



Title VI Considerations

for the Rockford Metropolitan Planning Organization

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Final Report - 6.20.2025

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

This report was prepared in cooperation with the following:

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

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



AN ENGINE FOR COLLABORATION IN NORTHERN ILLINOIS

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Introduction

Background

Region 1 Planning Council (R1), acting as the Rockford Metropolitan Planning Organization (MPO), is dedicated to a planning process that ensures residents are informed about and given meaningful opportunities to engage in regional planning efforts and decision making. R1 must ensure its planning reflects the varied demographics of the MPA to serve the widest range of citizens effectively. This approach will enable the implementation of strategies that utilize federal funding to benefit the entire region represented by the MPO. To accomplish this goal, the MPO has developed this Title VI Program in accordance with the federal laws, regulations, and guidance that govern nondiscrimination in its programs and activities.

The Title VI Program reflects the MPO's commitment to implementing planning processes that are designed to protect against discrimination and to ensure that it provides fairness and consideration of issues impacting disadvantaged residents. It also provides a clear process for resident to use if they feel that they have been discriminated against in one of R1's programs or activities. This program also outlines the strategies and tools that the MPO utilizes to reach and involve all of its residents, including those who have been harder to reach in previous outreach efforts.

The following Title VI program was approved by the MPO Policy Committee on June 20, 2025 for adoption. A copy of the draft MPO Policy Committee resolution can be found in Appendix B.

About the MPO

By Federal law, all large census defined urbanized areas (over 50,000) are required to have an organization that plans for and coordinates decisions regarding the region's transportation systems. The MPO is housed within R1; R1 is also comprised of the MPO, Winnebago County Geographical Information System (WinGIS), the Economic Development District (EDD), and Northern Illinois Land Bank Authority (NILBA).

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

Boards & Committees

The activities of the MPO are directed by the MPO Policy Committee that consists of the elected officials from the above entities in addition to 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 a 22-member Technical Committee comprised of entities listed below:

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

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

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

More information on the MPO's committees can be found in [Appendix A](#).

Regional Population Groups Representation on Planning & Advisory Bodies

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

Further goals and strategies to actively engage regional population group are included in the [Public Participation Plan](#) and recent special MPO changes, improvements or efforts included later in this document.

Legal Framework

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

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

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

Federal Non-Discrimination Acts

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

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

Executive Orders

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

Executive Order 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.

Nondiscrimination Policy

Nondiscrimination Policy

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

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

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

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

- Direct fair shares of funding or assistance to all regional population groups and low-income persons and populations.
- Minimize the adverse impacts of all activities on all persons and groups, but especially on less prominent population and low-income persons within the region.
- Make concerted efforts to determine what populations may be affected, before expenditure of any federal funds, implement any federal program, impose any federal regulations, or create or cause any adverse or harmful impacts.
- Periodically, review and analyze past actions to determine, to the extent possible, if all groups are being treated fairly.
- Make concerted efforts, as the MPO plans and programs its activities, to involve all regional populations groups and low-income groups in the decision-making process.
- Promote Title VI efforts both within the MPO and by all the MPO participant member agencies within their respective jurisdictions, especially the local units of government with transportation responsibilities.

Take into the account the multifaceted community composition of the MPO participants and all the communities within the MPO Metropolitan Planning Area (MPA). Care should be taken that all communities are represented when important transportation planning and transportation funding decisions are made, especially decisions that will affect less prominent populations or low-income person or groups within the region.

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 provides an inclusionary transportation planning process.

Notice to the Public

The MPO's Title VI Notice is posted within the public reception area of R1's offices as well as on the R1 website. References to Title VI 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 180 days of the date of incident. If complaints are not filed within 180 days, complainants will be advised that complaints that are appealed to FTA, FHWA, or IDOT must have been filed within 180 days of the date of the incident. All written complaints received by MPO shall be referred immediately to the Title VI Coordinator. The Title VI Coordinator shall resolve verbal and non-written complaints received by MPO informally. 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. R1 will advise the complainant of other avenues of redress available, such as the IDOT Equal Opportunity Office (EOO).

The R1 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 the 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 R1 Executive Director. The complaint will be forwarded to the IDOT Bureau of Civil Rights. Within 150 days of receipt of the complaint, the R1 Executive Director will notify the complainant of their right to file a formal complaint with IDOT Bureau of Civil Rights, if they are dissatisfied with the final decision rendered by R1. 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 document.

Participation & Outreach

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

The Public Participation Plan 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 disadvantaged populations, is critical to ensuring that a comprehensive viewpoint and considerations are appropriately incorporated into the transportation planning process.

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

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

Descriptions of the participation techniques employed by the MPO are detailed in the Public Participation Plan summary in [Appendix H](#).

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

- Communication with neighborhood organization representatives,
- Provide timely notices by email and informational posts on the R1 website and Engage R1,
- Flyers in high-volume locations, and
- Outreach to specific organizations that represent and provide services for:
 - a. Individuals with disabilities,
 - b. Low Income,
 - c. Elderly,
 - d. Minorities, and
 - e. Limited English Proficiency.

See [Appendix I](#) for MPO outreach efforts made since the last Title VI Program submission.

Monitoring Procedures & Efforts

Responsibility

The MPO is charged with the responsibility to direct, coordinate, and administer the continuing, comprehensive, and cooperative (3-C) transportation planning process. The MPO takes a comprehensive approach to monitoring population trends across the region and assembles detailed Census data to track demographic trends across the area. In addition to Census data, the MPO also develops detailed dwelling unit and employment forecasts encompassing Boone, Ogle, and Winnebago Counties. Longitudinal employment dynamics are also studied to determine the employment locations of less prominent populations 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 planning documents. A Memorandum of Understanding for Cooperative Transportation Planning, signed by R1 and the public transit agencies within its boundaries, including RMTD, denotes that R1 will:

- Assist the Public Transit Operators by periodically conducting a Title VI (Nondiscrimination) Assessment, in accordance with federal guidelines; and
- R1 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 Illinois Department of Transportation (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 requirements. A copy of the most recently approved self-certification can be found in Appendix K.

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

Considerations

Particular attention to mobility needs of less prominent populations as well as transit dependent populations is provided through the MPO Alternative Transportation Committee, which seceded the Mobility Subcommittee in the fourth quarter of Fiscal Year 2018. As previously described in this document, the MPO Alternative Transportation Committee has been charged with coordinating organizations from workforce investment, human services, public transit providers, members of the public and governmental entities to determine gaps in transportation services and accessibility for low-income, less prominent populations, elderly and persons with physical or mental conditions or impairments that substantially limit one or more major life activities.

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 Transportation Alternative Selection Committee and the HSTP process can be found in the MPO Coordinated [Public-Transit Human Services Transportation Plan](#). The plan can be accessed at www.r1planning.org.

Metropolitan Planning Area Demographics

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

Demographic Profile

The Metropolitan Planning Area (MPA), encompassing parts of Boone, Ogle, and Winnebago counties, has a total population of 345,598 residents, as reported in the most recent U.S. Census 2023 American Community Survey (ACS) 5-Year Estimates. Over the last year, the population has experienced a modest increase of 0.3 percent, reflecting steady growth within the region.

A multifaceted community composition remains a significant characteristic of the MPA, with 34.5 percent of residents identifying as minorities. This increasingly multifaceted community composition underscores the evolving cultural landscape of the area and contributes to the development of a more dynamic and welcoming community. Population sex distribution is nearly balanced, with 50.8 percent of the population identifying as one sex (F) and 49.2 percent as the other (M).

The age distribution within the MPA reveals a wide array of demographic needs. Individuals under the age of 18 account for 23.7 percent of the population, highlighting the necessity for enhanced educational and recreational resources. The largest demographic segment, comprising 45.1 percent, falls within the 18-44 age range, which represents the primary workforce of the region. Furthermore, 18.1 percent of the residents are aged 65 and older, indicating a need for senior services, healthcare access, and retirement support.

Economic challenges persist, as 14.9 percent of residents live below the poverty line. This statistic underscores the critical importance of economic development initiatives, job training programs, and social services to assist low-income individuals and families. As the region continues to evolve, these demographic insights will play an essential role in informing policy decisions and resource allocation to better serve the community.

Fair Access and Impact Assessment

Assessing Impacts

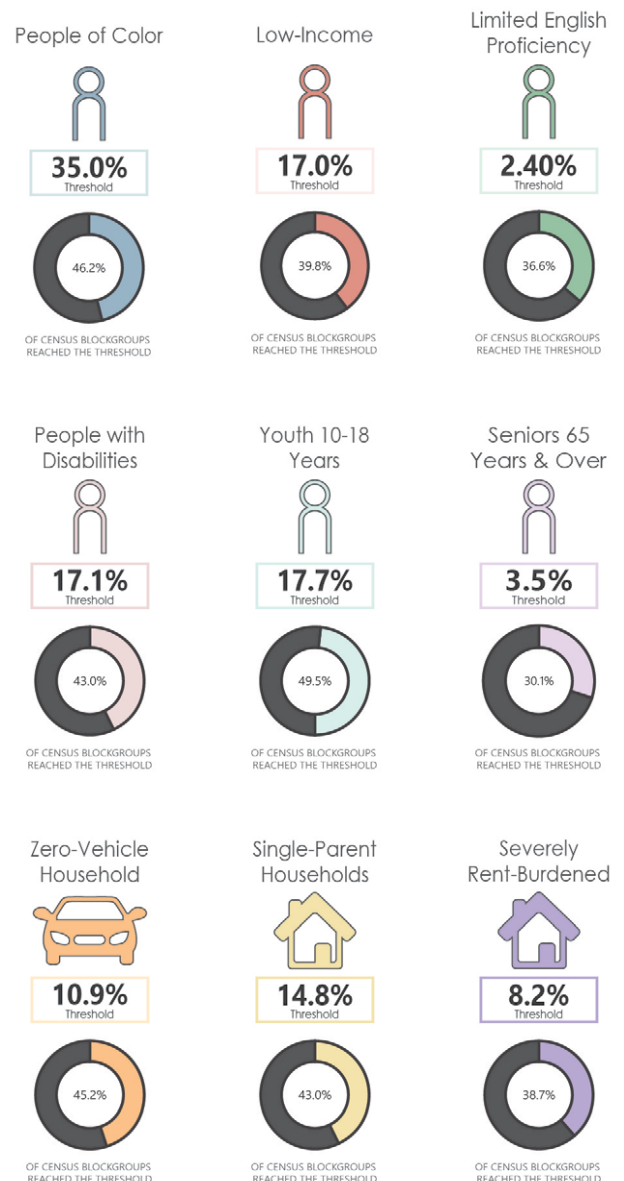
Establishing a demographic baseline is a vital step in conducting a Title VI assessment. The MPO has calculated thresholds for the Metropolitan Planning Area (MPA) to determine areas with traditionally disadvantaged populations that may be impacted by a transportation infrastructure project or a transit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

The thresholds are then applied to all the Census block groups within the planning area in order to identify areas with higher than average minority densities. To comply with Environmental Justice criteria, thresholds were calculated for traditionally disadvantaged populations, including low-income, People of Color, Limited English Proficiency, seniors (aged 65 and above), and zero-vehicle households.

