



REGION 1 PLANNING COUNCIL  
MPO POLICY COMMITTEE

MPO RESOLUTION 2019-2

RE: MPO TITLE VI/ENVIRONMENTAL JUSTICE (EJ) CONSIDERATIONS AND MPO LIMITED ENGLISH PROFICIENCY (LEP) PLAN

- WHEREAS the Federal Highway Act of 1962, as amended, and the Urban Mass Transportation Act of 1964, as amended, provides for an urban transportation planning process; and
- WHEREAS the Fixing America's Surface Transportation (FAST) Act currently authorizes funding to improve our nation's transportation system for highways, highway safety, public transit, alternative non-motorized forms of transportation, and freight; and
- WHEREAS the Fixing America's Surface Transportation (FAST) Act and its predecessors, require a Long-Range Transportation Plan (LRTP) as well as a Transportation Improvement Program (TIP); and
- WHEREAS the Region 1 Planning Council is the Metropolitan Planning Organization (MPO) for the Rockford Metropolitan Area, and the MPO Policy Committee has the specific responsibility to direct and administer the 3-C (continuing, cooperative, comprehensive) urban transportation planning process; and
- WHEREAS all programs and organizations receiving financial assistance from FHWA and FTA are subject to Title VI of the Civil Rights Act of 1964 and US DOT's implementing regulations; and
- WHEREAS Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Population and Low-Income Populations" builds on to Title VI activities by including the consideration of the impacts to low-income populations in addition to minority populations into transportation planning and decision-making processes; and
- WHEREAS the MPO assures that no person or group of persons on the basis of race, color, or national origin, including limited English proficient persons, are subjected to discrimination in the level and quality of transportation planning programs and activities provided by the MPO, whether federally funded or not; and

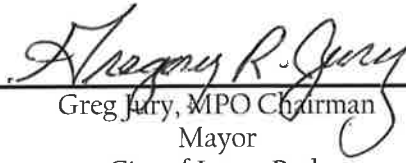
**WHEREAS** the MPO has developed an updated Title VI Program/ Environmental Justice (EJ) Considerations document and Limited English Proficiency (LEP) Plan that meets the requirements of FTA Circular 4702.1B (Title VI) and FTA Circular 4703.1 (Environmental Justice); and

**WHEREAS** part of the MPO planning process, the MPO (1) considered a wide range of citizen, community and technical input in accordance with the adopted MPO Public Participation Plan; (2) provided opportunities for public input and comment at all Alternative Transportation Committee, Technical Committee, and Policy Committee meetings and other informational public engagement meetings; and (3) made the drafts of the updates available via the MPO website and also upon request; and

**NOW, THEREFORE, BE IT RESOLVED THAT:**

The MPO Policy Committee hereby adopts the MPO Title VI & Environmental Justice (EJ) Considerations and MPO Limited English Proficiency (LEP) Plan and amends information contained in the aforementioned documents to the MPO Public Participation Plan;

Dated this 28<sup>th</sup> day of February 2019.



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Greg Jury, MPO Chairman  
Mayor  
City of Loves Park



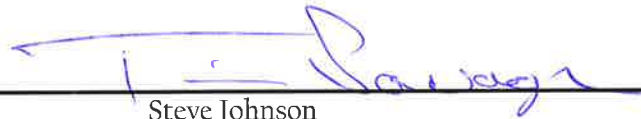
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Karl Johnson, MPO Vice-Chair  
Boone County Board Chairman  
Boone County



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Mike Chamberlain  
Mayor  
City of Belvidere

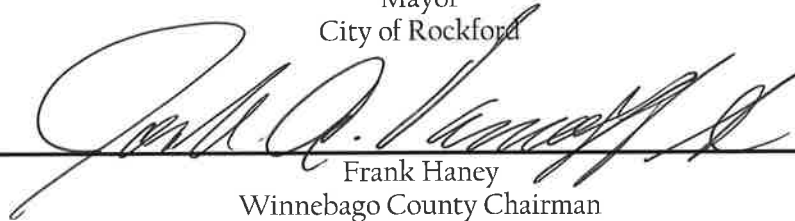


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Steve Johnson  
Mayor  
Village of Machesney Park

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Tom McNamara  
Mayor  
City of Rockford



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Frank Haney  
Winnebago County Chairman  
Winnebago County



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Pastor Herbert Johnson, Board Chair  
Rockford Mass Transit District



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Kevin Marchek  
Deputy Director  
Illinois Department of Transportation, Region 2

A photograph of a concrete bridge spanning a river. The bridge has multiple concrete piers and a metal railing. In the foreground, several ducks are swimming in the water. The sky is clear and blue.

# TITLE VI & ENVIRONMENTAL JUSTICE CONSIDERATIONS

For the Rockford Metropolitan  
Planning Organization



February 28, 2019

# Title VI & Environmental Justice Considerations

For the Rockford Metropolitan Planning Organization  
February 28, 2019

## MPO Policy Committee

Mayor Greg Jury	City of Loves Park, MPO Chairman
Chairman Karl Johnson	Boone County, MPO Vice-Chairman
Chairman Frank Haney	Winnebago County
Mayor Mike Chamberlain	City of Belvidere
Mayor Tom McNamara	City of Rockford
Village President Steve Johnson	Village of Machesney Park
Pastor Herbert Johnson, Board Chair	Rockford Mass Transit District
Deputy Director Kevin Marchek	Illinois Dept. of Transportation, Region 2

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Christina Washington	Office Manager

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.

# CONTENTS

<b>INTRODUCTION</b>	4
Background	4
About the MPO	5
Legal Framework	7
<b>NONDISCRIMINATION POLICY</b>	8
Nondiscrimination Policy	8
Notice to the Public	10
How to File a Complaint	10
Title VI Investigation	10
<b>PARTICIPATION &amp; OUTREACH</b>	11
<b>MONITORING PROCEDURES &amp; EFFORTS</b>	13
MPO's Responsibility with Title VI & EJ	13
Considerations of Mobility Needs of Minority Populations	14
<b>METROPOLITAN PLANNING AREA DEMOGRAPHICS</b>	15
Demographic Profile	15
<b>ENVIRONMENTAL JUSTICE ASSESSMENT</b>	17
Assessing Impacts & Environmental Justice	17
Planning Threshold Areas	19
Limited English Proficiency Plan	20
Benefits & Burdens Analysis	21
<b>OVERALL FINDINGS</b>	25



# 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.

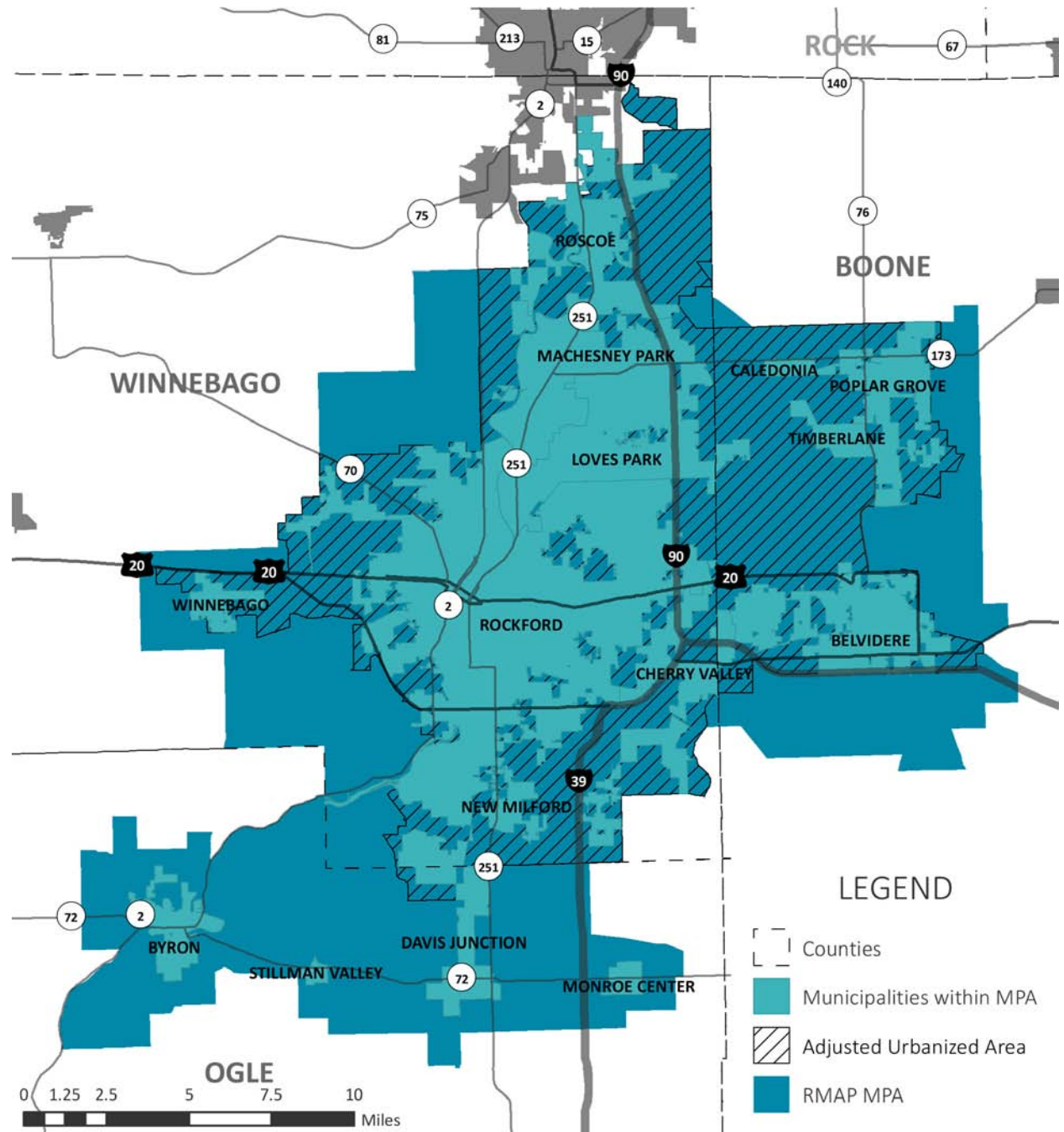
# About the MPO

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

The 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 3<sup>rd</sup>, 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](http://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

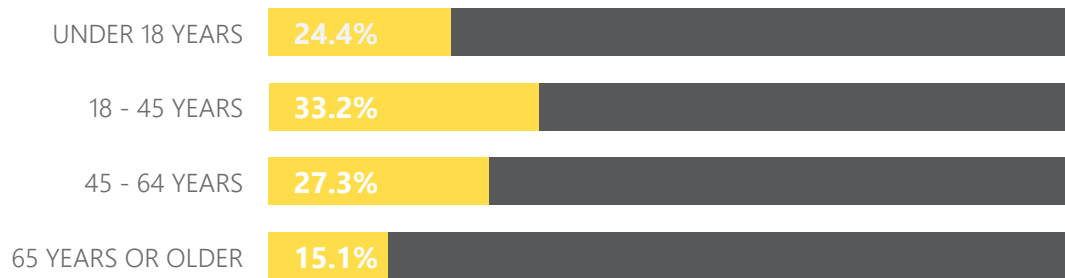
While the income levels have increased since 2000, the poverty rates have also increased and is equal to the state of Illinois's rate.

**49,055** 

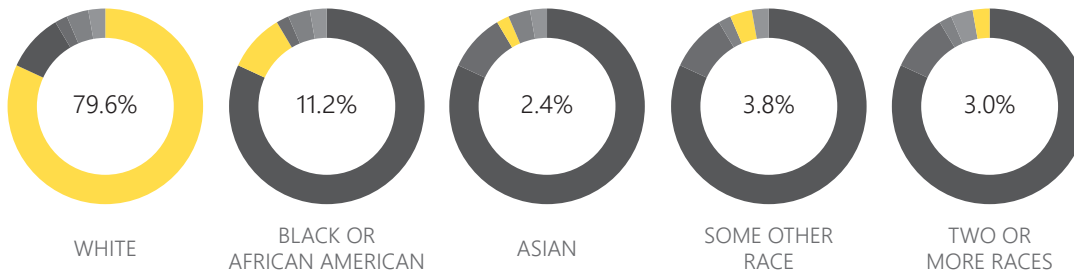
of the region's residents live in poverty (15%).

# 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

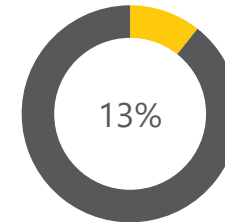


# Total Population

**330,899** residents

# Ethnicity

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



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.

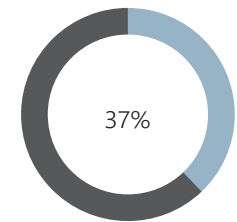
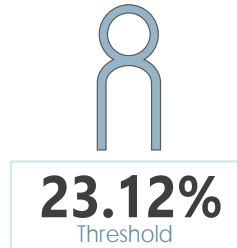
**Low Income** - A person whose median household income is at or below the Department of Health & Human Services (HHS) poverty guidelines for a household of 4, which is \$25,100.

