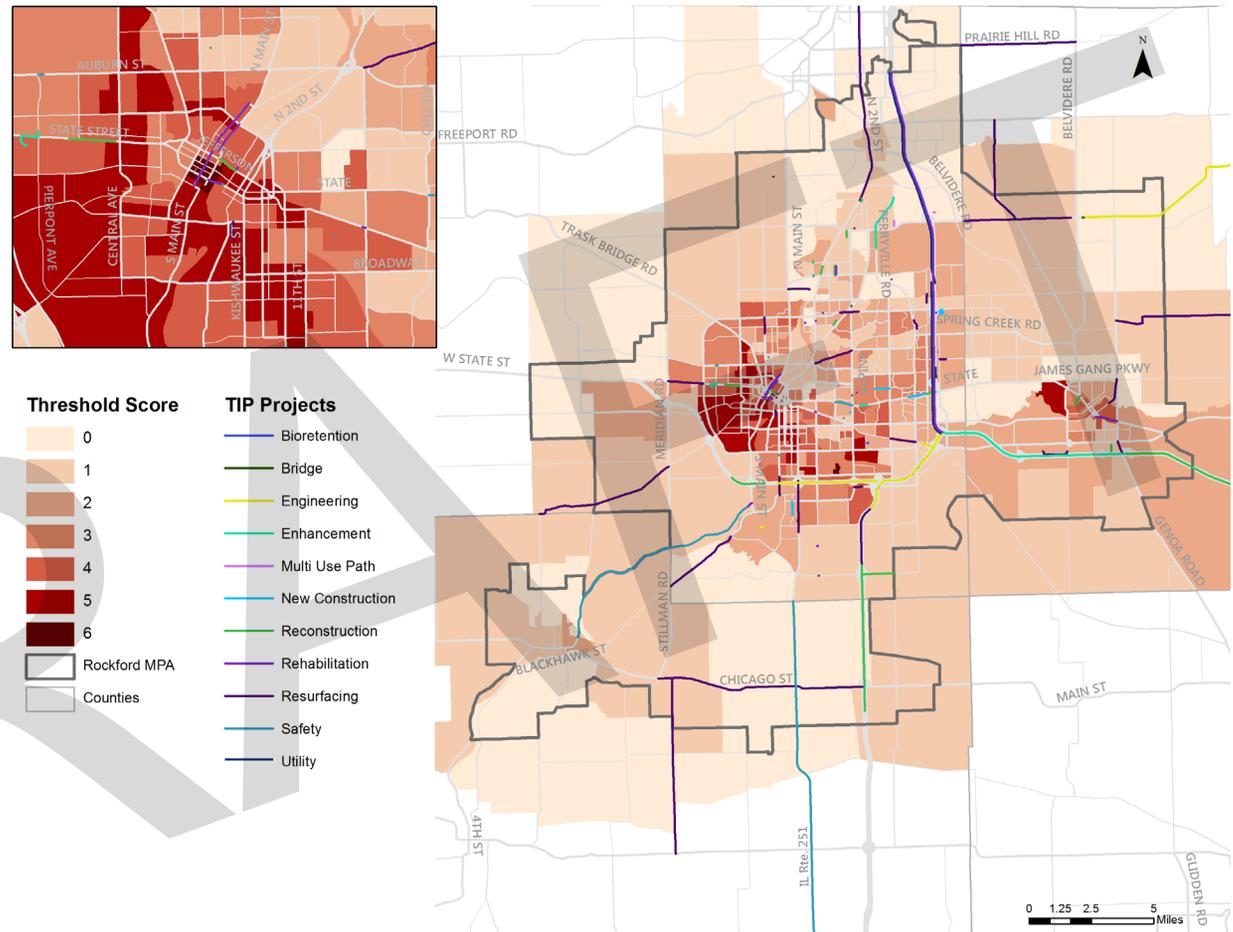
Planning Threshold Areas

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

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

All updates to the MPO's Long Range Transportation Plan (LRTP) and short range Transportation Improvement Program (TIP) will include a map of proposed projects overlaying these concentrations to assess any benefits and burdens on TUPs. The presence of these populations are also used as a weight in the selection process and programming of the Surface Transportation Block Grant and Transportation Alternatives Program funds allocated to the region.

Figure 2 | Population Category Thresholds in Planning Area



Threshold Score

- 0
- 1
- 2
- 3
- 4
- 5
- 6

Rockford MPA
Counties

TIP Projects

- Bioretention
- Bridge
- Engineering
- Enhancement
- Multi Use Path
- New Construction
- Reconstruction
- Rehabilitation
- Resurfacing
- Safety
- Utility

Thresholds Reached per Census Block group

| 0 | 1 | 2 | 3 | 4 | 5 | 6 |
|-----|-----|-----|-----|-----|----|----|
| 11% | 26% | 20% | 17% | 15% | 9% | 1% |

Benefits & Burdens Analysis

The benefits and burdens analysis provides feedback on the equity of the projects within the Long Range Transportation Plan (LRTP) and short range Transportation Improvement Program (TIP), by examining the impact they may have on minority and low income populations, and identifies any disproportionate impacts.

Benefits are the positive impacts from investment such as enhancements in transportation service/options, increases in public safety, congestion relief, increased economic vitality, reduced travel times, etc.

Burdens, on the other hand, are the adverse effects of investment, such as pollution (noise and air), disruption of community cohesion, displacement of persons or businesses, destruction or decrease of economic vitality, adverse employment effects, decline in tax base or property values, diminished aesthetics, disruption of businesses, parking /access to transit, congestion, or the denial, delay or reduction of receipts of benefits. On the following page, Table 3 gives examples of possible benefits, burdens, and mitigation strategies based on proposed project types.

This is a high level overview of projects



and these are illustrative considerations. Project specific context is reviewed by the implementing partner agencies. The intent of the comparisons made in this analysis is to judge how well the benefits and burdens generated by TIP projects are balanced between areas with high concentrations of TUPs, and all other areas of the Rockford MPO planning area.

Table 4 displays the financial breakdown of the Fiscal Year 2019-2022 Transportation Improvement Program projects by improvement type and population category. This data shows that majority of the programmed TIP projects are located in at least one of the block groups that has

reached at least one of the thresholds. Projects planned for the FY2019-2022 have a planned total amount of \$320,055,499. Of these projects, 80% of the funds are used in areas that have reached at least one of the thresholds.

Out of the total projects in the TIP, projects that have been adopted by the MPO Policy Committee in previous TIPs, which have been accepted and approved by the FHWA and the FTA, but have not yet been to letting or have not been awarded are listed in the "Previously Approved Projects" (PA) table. The TIP also included an "Awarded, Initiated, or Completed

Project" (AIC) table. This is a list of the previous year's highway projects that have been completed on which construction has begun or have been awarded via letting.

In the FY 2019-2022 TIP, there is a total of \$50,058,660 in 25 projects which have State or Federal funding that are AIC or PA. Of this total amount, 54%, or \$27,098,660 is within areas that have reached at least one or more of the thresholds.

The totals for each of the population categories for AIC/PA projects can be seen in Table 2. These projects are also included in the more detailed funding break down shown in Table 4. A more in-depth explanation of the entire TIP can be found in the FY 2019-2022 Transportation Improvement Plan on the MPO website, www.rmapil.com.