Traditionally Underserved Populations Definitions:

- Non-Caucasian Persons - Persons who identify as any of the following groups: American Indian or Alaska Native Alone (non-Hispanic/non-Latino); Asian Alone (non-Hispanic/non-Latino); Pacific Islander Alone (non-Hispanic/non-Latino); Black or African-American Alone (non-Hispanic/non-Latino); and Other (Some Other Race, Two or More Races, non-Hispanic/non-Latino); and all Hispanic/Latino persons.
- 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-Vehicle Household - Measured as households without access to an automobile.
- Seniors - A person aged 65+.
- Youth - Persons under the age of 5.
- Persons with Accessibility Needs - Persons who identify as having any of the following disabilities: Hearing difficulty- deaf or having serious difficulty hearing (DEAR); Vision difficulty- blind or having serious difficulty remembering, concentrating, or making decisions (DREM); Ambulatory difficulty- having serious difficulty walking or climbing stairs (DPHY); Self-care difficulty- having difficulty bathing or dressing (DDRS); Independent living difficulty- because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor's office or shopping (DOUT).
- Less than High School Diploma - People 25 years or older without a high school diploma or equivalent.
- Single Parent Households - Families with at least one child. To determine whether or not single-parent families exceed tract concentration thresholds, the share of single parent families is calculated as a share of all households regardless of whether or not they have any children.
- Unemployed - Persons 16 years and older who were without a job at all during the reporting period.
- Severely Rent-Burdened Households - Renters paying greater than 50% of income in rent. To determine whether or not severely rent-burdened households exceed tract concentration thresholds, the share of severely rent-burdened households is calculated as a share of all households regardless of occupancy status (renter or owner).

Figure 1: Thresholds in Planning Areas



Planning Threshold Areas

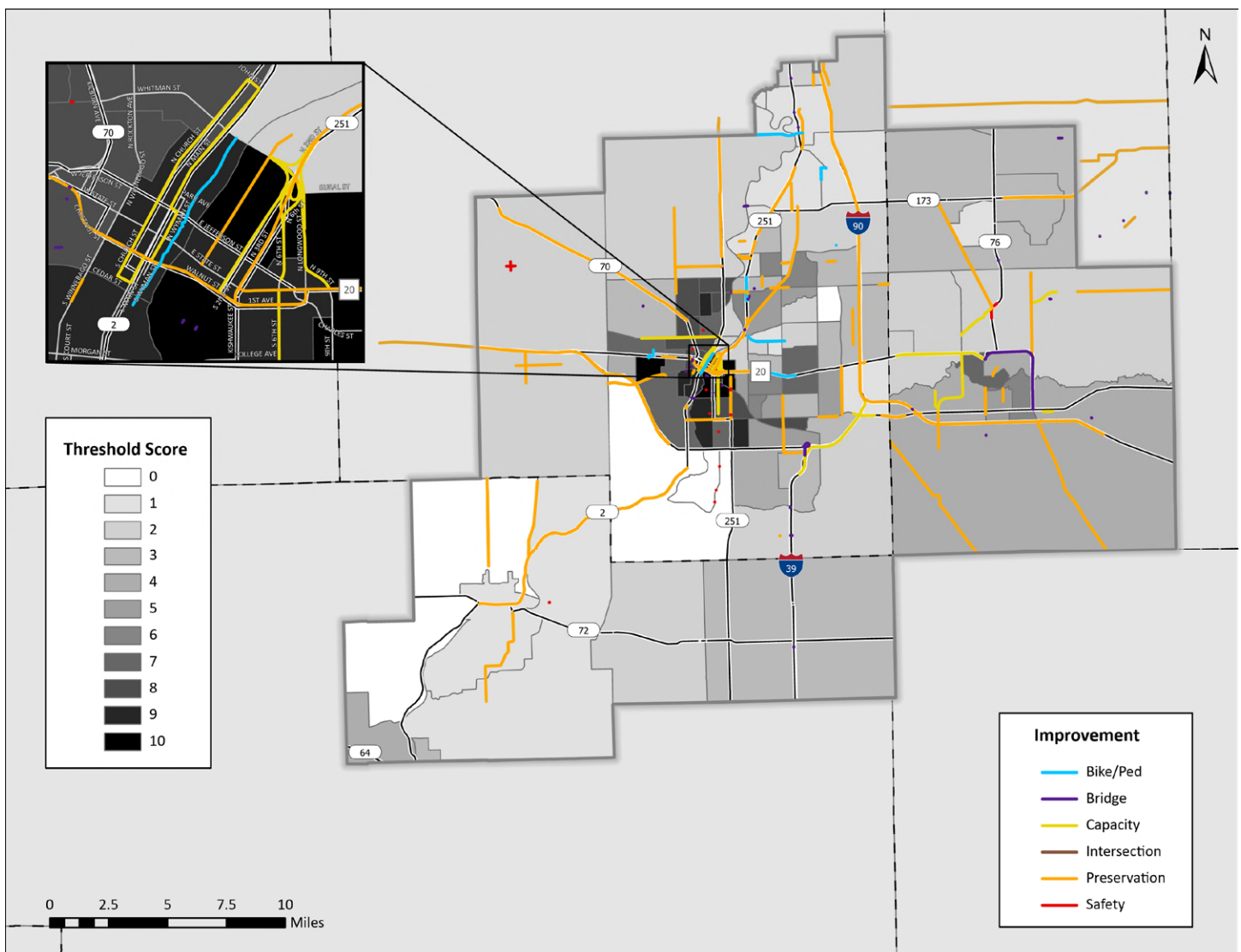
Using the thresholds established, the Census block groups were then categorized by how many Title VI thresholds they exceeded. This allows the Census block groups to be mapped showing the concentration of the identified populations. Darker areas on the map indicates a greater concentration of traditionally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

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

All updates to the 2050 Metropolitan Transportation Plan (MTP) and short-range Transportation Improvement Program (TIP) will include a map of proposed projects overlaying these concentrations to assess any benefits and burdens they may have on traditionally disadvantaged populations. The presence of these population groups is also considered in selection process and programming of the Surface Transportation Block Grant (STBG), Carbon Reduction Program (CRP), and Transportation Alternatives Program (TAP) 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 Areas



Limited English Proficiency Plan

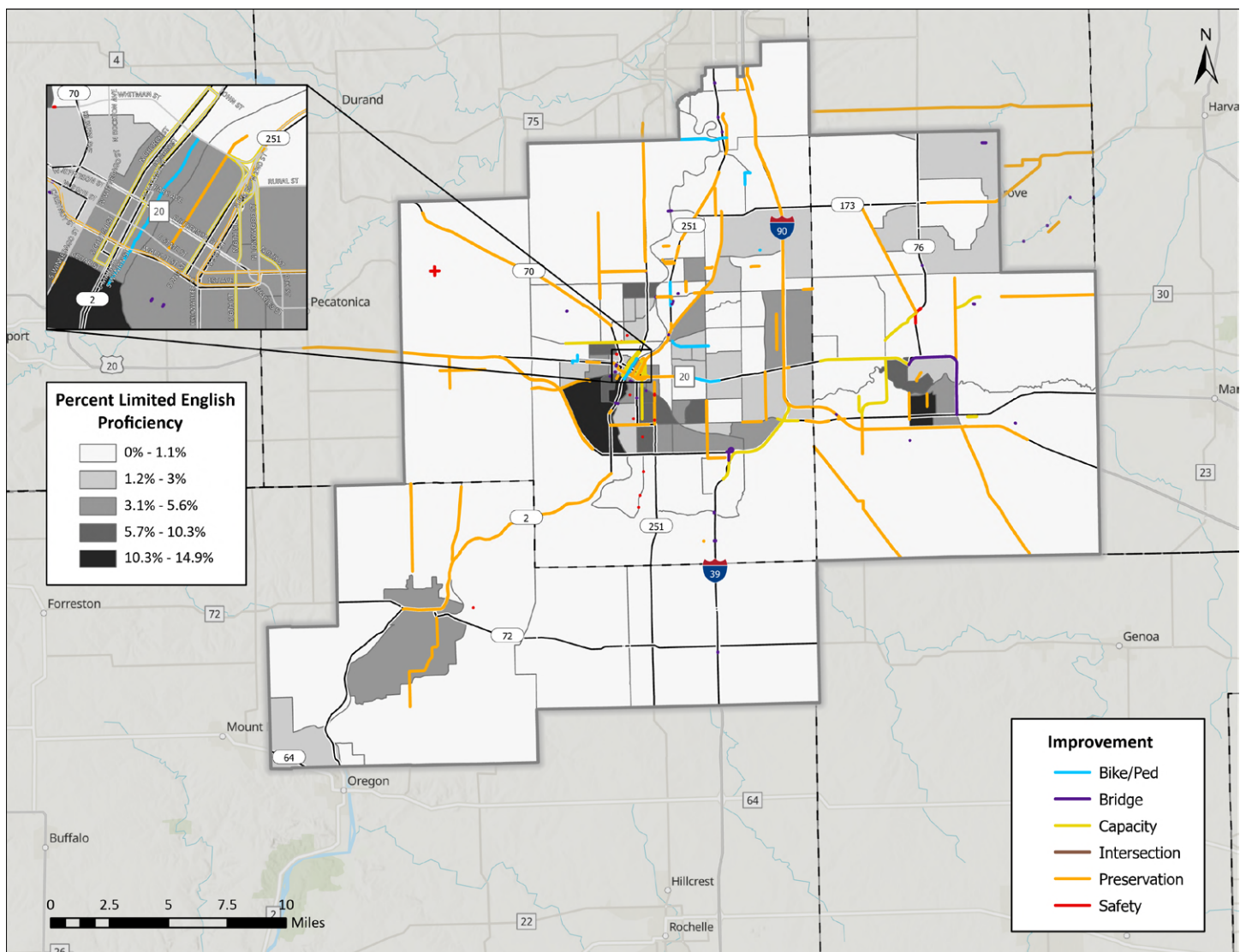
The MPO has developed a [Limited English Proficiency Plan \(LEP\)](#) to help identify reasonable steps to provide language assistance for LEP persons seeking meaningful access to MPO programs as required by Executive Order 13166. The MPO defines persons with limited English proficiency to be those individuals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

To view further information regarding the MPO Limited English Proficiency Plan see [Appendix J](#).

Figure 3: Limited English Proficiency in Planning Area



Benefits & Burdens Analysis

The benefit and burdens analysis assesses the proportionality of outcomes of the projects by examining the impact they may have on regional population groups and low-income populations and identifies any disproportionate impacts.

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

Burdens refer to the negative effects associated with transportation investments. These can include pollution (both noise and air), disruptions to community cohesion, displacement of individuals or businesses, a decline in economic vitality, adverse impacts on employment, a decrease in the tax base or property values, reduced aesthetic appeal, interruptions to businesses, issues with parking and access to transit, increased congestion, or delays, denials, or reductions in the receipt of benefits. Table 1 provides examples of possible benefits, burdens, and mitigation strategies for various transportation project types.

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

Table 3 displays the financial breakdown of the Fiscal Year 2026-2029 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 during the next four years have a collective cost of \$885,224,191. Of these projects, 85.36 percent of the funds are used in areas that have reached at least one of the thresholds.

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

In the FY 2026-2029 TIP, there is a total of \$330,912,785 in 135 projects that are listed in the AIC or PA tables. Of this total amount, 86.63 percent, or \$293,285,901, is within areas that have reached at least one or more of the thresholds.