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

**Seniors** - A person aged 65+.

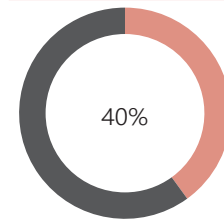
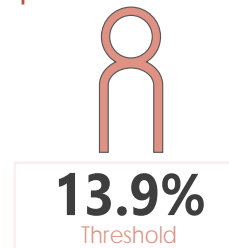
## Environmental Justice Thresholds

### Racial Minority



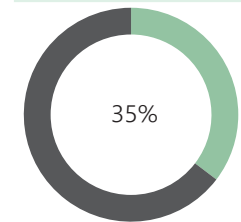
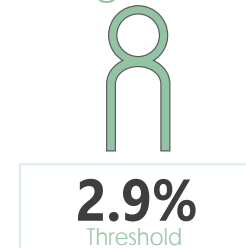
OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

### Hispanic Minority



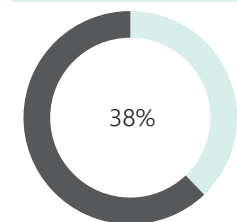
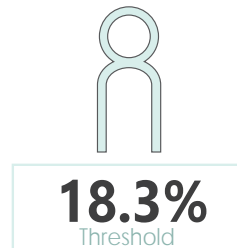
OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

### Limited English Proficiency



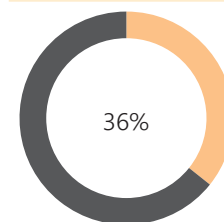
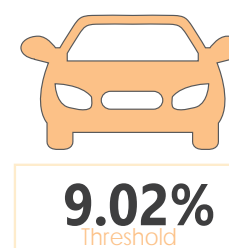
OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

### Low Income



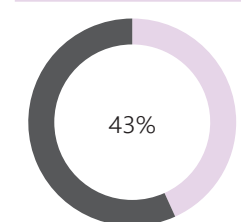
OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

### Zero Car Household



OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

### Seniors



OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

# Planning Threshold Areas

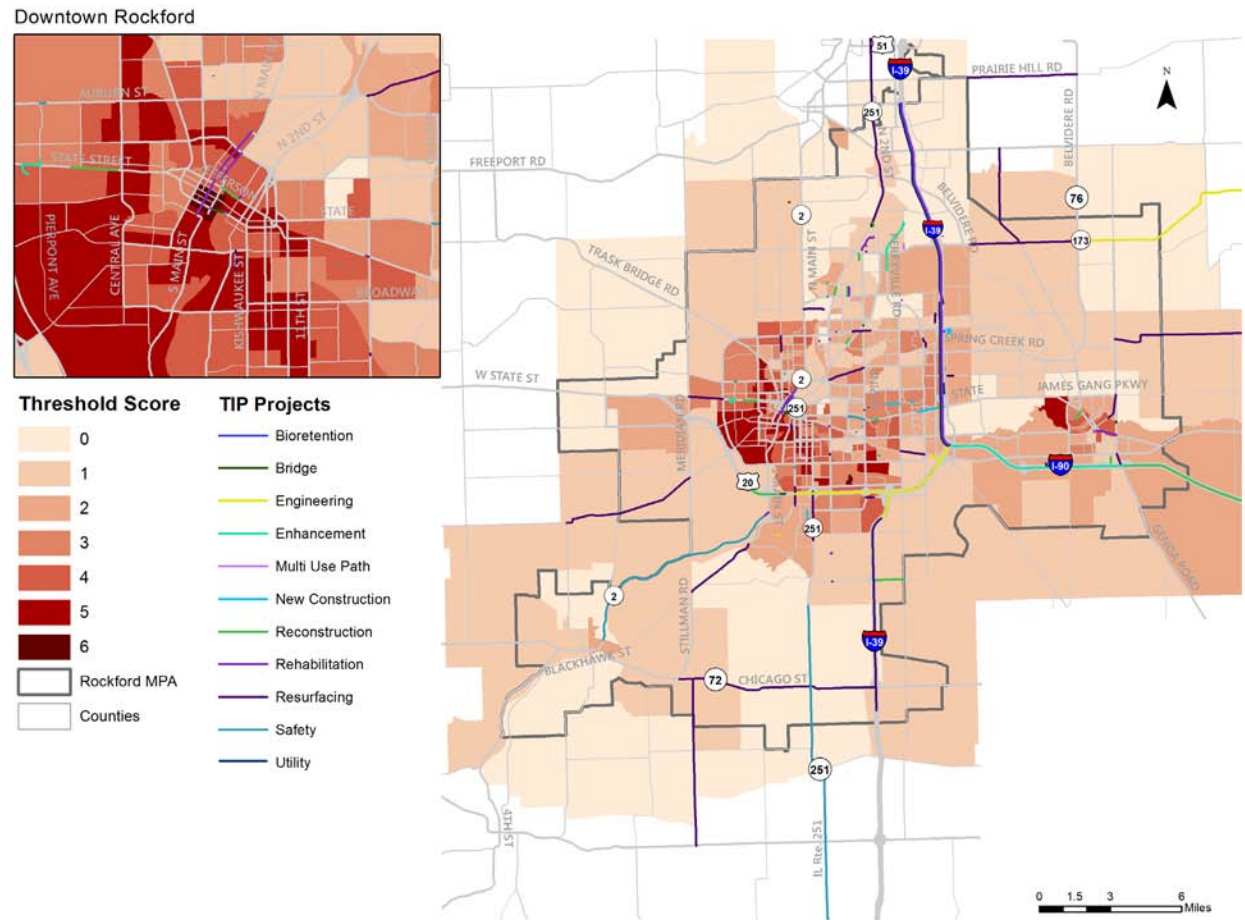
Using the thresholds established, the census block groups were then categorized by how many Title VI and EJ thresholds they exceeded. This allows the census block groups to be mapped showing the concentration of the identified populations. Darker areas on the map indicates a greater concentration of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

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

Figure 2 | Population Category Thresholds in Planning Area



Thresholds Reached per Census Block Group

0	1	2	3	4	5	6
11.4%	26.4%	20.0%	16.8%	15.4%	9.3%	0.7%

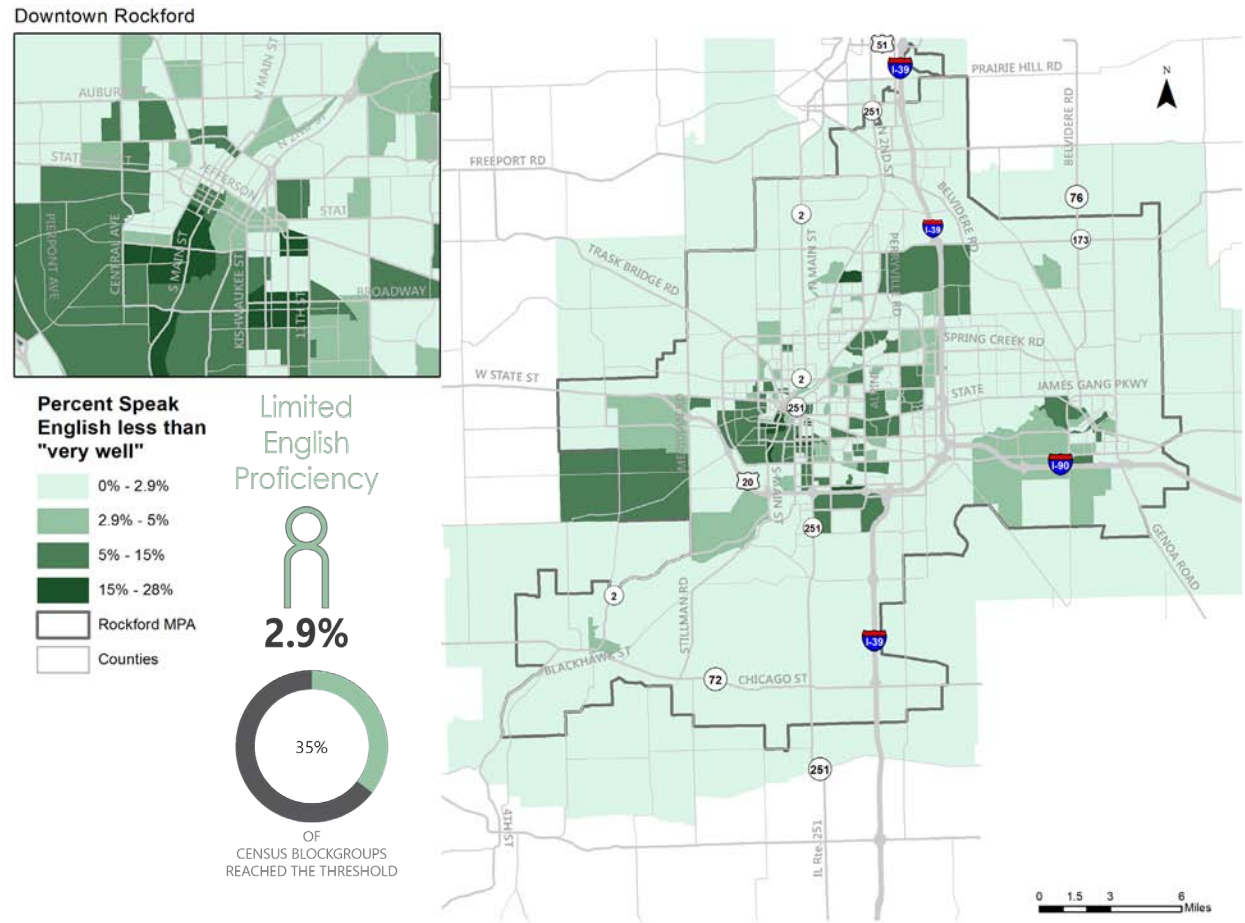
# Limited English Proficiency Plan

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

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

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

Figure 3 | Limited English Proficiency in Planning Area



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

# 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.org](http://www.rmapil.org).

Figure 4 | Federally & State Funded Projects in Planning Area

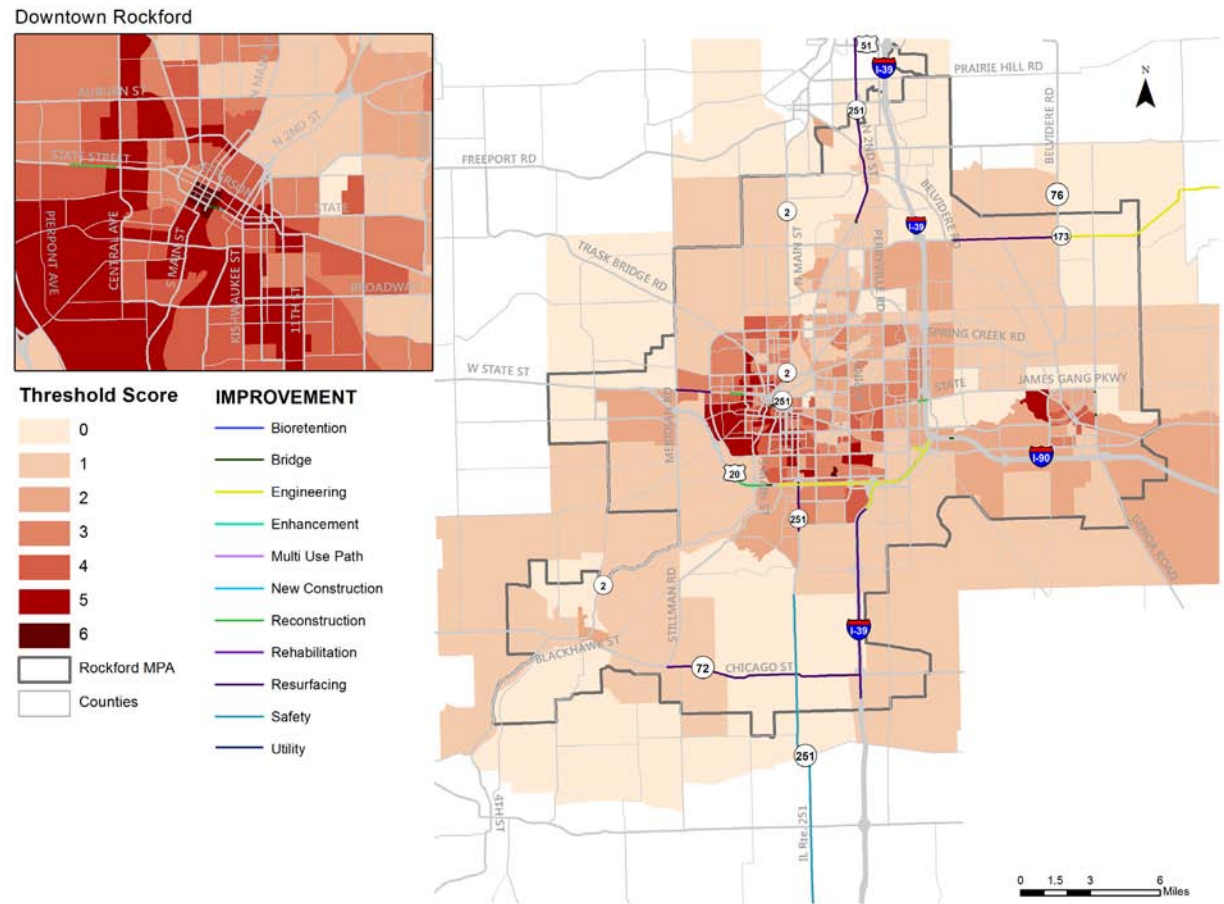


Table 2 | Transportation Improvement Program Planned Budget for AIC & PA Projects