Figure 4 | Federally & State Funded Projects in Planning Area

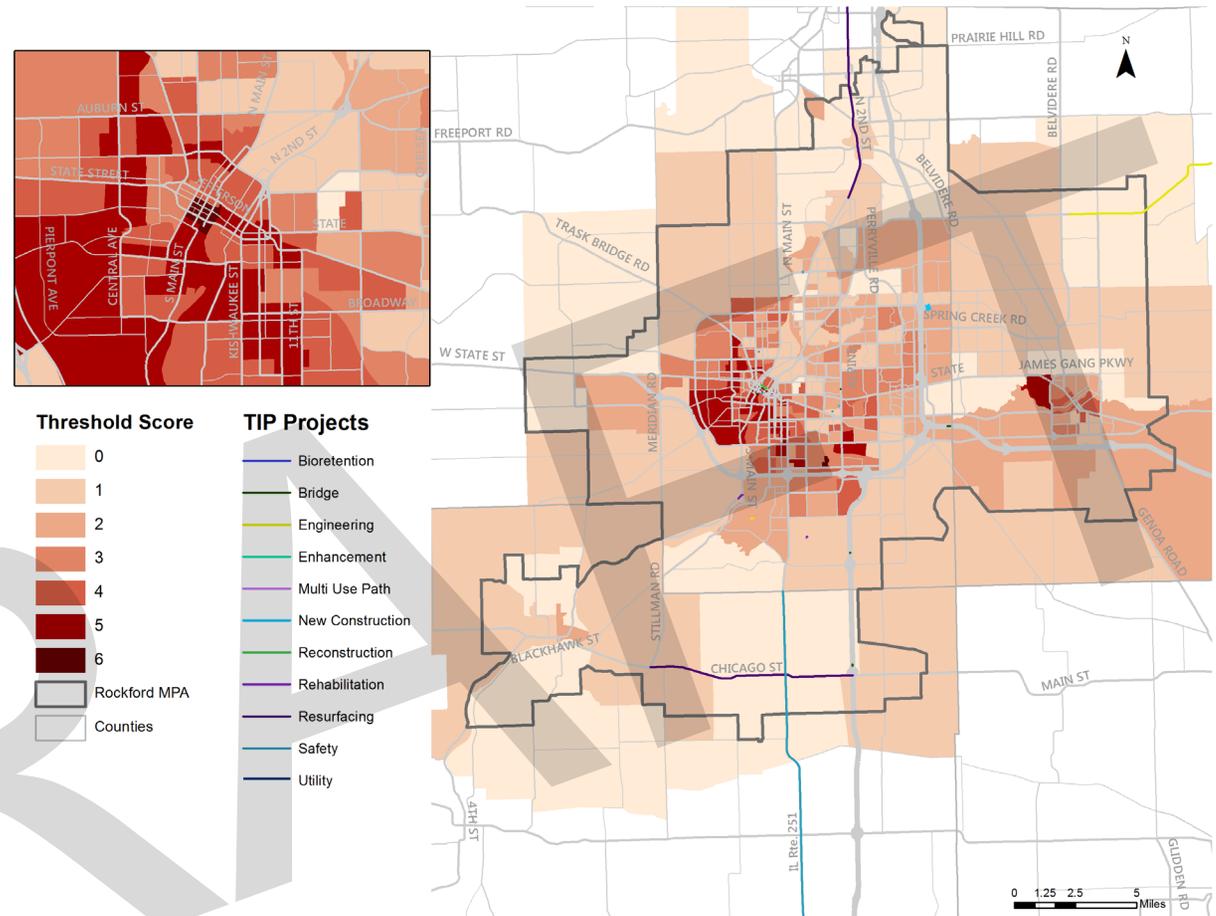


Table 2 | Transportation Improvement Program Planned Budget for AIC & PA Projects

| | Population Area Category | | | | | | | Region Total |
|------------------------------|--------------------------|-----------------------|-----------------------|-------------------|---------------------|---------------------|---------------------|--------------|
| | 0 | 1 | 2 | 3 | 4 | 5 | 6 | |
| Total AIC/PA Projects | \$22,960,000 45.9% | \$24,043,640 48.0% | \$12,480,000 24.9% | \$250,000 0.5% | \$3,125,020 6.2% | \$3,125,020 6.2% | \$2,515,020 5.0% | \$50,058,660 |

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

Table 3 | Benefits and Burdens Analysis

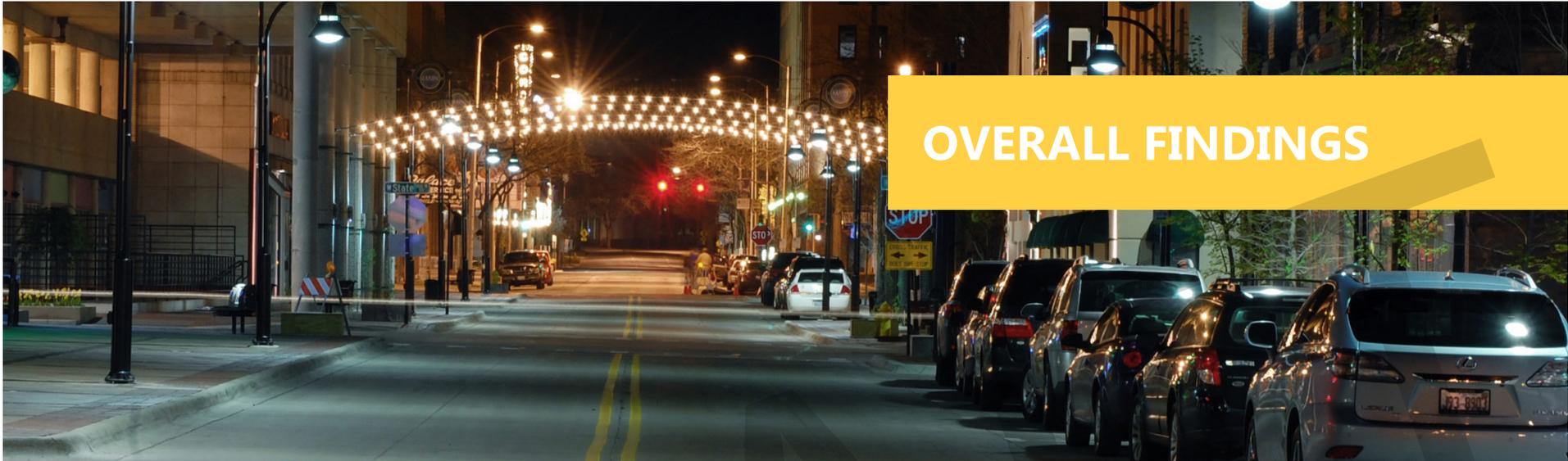
| Proposed Project Type | Possible Benefits | Possible Burdens | Possible Mitigation Strategies |
|---|--|--|---|
| Roadway System | | | |
| Bridge Engineering New Construction | Enhance accessibility & mobility. Promote economic development. Improve safety. Improve operational efficiency. | Benefits limited to populations with motor vehicles. Increase in noise & air pollution. Might impact existing neighborhoods. | Signal synchronization, pedestrian crosswalks, bike lanes, bus route addition, etc. Select ROW for minimum impacts. Try to incorporate context-sensitive design to maintain the neighborhood character. |
| Reconstruction Rehabilitation Resurfacing | Promote system preservation. Improve safety. Improve operational efficiency. | Expansion of shoulder width may impinge on residential property and result in additional acquisition of ROW. Diverted traffic during project construction causes potential delays and congestion on city streets. Noise & air pollution during construction. | Close large sections of roadways during non-peak hours to increase resurfacing productivity. Reroute construction traffic, if needed, to nearby major streets. |

| Proposed Project Type | Possible Benefits | Possible Burdens | Possible Mitigation Strategies |
|---|--|---|--|
| Enhancement Multi Use Path | Improve quality of life, health & environment by encouraging people to use the bike/pedestrian facilities. Improve safety to pedestrians & bike riders. Provide an alternative to motor vehicles. | "Bump-outs" & traffic calming measures make commercial deliveries difficult. Bike routes takes space for passing turning cars at intersections & reduce on-street parking. | Create improvement plans to accommodate both motor vehicle traffic & bike/pedestrian usage. |
| Public Transit | | | |
| Facility Improvements New Buses Shelter/Stop Infrastructure | Enhance accessibility by transit for "Traditionally Underserved Populations". Reduce reliance on motor vehicles and improve air quality. Increase mobility and safety for "Traditionally Underserved Populations". | Temporary shelter/stop infrastructure may not be ADA accessible. Temporary bus routes deviations may be burdensome. | Increase service communication between operators and public. Bus routes should be within walking distance of "Traditionally Underserved Populations". |
| Other Transportation Projects | | | |
| Multi-modal Connection ITS Improvements CMS Strategies | Enhance mobility & accessibility. Improve safety. Enhance system preservation & operational efficiency. | Funding for ITS implementation might not be available. | Multi-modal incorporates transit stations & other modes. Have a comprehensive design phase before implementing ITS projects. |

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

| Project Category | Population Area Category | | | | | | | Region Total |
|---|--------------------------|------------------------|-----------------------|-----------------------|------------------------|----------------------|---------------------|-----------------------|
| | 0 | 1 | 2 | 3 | 4 | 5 | 6 | |
| Biorentention | \$0 | \$0 | \$90,000 100% | \$0 | \$0 | \$0 | \$0 | \$90,000 0.03% |
| Bridge | \$2,210,000 7.3% | \$6,321,000 21% | \$7,435,000 24.7% | \$2,100,000 7% | \$12,078,750 40.1% | \$0 | \$0 | \$30,144,750 9.4% |
| Engineering | \$1,700,000 16.3% | \$0 0% | \$8,720,000 83.7% | \$8,000,000 76.8% | \$8,000,000 76.8% | \$0 | \$0 | \$10,420,000 3.3% |
| Enhancement | \$6,000,000 72.8% | \$7,300,000 88.6% | \$7,300,000 88.6% | \$339,370 4.1% | \$937,020 11.4% | \$0 | \$250,000 3% | \$8,237,020 2.6% |
| Multiuse Path | \$900,000 85.7% | \$150,000 14.3% | \$0 | \$0 | \$0 | \$0 | \$0 | \$1,050,000 0.3% |
| New Construction | \$0 | \$0 | \$11,245,000 73.2% | \$4,110,000 26.8% | \$0 | \$0 | \$0 | \$15,355,000 4.8% |
| Reconstruction | \$775,000 1.4% | \$38,242,000 70.3% | \$38,240,000 70.3% | \$3,675,000 6.8% | \$11,615,020 21.3% | \$3,615,020 6.6% | \$2,515,020 4.6% | \$54,426,020 17% |
| Rehabilitation | \$24,155,000 56.9% | \$24,384,640 57.4% | \$27,285,000 64.3% | \$3,000,000 7.1% | \$7,250,000 17.1% | \$2,900,000 6.8% | \$2,350,000 5.5% | \$42,454,640 13.3% |
| Resurfacing | \$22,897,880 21.1% | \$45,180,000 41.5% | \$9,395,000 8.6% | \$13,408,189 12.3% | \$67,618,189 62.2% | \$5,050,000 4.6% | \$0 | \$108,766,069 34% |
| Safety | \$4,100,000 8.6% | \$38,911,000 82.0% | \$700,000 1.5% | \$330,000 0.7% | \$3,410,000 7.2% | \$610,000 1.3% | \$0 | \$47,451,000 14.8% |
| Utility | \$1,271,000 76.5% | \$1,271,000 76.5% | \$1,661,000 100% | \$390,000 23.5% | \$0 | \$0 | \$0 | \$1,661,000 0.5% |
| Total Projects within the Region | \$64,008,880 20% | \$161,759,640 50.5% | \$112,071,000 35% | \$35,352,559 11% | \$110,908,979 34.7% | \$12,175,020 3.8% | \$5,115,020 1.6% | \$320,055,499 |