The total amount of AIC/PA project funding associated with each level of population category thresholds met is shown in Table 2. Population category thresholds and their associated funding within the TIP, broken down by project type, is shown in Table 3.

A more in-depth explanation of the [Transportation Improvement Plan](#) is available on the [TIP Engage R1 Page](#).

Figure 4: Federal & State Funded Projects in Planning Area

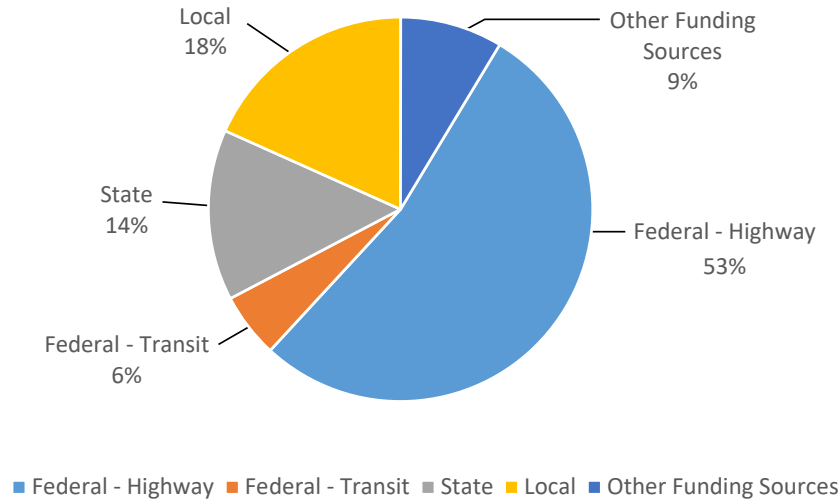


Table 1: Benefits and Burdens Analysis

Bridges, Capacity & Engineering Projects

Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Enhance accessibility & mobility.	Benefits limited to populations with motor vehicles.	Signal synchronization, pedestrian crosswalks, bike lanes, bus routes additions, etc.
Promote economic development.	Increase in noise and air pollution.	Select right-of-way (ROW) for minimum impacts.
Improve safety.	Might impact existing neighborhoods.	Try to incorporate context sensitive design to maintain the neighborhood character.
Improve operational efficiency.		

Resurfacing, Rehabilitation, & Reconstruction (3R) Projects

Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Promote system preservation.	Expansion of shoulder with may impinge on residential property, resulting in additional ROW acquisition.	Close large sections of roadways during non-peak hours to increase resurfacing productivity.
Improve safety.	Diverted traffic during project construction causes potential delays and congestion.	Reroute construction traffic, if needed, to nearby major roads.
Improve operations.	Noise and air pollution during construction.	

Bicycle & Pedestrian Projects

Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Improve quality of life, health & environment by encouraging people to use the bike/pedestrian facilities.	Some traffic calming measures make commercial deliveries difficult.	Create improvement plans to accommodate both motor vehicle traffic & bike/pedestrian usage.
Improve safety to pedestrians & bike riders.	Bike routes takes space for passing turning cars at intersections and reduce on-street parking.	
Provide an alternative to motor vehicles.		

Table 1: Benefits and Burdens Analysis Contd.

Public Transit Projects

Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Enhance accessibility by transit for Traditionally Underserved Populations (TUP).	Temporary shelter/stop infrastructure may not be ADA accessible.	Increase service communication between operators and public.
Reduce reliance on motor vehicles and improve air quality.	Temporary bus route deviations may be burdensome.	Bus routes should be within walking distance of TUP.
Increase mobility and safety for TUP.		

Public Transit Projects

Possible Benefits	Possible Burdens	Possible Mitigation Strategies
Enhance mobility & accessibility.	Funding for ITS implementation might not be available.	Multi-modal incorporates transit stations & other modes.
Improve safety.		Have a comprehensive design phase before any ITS projects are implemented.
Enhance system preservation & operational efficiency.		

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

Population Area Category	Total AIC/PA Projects by Dollars	Total AIC/PA Projects by Percent
0	\$13,616,000	2.76%
1	\$387,666,682	78.69%
2	\$420,254,732	85.30%
3	\$397,432,703.00	80.67%
4	\$26,398,321.00	5.36%
5	\$8,357,080.00	1.70%
6	\$19,271,580.00	3.91%
7	\$32,696,779.00	6.64%
8	\$22,706,437.00	4.61%
9	\$21,374,937.00	4.28%
10	\$21,408,937.00	4.35%
Region Total	\$492,675,901	100.00%

Table 3: Transportation Improvement Program Planned Budget by Population Area Category

Project Category	Bicycle/ Pedestrian	Bridge	Capacity	Intersection	Preservation	Safety	Total Projects within the Region
0	\$0.00	\$188,000.00	\$0.00	\$1,080,000.00	\$120,900,000.00	\$790,000.00	\$122,958,000.00
	0.00%	0.14%	0.00%	100.00%	25.90%	4.51%	
1	\$6,042,875.00	\$17,535,000.00	\$25,500,000.00	\$0.00	\$242,460,770.00	\$0.00	\$291,538,645.00
	37.15%	13.25%	24.01%	0.00%	51.94%	0.00%	
2	\$8,750,000.00	\$17,535,000.00	\$67,607,892.00	\$0.00	\$166,435,770.00	\$5,763,580.00	\$266,092,242.00
	53.79%	13.25%	63.66%	0.00%	35.65%	32.92%	
3	\$6,026,000.00	\$10,518,000.00	\$8,365,500.00	\$1,080,000.00	\$149,898,857.00	\$2,633,000.00	\$178,521,357.00
	37.04%	7.95%	7.88%	100.00%	32.11%	15.04%	
4	\$0.00	\$74,110,000.00	\$600,000.00	\$0.00	\$62,899,100.00	\$0.00	\$137,609,100.00
	0.00%	55.99%	0.56%	0.00%	13.47%	0.00%	
5	\$0.00	\$1,050,000.00	\$0.00	\$1,080,000.00	\$78,555,707.00	\$0.00	\$80,685,707.00
	0.00%	0.79%	0.00%	100.00%	16.83%	0.00%	
6	\$5,983,000.00	\$3,600,000.00	\$0.00	\$1,080,000.00	\$81,098,600.00	\$0.00	\$91,671,600.00
	36.22%	2.72%	0.00%	100.00%	17.37%	0.00%	
7	\$1,267,000.00	\$4,335,500.00	\$59,840,000.00	\$0.00	\$42,713,100.00	\$395,000.00	\$108,550,600.00
	7.79%	3.28%	56.35%	0.00%	9.15%	2.26%	
8	\$0.00	\$6,321,000.00	\$12,340,000.00	\$0.00	\$32,245,779.00	\$2,170,000.00	\$53,076,779.00
	0.00%	4.78%	11.62%	0.00%	6.91%	12.39%	
9	\$275,000.00	\$3,397,500.00	\$18,242,392.00	\$0.00	\$32,394,779.00	\$395,000.00	\$54,704,671.00
	1.69%	2.57%	17.18%	0.00%	6.94%	2.26%	
10	\$0.00	\$12,307,500.00	\$18,242,392.00	\$0.00	\$39,232,779.00	\$1,336,000.00	\$71,118,671.00
	0.00%	9.30%	17.18%	0.00%	8.40%	7.63%	
Total	\$16,267,875.00	\$132,362,500.00	\$106,195,392.00	\$1,080,000.00	\$466,802,989.00	\$17,509,580.00	\$740,218,336.00
	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%	

Overall Findings

The above discussions, past assessments, and the included maps and charts serve to illustrate that Title VI has 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 MPA. Looking at transportation projects in the TIP, it appears there is a balance of projects in less prominent populations and/or low-income areas compared to more advantaged population groups and upper income areas. Additionally, when the data is compared with the deployment of the public transit system, there is strong evidence that the public transit operators are providing a majority of their services to disadvantaged individuals and low-income areas, thus effectively providing service to transit dependent populations.

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

The MPO will continue to monitor changes in planning area's demographics towards ongoing 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 levels of benefits to these traditionally 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

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 (R1). R1 is comprised of the MPO, WinGIS, Northern Illinois Land Bank, 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 Policy Committee meets on the fourth Friday every other month at 8:30 AM. The Policy Committee meeting location is at the Region 1 Planning Council offices at 127 N Wyman Street, Rockford, IL.

Technical Committee

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

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

Ad Hoc & Sub-Committees

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

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

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 ATC committee meets as needed and ad hoc working groups meet 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 (TA) Set-Aside eligible projects.

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.

STP/STBG Subcommittee

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

The Community Advisory Forum

The Climate Resiliency Forum, formed in 2022, was established to enhance the various perspectives and significance of public participation, which is an essential component of the planning process. The CAF functions as a platform for stakeholders to provide feedback on deliverables associated with MPO projects that require stakeholder input. The membership of the CAF is intentionally broad to encompass a wide array of perspectives and constituencies, including but not limited to conservation, accessibility services, education, sustainability, health, hospitality, housing, labor, low-income individuals, various demographic groups, not-for-profit organizations, recreation, senior citizens, advocacy for bicycles and pedestrians, small businesses, tourism, and veterans.

Greenways Planning Working Group

To support the development of the Greenways Plan and map, a Greenways Planning Working Group was formed. This group was established to ensure that the plan reflects regional environmental priorities and opportunities. Members of the working group include representatives from major environmental planning and advocacy organizations, such as park districts, forest preserves, and conservation groups.

Appendix B - MPO Policy Committee Title VI Document Approval Resolution



AN ENGINE FOR COLLABORATION IN NORTHERN ILLINOIS

MPO POLICY COMMITTEE MPO Resolution 2025-16

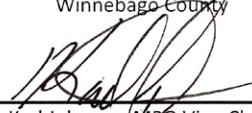
- RE:** Adoption of the Title VI Considerations for the Rockford Metropolitan Planning Organization
- WHEREAS** the Federal Highway Act of 1962, as amended, and the Urban Mass Transportation Act of 1964, as amended, provide for an urban transportation planning process; and
- WHEREAS** the Infrastructure Investment and Jobs Act (IIJA) 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 Infrastructure Investment and Jobs Act (IIJA) and its predecessors, require a Metropolitan Transportation Plan (MTP) as well as a Transportation Improvement Program (TIP); and
- WHEREAS** the Region 1 Planning Council is the Metropolitan Planning Organization (MPO) for the Rockford Urban and Metropolitan Area, and the MPO Policy Committee has the specific responsibility to direct and administer the continuing 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 in regards to transportation planning and decision-making processes; and
- WHEREAS** the MPO has developed an updated Title VI Program document that meets the requirements of FTA Circular 4702.1B; 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

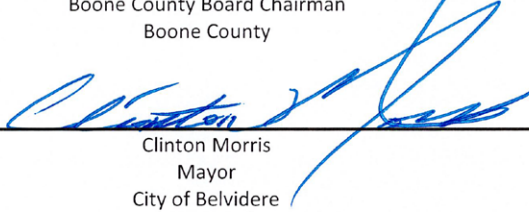
the MPO Policy Committee hereby adopts the MPO Title VI Plan and amends information contained in the aforementioned documents to the MPO Public Participation Plan;

Dated this 20th day of June 2025.