	Population Area Category							Region Total
	0	1	2	3	4	5	6	
<b>Total AIC/PA Projects</b>	\$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**

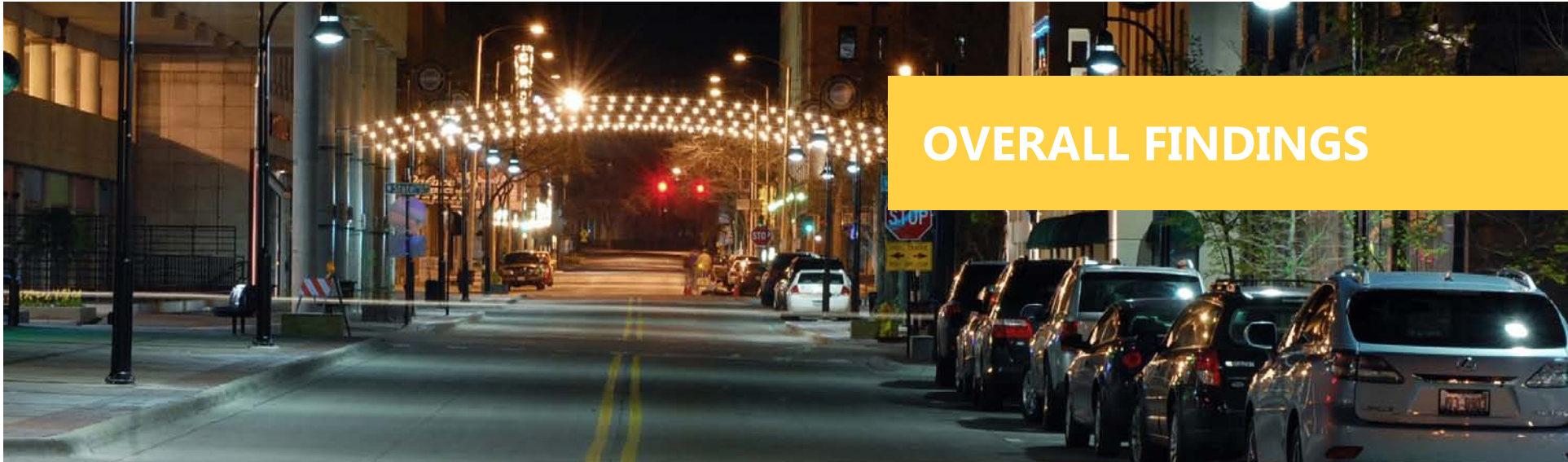
Proposed Project Type	Possible Benefits	Possible Burdens	Possible Mitigation Strategies
<b>Roadway System</b>			
Bridge Engineering New Construction	Enhance accessibility & mobility.  Promote economic development.  Improve safety.  Improve operational efficiency.	Benefits limited to populations with 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.
<b>Public Transit</b>			
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".
<b>Other Transportation Projects</b>			
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 implmenting 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%
<b>Total Projects within the Region</b>	\$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.

## APPENDICES

A - MPO Structure	27
B - MPO Policy Committee Title VI & EJ Considerations Document Approval Resolution	30
C - Title VI Notice to the Public	31
D - Title VI Complaint Form	32
E - MPO Title VI Discrimination Complaint Procedure	33
F - Previous Submittals & Documents for RMTD	35
G - Recent Special MPO Changes, Improvements or Efforts	36
H - MPO Public Participation Plan	37
I - MPO Public Outreach Made Since Last Title VI Program Submission	39
J - Limited English Proficiency Plan	40
K - MPO Metropolitan Transportation Planning Process Certificate	41
L - Public Comments and Notices	42
M - Population Category Threshold Maps	44

# 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 12:45 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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Insert Page

# APPENDIX C - TITLE VI NOTICE TO THE PUBLIC

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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](mailto:JHalsted@r1planning.org).

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

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

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

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

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## 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

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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 2017, as prepared by the MPO.

# APPENDIX G - RECENT SPECIAL MPO CHANGES, IMPROVEMENTS OR EFFORTS

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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 law.
- The FAST Act, converted the Surface Transportation Program into the Surface Transportation Block Grant Program. The STBG promotes flexibility in State and local transportation decisions and provides flexible funding to best address state and local transportation needs. A specific percentage of funds used from the STBG must be set aside for transportation enhancement activities and transportation alternative projects.
- As part of FAST Act, the former Transportation Alternatives Program (TAP) was replaced with a set-aside of funds under the STBG. The TA Set-Aside authorizes funding for programs and projects including on- and off-road pedestrian and bicycle facilities; infrastructure projects for improving non-driver access to public transportation and enhanced mobility; safe routes to school projects; and projects for planning, designing, or constructing boulevards and other roadways largely in the right-of-way of former divided highways. While FHWA administers the TA Set-

Aside, states and MPO's that represent urbanized areas with populations over 200,000 such as 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

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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](http://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

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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](http://www.rmapil.org).

# APPENDIX K - ROCKFORD METROPOLITAN PLANNING ORGANIZATION TRANSPORTATION PLANNING PROCESS CERTIFICATION

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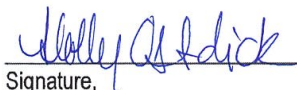
## Metropolitan Transportation Planning Process Certification

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 3<sup>rd</sup>, 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 - PUBLIC COMMENTS & NOTICES

Public comments regarding the Title VI & Environmental Justice Considerations document and Limited English Proficiency Plan were accepted from November 16, 2018 until December 17, 2018. Provided in this section are the public notices distributed for the draft documents review and comment. Comments received during this period are also included. In accordance with the procedures outlined in the MPO Public Participation Plan, Title VI & EJ Considerations, and Limited English Proficiency Plan, the MPO will utilize available services as needed to provide translation of transportation planning documents/information. Additional translation services will be continued to be evaluated and incorporated as potential resources for the MPO.

## Notices



**ourmap**

- Home
- + Publications
- + About
- + Resources
- + MPO Policy Committee Calendar

**Greenways Document:**  
Greenways: A Green Infrastructure Plan for Boone and Winnebago Counties  
[Click to Visit](#)

**RMAP Bicycle & Pedestrian Plan Page**  
[Click to Visit](#)

**Long Range Transportation Plan:**  
**TRANSPORTATION TOMORROW**  
[Click to Review](#)

**EXECUTIVE DIRECTOR**  
Michael Dunn, Jr.  
313 N. MAIN STREET  
ROCKFORD, IL 61101  
815.319.4180 phone

The MPO Technical Committee meeting scheduled for Thursday, December 20, 2018 (10:00am) at the City of Loves Park City Hall has been CANCELLED.

If you have any questions, please do not hesitate to contact Jon Paul Diipla at 815-319-4180 or by email at [jpdiipla@r1planning.org](mailto:jpdiipla@r1planning.org).

The MPO is seeking public comments on its draft of the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan. The draft documents will be available for public comment from November 16th, 2018 through December 17th, 2018.

The draft Title VI & Environmental Justice Considerations Plan can be accessed [here](#).

The draft Limited English Proficiency Plan can be accessed [here](#).

Comments should be direct to Margaret Campbell at 815-319-4180 or by email at [mcampbell@r1planning.org](mailto:mcampbell@r1planning.org).

The MPO Technical Committee meeting scheduled for Thursday, November 15, 2018 (10:00am) at the City of Loves Park City Hall has been CANCELLED.

The MPO Technical Committee meeting scheduled for Thursday, September 20, 2018 (10:00am) at the City of Loves Park City Hall has been CANCELLED.

The next scheduled meeting of the MPO Technical Committee will be held on Thursday, October 18, 2018 at 10:00 AM at Loves Park City Hall, City of Loves Park City Hall, 100 Heart Boulevard, Loves Park, IL 61111.

The public comment and review period from MPO FY 2019 –FY 2022 Transportation Improvement Program draft document was from July 18th, 2018 through August 13th, 2018. The document can be viewed on the MPO website and a link to the document is provided [here](#).

**Subject:** MPO Title VI & Environmental Justice Considerations and Limited English Proficiency Plan Update - Public Comment

**Attachments:** TITLEVI\_PUBLIC-NOTICE.pdf

Good Afternoon,

Notice is hereby given that the Region 1 Planning Council Metropolitan Planning Organization (MPO) is seeking public comments on its draft of the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan.

Title VI of the Civil Rights Act of 1964 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 transportation planning program or transportation planning activity for which the MPO receives federal transportation financial assistance.

The draft Title VI & Environmental Justice Considerations Plan can be viewed at:  
[http://www.rmapil.org/wp-content/uploads/title\\_vi\\_ej\\_draft\\_v1.pdf](http://www.rmapil.org/wp-content/uploads/title_vi_ej_draft_v1.pdf).

The Limited English Proficiency (LEP) Plan is designed to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs and planning processes as required by Executive Order 13166 from the Office of the President of the United States. The LEP 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, updates on events and demographic changes since the original release of the plan, and information for future plan updates.

The draft Limited English Proficiency Plan can be viewed at:  
[http://www.rmapil.org/wp-content/uploads/2018\\_lep\\_draft\\_v1.pdf](http://www.rmapil.org/wp-content/uploads/2018_lep_draft_v1.pdf).

Public comments will be accepted regarding the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan from November 16, 2018 until December 17, 2018. Comments can be submitted to the MPO through email, telephone, or sending written comments.

Please see the attached notice for further information regarding the draft documents and submittal of comments to the MPO.

**Jon Paul Diipla, AICP**  
Deputy Director of Regional Planning  
Director of Metropolitan Planning Organization



COLLABORATIVE PLANNING FOR NORTHERN ILLINOIS

Public Notice
For Immediate Release
November 16, 2018

NOTICE OF PUBLIC COMMENTS FOR THE TITLE VI & ENVIRONMENTAL JUSTICE CONSIDERATIONS PLAN and LIMITED ENGLISH PROFICIENCY (LEP) PLAN DRAFTS

Notice is hereby given that the Region 1 Planning Council Metropolitan Planning Organization (MPO) is seeking public comments on its draft of the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan.

The Title VI & Environmental Justice Considerations Plan is a federally required document that reflects the MPO's commitment to protect against discrimination in transportation planning and processes.

Title VI of the Civil Rights Act of 1964 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 transportation planning program or transportation planning activity for which the MPO receives federal transportation financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice pertaining to the MPO transportation planning process under Title VI has a right to file a formal complaint with RIPC.

The draft Title VI & Environmental Justice Considerations Plan can be viewed at:
http://www.rmapil.org/wp-content/uploads/title\_vi\_ej\_draft\_v1.pdf.

The Limited English Proficiency (LEP) Plan is designed to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs and planning processes as required by Executive Order 13166 from the Office of the President of the United States.

313 N. Main Street Rockford, Illinois 61101 R1planning.org 815.319.4180

Winnebago County / Boone County / City of Rockford / City of Belvidere / City of Loves Park / Village of Machesney Park / Rockford Mass Transit District / IDOT District #2

The draft Limited English Proficiency Plan can be viewed at:
http://www.rmapil.org/wp-content/uploads/2018\_lep\_draft\_v1.pdf.

As stipulated in FAST Act, a 30-day public comment period is afforded on the draft documents. The purpose of this comment period is to solicit feedback from the public as to how they perceive the transportation planning process as well as solicit suggestions from the public as to how to better the process.

Public comments will be accepted regarding the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan from November 16, 2018 until December 17, 2018. Comments can be submitted to the MPO through email, telephone, or sending written comments.

Margaret Campbell
Metropolitan Planner
Region 1 Planning Council
313 N Main Street, Rockford, IL 61101
mcampbell@r1planning.org
815-319-4193

Public Comment

From: Medrano, Leonardo
Sent: Tuesday, November 27, 2018 9:53 AM
To: Christina Washington
Subject: RE: MPO Title VI & Environmental Justice Considerations and Limited English Proficiency Plan Update - Public Comment

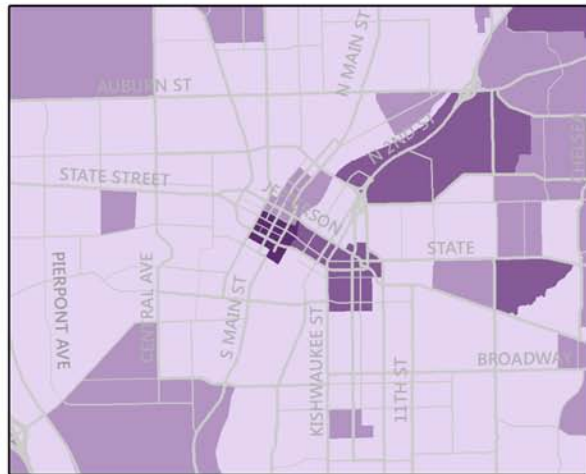
Hello Christina, I read the LEP policy and a few things. If possible, staff should first use an online service such as Google Translate (http://translate.google.com/) or a similar service to aid in the interpretation of services on a one on one basis. Google translate should never be the first option Language line should. I like the flash cards and is there a way this can be posted on the front desk?