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



OVERALL FINDINGS

The above discussions, past assessments, and the included maps and charts serve to illustrate that Title VI and Environmental Justice have been long-standing considerations in the MPO transportation planning process. Information has been developed that identifies the location of minority groups and low-income populations in the Rockford Metropolitan Planning Area. When the data is compared with transportation projects in the TIP, it appears there is an equitable balance of projects in minority / low-income areas and non-minority / upper income areas. Additionally, when the data is compared with the deployment of the public transit system there is strong evidence (RMTD Title VI and Environmental Justice document – dated June 28th, 2017) that the public

transit operators are providing much better service to minorities and low income person and groups in comparison to the general population, thus effectively providing service to transit dependent populations.

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

The MPO will continue to monitor changes in planning area's demographics towards continuing equitable access to the transportation planning process and federal transportation funding. Additionally, the MPO will encourage its partner organizations to continue to ensure that new investments and facilities, service, and maintenance of

existing infrastructure (state-of-good-repair) deliver equitable levels of benefits to these traditionally under-served and disadvantaged populations. This can be achieved through continuing to actively engage minority and disadvantaged populations in the transportation decision making process to avoid, minimize or mitigate any disproportionately high and adverse effects.

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APPENDIX A - MPO STRUCTURE

By Federal law, all large urbanized areas (over 50,000 persons) are required to have an organization that plans for and coordinates the decisions regarding the area's transportation systems. The MPO transportation planning function is housed within Region 1 Planning Council (R1PC). R1PC is comprised of the MPO, WinGIS, and Economic Development District of Northern Illinois. The MPO is empowered by an inter-agency agreement known as the MPO Cooperative Agreement that was developed and mutually adopted by the Cities of Rockford, Loves Park, and Belvidere; the Counties of Winnebago and Boone; the Village of Machesney Park; Rockford Mass Transit District; and the State of Illinois acting through the Illinois Department of Transportation (IDOT).

Policy Committee

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

The Policy Committee meets on the fourth

Thursday of even months at 1:00 P.M. The Policy Committee meeting location is at the Regional Design Center 315 North Main Street, Rockford, IL.

FIGURE A.1

- City of Belvidere
- Winnebago County
- Boone County
- City of Loves Park
- City of Rockford
- Village of Machesney Park
- Rockford Mass Transit District
- Illinois Dept. of Transportation, Region 2

Technical Committee

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

The Technical Committee meets on the third Thursday of each month at 10:00 A.M. at the City of Loves Park City Hall, 100 Heart Boulevard, Loves Park, IL 61111.

FIGURE A.2 Technical Committee Members

- Belvidere Public Works Department

- Belvidere Planning Department
- Boone County Conservation District
- Boone County Highway Department
- Boone County Planning Department
- Forest Preserves of Winnebago County
- Greater Rockford Airport Authority
- Illinois Department of Transportation, Region 2
- Loves Park Public Works Department
- Loves Park Community Development Department
- Machesney Park Planning Department
- Machesney Park Public Works Department
- Winnebago County Soil and Water Conservation District
- City of Rockford Community Development Department, Planning Division
- Rockford Mass Transit District
- Rockford Park District
- City of Rockford Public Works Department
- Rock River Reclamation District
- Winnebago County Highway Department
- Winnebago County Planning and Economic Development Department

Subcommittees

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

In the past, the Technical Committee has appointed special subcommittees including the following:

STP/STBG Subcommittee

This subcommittee was originally created to focus on the selection and prioritization of candidate projects for the use of Federal Aid Urban (FAU) funds, a special category of funding used primarily for regional highway projects. Under MAP-21, the Federal Aid Urban category had been replaced with the Surface Transportation Program (STP) and the funds could be used for highway and transit purposes. The recently passed federal transportation law Fixing America's Surface Transportation (FAST) Act, converts the STP into the Surface Transportation Program Block Grant (STBG) Program under Section 133 of Title 23 of the United States Code. The STBG promotes flexibility

in State and local transportation decisions and provides funding to best address State and local transportation needs. Approximately \$2.5-\$2.9 million dollars is allocated annually to the Rockford MPO Urbanized Area. The STP/STBG Subcommittee continues to meet on an as-needed basis to provide advice on the use of these funds. Project funds are programmed and adopted at the discretion of the MPO Policy Committee.

Greenways Planning Committee

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

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

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

- Conservation District
- Winnebago County Geographic Information System
- Boone County Conservation District
- Local Residents

Bicycle & Pedestrian Advisory Committee

As part of the process of developing the vision statement, goals, and strategies for the Bicycle and Pedestrian Plan, a Bicycle & Pedestrian Advisory Committee (BPAC) was created. This ad hoc committee was developed to ensure that the Bicycle and Pedestrian Plan would reflect the needs, interests, and concerns of the community. Members of the BPAC are representatives of various agencies, organizations, and individuals working to enhance active transportation in the region.

Environmental Committee

The Environmental Committee was formed in 2017 as a committee of Regional 1 Planning Council (R1PC). The Committee is made up of technical experts and interested individuals from around the region with representatives from local governments, organizations, and private

citizens. There are over 20 people who currently serve on this committee.

The overarching goal of the committee is to further the collaboration, implementation, and effectiveness of environmental planning throughout the Rockford Region. The committee will also provide advice, input, and support on environmental planning topics to the R1PC board and other MPO committees.

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

Alternative Transportation Committee

The Alternative Transportation Committee (ATC) was created to act in an advisory capacity to the MPO Technical Committee on alternative transportation policy, planning, and implementation activities. Alternative transportation refers to any mode of personal transportation other than a single-occupant vehicle. Alternative transportation modes include

biking, walking, carpooling, and taking public transportation. The ATC supports the development of and maintenance of both the Coordinated Public Transit-Human Services Transportation Plan and the Bicycle and Pedestrian Plan for the Rockford Metropolitan Area, as well as makes recommendations on priorities for funding and implementation of alternative transportation programs and capital projects.

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

- The Mobility acts as a standing advisory working group to the ATC on the evaluation and recommendation of the FTA Section 5310 Program projects, as well as evaluate and prioritize Job Access and Reverse Commute (JARC) and New Freedom eligible projects.
- The Transportation Alternative Program (TAP) acts as a standing advisory working group to the ATC on the evaluation and recommendation of Transportation Alternatives Set-Aside eligible projects.
- Access Advisory acts as a standing advisory working group to the ATC to provide advice and recommendations to improve accessibility needs and issues to new and existing transportation programs and plans as it relates to ADA.

APPENDIX B - MPO POLICY
COMMITTEE TITLE VI & EJ RESOLUTION

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APPENDIX C - TITLE VI NOTICE TO THE PUBLIC

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

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

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

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

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

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

Para obtener más información sobre la MPO Título VI Programa o los procedimientos para presentar una queja, comuníquese con MPO en 815-319-1483 o envíe por correo electrónico al Coordinador de Título VI a JHalsted@r1planning.org.

APPENDIX D

Rockford Metropolitan Agency for Planning Title VI and Related Statutes Discrimination Complaint Form

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

Rockford Agencia Metropolitana de Planificación Formulario de Quejas de Discriminación del Título VI y Estatutos Relacionados

| | | |
|--|--|-----------------------------------|
| Nombre | Número de teléfono (Residencia) | Número de teléfono (Trabajo) |
| Dirección de residencia (Número y calle, número de departamento) | Ciudad, estado, y código postal de residencia | |
| Nombre de la persona o agencia que usted cree que discriminó en su contra. | | |
| Dirección de la persona o agencia que usted cree que discriminó en su contra. | Ciudad, estado y código postal de la persona o agencia que usted cree que discriminó en su contra. | |
| Fecha del incidente discriminatorio. | | |
| Causa de la discriminación: | | |
| <input type="checkbox"/> Raza | <input type="checkbox"/> Retaliación | <input type="checkbox"/> Sexo |
| <input type="checkbox"/> Color de Piel | <input type="checkbox"/> Nacionalidad (Lengua) | <input type="checkbox"/> Edad |
| | <input type="checkbox"/> Estado Civil | <input type="checkbox"/> Religión |
| | <input type="checkbox"/> Impedimento Físico o Mental | <input type="checkbox"/> Otro |
| Explique claramente como sucedió la discriminación y quienes participaron en la discriminación. Incluya en su explicación cualquier forma en que usted se siente que fue tratado injustamente. Adjunte cualquier otro escrito relacionado con su caso. | | |
| Firma | Fecha | |

APPENDIX E - ROCKFORD METROPOLITAN AGENCY FOR PLANNING TITLE VI DISCRIMINATION COMPLAINT PROCEDURE

1. Alignment

Region 1 Planning Council (R1PC) and its staff are responsible for operating within the parameters set forth by prevailing law and professional ethics.