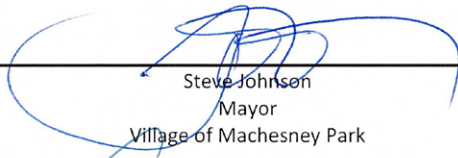
Joseph Chiarelli, MPO Chairman
Winnebago County Chairman
Winnebago County



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



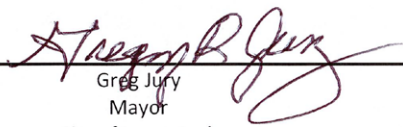
Clinton Morris
Mayor
City of Belvidere



Steve Johnson
Mayor
Village of Machesney Park



Tom McNamara
Mayor
City of Rockford



Greg Jury
Mayor
City of Loves Park



Michael Stubbe
Executive Director
Rockford Mass Transit District

Illinois Department of Transportation



Appendix C - Title VI Notice to the Public

The Rockford Metropolitan Planning Organization (MPO) hereby gives public notice that it is the policy of the agency to assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, 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 info@r1planning.org.

Es la póliza 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 de la Ley de Restauración de 1987, estatutos y reglamentos en todos los programas y actividades.

Título VI requiere que ninguna persona en los Estados Unidos de Norteamérica, debido a la raza, color, sexo, u origen nacional, sea excluido de la participación en, ni se le negarán los beneficios de otro modo sometido 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 MPO. Cualquier queja debe ser por escrito y presentada a la Coordinadora de la MPO de Título VI dentro de los ciento ochenta (180) días siguientes a la fecha de la presunta ocurrencia de discriminación.

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

Appendix D - Title VI Complaint Form

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

Rockford Agencia Metropolitana de Planificación

Formulario de Quejas de Discriminación del Título VI y Estatutos Relacionados

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

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

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

Fecha del incidente discriminatorio.

Causa de la discriminación:

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

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

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

Appendix E - MPO Title VI Discrimination Complaint Procedure

1. Alignment: Region 1 Planning Council (R1) 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, R1 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 R1'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 180 days of the date of the incident. All written complaints received by R1 shall be referred immediately to the Region 1 Planning Council Title VI Coordinator. Written Complaints shall be sent to:

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

- b. Verbal and non-written complaints by R1 shall be resolved informally by the R1 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. R1 will advise the complainant of other avenues of redress available, such as the IDOT Equal Opportunity Office (EOO).
 - c. The R1 Title VI Coordinator will advise the R1 Executive Director within ten (10) calendar days of receipt of the complaint(s). The following information will be included in every notification to the Executive Director (or designated human resource manager):
 - Name, address, and phone number of the complainant
 - Name, address, and phone number of R1
 - Basis of complaint
 - Date of alleged discriminatory act(s)
 - Date complaint received by R1
 - A statement of the complaint
 - Other agencies (local, state, or Federal) where the complaint has been filed
 - An explanation of the actions R1 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 R1 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) Bureau of Civil Rights.

IDOT Bureau of Civil Rights
2300 S Dirksen Parkway, Room 317
Springfield, IL 62764
 - e. Within one-hundred twenty (120) calendar days of receipt of the complaint(s), the R1 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 R1 Executive Director (or designee).
 - f. Within one-hundred fifty (150) calendar days of receipt of the complaint(s), the R1 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 Bureau of Civil Rights they are dissatisfied with the final decision rendered by R1. The R1 Title VI Coordinator will also provide the governing board with a copy of this decision and summary of findings.

g. The R1 Title VI Coordinator will maintain a log of all verbal and non-written complaints received. The log will include the following information:

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

5. Responsibility and Accountability: All employees and representatives of Region 1 Planning Council are responsible for abiding by Title VI as applicable to both internal and external parties. All R1 employees with supervisory responsibilities are accountable or ensuring employees access to this process.
6. Review Schedule: The document is recommended for review no less than every two years. The Executive Director (or human resources designee) will ensure this policy is maintained and approved by the applicable authority accordingly.
7. Prevailing Authority” Title VI of the Civil Rights Act of 1964.
8. Internal Cross-Reference: Standard Operating Procedure: Policy & Procedure System; Personnel Policy: Anti-Discrimination and Harassment
9. Attachments and Forms: None

Appendix F - Previous Submittals & Documents for RMTD

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

- 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 Rockford Area Transportation Study (RATS).
- The letter dated March 29, 2007, regarding “Title VI and Environmental Justice Assessment for the Rockford Mass Transit District” addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Gary McIntyre (RATS).
- The letter dated March 27, 2008, regarding “Title VI and Environmental Justice Update for the Rockford Mass Transit District Reporting Requirements”, addressed to Dwight B. Sinks, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Jon Paul Diipla (RATS).
- The letter dated June 20, 2011, regarding “Title VI and Environmental Justice for the Rockford Mass Transit District Status Report”, addressed to Donald Allen, Civil Rights Officer, US DOT / Federal Transit Administration / Region V, from Jon Paul Diipla (RMAP).
- The report entitled, “Title VI Program and Environmental Justice Assessment 2014-2017” provided by the Rockford Mass Transit District in the Rockford Urbanized Area, March 2014, as prepared by RMAP.
- The report entitled, “Title VI Program and Environmental Justice Assessment 2018-2020” provided by the Rockford Mass Transit District in the Rockford Urbanized Area, June 2017, as prepared by the MPO.
- The report entitled, “Title VI Program and Environmental Justice Assessment 2021-2023” provided by Rockford Mass Transit District in the Rockford Urbanized Area, September 2020, as prepared by R1.
- The report entitled, “Title VI Program and Environmental Justice Assessment 2024-2026” provided by Rockford Mass Transit District, July 2023, as prepared by R1.

Appendix G - Recent Special MPO Changes, Improvements or Efforts

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

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

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

In 2021, the Bipartisan Infrastructure Law (BIL) was signed into law, authorizing just under \$1 trillion in funding to upgrade transportation infrastructureⁱ. The largest portion of the BIL was a \$475 billion re-authorization of the core federal surface transportation program, which continues the programs created by the FAST Act. This reauthorization, which included programs such as STBG and TA Set-Aside, represented a 56 percent increase in funding from the FAST Act. The BIL also led to a new federal funding source for MPO's, the Carbon Reduction Program (CRP). The CRP funds a range of project with the purpose of improving air quality by reducing carbon dioxide emissions from on-road highway sourcesⁱⁱ.

In order to better align with these three MPO attributable federal funding sources, the MPO adopted a new set of Policies & Procedures for the Distribution of Federal Transportation Funds in October 2024. The policies and procedures include a set of updated scoring criteria that allows for projects to be assessed relative to their purpose and type.

The Community Advisory Forum (CAF) was established in 2023 to enhance public participation in planning by representing stakeholder input in the development of plans and programs. Its primary objectives include providing timely advice for effective public engagement and ensuring that all plans address potential social, economic, and sustainability issues. Additionally, the CAF fosters ongoing communication between its members and staff, creating a channel for identifying challenges and developing innovative solutions throughout the planning process. This approach aims to expand and strengthen public opinion in decision-making, ultimately improving the overall planning outcomes.

Appendix H - MPO Public Participation Plan

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

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

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

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

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

Table 4: MPO Public Outreach made since Last Title VI Program Submission

Executive Committee

Date	Time
20-Jan-22	10:45 am- 11:00 am
25-Feb-22	7:33 am- 8:43 am
29-Apr-22	7:43 am- 8:16 am
23-Jun-22	7:35 am- 8:57 am
2-Aug-22	11:13 am- 1:10 pm
26-Aug-22	7:33 am- 8:21 am
7-Sep-22	8:04 am- 8:41 am
21-Oct-22	10:34 am- 11:11 am
4-Nov-22	7:32 am- 8:27 am
27-Jan-23	7:32 am- 8:21 am
31-Mar-22	7:32 am- 8:01 am
21-Apr-23	7:22 am- 8:24 am
28-Apr-23	7:31 am- 8:19 am
30-Jun-23	7:32 am- 8:24 am
25-Aug-23	7:34 am- 8:35 am
27-Oct-23	8:01 am- 8:49 am
26-Jan-24	7:35 am- 8:24 am
22-Mar-24	7:33 am- 8:25 am
26-Apr-24	7:36 am- 8:20 am
28-Jun-24	7:32 am- 8:38 am
23-Aug-24	7:32 am- 8:26 am

Metropolitan Planning Organization Policy Committee

Date	Time
20-Jan-22	11:02 am- 11:30 am
25-Feb-22	8:45 am- 9:11 am
29-Apr-22	8:30 am- 9:06 am
23-Jun-22	9:00 am- 9:20 am
26-Aug-22	8:30 am- 9:22 am
4-Nov-22	8:33 am- 8:50 am
27-Jan-23	8:45 am- 9:18 am
31-Mar-23	8:08 am- 8:15 am
28-Apr-23	8:30 am- 8:43 am
2-Jun-23	8:30 am- 8:54 am
30-Jun-23	8:30 am- 8:57 am
25-Aug-23	8:39 am- 9:04 am
27-Oct-23	8:52 am- 9:30 am
26-Jan-24	8:30 am- 9:01 am
22-Mar-24	8:35 am- 9:02 am
31-May-24	8:30 am- 8:57 am
28-Jun-24	8:40 am- 9:02 am
23-Aug-24	8:31 am- 8:43 am
1-Oct-24	8:30 am- 8:50 am
17-Oct-24	8:30 am- 8:42 am

Metropolitan Planning Organization Technical Committee

Date	Time
20-Jan-22	10:00 am- 11:00 am
21-Feb-22	10:00 am- 10:43 am
21-Apr-22	10:00 am- 11:32 am
22-Jun-22	10:01 am- 11:31 am
18-Aug-22	10:00 am- 10:35 am
20-Oct-22	10:00 am- 10:54 am
19-Jan-23	10:00 am- 10:44 am
23-Feb-23	10:00 am- 11:17 am
23-Mar-23	10:00 am- 10:50 am
20-Apr-23	10:00 am- 10:35 am
22-Jun-23	10:00 am- 10:42 am
17-Aug-23	10:00 am- 10:40 am
19-Oct-23	10:01 am- 10:56 am
18-Jan-24	10:00 am- 11:29 am
22-Feb-24	10:00 am- 11:11 am
21-Mar-24	10:01 am- 11:19 am
23-May-24	10:00 am- 11:06 am
20-Jun-24	10:03 am- 10:44 am
18-Jul-24	10:00 am- 11:13 am
22-Aug-24	10:05 am- 10:38 am
19-Sep-24	10:00 am- 10:56 am
16-Oct-24	10:00 am- 10:33 am

Metropolitan Transportation Plan Pop-Up

Date	Time
10-Sep-23	8:30 am- 10:30 am
12-Sep-23	9:30 am- 11:30 am
13-Sep-23	10:30 am- 12:30 pm
18-Sep-23	3:30 pm- 5:30 pm
20-Sep-23	9:30 am- 11:30 am
18-Oct-23	9:00 am-3:30 pm

Metropolitan Transportation Plan Workshops

Date	Time
19-Jul-23	8:30 am- 10:30 am
26-Jul-23	8:30 am- 10:30 am
2-Aug-23	8:30 am- 10:30 am
16-Aug-23	8:30 am- 10:30 am
28-Aug-23	8:30 am- 10:30 am
30-Aug-23	8:30 am- 10:30 am
28-Nov-23	8:15 am- 9:45 am