Thank You,

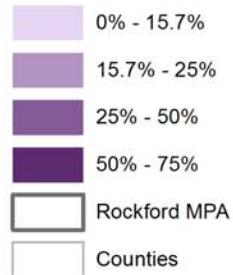
Leo Medrano
Director, Patient & Family Experience
SwedishAmerican
A Division of UW Health

# APPENDIX M - POPULATION CATEGORY THRESHOLD MAPS

Downtown Rockford



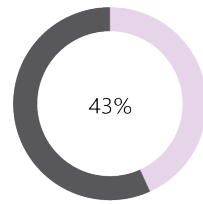
## Percent 65 Years and Over



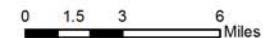
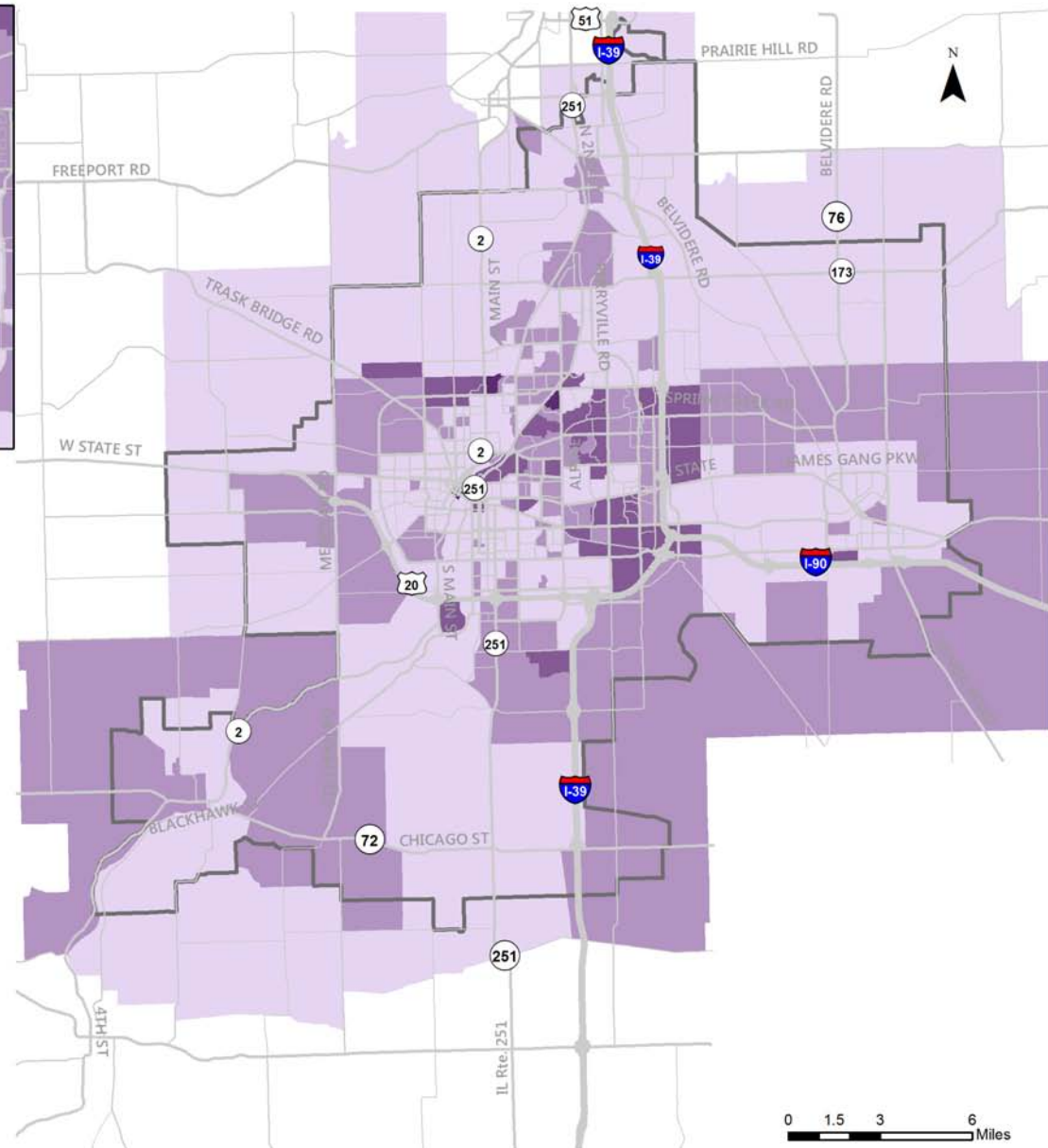
## Seniors



**15.7%**



OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD



# Downtown Rockford



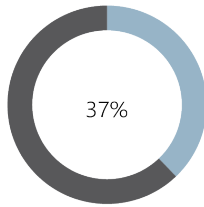
## Percent Population as Minority



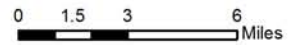
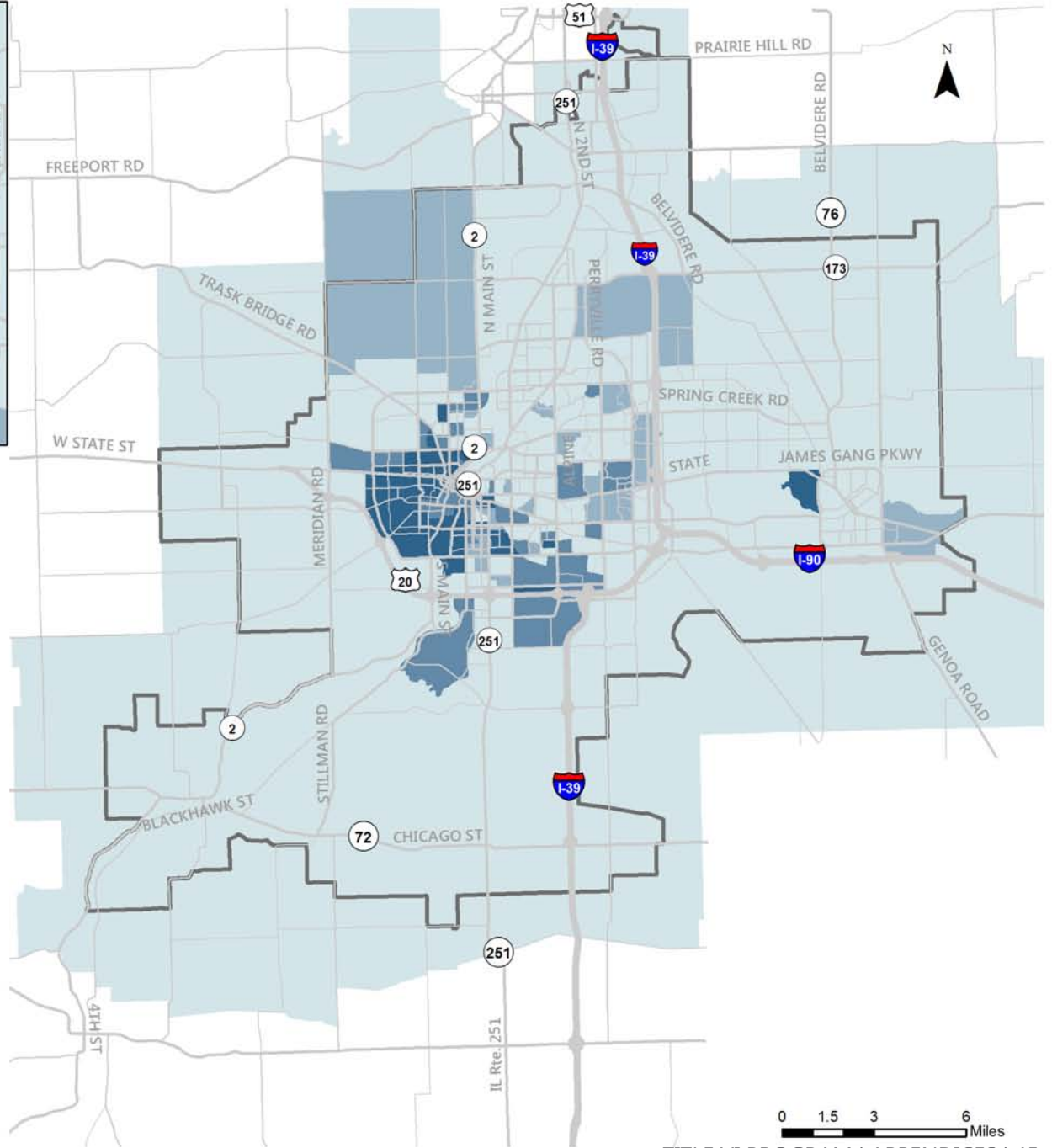
## Racial Minority



**23.12%**

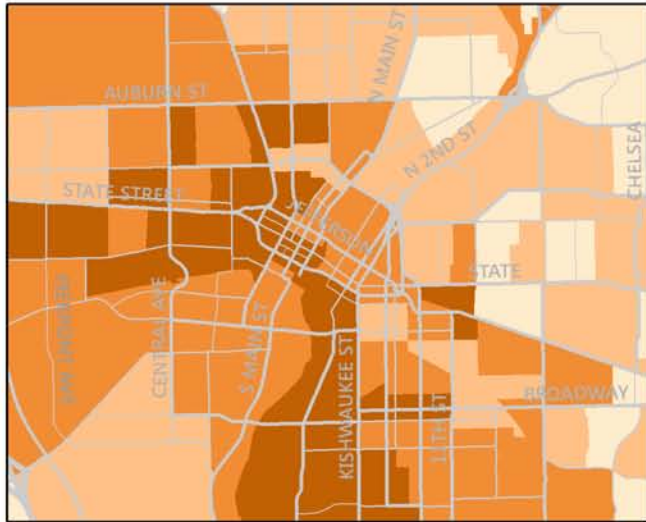


OF  
CENSUS BLOCKGROUPS  
REACHED THE THRESHOLD

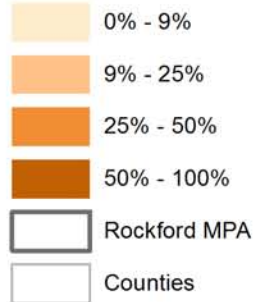




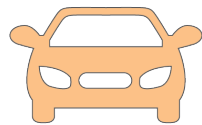
# Downtown Rockford



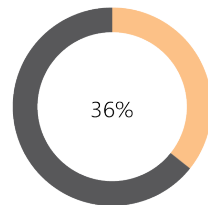
## Percent No Vehicles Available



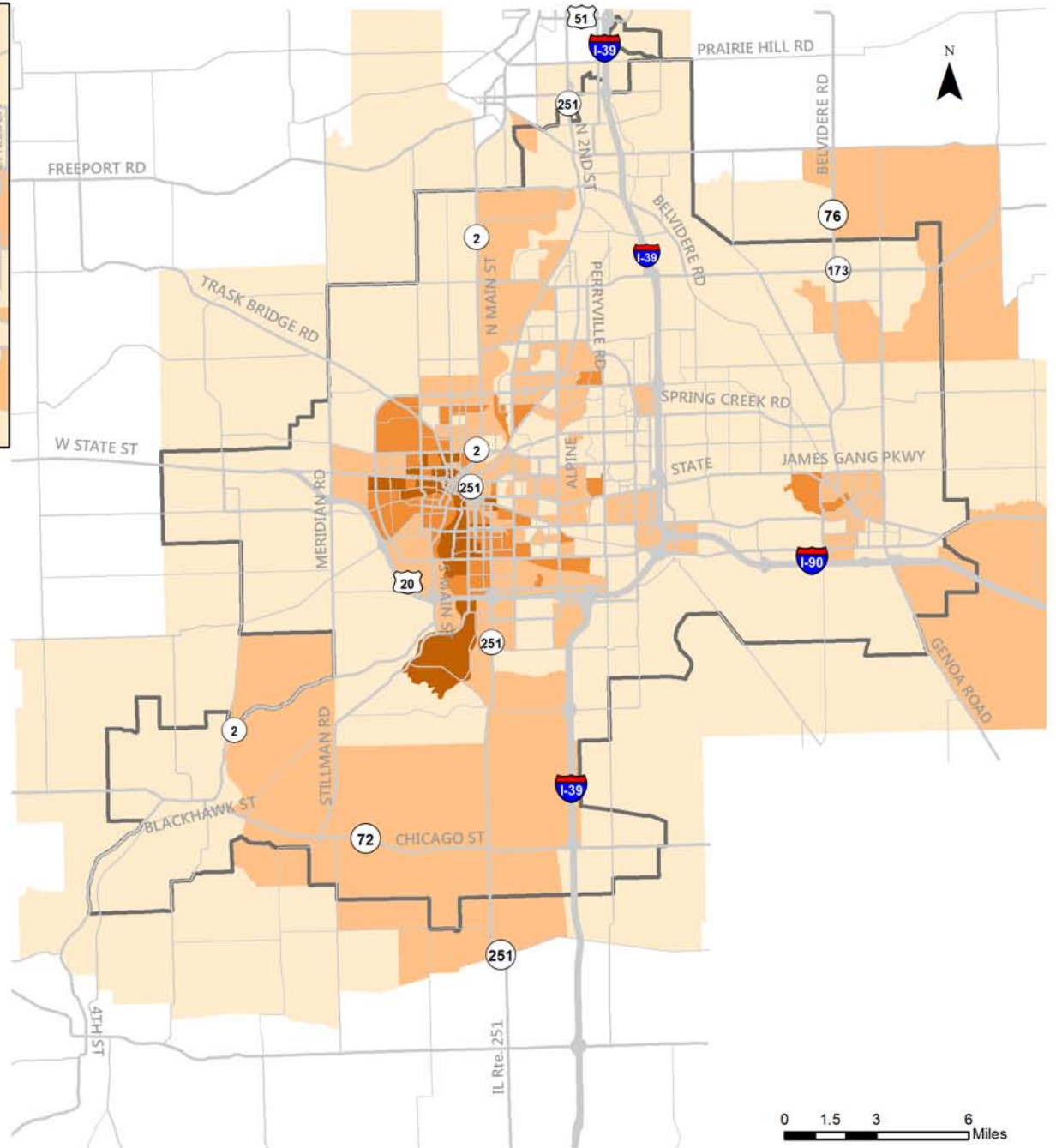
Zero Car Household



**9.02%**



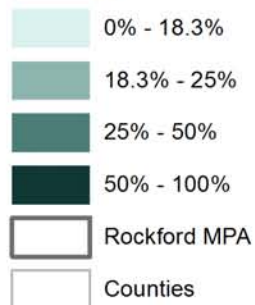
OF CENSUS BLOCKGROUPS REACHED THE THRESHOLD