2. Objective

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

3. Standard

Title VI of the Civil Rights Act of 1964 as amended prohibits discrimination on the basis of race, color, and national origin for programs and activities receiving federal financial assistance. As a recipient of federal financial assistance, R1PC has adopted the following complaint procedure.

4. Procedure

a. Any person who believes that he or she, or any specific class of persons, has been subjected to discrimination or retaliation by R1PC's administration of federally funded programs, as prohibited by Title VI of the Civil Rights Act of 1964, as amended, and related statutes, may file a written complaint. All written complaints received by R1PC shall be referred immediately to the Region 1 Planning Council Title VI Coordinator.

b. Verbal and non-written complaints by R1PC shall be resolved informally by the R1PC Title VI Coordinator. If the issue has not been satisfactorily resolved through informal means, or if at any time the complainant requests to file a formal written complaint, the Complainant shall be permitted to do so, and the complaint shall follow the process for written complaints.

c. The R1PC Title VI Coordinator will advise the R1PC Executive Director within ten (10) calendar days of receipt of the complaint(s). The following information will be included in every notification to the Executive Director (or designated human resource manager):

- a. Name, address, and phone number of the complainant
- b. Name, address, and phone number of R1PC
- c. Basis of complaint
- d. Date of alleged discriminatory act(s)
- e. Date complaint received by R1PC
- f. A statement of the complaint
- g. Other agencies (local, state, or Federal) where the complaint has been filed
- h. An explanation of the actions R1PC has taken or proposed to resolve the allegation(s) raised in the complaint

d. Within thirty (30) calendar days of receipt of the complaint(s), the R1PC Title VI Coordinator will acknowledge receipt of the complaint(s), inform the complainant of action taken or proposed action to process the complaint(s), and advise the complainant of other avenues of redress available, such

Written Complaints shall be sent to:
Region 1 Planning Council
Attention: Title VI Coordinator
313 N. Main Street
Rockford, IL 61101

as the Illinois Department of Transportation's (IDOT) Equal Opportunity Office (EOO).

e. Within one-hundred twenty (120) calendar days of receipt of the complaint(s), the R1PC Title VI Coordinator will conduct and complete a review of the complaint(s) and, based on the information obtained, will render a recommendation for action in a report of findings to the R1PC Executive Director (or designee).

f. Within one-hundred fifty (150) calendar days of receipt of the complaint(s), the R1PC Executive Director (or designee) will notify the complainant in writing of the final decision reached. The notification will advise the complainant of his or her right to file a formal complaint with IDOT's EOO if they are dissatisfied with the final decision rendered by R1PC. The R1PC Title VI Coordinator will also provide the governing board with a copy of this decision and summary of findings.

g. The R1PC Title VI Coordinator will maintain a log of all verbal and non-written complaints received. The log will include the following information:

- a. Name of complainant
- b. Name of respondent
- c. Basis of complaint
- d. Date complaint received
- e. Explanation of the actions the MPO has taken or proposed to resolve the issue raised in the complaint

A person may also file a complain directly with the Federal Transit Administration, at FTA Office of Civil Rights, 1200 New Jersey Avenue SE, Washington, DC, 2059.

5. Responsibility and Accountability

All employees and representatives of Region 1 Planning Council are responsible for abiding by Title VI as applicable to both internal and external parties. All R1PC employees with supervisory responsibilities are accountable or ensuring employees access to this process.

6. Review Schedule

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

7. Prevailing Authority

Title VI of the Civil Rights Act of 1964.

8. Internal Cross-Reference

Standard Operating Procedure: Policy & Procedure System
Personnel Policy: Anti-Discrimination and Harassment

9. Attachments and Forms

None

APPENDIX F - PREVIOUS SUBMITTALS & DOCUMENTS FOR RMTD

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

1. The report entitled, "Title VI & Environmental Justice of the Public Transit Services provided by the Rockford Mass Transit District in the Rockford Urbanized Area", March 2004, as prepared by RATS
2. The letter dated March 29, 2007, regarding "Title VI and Environmental Justice Assessment for the Rockford Mass Transit District" addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Gary McIntyre (RATS)
3. The letter dated March 27, 2008, regarding "Title VI and Environmental Justice Update for the Rockford Mass Transit District Reporting Requirements", addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Jon Paul Diipla (RATS)
4. The letter dated June 20, 2011, regarding "Title VI and Environmental Justice for the Rockford Mass Transit District Status Report", addressed to Donald Allen, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Jon Paul Diipla (RMAP)
5. The report entitled, "Title VI Program and Environmental Justice Assessment 2014-2017" provided by the Rockford Mass Transit District in the Rockford Urbanized Area, March 2014, as prepared by RMAP.
6. The report entitled, "Title VI Program and Environmental Justice Assessment 2018-2020" provided by the Rockford Mass Transit District in the Rockford Urbanized Area, June 201, as prepared by the MPO.

APPENDIX G - RECENT SPECIAL MPO CHANGES, IMPROVEMENTS OR EFFORTS

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

- The Rockford Metropolitan Agency for Planning is now and part of the Region 1 Planning Council (R1PC), a regional organization that combines key public sector operating entities into shared assets for planning, fund development, and research.
- In 2015, Fixing America's Surface Transportation Act (FAST Act) was adopted for the guiding transportation authorization document.
- The FAST Act, converted the Surface Transportation Program into the Surface Transportation Block Grant Program. The STBG promotes flexibility in State and local transportation decisions and provides flexible funding to best address state and local transportation needs. A specific percentage of funds used from the STBG must be set aside for transportation enhancement activities and transportation alternative projects.
- As part of FAST Act, the former Transportation Alternatives Program (TAP) was replaced with a set-aside of funds under the STBG. The TA Set-Aside authorizes funding for programs and projects including on- and off-road pedestrian and bicycle facilities; infrastructure projects for improving non-driver access to public transportation and enhanced mobility; safe routes to school projects; and projects for planning, designing, or constructing boulevards and other roadways largely in the right-of-way of former divided highways. While FHWA administers the TA Set-

Aside, states and MPO's that represent urbanized areas with populations over 200,000 such as Rockford MPO, are involved in the project selection.

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

APPENDIX H - ROCKFORD METROPOLITAN PLANNING ORGANIZATION PUBLIC PARTICIPATION PLAN

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

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

The MPO will also continue to apply the following planning principles:

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

- Pay special attention to the coordination of decisions and the long-range consequences of present actions.

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



Engage

Engage the public in the transportation planning process.

Tactic 1: Provide information to citizens, affected public agencies, and other interested parties regarding transportation plans and programs early in the process to afford time to review materials and participate in the process.

Tactic 2: Maintain the MPO mailing list to ensure that all interested parties are notified of planning activities so that they may comment and participate in the planning process.

Tactic 3: Utilize various visualization techniques, which include but are not limited to maps, graphs and charts to assist the public better understanding transportation plans and planning processes.

Tactic 4: Provide reasonable public access to technical and policy information used in the development of transportation related plans.

Inform

Inform the public of transportation related activities.

Tactic 1: Provide access to transportation plans and related information to the public during normal business hours.

Tactic 2: Make documents available related to the transportation planning process to interested parties through a comprehensive and continually updated contact list (i.e. the MPO Mailing List).

Tactic 3: Maintain the R1PC website with transportation plans, contact information, upcoming events, committee meeting schedules, agendas, minutes, and related transportation planning materials.

Promote

Promote participation in the transportation planning process.

Tactic 1: Continue the MPO policy of affording all members of the public to comment at all MPO meetings.

Tactic 2: Facilitate public meetings/informational open houses, when appropriate, at convenient and accessible places and times.

Tactic 3: Publish public notice regarding transportation plans, open houses etc. to make the public aware of comment periods.

Tactic 4: Promote the R1PC webpage on MPO documents.

Improve

Improve public participation methods and techniques.

Tactic 1: Continually assess current current public participation techniques used to encourage involvement and modify accordingly.

Tactic 2: Continue to work with the MPO committees to encourage public participation.