Metropolitan Transportation Plan Open House

Date	Time
5-Oct-23	4:30 pm- 6:30 pm
10-Oct-23	4:30 pm- 6:30 pm
12-Oct-23	4:30 pm- 6:30 pm

Alternative Transportation Committee

Date	Time
13-May-24	3:04 pm- 3:25 pm

Surface Transportation Block Grant Committee

Date	Time
21-Mar-24	11:28 am- 12:25 pm
18-Apr-24	11:02 am- 12:15 pm
23-May-24	11:20 am- 12:49 pm
20-Jun-24	10:54 am- 12:04 pm
18-Jul-24	11:17 am- 12:09 pm
22-Aug-24	10:53 am- 12:09 pm

Community Advisory Forum

Date	Time
23-Feb-23	3:32 pm- 4:50 pm
27-Apr-23	3:37 pm- 4:40 pm
29-Jun-23	3:33 pm- 4:30 pm
24-Aug-23	3:32 pm- 4:08 pm
26-Oct-23	3:33 pm- 4:34 pm
14-Dec-23	3:35 pm- 4:59 pm
22-Feb-24	3:38 pm- 5:01 pm
25-Apr-24	3:37 pm- 5:04 pm
27-Jun-24	3:32 pm- 4:37 pm
22-Aug-24	3:34 pm- 4:38 pm
24-Oct-24	3:36 pm- 4:35 pm
12-Dec-24	3:33 pm- 4:55 pm

Appendix J - Limited English Proficiency Plan

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

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

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

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

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

Further information regarding the LEP populations and LEP integration within the MPO planning are can be found in the [MPO Limited English Proficiency Plan \(LEP\)](#). This document in its entirety can be accessed via the [MPO website](#).

Appendix K - MPO Metropolitan Transportation Planning Process Certificate

A copy of the certificate will be included following its execution.

Appendix L - Public Comments and Notices

Public comments regarding the Title VI document and Limited English Proficiency Plan were accepted from March 16, 2022 to April 15, 2022. Provided in this section are the public notices distributed for the draft documents review and comment. Comments received during this period are also included. In accordance with the procedures outlined in the MPO Public Participation Plan, Title VI, 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.