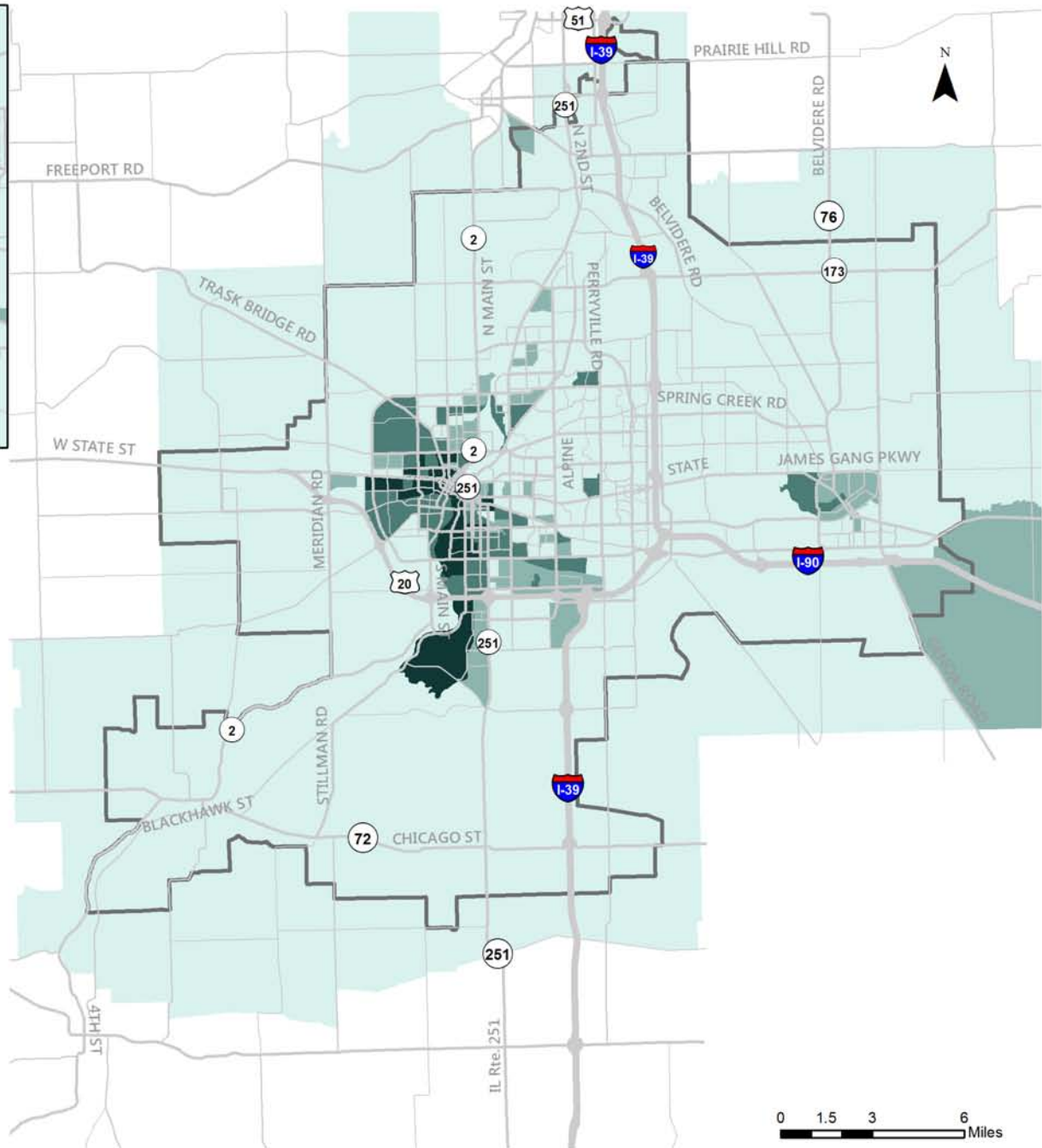
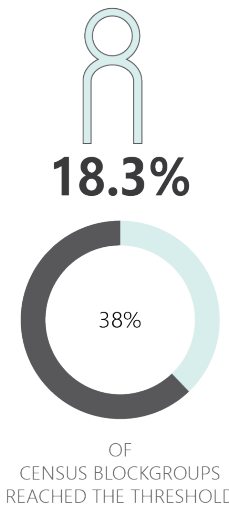
# Downtown Rockford



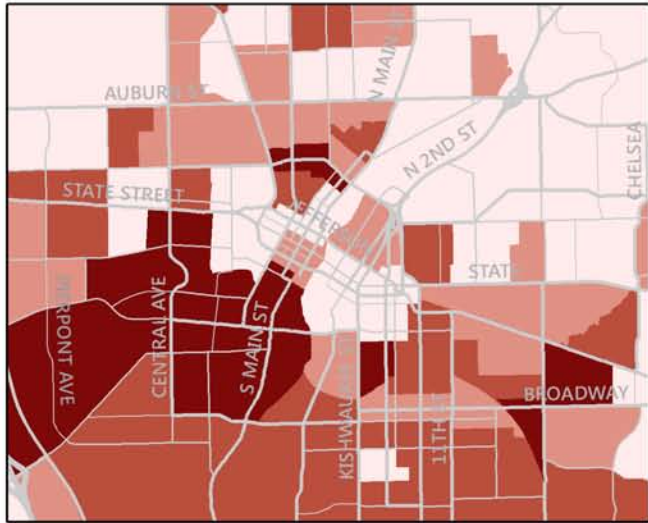
## Percent Below Poverty



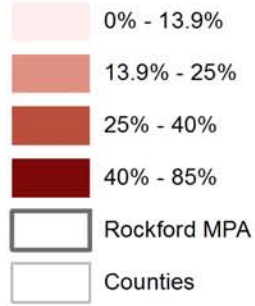
Low Income



# Downtown Rockford



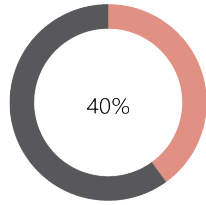
## Percent Population Hispanic/Latino



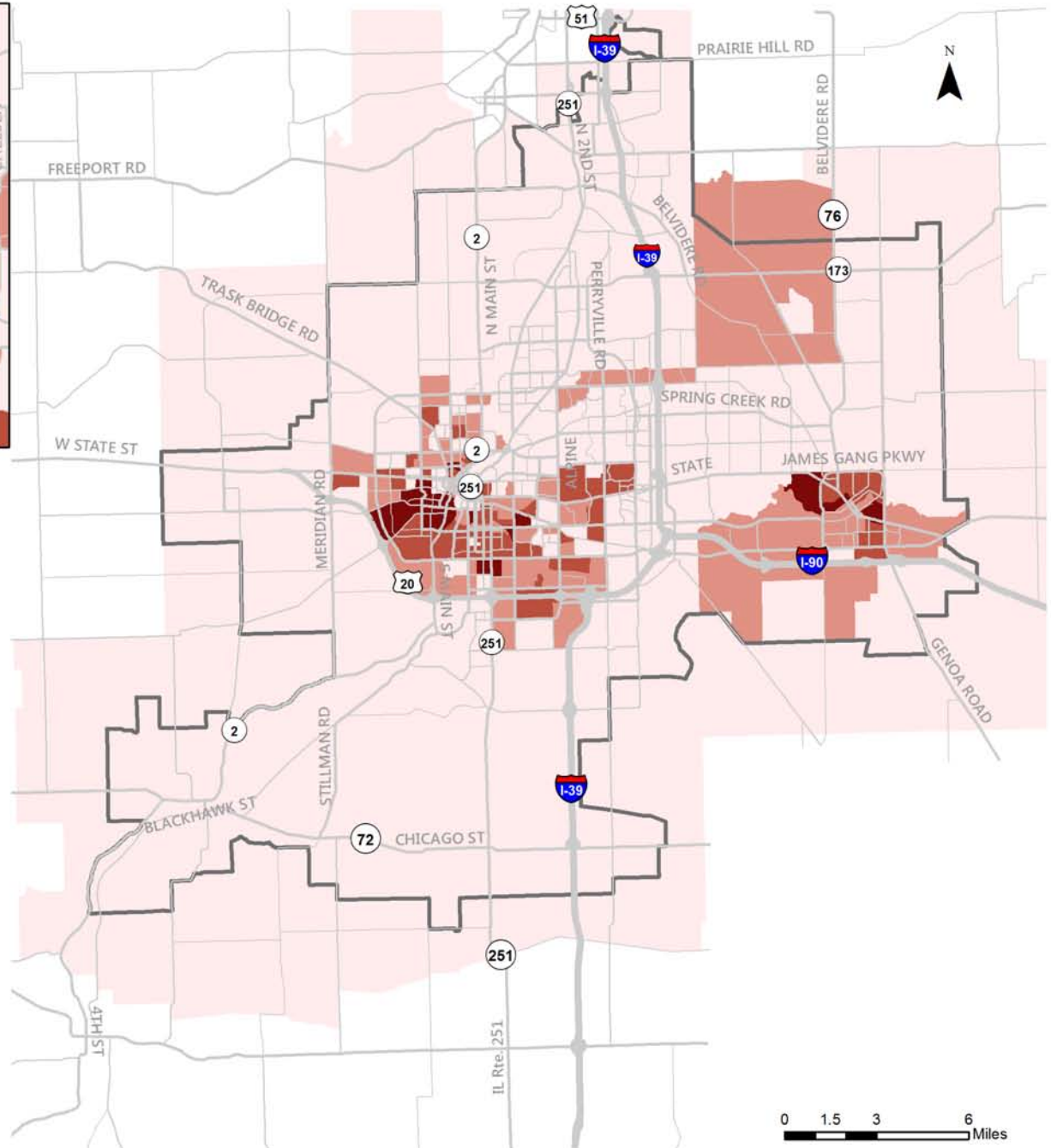
## Hispanic Minority



**13.9%**



OF CENSUS BLOCKGROUPS REACHED THE THRESHOLD



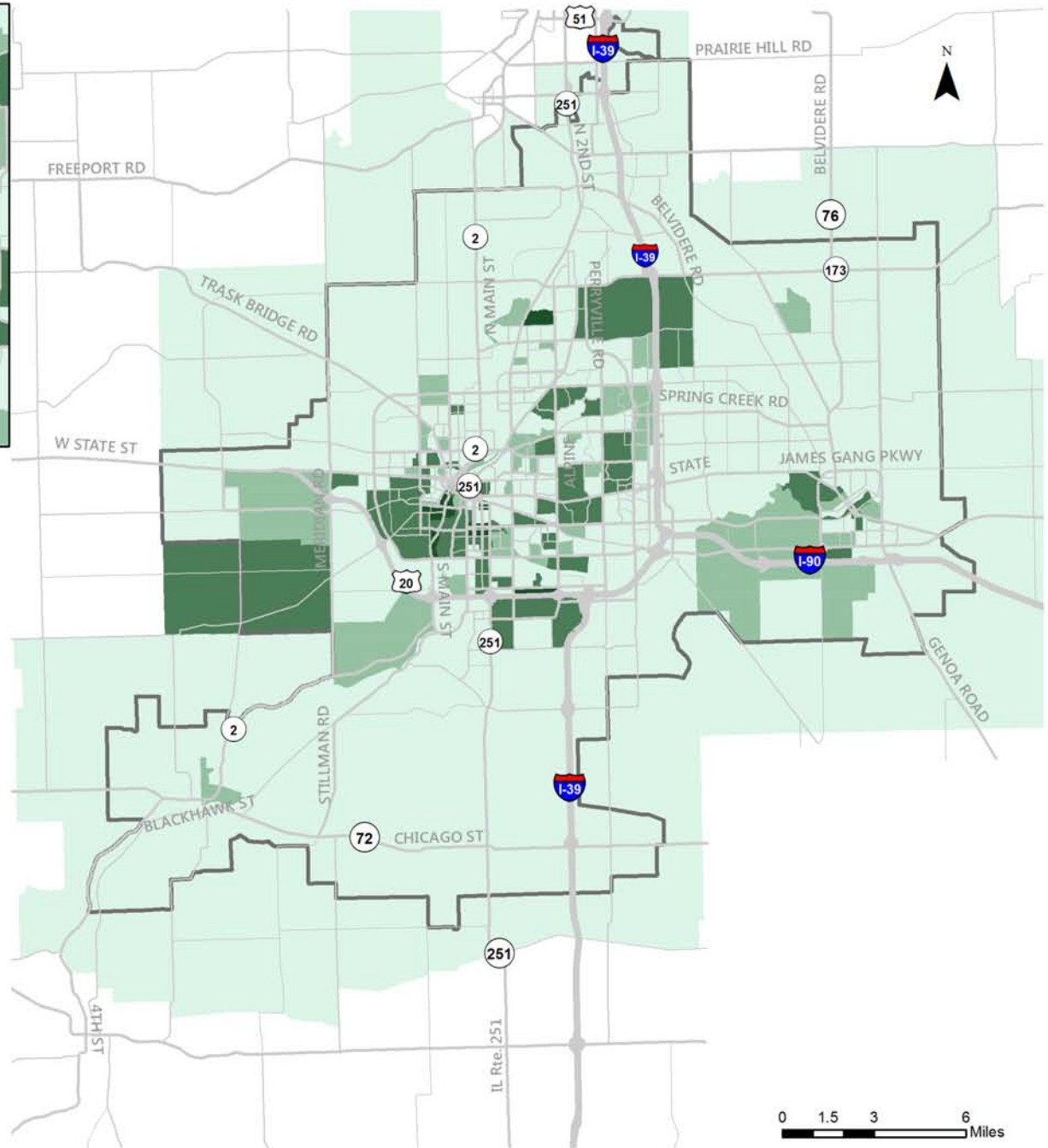
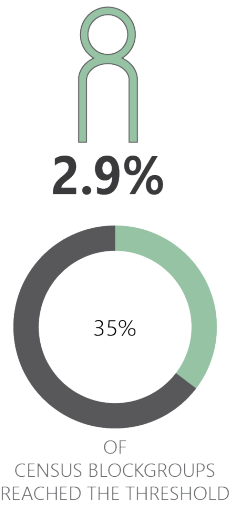
# Downtown Rockford