APPENDIX I - MPO PUBLIC OUTREACH MADE SINCE THE LAST TITLE VI PROGRAM SUBMISSION

| OUTREACH EFFORT | DATE | TIME | LOCATION/EVENT |
|---|------------|-------------------|--|
| Boone and Winnebago County Greenways Plan | 1/6/2015 | NA | Boone County Soil & Water Conservation District |
| Boone and Winnebago County Greenways Plan | 5/13/2015 | NA | Regional Center for Planning and Design |
| Boone and Winnebago County Greenways Plan | 12/10/2015 | NA | Regional Center for Planning and Design |
| Boone and Winnebago County Greenways Plan | 12/16/2015 | NA | Winnebago County |
| MPO Long Range Transportation Plan | 2/24/2015 | 10:00 AM-1:00 PM | City of Loves Park, City Hall Council Chambers |
| MPO Long Range Transportation Plan | 2/24/2015 | 3:00-6:00 PM | Village of Roscoe, Village Hall |
| MPO Long Range Transportation Plan | 2/25/2015 | 2:00-6:00 PM | Regional Center for Planning and Design |
| MPO Long Range Transportation Plan | 5/14/2015 | 7:30-9:00 AM | Regional Center for Planning and Design |
| MPO Long Range Transportation Plan | 5/14/2015 | 3:00-6:00 PM | Regional Center for Planning and Design |
| MPO Long Range Transportation Plan | 5/15/2015 | 11:00 AM- 1:00 PM | RMTD Administration Building |
| MPO Long Range Transportation Plan | 5/19/2015 | 5:00-7:00 PM | Belvidere City Hall |
| MPO Long Range Transportation Plan | 5/21/2015 | 9:30-11:30 AM | Regional Center for Planning and Design |
| MPO Long Range Transportation Plan | 5/21/2015 | 3:00-6:00 PM | RMTD East Side Transfer Center |
| MPO Long Range Transportation Plan | 5/22/2015 | 3:00-6:00 PM | Rockford City Market |
| MPO Long Range Transportation Plan | 5/27/2015 | 7:30-9:00 AM | Belvidere Township Offices |
| MPO Long Range Transportation Plan | 6/9/2015 | 4:00-5:00 PM | Rockford Park District |
| MPO Mobility Subcommittee | 3/10/2015 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 4/14/2015 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 5/12/2015 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 6/22/2015 | 11:00 AM | Regional Center for Planning and Design |
| MPO Mobility Subcommittee | 12/1/2015 | 11:00 AM | Regional Center for Planning and Design |
| MPO Policy Committee | 1/29/2015 | 1:15 PM | City of Belvidere City Hall, Council Chambers |
| MPO Policy Committee | 3/26/2015 | 1:15 PM | Village of Machesney Park, Village Chambers |
| MPO Policy Committee | 4/30/2015 | 1:15 PM | Winnebago County, Room 303 |
| MPO Policy Committee | 5/28/2015 | 1:15 PM | Boone County, Board Room |
| MPO Policy Committee | 7/24/2015 | 1:15 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 7/30/2015 | 11:00 AM | Chicago/Rockford International Airport, Executive Board Room |
| MPO Policy Committee | 12/10/2015 | 1:00 PM | City of Belvidere City Hall, Council Chambers |
| MPO Technical Committee Meeting | 1/22/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 2/19/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 3/19/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 4/23/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 5/21/2015 | 10:00 AM | Regional Center for Planning and Design |
| MPO Technical Committee Meeting | 7/23/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 9/17/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 12/3/2015 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| Boone and Winnebago County Greenways Plan | 1/13/2016 | NA | Northern Grounwater Protection Planning Meeting |
| Boone and Winnebago County Greenways Plan | 1/27/2016 | NA | Boone County Rotary Meeting |
| Boone and Winnebago County Greenways Plan | 2/8/2016 | NA | City of Rockford City Hall, Planning and Development Committee Meeting |
| MPO Mobility Subcommittee | 2/9/2016 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 3/8/2016 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 4/12/2016 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 7/12/2016 | 11:30 AM | Regional Center for Planning and Design |
| MPO Mobility Subcommittee | 7/13/2016 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 11/8/2016 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Policy Committee | 1/28/2016 | 1:15 PM | City of Belvidere City Hall, Council Chambers |
| MPO Policy Committee | 2/25/2016 | 1:15 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 4/28/2016 | 1:15 PM | Winnebago County, Room 303 |
| MPO Policy Committee | 5/26/2016 | 1:15 PM | Boone County Administration Building Board Room |
| MPO Policy Committee | 6/9/2016 | 12:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 8/4/2016 | 3:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 9/1/2016 | 1:15 PM | City of Belvidere City Hall, Council Chambers |

| OUTREACH EFFORT | DATE | TIME | LOCATION/EVENT |
|--|------------|------------------|---|
| MPO Policy Committee | 11/17/2016 | 1:15 PM | Boone County Administration Building Board Room |
| MPO Technical Committee Meeting | 1/21/2016 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 3/17/2016 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 5/19/2016 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 7/21/2016 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 8/18/2016 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 9/22/2016 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| Bicycle and Pedestrian Plan | 2/15/2017 | 5:30-7:00 PM | Veteran's Memorial Hall |
| Bicycle and Pedestrian Plan | 8/1/2017 | 4:00-6:00 PM | Boone County Administration Building Board Room |
| Bicycle and Pedestrian Plan | 8/2/2017 | 4:00-7:00 PM | Regional Center for Planning and Design |
| Bicycle and Pedestrian Plan | 8/3/2017 | 5:00-7:00 PM | Village of Machesney Park, Village Chambers |
| Coordinated Human Services Transportation Plan | 5/17/2017 | 11:00 AM-2:00 PM | Boone County Council on Aging; Keen Age Center |
| Coordinated Human Services Transportation Plan | 5/18/2017 | 4:00-7:00 PM | Regional Center for Planning and Design |
| MPO Mobility Subcommittee | 1/10/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 2/14/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 3/14/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 4/17/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 5/9/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 7/11/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Mobility Subcommittee | 12/12/2017 | 10:00 AM | RMTD East Side Transfer Center |
| MPO Policy Committee | 3/30/2017 | 1:15 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 5/25/2017 | 1:30 PM | City of Belvidere City Hall, Council Chambers |
| MPO Policy Committee | 7/20/2017 | 1:30 PM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Policy Committee | 7/27/2017 | 10:00 AM | Regional Center for Planning and Design |
| MPO Policy Committee | 8/23/2017 | 10:00 AM | Regional Center for Planning and Design |
| MPO Policy Committee | 9/27/2017 | 10:00 AM | Regional Center for Planning and Design |
| MPO Policy Committee | 11/8/2017 | 10:00 AM | Regional Center for Planning and Design |
| MPO Technical Committee Meeting | 1/19/2017 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 3/30/2017 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 5/18/2017 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 7/20/2017 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 9/21/2017 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 12/16/2017 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| Alternative Transportation Committee | 7/10/2018 | 2:00 PM | Regional Center for Planning and Design |
| Alternative Transportation Committee | 10/9/2018 | 2:00 PM | Regional Center for Planning and Design |
| Bicycle and Pedestrian Plan | 2/16/2018 | 5:30-7:00 PM | Veteran's Memorial Hall |
| MPO Policy Committee | 1/25/2018 | 1:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 2/22/2018 | 1:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 4/26/2018 | 1:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 6/28/2018 | 1:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 8/23/2018 | 1:00 PM | Regional Center for Planning and Design |
| MPO Policy Committee | 10/25/2018 | 1:00 PM | Regional Center for Planning and Design |
| MPO Technical Committee Meeting | 1/18/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 2/15/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 4/19/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 5/24/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 6/21/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 8/16/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| MPO Technical Committee Meeting | 10/18/2018 | 10:00 AM | City of Loves Park City Hall, PW/CD Conference Room |
| Public Participation Plan | 2/5/2018 | 4:00-6:00 PM | City of Loves Park City Hall, Community Center |
| Public Participation Plan | 2/7/2018 | 5:00-7:00 PM | Ida Public Library |

APPENDIX J - LIMITED ENGLISH PROFICIENCY PLAN

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

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

The Metropolitan Planning Organization (MPO) for the Rockford

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

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

- The number or proportion of LEP persons eligible in the three-county area to be served or likely to encounter an MPO program, activity, or service;
- The frequency with which LEP individuals come in contact with an MPO program;
- The nature and importance of the program, activity or service provided by the MPO to the LEP population; and
- The resources available to the MPO and overall costs to provide LEP assistance.

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

APPENDIX K - ROCKFORD METROPOLITAN PLANNING ORGANIZATION TRANSPORTATION PLANNING PROCESS CERTIFICATION

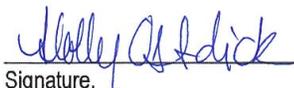
Metropolitan Transportation Planning Process Certification

In accordance with 23 CFR 450.334 (b), the planning process in the Rockford Urbanized Area was fully certified by USDOT – FHWA – FTA on **May 12, 2016**.