Appendix M - Population Category Threshold Map

Figure 5: Population Category Threshold by People of Color

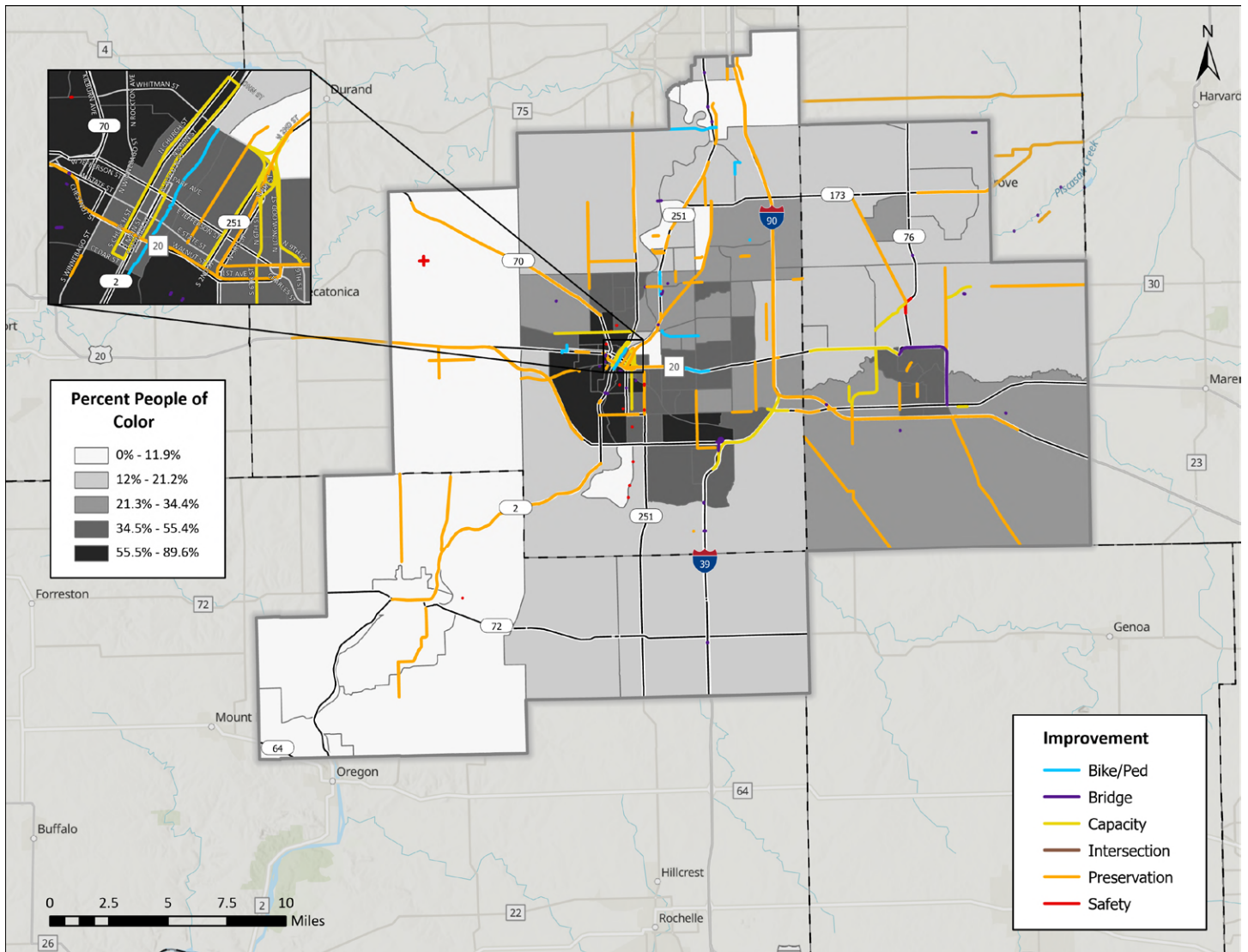


Figure 6: Population Category Threshold by Low-Income

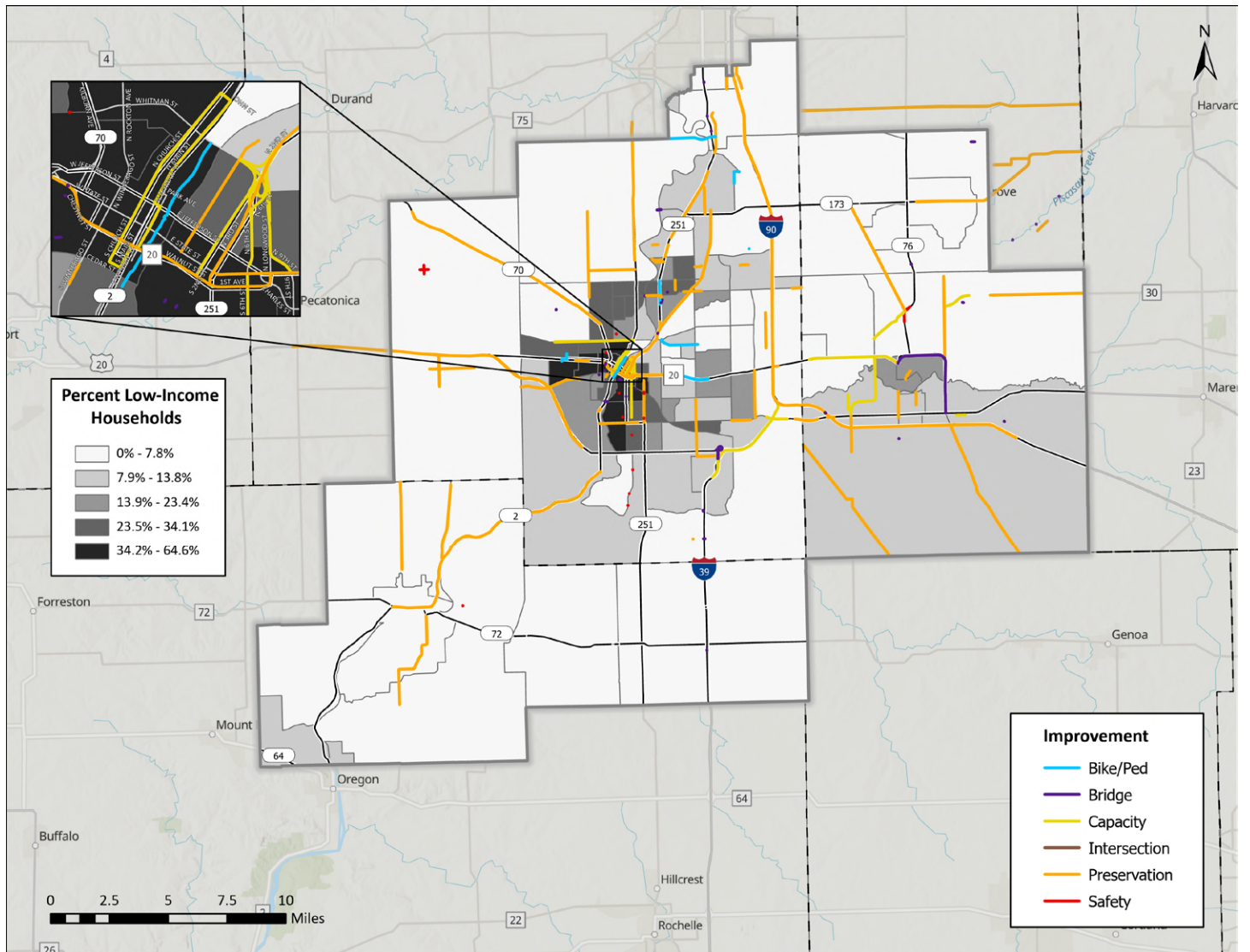


Figure 7: Population Category Threshold by Limited English Proficiency

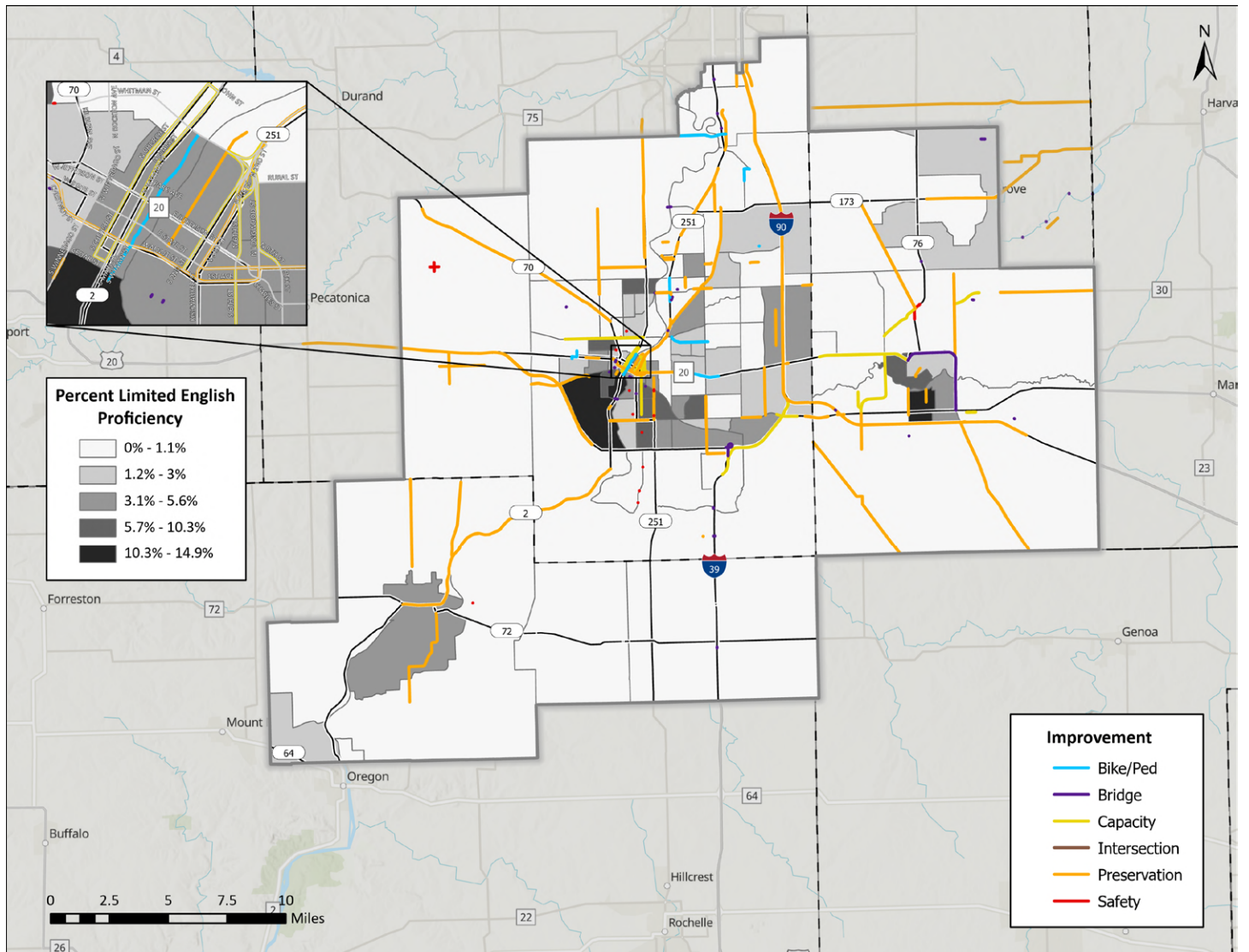


Figure 8: Population Category Threshold by People with Disabilities

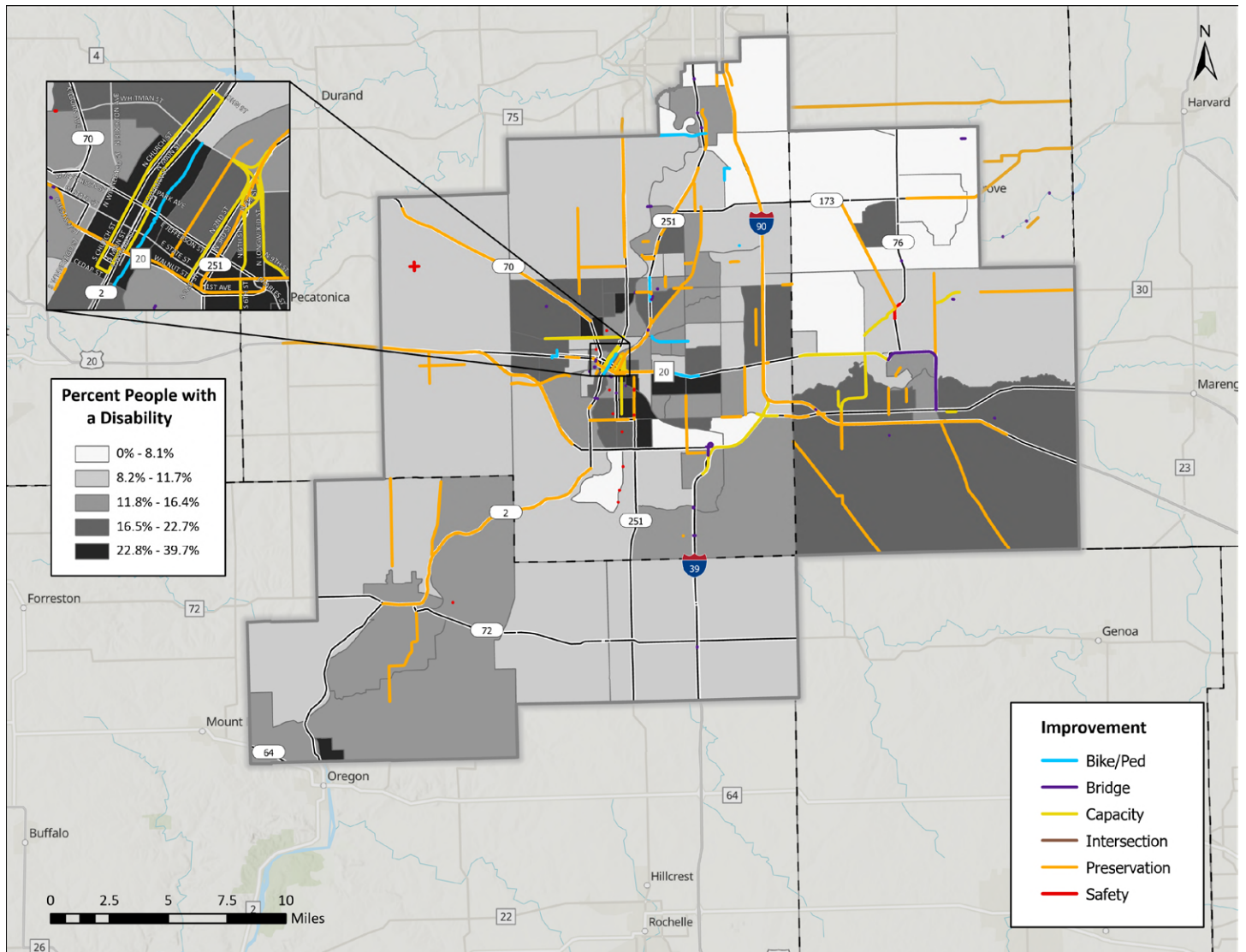


Figure 9: Population Category Threshold by Youth

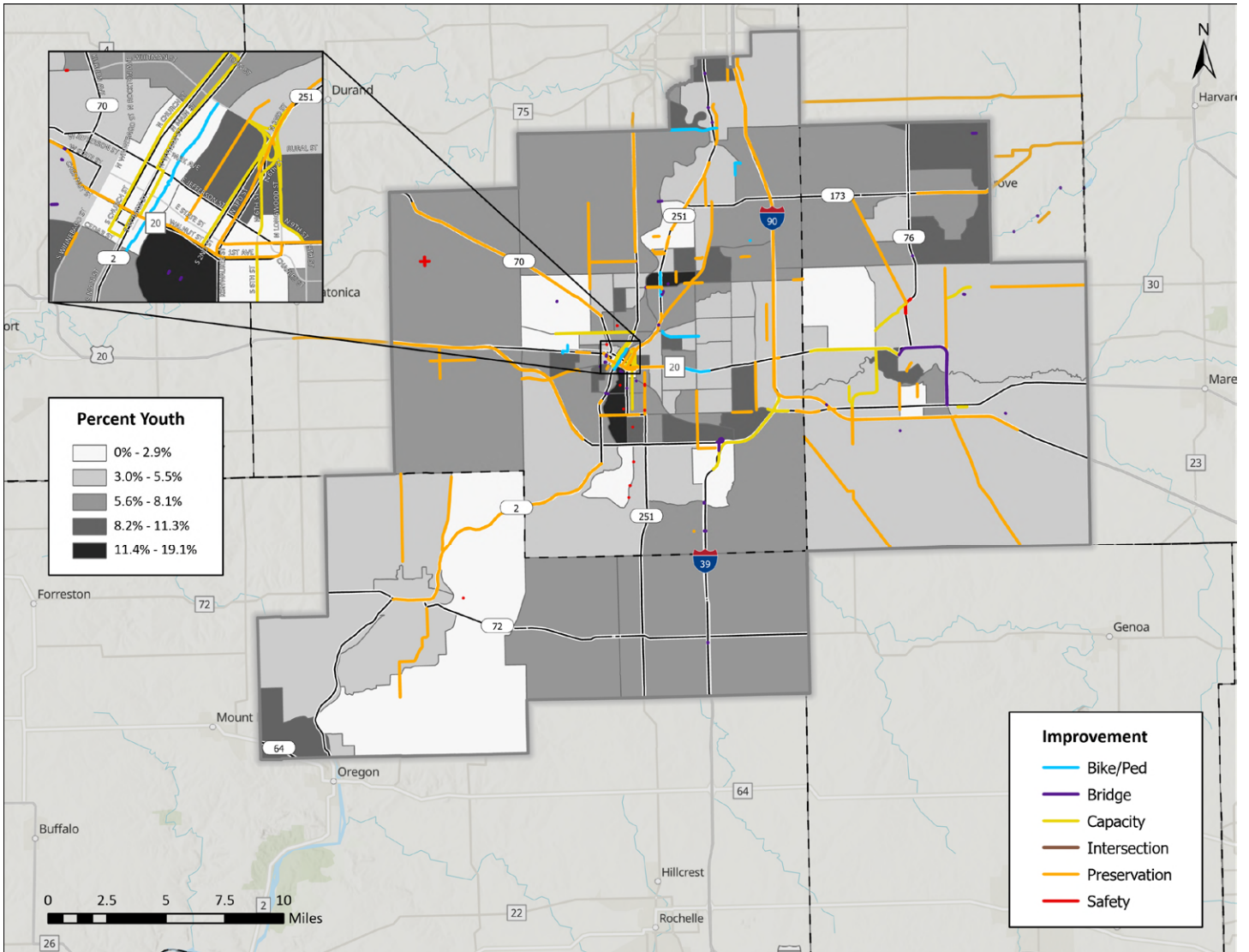