**Percent Speak English less than "very well"**

- 0% - 2.9%
- 2.9% - 5%
- 5% - 15%
- 15% - 28%
- Rockford MPA
- Counties

Limited English Proficiency





# LIMITED ENGLISH PROFICIENCY PLAN

For the Rockford Metropolitan  
Planning Organization



February 28th, 2019

# Limited English Proficiency Plan

For the Rockford Metropolitan Planning Organization  
February 28, 2019

## MPO Policy Committee

Mayor Greg Jury	City of Loves Park, MPO Chairman
Chairman Karl Johnson	Boone County, MPO Vice-Chairman
Chairman Frank Haney	Winnebago County
Mayor Mike Chamberlain	City of Belvidere
Mayor Tom McNamara	City of Rockford
Village President Steve Johnson	Village of Machesney Park
Pastor Herbert Johnson, Board Chair	Rockford Mass Transit District
Deputy Director Kevin Marchek	Illinois Dept. of Transportation, Region 2

## Staff

Michael Dunn	Executive Director
Jon Paul Diipla, AICP	Director of MPO
Sydney Turner	Metro Program Manager
Colin Belle	Transportation Systems Planner
Margaret Campbell	Metropolitan Planner
Dhawal Kataria	Metropolitan Planner
Brandon Geber	Metropolitan Transit Planner
Christina Washington	Office Manager

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.

# Contents

<b>Policy Statement</b>	4
<b>Executive Order 13166</b>	4
<b>Plan Summary</b>	4
<b>Four Factor Analysis</b>	5
<b>How to Identify a Person in Need of Language Assistance</b>	6
<b>Language Assistance Measures</b>	6
<b>MPO Staff Training</b>	7
<b>Outreach Techniques</b>	7
<b>Monitoring and Updating the LEP Plan</b>	8
<b>Dissemination of the MPO Limited English Proficiency Plan</b>	8
<b>Notice to MPO Grant and Program Subrecipients</b>	8
<b>Appendices</b>	9

A vertical image on the left side of the page shows a brick building with a dark awning and several bicycles parked in front. People are partially visible near the bicycles.

## Policy Statement

The purpose of this 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, and;

## Executive Order 13166

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 subrecipients.

## Plan Summary

The Rockford Metropolitan Planning Organization (MPO), has developed this Limited English Proficiency Plan (LEP) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs. 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.

This plan details procedures on how to identify a person who may need language assistance, the ways in which assistance may be provided, how staff is trained, how to notify LEP persons



that assistance is available, and information for future plan updates. In developing the plan, the MPO undertook a U.S. Department of Transportation four factor LEP analysis which considers the following:

1. 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;
2. The frequency with which LEP individuals come in contact with an MPO program;
3. The nature and importance of the program, activity or service provided by the MPO to the LEP population; and
4. The resources available to the MPO and overall costs to provide LEP assistance. A brief description of these considerations is provided in the following section.

## Four Factor Analysis

1. The number or proportion of LEP persons eligible to be served or likely to encounter an MPO program, activity, or service.

The MPO examined the US Census Bureau's 2011-2015 American Community Survey data and was able to determine that approximately 13.2% of the MPO Region, or 49,153 persons, speak a language other than English at home. However, only approximately 7.92% of the MPO Region, or 29,476 persons, speak a language other than English at home and are identified as speaking English less than 'very well'. Spanish or Spanish Creole is the most common language

2. The frequency with which LEP individuals come in contact with an MPO program, activity, or service.

The MPO assesses the frequency at which staff has or could possibly have contact with LEP persons. To date, the MPO has not had a request for interpreters or translated MPO documents. With the implementation of this LEP Plan, the MPO will document all phone inquiries from LEP persons and/or requiring translation. In addition, the MPO will document public meeting attendees requiring translation or the use of "I Speak Cards" as discussed later in this document.

3. The nature and importance of the program, activity, or service provided by the MPO to LEP community.

In the MPO region, there are concentrations of LEP individuals in places that are categorized as having high concentrations of low income or working poor individuals. Of the services provided by or related to the MPO, this group of individuals has a high degree of reliance upon and need for public transit. The Rockford Mass Transit District (RMTD), the primary local provider of public transportation has a wide number of materials available to aid the LEP population, particularly schedule books and rail cards available in Spanish, Braille, and large print. Additionally, RMTD will provide Spanish translation and sign language interpreters at

all public hearings upon request if notified up to 48 hours prior to the scheduled hearing. If RMTD is not notified and an interpreter is needed, RMTD will provide a translated transcript of the public hearing upon request within seven (7) to fourteen (14) days.

4. The resources available to the MPO and overall costs.

The MPO assessed its available resources that could be used for providing LEP assistance, including, how much a professional interpreter and translation service would cost; current market rates suggest that translations cost approximately \$0.10 per word, which documents should be translated, taking an inventory of available organizations that the MPO could partner with for outreach and translation efforts; such as La Voz Latina and SWIFTT, examining which financial and in-kind sources could be used to provide assistance, and what level of staff training is needed. While identifying what staff capabilities are readily available, it was determined that MPO staff may be able to provide informal interpretations in Spanish.

## How to Identify a Person in Need of Language Assistance

After analyzing the four factors, the MPO developed the plan outlined in the following section for assisting persons of limited English proficiency.


Below are tools to help identify persons who may need language assistance:

- Examine records requests for language assistance from past meetings and events to anticipate the possible need for assistance at upcoming meetings.
- When MPO sponsored workshops or conferences are held, set up a sign-up sheet table, have a staff member greet and briefly speak to each attendee. To informally gauge to the attendee's ability to speak and understand English, ask a question that requires a full sentence reply.
- Have the Census Bureau's "I Speak Cards" at the workshop or conference sign-sheet table. While staff may not be able to provide translation assistance at this meeting, the cards are an excellent tool to identify language needs for future meetings. Also, have the cards available at the MPO office reception area.
- Place Notice of Available Language Assistance and Title VI Notice to the Public in the foyer of the MPO office space.

## Language Assistance Measures

When an interpreter is needed, in person or on the telephone, first determine what language is required. The Census Bureau's "I Speak Cards" are to be located at the MPO reception area at all times in order to aid this process.

If possible, staff should first use an online service such as Google Translate (<http://translate.google.com/>) or a similar service to aid in the interpretation of services on a one on one basis.



If this proves infeasible or if a formal interpretation is requested, staff should use the telephone interpreter service, Language Line, available from <http://www.languageline.com/>. On the Language Line home page the staff will select the “Need an Interpreter Now” link and follow the directions to receive an access code. The MPO’s purchasing card number as a method of payment must be provided before an authorization number is given and the staff person is connected with a translator. In the event that the MPO requires translation in-person or at a meeting, local services are to be prioritized over ones from outside the region, and will be evaluated at the time of such need.

## MPO Staff Training

All MPO staff will be provided with the LEP Plan and will be educated on procedures and services available. This information will also be part of the MPO staff orientation process for new hires. Training topics are listed below:

- Understanding the Title VI Policy and LEP responsibilities;
- Use of LEP “I Speak Cards”;
- How to use the Google Translate service;
- How to use the Language Line interpretation and translation services;
- Documentation of language assistance requests;
- How to handle a complaint; and
- The importance of educating subrecipients on the MPO’s LEP program responsibilities and their obligation to provide language assistance.

## Outreach Techniques

There are two main outreach techniques that should be utilized by staff:

- If staff knows they will be presenting a topic that could affect LEP persons or if staff will be hosting a meeting or a workshop in a geographic location with a known concentration of LEP persons, have meeting notices, fliers, advertisements, and agendas printed in an alternative language, based on known LEP population in the area.
- Include in the following statement when running a general public meeting notice or when sending emails to the MPO mailing list: “Persons who require special accommodations under the Americans with Disabilities Act or person who require translation services (free of charge) should contact the MPO at (815)-319-4180 at least 2 working days before the need for such services or accommodations.”



## Monitoring and Updating the LEP Plan

This plan is designed to be flexible and is one that can be easily updated. At a minimum, the MPO will follow the Title VI Program update schedule for the LEP Plan.

Each update should examine all plan components, such as:

- How many LEP persons were encountered?
- Were their needs met?
- What is the current LEP population in the MPO area?
- Has there been a change in the types of languages where translation services are needed?
- Is there still a need for continued language assistance for previously identified MPO programs? Are there other programs that should be included?
- Have the MPO's available resources, such as technology, staff, and financial costs changed?
- Has the MPO fulfilled the goals of the LEP Plan?
- Were any complaints received?

## Dissemination of the MPO Limited English Proficiency Plan

The MPO will post the LEP Plan on its website at [www.rmapil.org](http://www.rmapil.org). Any person, including social service, non-profit, law enforcement agencies and other community partners with internet access will be able to access the plan. For those without personal internet service, local libraries offer free internet access. Copies of the LEP Plan and any of the MPO's documents will be provided, on request, to any person(s) requesting the document via electronic or hard copy. LEP persons may obtain copies/translations of any of the MPO's documents upon request.

Any questions or comments regarding this plan should be directed to the MPO Title VI Coordinator, by calling (815)-319-4180.

## Notice to MPO Grant and Program Subrecipients

All programs and operations of entities that receive assistance from the federal government including the MPO and its subrecipients must comply to the fullest reasonable extent for improving access to services for LEP persons. Subrecipients are encouraged to have in place written policies on the provision of interpreter and translation services.

# Appendices

A - Population Data	10
B - Limited English Proficiency Threshold Map	13
C - MPO Discrimination Complaint Procedure	14
D - MPO Discrimination Complaint Form	16
E - Language Identification Flashcard	18
F - Public Comments	21
G - MPO Metropolitan Planning Area	25

# Appendix A - Population Data

B16001: LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER - Universe:  
 2011-2015 American Community Survey 5-Year Estimates  
 Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