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

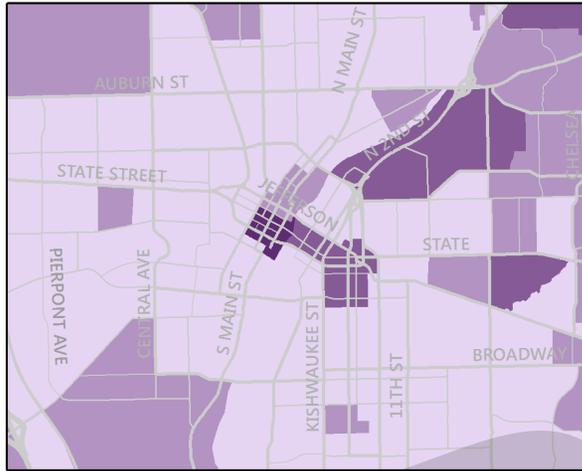
1. 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR 450 subpart C;
2. (Only applicable to nonattainment and maintenance areas) Sections 174 and 176(c) and (d) of the Clean Air Act, as amended (42 U.S.C. 7504, 7506 and (d) and 40 CFR part 93;
3. Title VI of the Civil Rights Act of 1964, as amended (42 U.S.C.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


Signature,
Mayor of the City of Loves Park,
Chairman – RMAP Policy Committee or
Other Authorized Representative of the
Rockford Metropolitan Agency for Planning
May 3rd, 2018

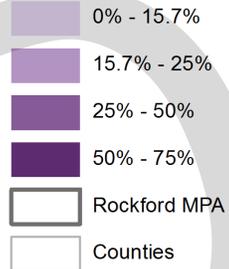

Signature,
Bureau Chief, Urban Program Planning
Illinois Department of Transportation or
other Authorized Representative of the
Illinois Department of Transportation
Dated: 11/13/18

APPENDIX L - POPULATION CATEGORY THRESHOLD MAPS

Downtown Rockford



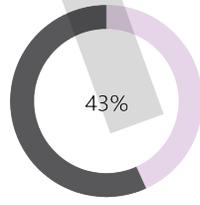
Percent 65 Years and Over



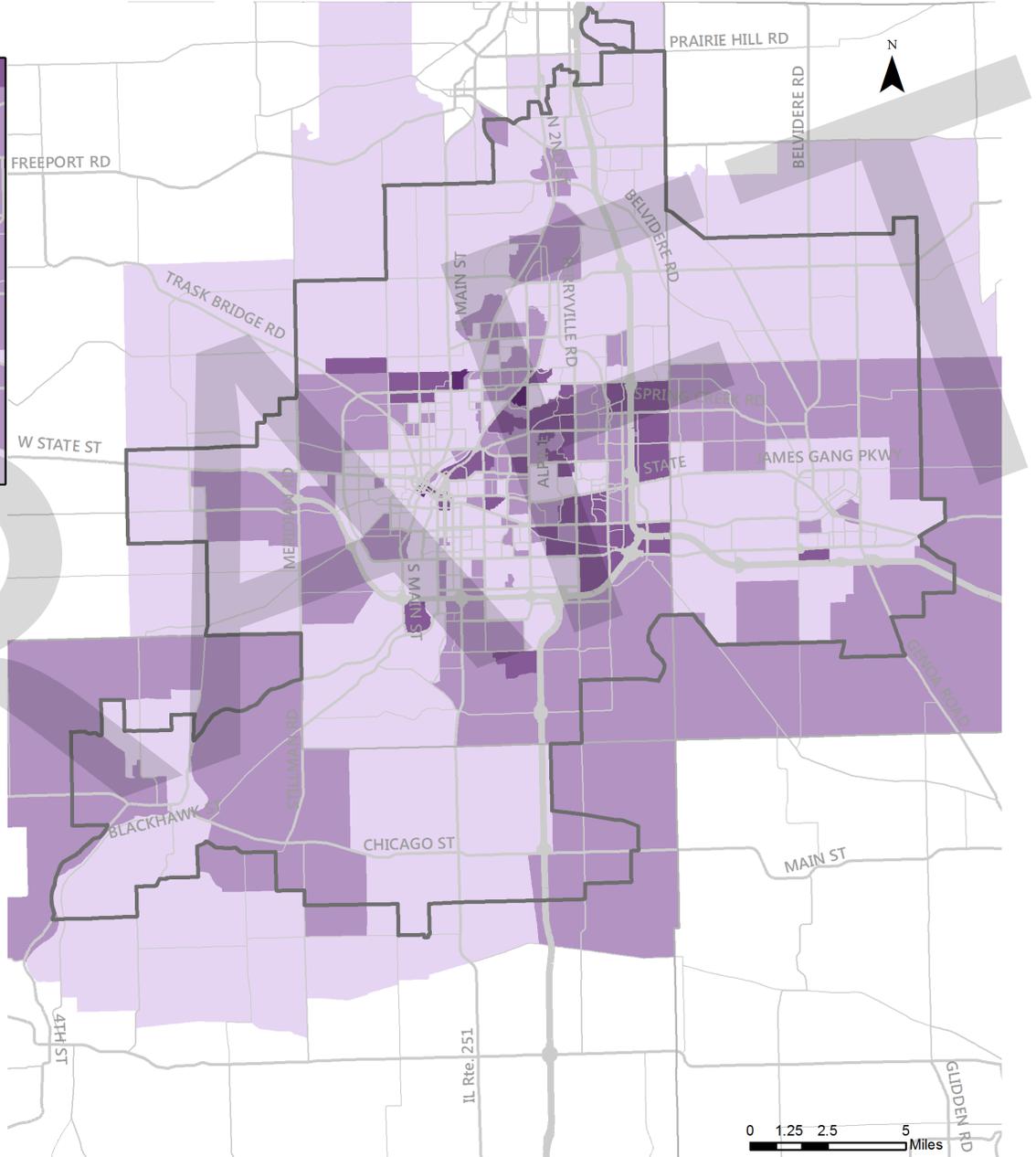
Seniors



15.7%



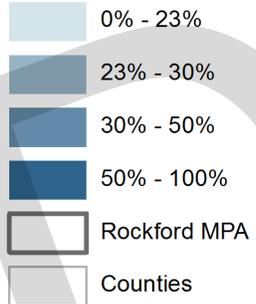
OF CENSUS BLOCKGROUPS REACHED THE THRESHOLD



Downtown Rockford



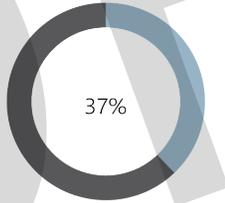
Percent Population as Minority



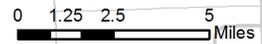
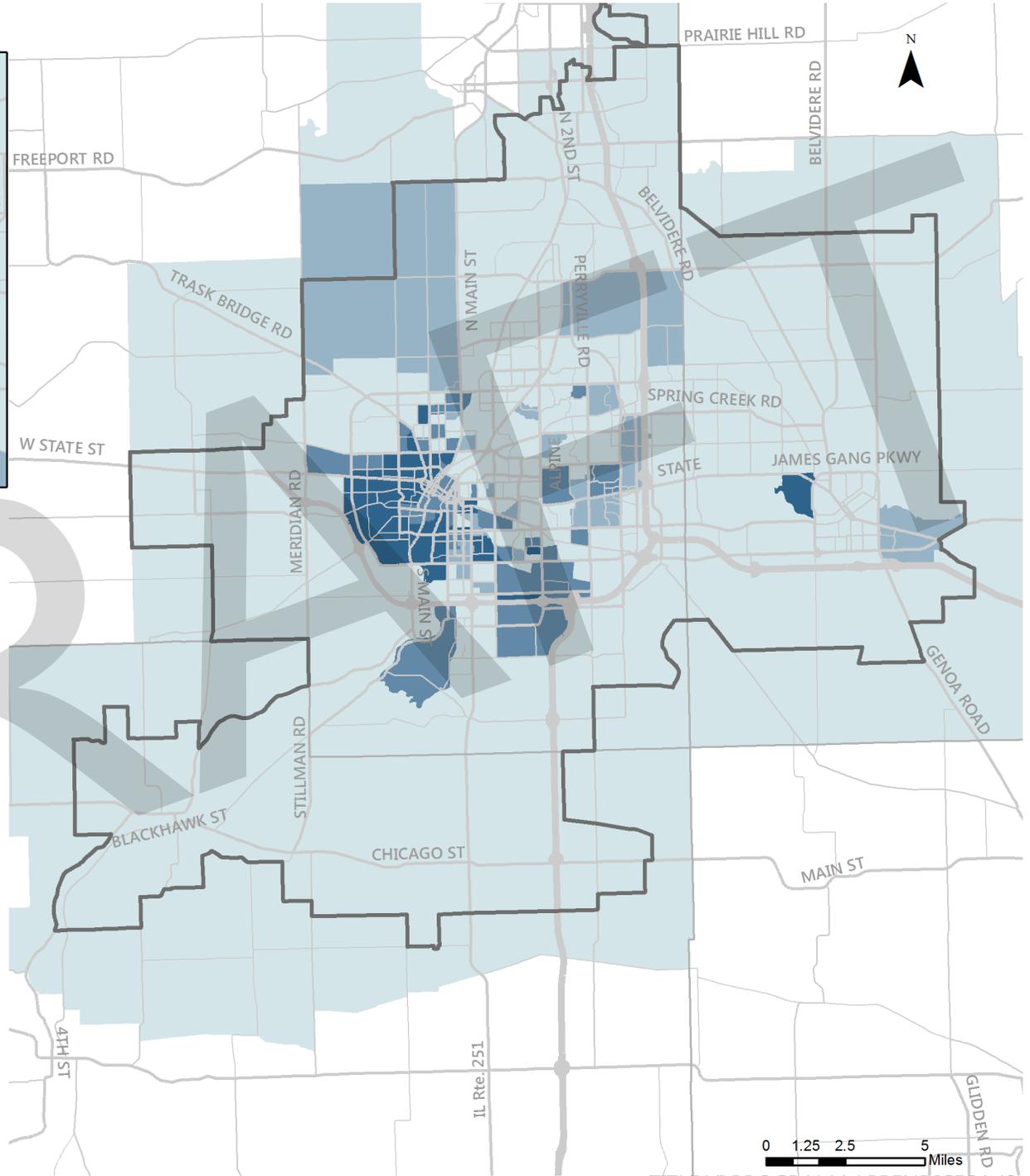
Racial Minority