Figure 10: Population Category Threshold by Seniors

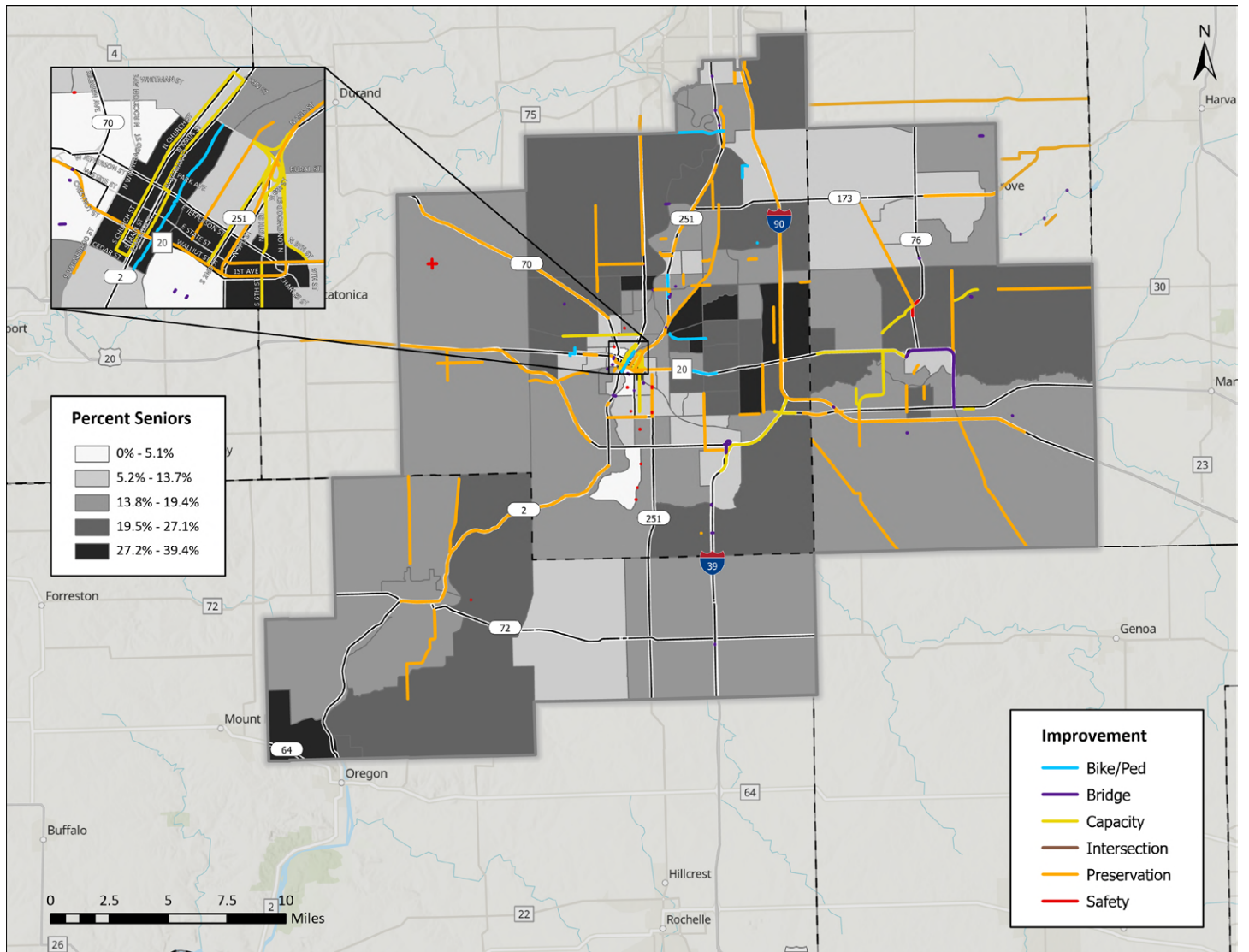


Figure 11: Population Category Threshold by Zero-Vehicle Household

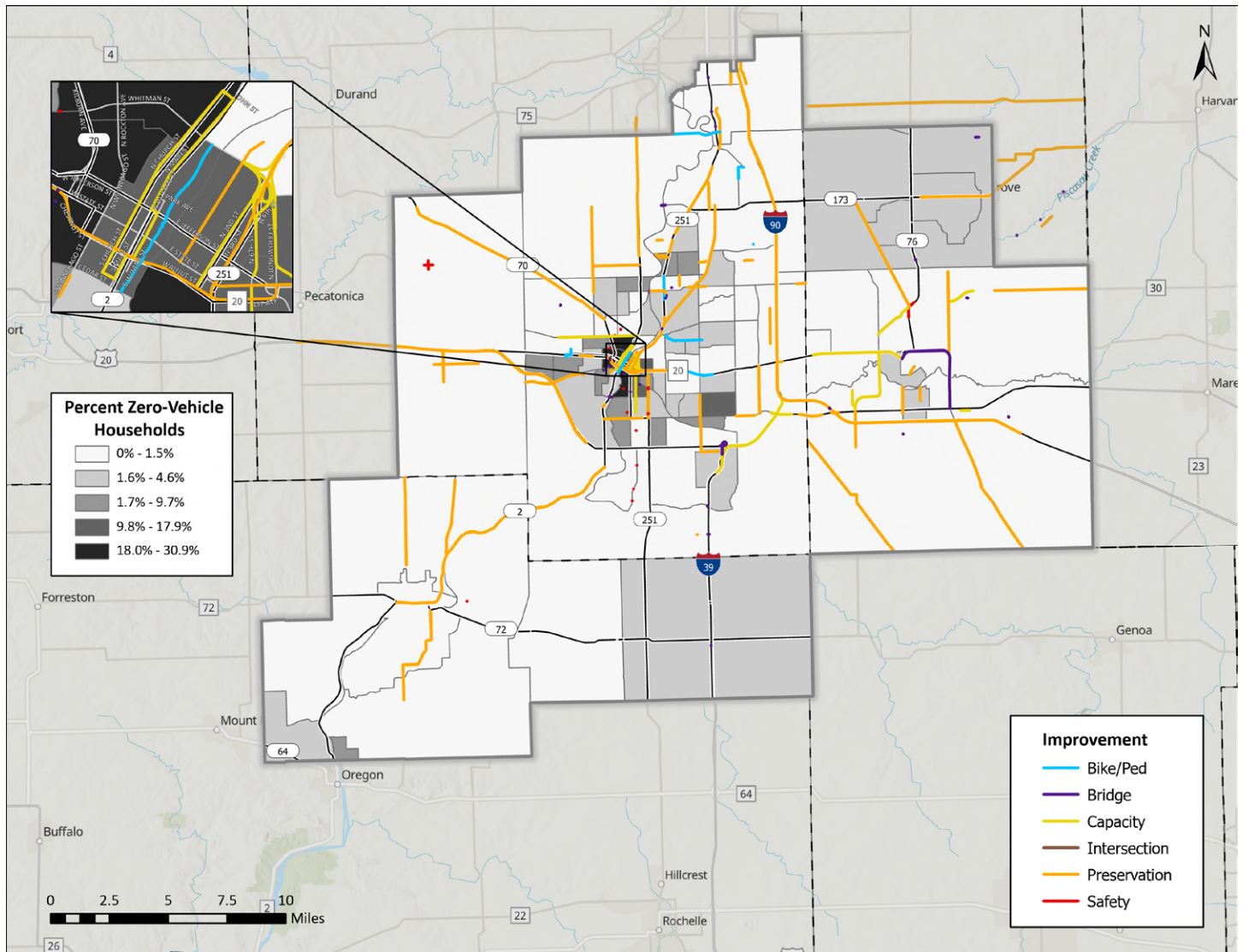


Figure 12: Population Category Threshold by Single Parent Household

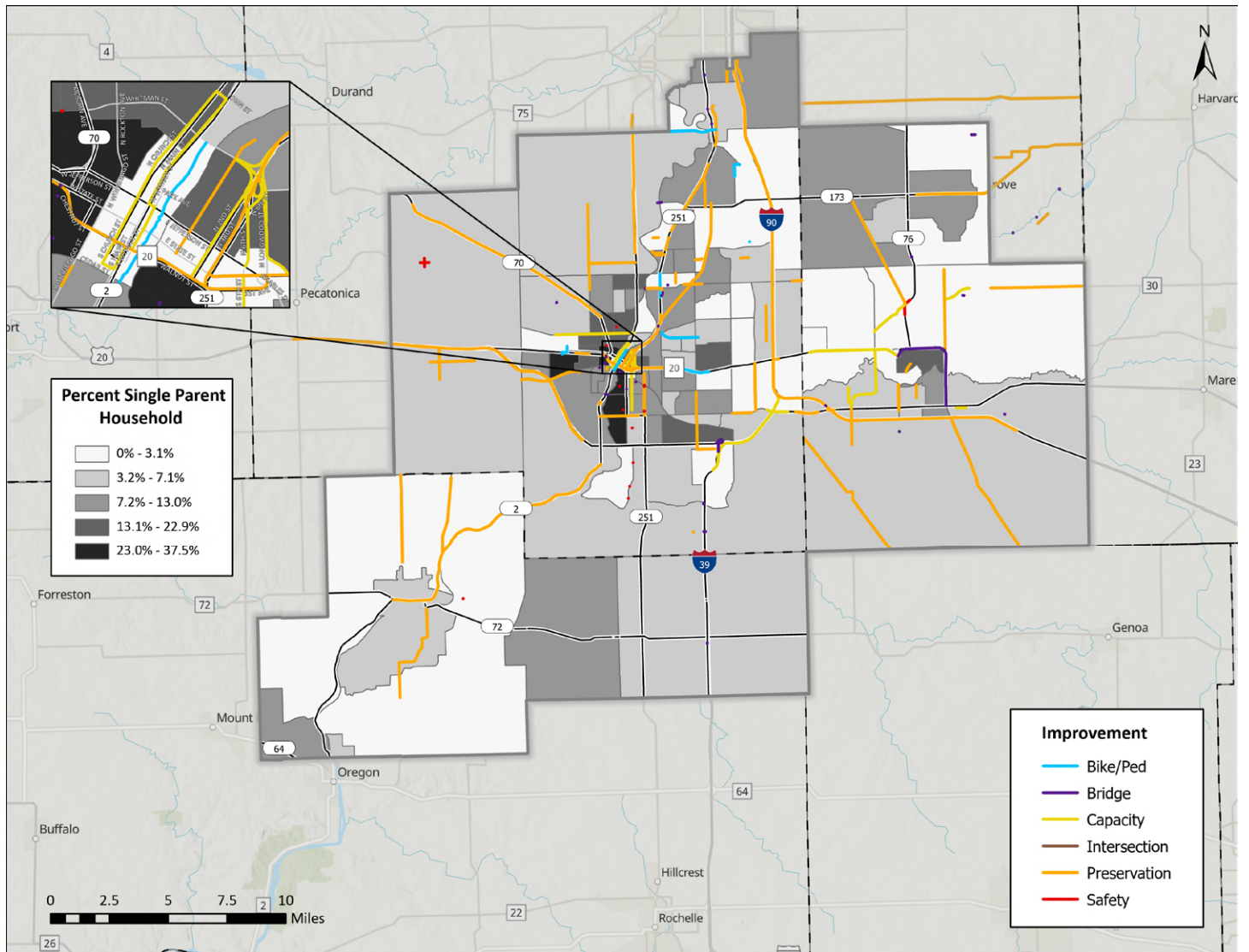


Figure 13: Population Category Threshold by Severely Rent-Burdened

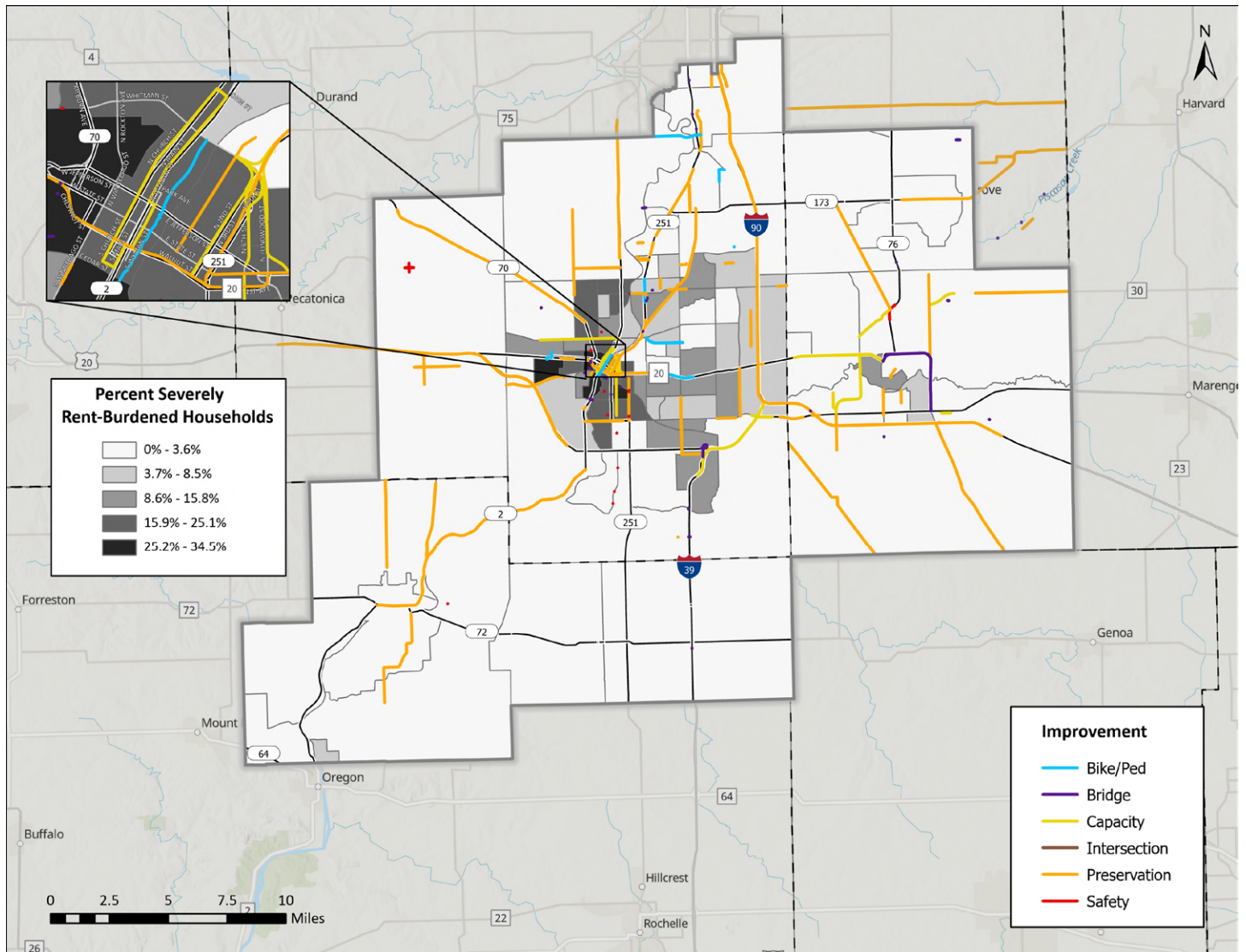


Figure 14: Population Category Threshold by Less than High School Diploma

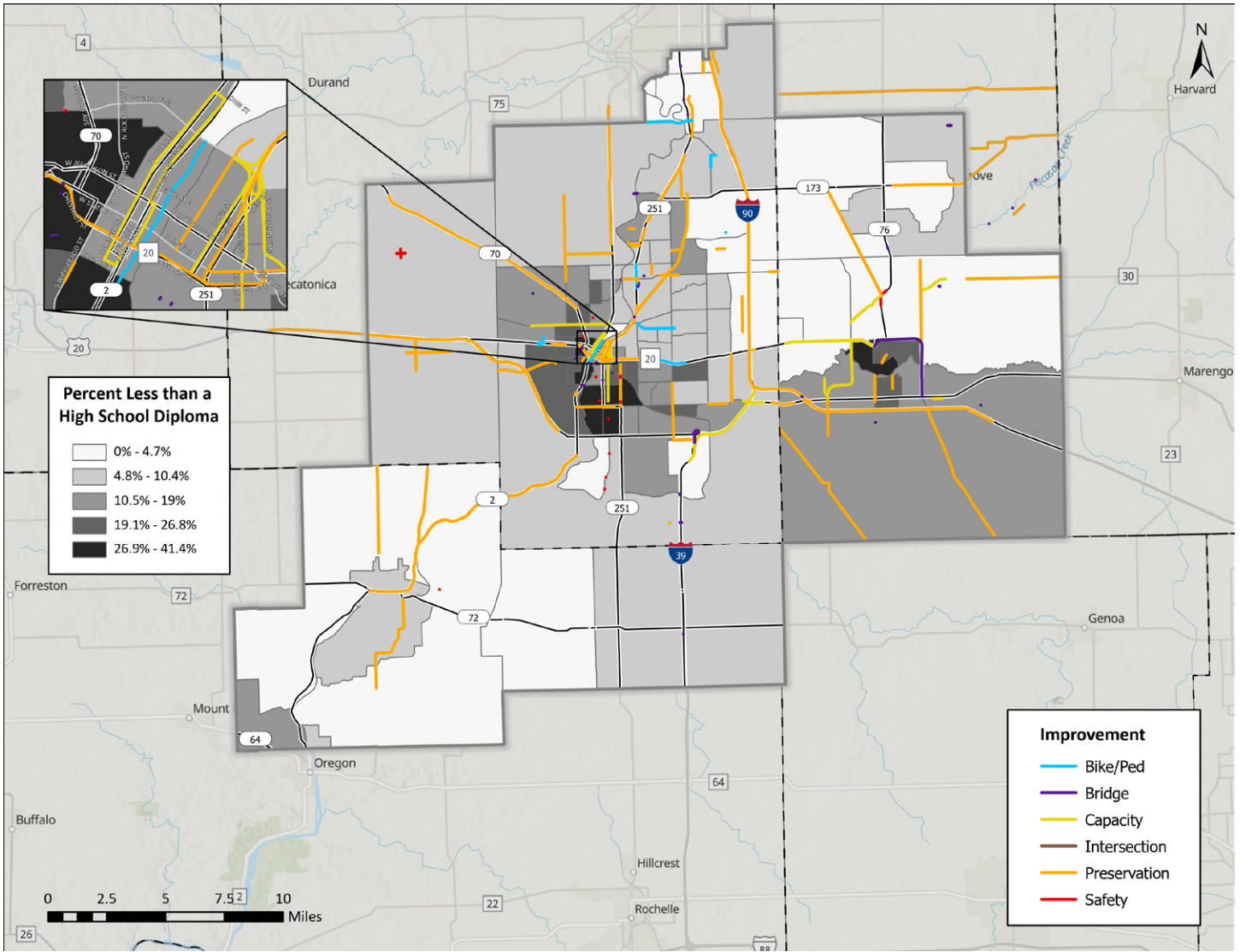
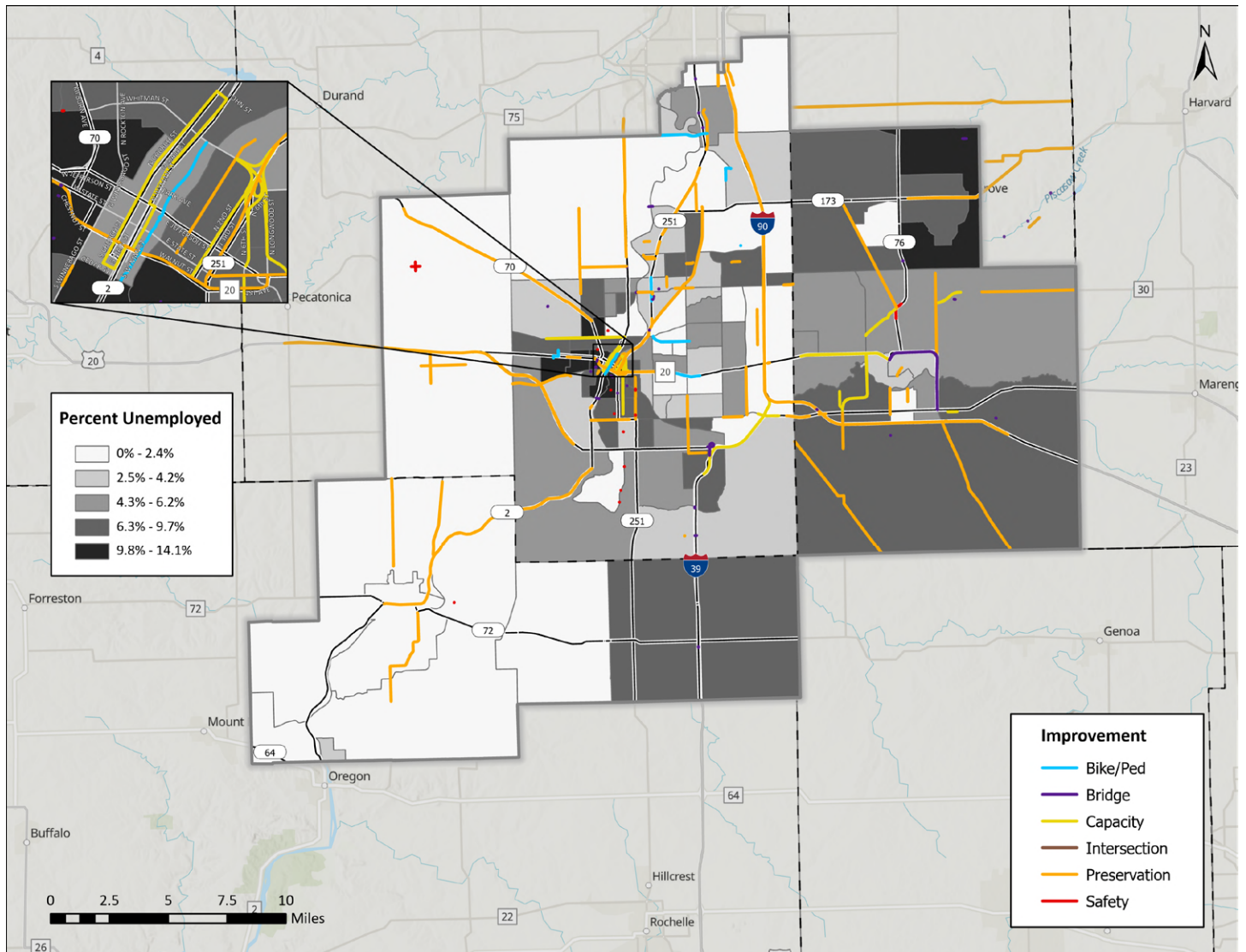


Figure 15: Population Category Threshold by Unemployed



Endnotes

i Metropolitan Transportation Commission. “Bipartisan Infrastructure Law (BIL).” Metropolitan Transportation Commission, 2025. <https://mtc.ca.gov/advocacy/federal-advocacy/bipartisan-infrastructure-law-bil>.

ii Chicago Metropolitan Agency for Planning. “Transportation Improvement Program Carbon Reduction Program.” Chicago Metropolitan Agency for Planning, 2025. <https://cmap.illinois.gov/funding-assistance/transportation-improvement-program/carbon-reduction/>.



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