	Boone County, Illinois		Ogle County, Illinois		Winnebago County, Illinois		3 County Area	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Percentage
Total:	50,524	+/-99	49,650	+/-53	272,105	+/-40	372,279	100%
Speak only English	41,295	+/-923	45,739	+/-415	236,092	+/-1,410	323,126	86.80%
Spanish or Spanish Creole:	7,488	+/-715	3,181	+/-358	24,066	+/-856	34,735	9.33%
Speak English "very well"	4,295	+/-656	1,714	+/-360	14,902	+/-930	20,911	5.62%
Speak English less than "very well"	3,193	+/-596	1,467	+/-294	9,164	+/-655	13,824	3.71%
French (incl. Patois, Cajun):	0	+/-26	40	+/-30	449	+/-156	489	0.13%
Speak English "very well"	0	+/-26	40	+/-30	367	+/-133	407	0.11%
Speak English less than "very well"	0	+/-26	0	+/-26	82	+/-62	82	0.02%
French Creole:	27	+/-44	0	+/-26	0	+/-26	27	0.01%
Speak English "very well"	27	+/-44	0	+/-26	0	+/-26	27	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Italian:	58	+/-77	120	+/-138	650	+/-214	828	0.22%
Speak English "very well"	47	+/-60	113	+/-132	349	+/-116	509	0.14%
Speak English less than "very well"	11	+/-18	7	+/-13	301	+/-186	319	0.09%
Portuguese or Portuguese Creole:	0	+/-26	15	+/-16	23	+/-27	38	0.01%
Speak English "very well"	0	+/-26	15	+/-16	23	+/-27	38	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
German:	182	+/-120	49	+/-38	652	+/-189	883	0.24%
Speak English "very well"	175	+/-120	48	+/-38	444	+/-151	667	0.18%
Speak English less than "very well"	7	+/-11	1	+/-3	208	+/-125	216	0.06%
Yiddish:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Other West Germanic languages:	25	+/-40	31	+/-25	3	+/-5	59	0.02%
Speak English "very well"	25	+/-40	21	+/-21	3	+/-5	49	0.01%
Speak English less than "very well"	0	+/-26	10	+/-14	0	+/-26	10	0.00%
Scandinavian languages:	50	+/-49	0	+/-26	215	+/-90	265	0.07%
Speak English "very well"	50	+/-49	0	+/-26	195	+/-84	245	0.07%
Speak English less than "very well"	0	+/-26	0	+/-26	20	+/-18	20	0.01%
Greek:	0	+/-26	24	+/-20	123	+/-90	147	0.04%
Speak English "very well"	0	+/-26	24	+/-20	98	+/-87	122	0.03%
Speak English less than "very well"	0	+/-26	0	+/-26	25	+/-19	25	0.01%
Russian:	16	+/-25	24	+/-39	396	+/-315	436	0.12%
Speak English "very well"	16	+/-25	24	+/-39	266	+/-279	306	0.08%
Speak English less than "very well"	0	+/-26	0	+/-26	130	+/-134	130	0.03%
Polish:	241	+/-159	101	+/-55	1,031	+/-418	1,373	0.37%
Speak English "very well"	176	+/-118	74	+/-49	586	+/-211	836	0.22%
Speak English less than "very well"	65	+/-58	27	+/-19	445	+/-235	537	0.14%
Serbo-Croatian:	69	+/-72	15	+/-19	1,351	+/-446	1,435	0.39%
Speak English "very well"	55	+/-53	15	+/-19	688	+/-259	758	0.20%
Speak English less than "very well"	14	+/-22	0	+/-26	663	+/-268	677	0.18%
Other Slavic languages:	323	+/-383	63	+/-61	71	+/-45	457	0.12%
Speak English "very well"	307	+/-382	53	+/-55	43	+/-33	403	0.11%
Speak English less than "very well"	16	+/-25	10	+/-14	28	+/-27	54	0.01%
Armenian:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Persian:	24	+/-38	0	+/-26	51	+/-77	75	0.02%

Speak English "very well"	24	+/-38	0	+/-26	51	+/-77	75	0.02%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Gujarati:	0	+/-26	0	+/-26	580	+/-399	580	0.16%
Speak English "very well"	0	+/-26	0	+/-26	331	+/-233	331	0.09%
Speak English less than "very well"	0	+/-26	0	+/-26	249	+/-177	249	0.07%
Hindi:	0	+/-26	0	+/-26	194	+/-128	194	0.05%
Speak English "very well"	0	+/-26	0	+/-26	165	+/-114	165	0.04%
Speak English less than "very well"	0	+/-26	0	+/-26	29	+/-28	29	0.01%
Urdu:	0	+/-26	0	+/-26	207	+/-140	207	0.06%
Speak English "very well"	0	+/-26	0	+/-26	152	+/-93	152	0.04%
Speak English less than "very well"	0	+/-26	0	+/-26	55	+/-58	55	0.01%
Other Indic languages:	0	+/-26	0	+/-26	98	+/-97	98	0.03%
Speak English "very well"	0	+/-26	0	+/-26	51	+/-49	51	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	47	+/-53	47	0.01%
Other Indo-European languages:	194	+/-291	132	+/-180	415	+/-181	741	0.20%
Speak English "very well"	39	+/-60	99	+/-135	284	+/-125	422	0.11%
Speak English less than "very well"	155	+/-232	33	+/-46	131	+/-109	319	0.09%
Chinese:	158	+/-107	4	+/-7	644	+/-270	806	0.22%
Speak English "very well"	73	+/-66	4	+/-7	189	+/-95	266	0.07%
Speak English less than "very well"	85	+/-60	0	+/-26	455	+/-240	540	0.15%
Japanese:	24	+/-26	0	+/-26	88	+/-67	112	0.03%
Speak English "very well"	24	+/-26	0	+/-26	49	+/-38	73	0.02%
Speak English less than "very well"	0	+/-26	0	+/-26	39	+/-35	39	0.01%
Korean:	114	+/-118	0	+/-26	305	+/-172	419	0.11%
Speak English "very well"	79	+/-76	0	+/-26	86	+/-86	165	0.04%
Speak English less than "very well"	35	+/-51	0	+/-26	219	+/-120	254	0.07%
Mon-Khmer, Cambodian:	1	+/-2	0	+/-26	23	+/-40	24	0.01%
Speak English "very well"	0	+/-26	0	+/-26	5	+/-8	5	0.00%
Speak English less than "very well"	1	+/-2	0	+/-26	18	+/-38	19	0.01%
Hmong:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Thai:	0	+/-26	0	+/-26	31	+/-28	31	0.01%
Speak English "very well"	0	+/-26	0	+/-26	16	+/-18	16	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	15	+/-23	15	0.00%
Laotian:	0	+/-26	0	+/-26	1,135	+/-342	1,135	0.30%
Speak English "very well"	0	+/-26	0	+/-26	598	+/-240	598	0.16%
Speak English less than "very well"	0	+/-26	0	+/-26	537	+/-164	537	0.14%
Vietnamese:	0	+/-26	10	+/-13	531	+/-199	541	0.15%
Speak English "very well"	0	+/-26	5	+/-7	191	+/-100	196	0.05%
Speak English less than "very well"	0	+/-26	5	+/-7	340	+/-144	345	0.09%
Other Asian languages:	80	+/-96	0	+/-26	890	+/-283	970	0.26%
Speak English "very well"	19	+/-31	0	+/-26	432	+/-178	451	0.12%
Speak English less than "very well"	61	+/-90	0	+/-26	458	+/-228	519	0.14%
Tagalog:	123	+/-124	53	+/-70	556	+/-169	732	0.20%
Speak English "very well"	89	+/-117	53	+/-70	333	+/-117	475	0.13%
Speak English less than "very well"	34	+/-42	0	+/-26	223	+/-112	257	0.07%
Other Pacific Island languages:	0	+/-26	3	+/-4	101	+/-92	104	0.03%
Speak English "very well"	0	+/-26	3	+/-4	76	+/-80	79	0.02%
Speak English less than "very well"	0	+/-26	0	+/-26	25	+/-28	25	0.01%
Navajo:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Other Native North American	0	+/-26	0	+/-26	104	+/-130	104	0.03%
Speak English "very well"	0	+/-26	0	+/-26	104	+/-130	104	0.03%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Hungarian:	0	+/-26	0	+/-26	10	+/-14	10	0.00%
Speak English "very well"	0	+/-26	0	+/-26	10	+/-14	10	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Arabic:	32	+/-42	46	+/-65	657	+/-347	735	0.20%
Speak English "very well"	24	+/-40	46	+/-65	241	+/-160	311	0.08%
Speak English less than "very well"	8	+/-16	0	+/-26	416	+/-243	424	0.11%
Hebrew:	0	+/-26	0	+/-26	25	+/-36	25	0.01%

Speak English "very well"	0	+/-26	0	+/-26	25	+/-36	25	0.01%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
African languages:	0	+/-26	0	+/-26	338	+/-178	338	0.09%
Speak English "very well"	0	+/-26	0	+/-26	228	+/-135	228	0.06%
Speak English less than "very well"	0	+/-26	0	+/-26	110	+/-78	110	0.03%
Other and unspecified languages:	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%
Speak English less than "very well"	0	+/-26	0	+/-26	0	+/-26	0	0.00%

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Methodological changes to data collection in 2013 may have affected language data for 2013. Users should be aware of these changes when using multi-year data containing data from 2013. For more information, see: Language User Note.

While the 2011-2015 American Community Survey (ACS) data generally reflect the February 2013 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2010 data. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2011-2015 American Community Survey 5-Year Estimates

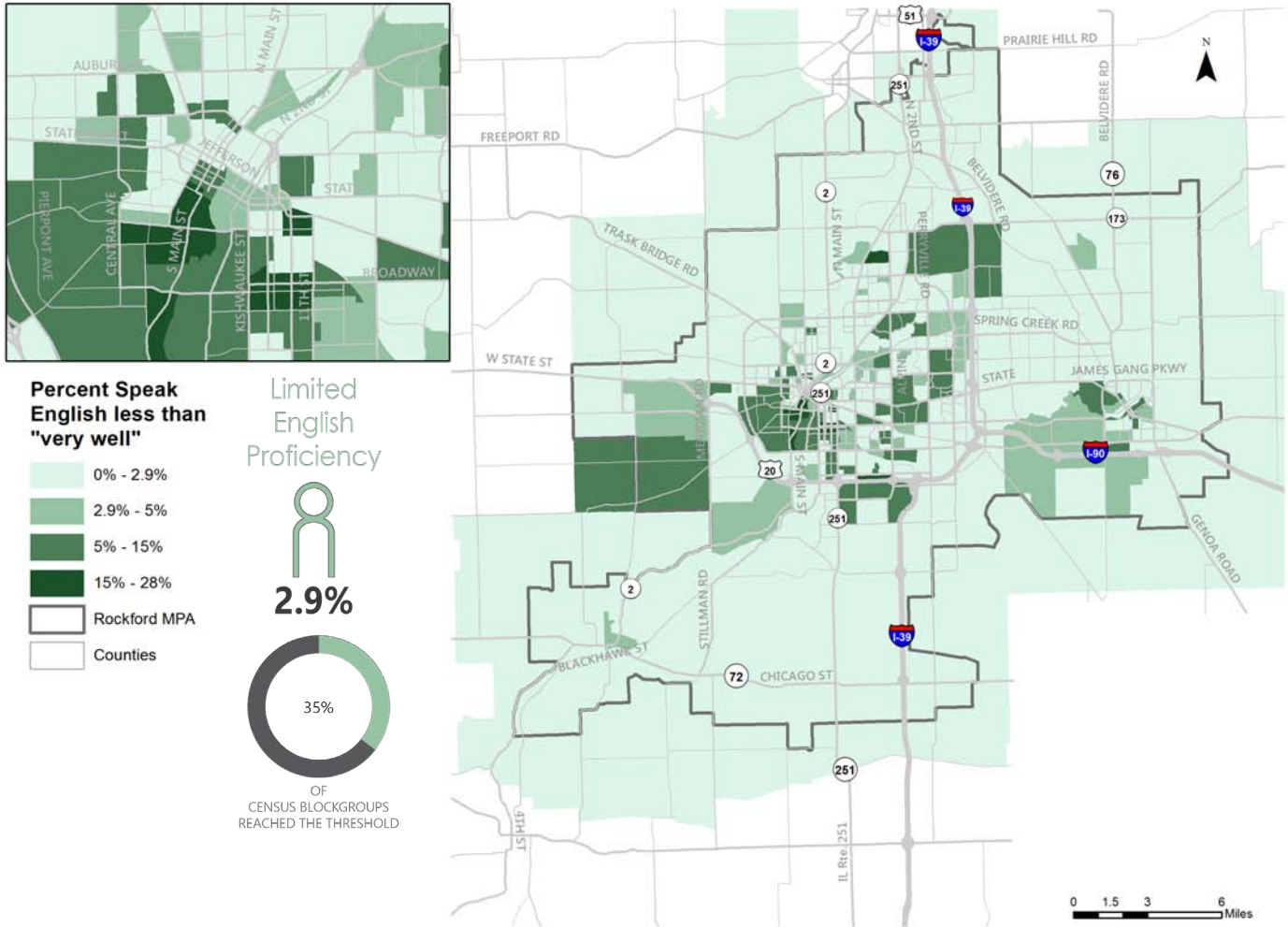
#### Explanation of Symbols:

1. An '\*\*\*' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '\*\*\*\*' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '\*\*\*\*\*' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.



# Appendix B - Limited English Proficiency Threshold Map

Downtown Rockford



As part of the Title VI and Environmental Justice Considerations document, a demographic baseline and thresholds for different Traditionally Underserved Populations (TUP) were established. A threshold represents the overall concentration of a population across the entire metropolitan planning area. To calculate the threshold, a regional average for each population category such as limited English proficiency was calculated. It was then applied to all census block groups in the planning area to identify areas with higher than average targeted population densities.

The threshold for limited English proficiency (households in which no one over the age of 14 understands English well) is 2.9%. In the above map, block groups that are shaded darker show a higher concentration of households with Limited English Proficiency. A more in-depth analysis of impacts and environmental justice can be found in the Title VI and Environmental Justice Considerations document, Environmental Justice Assessment section.

# Appendix C - MPO Discrimination Complaint Procedure

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## 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.