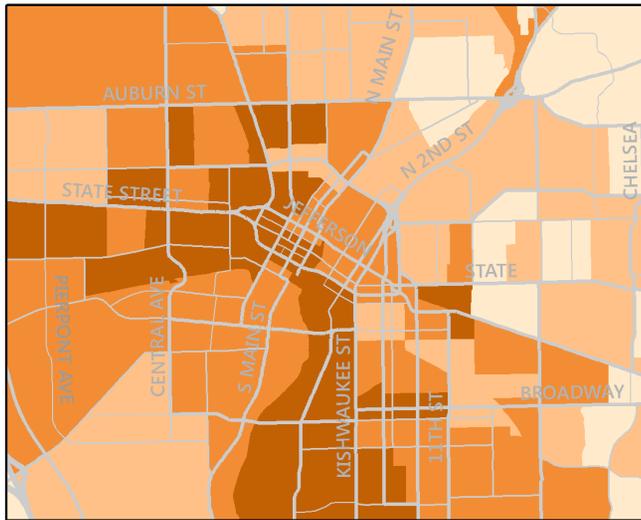
23.12%



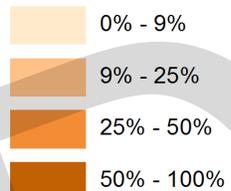
OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD



Downtown Rockford



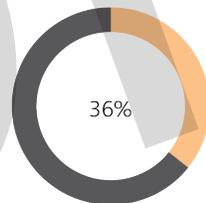
Percent No Vehicles Available



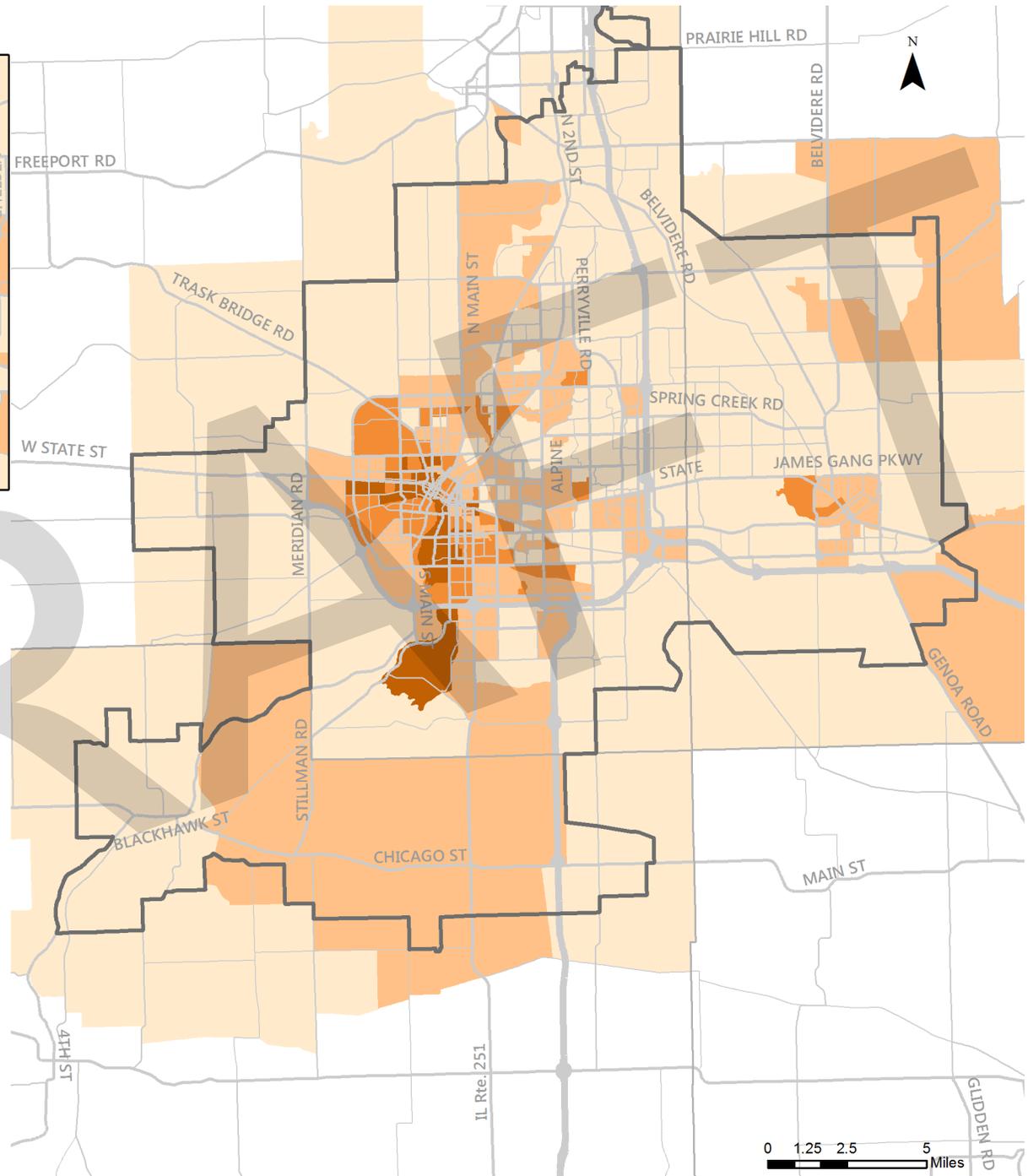
Zero Car Household



9.02%



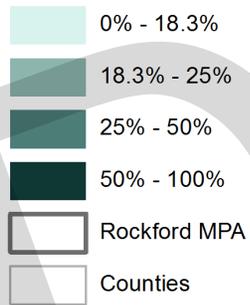
OF CENSUS BLOCKGROUPS REACHED THE THRESHOLD



Downtown Rockford



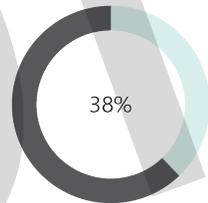
Percent Below Poverty



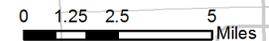
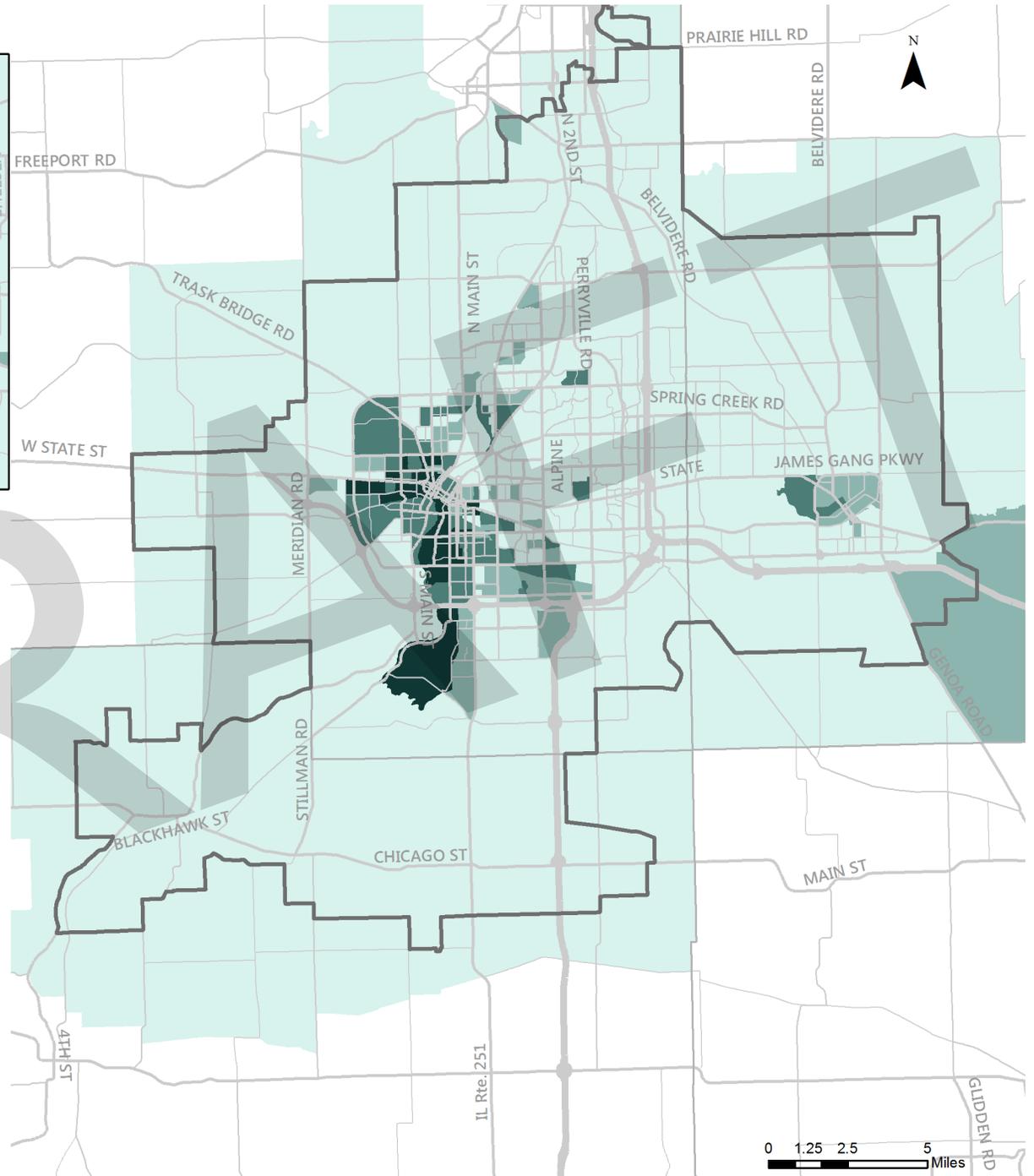
Low Income



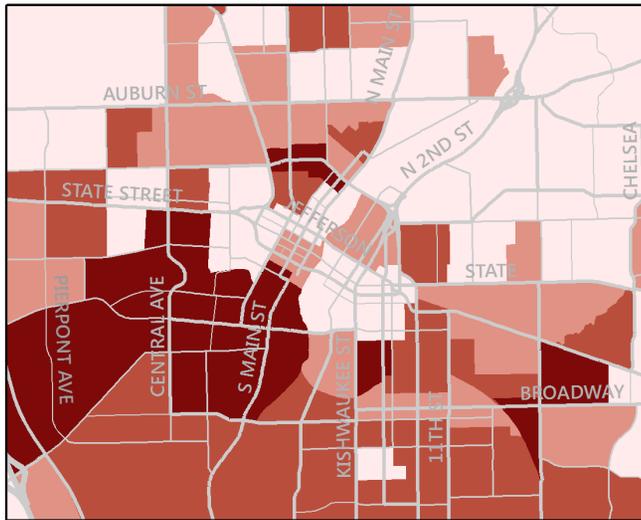
18.3%



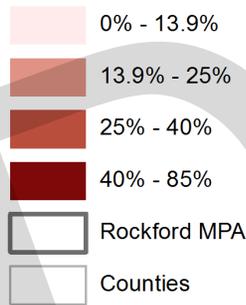
OF
CENSUS BLOCKGROUPS
REACHED THE THRESHOLD



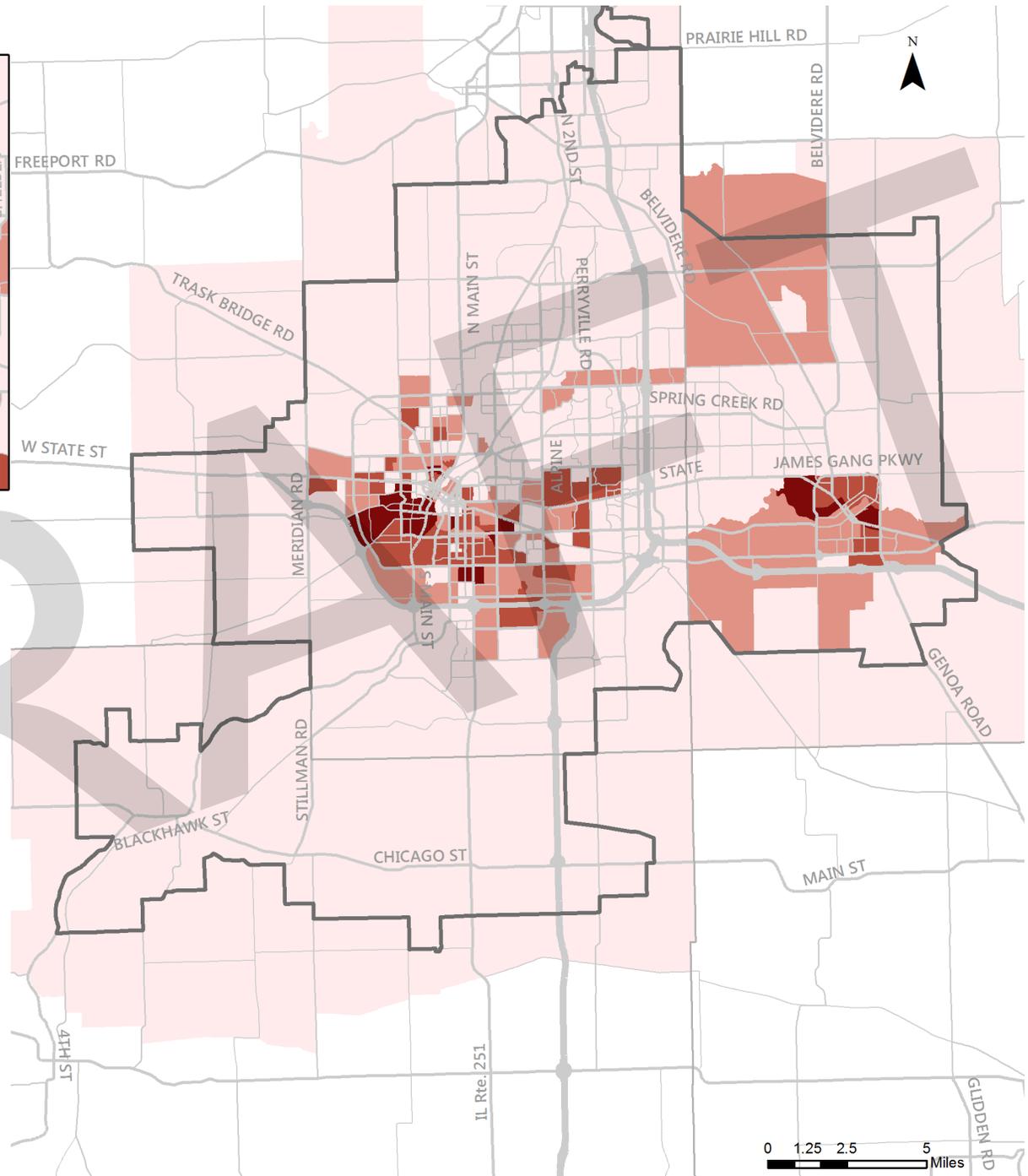
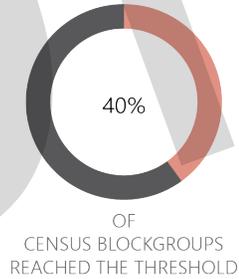
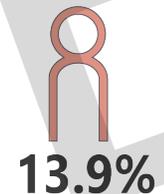
Downtown Rockford



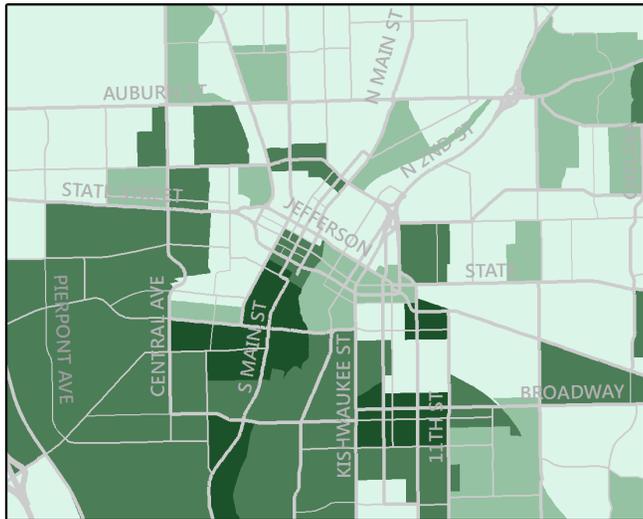
Percent Population Hispanic/Latino



Hispanic Minority



Downtown Rockford



Percent Speak English less than "very well"

- 0% - 2.9%
- 2.9% - 5%
- 5% - 15%
- 15% - 28%

- Rockford MPA
- Counties

Limited English Proficiency