Written Complaints shall be sent to:

Region 1 Planning Council  
Attention: Title VI Coordinator  
313 N. Main Street  
Rockford, IL 61101

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 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 D - MPO Discrimination Complaint Form

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## 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
<p>Explain clearly how discrimination occurred and who participated in discrimination. Include in your explanation any way that you feel you were treated unfairly. Attach any other writing that relates to your case.</p>		
<b>Signature</b>	<b>Date</b>	

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

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

<b>Firma</b>	<b>Fecha</b>
--------------	--------------

# Appendix E - Language Identification Flashcard

- |   |                        |
|---|------------------------|
| <input type="checkbox"/> <p>ضع علامة في هذا المربع إذا كنت تقرأ أو تتحدث العربية.</p>   | 1. Arabic              |
| <input type="checkbox"/> <p>Խոսողո՞ւմ ե՞ս, չե՞ս խոսում կամ կապողո՞ւմ ե՞ս քառակուսում, եթե խոսում կամ կապողո՞ւմ ե՞ք հայերեն:</p> | 2. Armenian            |
| <input type="checkbox"/> <p>যদি আপনি বাংলা পড়েন বা বলেন তা হলে এই বাক্সে দাগ দিন।</p>  | 3. Bengali             |
| <input type="checkbox"/> <p>ល្អប្រសើរណាស់ប្រសិនបើ បើអ្នកអាន ឬនិយាយភាសា ខ្មែរ ។</p>  | 4. Cambodian           |
| <input type="checkbox"/> <p>Motka i kakhon ya yangin ûntûngnu' manaitai pat ûntûngnu' kumentos Chamorro.</p>                    | 5. Chamorro            |
| <input type="checkbox"/> <p>如果你能读中文或讲中文，请选择此框。</p>  | 6. Simplified Chinese  |
| <input type="checkbox"/> <p>如果你能讀中文或講中文，請選擇此框。</p>  | 7. Traditional Chinese |
| <input type="checkbox"/> <p>Označite ovaj kvadratić ako čitate ili govorite hrvatski jezik.</p>                                 | 8. Croatian            |
| <input type="checkbox"/> <p>Zaškrtněte tuto kolonku, pokud čtete a hovoříte česky.</p>  | 9. Czech               |
| <input type="checkbox"/> <p>Kruis dit vakje aan als u Nederlands kunt lezen of spreken.</p>                                     | 10. Dutch              |
| <input type="checkbox"/> <p>Mark this box if you read or speak English.</p>   | 11. English            |
| <input type="checkbox"/> <p>اگر خواندن و نوشتن فارسی بلد هستید، این مربع را علامت بنید.</p>                                     | 12. Farsi              |

- |                          |  |                    |
|--------------------------|--|--------------------|
| <input type="checkbox"/> | Cocher ici si vous lisez ou parlez le français.                                      | 13. French         |
| <input type="checkbox"/> | Kreuzen Sie dieses Kästchen an, wenn Sie Deutsch lesen oder sprechen.                | 14. German         |
| <input type="checkbox"/> | Σημειώστε αυτό το πλαίσιο αν διαβάσετε ή μιλάτε Ελληνικά.                            | 15. Greek          |
| <input type="checkbox"/> | Make kazyè sa a si ou li oswa ou pale kreyòl ayisyen.                                | 16. Haitian Creole |
| <input type="checkbox"/> | अगर आप हिन्दी बोलते या पढ़ सकते हैं तो इस बक्स पर चिह्न लगाएँ।                       | 17. Hindi          |
| <input type="checkbox"/> | Kos lub voj no yog koj paub twm thiab hais lus Hmoob.                                | 18. Hmong          |
| <input type="checkbox"/> | Jelölje meg ezt a kockát, ha megérte vagy beszél a magyar nyelvet.                   | 19. Hungarian      |
| <input type="checkbox"/> | Markaam daytoy nga kahon no makabasa wenno makasaoka iti Ilocano.                    | 20. Ilocano        |
| <input type="checkbox"/> | Marchi questa casella se legge o parla italiano.                                     | 21. Italian        |
| <input type="checkbox"/> | 日本語を読んだり、話せる場合はここに印を付けてください。   | 22. Japanese       |
| <input type="checkbox"/> | 한국어를 읽거나 말할 수 있으면 이 칸에 표시하십시오.   | 23. Korean         |
| <input type="checkbox"/> | ໃຫ້ໝາຍໃສ່ຊ່ອງນີ້ ຖ້າທ່ານອ່ານຫຼືປາກພາສາລາວ.   | 24. Laotian        |
| <input type="checkbox"/> | Prosimy o zaznaczenie tego kwadratu, jeżeli posługuje się Pan/Pani językiem polskim. | 25. Polish         |

<input type="checkbox"/>	Assinale este quadrado se você lê ou fala português.	26. Portuguese
<input type="checkbox"/>	Însemnați această căsuță dacă citiți sau vorbiți românește.	27. Romanian
<input type="checkbox"/>	Пометьте этот квадратик, если вы читаете или говорите по-русски.	28. Russian
<input type="checkbox"/>	Обележите овај квадратик уколико читате или говорите српски језик.	29. Serbian
<input type="checkbox"/>	Označte tento štvorček, ak viete čítať alebo hovoriť po slovensky.	30. Slovak
<input type="checkbox"/>	Marque esta casilla si lee o habla español.	31. Spanish
<input type="checkbox"/>	Markahan itong kuwadrado kung kayo ay marunong magbasa o magsalita ng Tagalog.	32. Tagalog
<input type="checkbox"/>	ให้กาเครื่องหมายลงในช่องถ้าท่านอ่านหรือพูดภาษาไทย.	33. Thai
<input type="checkbox"/>	Maaka 'i he puha ni kapau 'oku ke lau pe lea fakatonga.	34. Tongan
<input type="checkbox"/>	Відмітьте цю клітинку, якщо ви читаете або говорите українською мовою.	35. Ukrainian
<input type="checkbox"/>	اگر آپ اردو پڑھتے یا بولتے ہیں تو اس خانے میں نشان لگائیں۔	36. Urdu
<input type="checkbox"/>	Xin đánh dấu vào ô này nếu quý vị biết đọc và nói được Việt Ngữ.	37. Vietnamese
<input type="checkbox"/>	באצייכנט דעם קעסטל אויב איר לייענט אדער רעדט אידיש.	38. Yiddish



# Appendix F - Public Comments

Public comments regarding the Title VI & Environmental Justice Considerations document and Limited English Proficiency Plan were accepted from November 16, 2018 until December 17, 2018. Provided in this section are the public notices distributed for the draft documents review and comment. Comments received during this period are also included. In accordance with the procedures outlined in the MPO Public Participation Plan, Title VI & EJ Considerations, and Limited English Proficiency Plan, the MPO will utilize available services as needed to provide translation of transportation planning documents/information. Additional translation services will be continued to be evaluated and incorporated as potential resources for the MPO.

## Notices



- Home
- + Publications
- + About
- + Resources
- + MPO Policy Committee Calendar

### Greenways Document:

Greenways: A Green Infrastructure Plan for Boone and Winnebago Counties



[Click to Visit](#)

### RMAP Bicycle & Pedestrian Plan Page

[Click to Visit](#)

### Long Range Transportation Plan:

#### TRANSPORTATION 4 TOMORROW

A Long Range Transportation Plan for the Rockford Region

[Click to Review](#)

**EXECUTIVE DIRECTOR**  
Michael Dunn, Jr.

313 N. MAIN STREET  
ROCKFORD, IL 61101

815.319.4180 phone

The MPO Technical Committee meeting scheduled for Thursday, December 20, 2018 (10:00am) at the City of Loves Park City Hall has been CANCELLED.

If you have any questions, please do not hesitate to contact Jon Paul Diipla at 815-319-4180 or by email at [jpdiipla@r1planning.org](mailto:jpdiipla@r1planning.org).

The MPO is seeking public comments on its draft of the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan. The draft documents will be available for public comment from November 16th, 2018 through December 17th, 2018.

The draft Title VI & Environmental Justice Considerations Plan can be accessed [here](#).

The draft Limited English Proficiency Plan can be accessed [here](#).

Comments should be direct to Margaret Campbell at 815-319-4180 or by email at [mcampbell@r1planning.org](mailto:mcampbell@r1planning.org).

The MPO Technical Committee meeting scheduled for Thursday, November 15, 2018 (10:00am) at the City of Loves Park City Hall has been CANCELLED.

The MPO Technical Committee meeting scheduled for Thursday, September 20, 2018 (10:00am) at the City of Loves Park City Hall has been CANCELLED.

The next scheduled meeting of the MPO Technical Committee will be held on Thursday, October 18, 2018 at 10:00 AM at Loves Park City Hall, City of Loves Park City Hall, 100 Heart Boulevard, Loves Park, IL 61111.

The public comment and review period from MPO FY 2019 –FY 2022 Transportation Improvement Program draft document was from July 18th, 2018 through August 13th, 2018. The document can be viewed on the MPO website and a link to the document is provided [here](#).

**Subject:**

[REDACTED]  
MPO Title VI & Environmental Justice Considerations and Limited English Proficiency  
Plan Update - Public Comment

**Attachments:**

TITLEVI\_PUBLIC-NOTICE.pdf

Good Afternoon,

Notice is hereby given that the Region 1 Planning Council Metropolitan Planning Organization (MPO) is seeking public comments on its draft of the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan.

Title VI of the Civil Rights Act of 1964 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 transportation planning program or transportation planning activity for which the MPO receives federal transportation financial assistance.

The draft Title VI & Environmental Justice Considerations Plan can be viewed at:

[http://www.rmapil.org/wp-content/uploads/title vi ej draft vl.pdf](http://www.rmapil.org/wp-content/uploads/title_vi_ej_draft_vl.pdf).

The Limited English Proficiency (LEP) Plan is designed to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs and planning processes as required by Executive Order 13166 from the Office of the President of the United States. The LEP 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, updates on events and demographic changes since the original release of the plan, and information for future plan updates.

The draft Limited English Proficiency Plan can be viewed at:

[http://www.rmapil.org/wp-content/uploads/2018 lep draft vl.pdf](http://www.rmapil.org/wp-content/uploads/2018_lep_draft_vl.pdf).

Public comments will be accepted regarding the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan from November 16, 2018 until December 17, 2018. Comments can be submitted to the MPO through email, telephone, or sending written comments.

Please see the attached notice for further information regarding the draft documents and submittal of comments to the MPO.

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**Jon Paul Diipla, AICP**

*Deputy Director of Regional Planning*

*Director of Metropolitan Planning Organization*



## Public Notice

For Immediate Release  
November 16, 2018

### NOTICE OF PUBLIC COMMENTS FOR THE TITLE VI & ENVIRONMENTAL JUSTICE CONSIDERATIONS PLAN and LIMITED ENGLISH PROFICIENCY (LEP) PLAN DRAFTS

Notice is hereby given that the Region 1 Planning Council Metropolitan Planning Organization (MPO) is seeking public comments on its draft of the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan.

The Title VI & Environmental Justice Considerations Plan is a federally required document that reflects the MPO's commitment to protect against discrimination in transportation planning and processes. The document also provides information regarding the transportation planning process, organizations involved in the transportation planning process, and information regarding other MPO planning documents.

Title VI of the Civil Rights Act of 1964 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 transportation planning program or transportation planning activity for which the MPO receives federal transportation financial assistance.

Any person who believes they have been aggrieved by an unlawful discriminatory practice pertaining to the MPO transportation planning process under Title VI has a right to file a formal complaint with RIPC. Environmental Justice (EJ) builds on to Title VI activities by including the consideration of the impacts to low-income populations in addition to minority populations into transportation planning and decision-making processes. The MPO Title VI & Environmental Justice document discusses and elaborates on matters related to Title VI & Environmental Justice in the context of transportation planning activities in the region, and persons who may feel they have need of the redress provided by Title VI.

The draft Title VI & Environmental Justice Considerations Plan can be viewed at:

[http://www.rmapil.org/wp-content/uploads/title\\_vi\\_ej\\_draft\\_v1.pdf](http://www.rmapil.org/wp-content/uploads/title_vi_ej_draft_v1.pdf).

The Limited English Proficiency (LEP) Plan is designed to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs and planning processes as required by Executive Order 13166 from the Office of the President of the United States. The LEP 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, updates on events and demographic changes since the original release of the plan, and information for future plan updates.

The draft Limited English Proficiency Plan can be viewed at:

[http://www.rmapil.org/wp-content/uploads/2018\\_lep\\_draft\\_v1.pdf](http://www.rmapil.org/wp-content/uploads/2018_lep_draft_v1.pdf).

As stipulated in FAST Act, a 30-day public comment period is afforded on the draft documents. The purpose of this comment period is to solicit feedback from the public as to how they perceive the transportation planning process as well as solicit suggestions from the public as to how to better the process.

Public comments will be accepted regarding the Title VI & Environmental Justice Considerations Plan and the Limited English Proficiency Plan from November 16, 2018 until December 17, 2018. Comments can be submitted to the MPO through email, telephone, or sending written comments. MPO staff contact information is listed below.

Margaret Campbell  
Metropolitan Planner  
Region 1 Planning Council  
313 N Main Street, Rockford, IL 61101  
[mcampbell@r1planning.org](mailto:mcampbell@r1planning.org)  
815-319-4193

## Public Comment

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**From:** Medrano, Leonardo [REDACTED]  
**Sent:** Tuesday, November 27, 2018 9:53 AM  
**To:** Christina Washington [REDACTED]  
**Subject:** RE: MPO Title VI & Environmental Justice Considerations and Limited English Proficiency Plan Update - Public Comment

Hello Christina, I read the LEP policy and a few things. If possible, staff should first use an online service such as Google Translate (<http://translate.google.com/>) or a similar service to aid in the interpretation of services on a one on one basis. Google translate should never be the first option Language line should. I like the flash cards and is there a way this can be posted on the front desk?

Thank You,

Leo Medrano  
Director, Patient & Family Experience  
SwedishAmerican  
A Division of UW Health  
[REDACTED]

# Appendix G - MPO Metropolitan Planning Area

