

# Equitable & Sustainable Transportation

For the  
Bloomington-Normal, Illinois Urbanized Area Metropolitan Planning Organizations  
And  
The Metropolitan Planning Area



## Title VI Plan 2024

Public Participation Plan &  
Language Assistance Plan

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# McLean County Regional Planning Commission Transportation Committees

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# McLean County Regional Planning Commission

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Carl Olson  
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Rory Roberge  
Town of Normal

Katie Ruder  
City of Bloomington

## Section 1: INTRODUCTION

Access to transportation is a central concern in our daily lives. People rely on many types of transportation to get to school, commute to work, buy household goods and reach essential services such as health care. The need to move around the community for these and many other reasons is not limited to selected social, economic or age characteristics, or by ethnic and racial identity, but is a necessity of all people.

Today, access to transportation is more vital than ever, despite the advent of online education, remote work, e-commerce, and other shifts in how daily life is lived in our era. Not every person inhabits the world where the logistics of economic activity, education and mobility are defined by the space between a person and a smart phone. Access to and use of the relevant technologies can be difficult for people facing challenges such as poverty, physical or cognitive disabilities, constraints due to age, and the racial and ethnic discrimination that still permeates our society.

### In This Plan

This plan explains the steps that the McLean County Regional Planning Commission (MCRPC) takes to ensure that every person can participate in the planning work carried out by MCRPC. To assess what portion of the population falls within the parameters of Title VI civil rights protections, the plan describes the demographic characteristics of the planning area population, along with general characteristics of the community and planning area. It also analyzes their geographical distribution in the community (Section 2). The plan incorporates the Public Participation Plan (Section 3) and Language Assistance Plan, to involve and assist community members for whom English is not their primary language due to national origin (Section 4). MCRPC organization and MPO functions are described in Section 5. Sections 6 and 7 of the plan deal with oversight and procedural requirements for maintaining Title VI compliance.

The MCRPC notification to the public of its Title VI Notice to the Public follows on page 2. This statement of our commitment to the statutory and regulatory processes for Title VI compliance, and to the civil rights protections embodied by Title VI and related or successor legislation, is available to the public through posting on our website and display in our offices, and upon request to our staff.

Title VI Notice to the Public

*for the* McLean County Regional Planning Commission -  
Metropolitan Planning Organization for the Bloomington-Normal Urbanized Area

The Mclean County Regional Planning Commission (MCRPC) assurance that no person shall on the grounds of race, color, national origin, or sex, as provided by the Title VI of the Civil Rights Act of 1964 and related statues, executive orders and regulations, be excluded from participation in, be denied the benefits of or otherwise be subjected to discrimination under any program or activity receiving federal financial assistance.

The McLean County Regional Planning Commission further assures that every effort is made to ensure nondiscrimination in all of its programs and activities, regardless of funding source or support.

In the event that the McLean County Regional Planning Commission distributes federal assistance to a consultant, contractor or subcontractor, or other participant, MCRPC will incorporate Title VI adherence language written into agreements and will monitor the consultant, contractor or subcontractor, or participant for compliance.

The MCRPC Title VI Coordinator is responsible for initiating and monitoring Title VI activities, preparing required reports and undertaking other required responsibilities.

Any person who believes him/herself or any specific class of persons, to be subjected to discrimination prohibited by Title VI in any MCRPC program or activity may by him/herself or by representative file a written complaint with MCRPC by mail, email, or other electronic transmission using the form found [<https://mcplan.org/about-mcrpc/title-vi>] (or in Appendix D. Contact MCRPC via [JSicks@mcplan.org](mailto:JSicks@mcplan.org) or at 309-828-4331 for a complaint form or further information.

Complaints may also be made directly to the Federal Transit Administration; please direct inquiries to the Office of Civil Rights, 1200 New Jersey Avenue, SE, Washington, DC 20590, or visit their website [File a Complaint with FTA | FTA \(dot.gov\)](#) to file a complaint online.

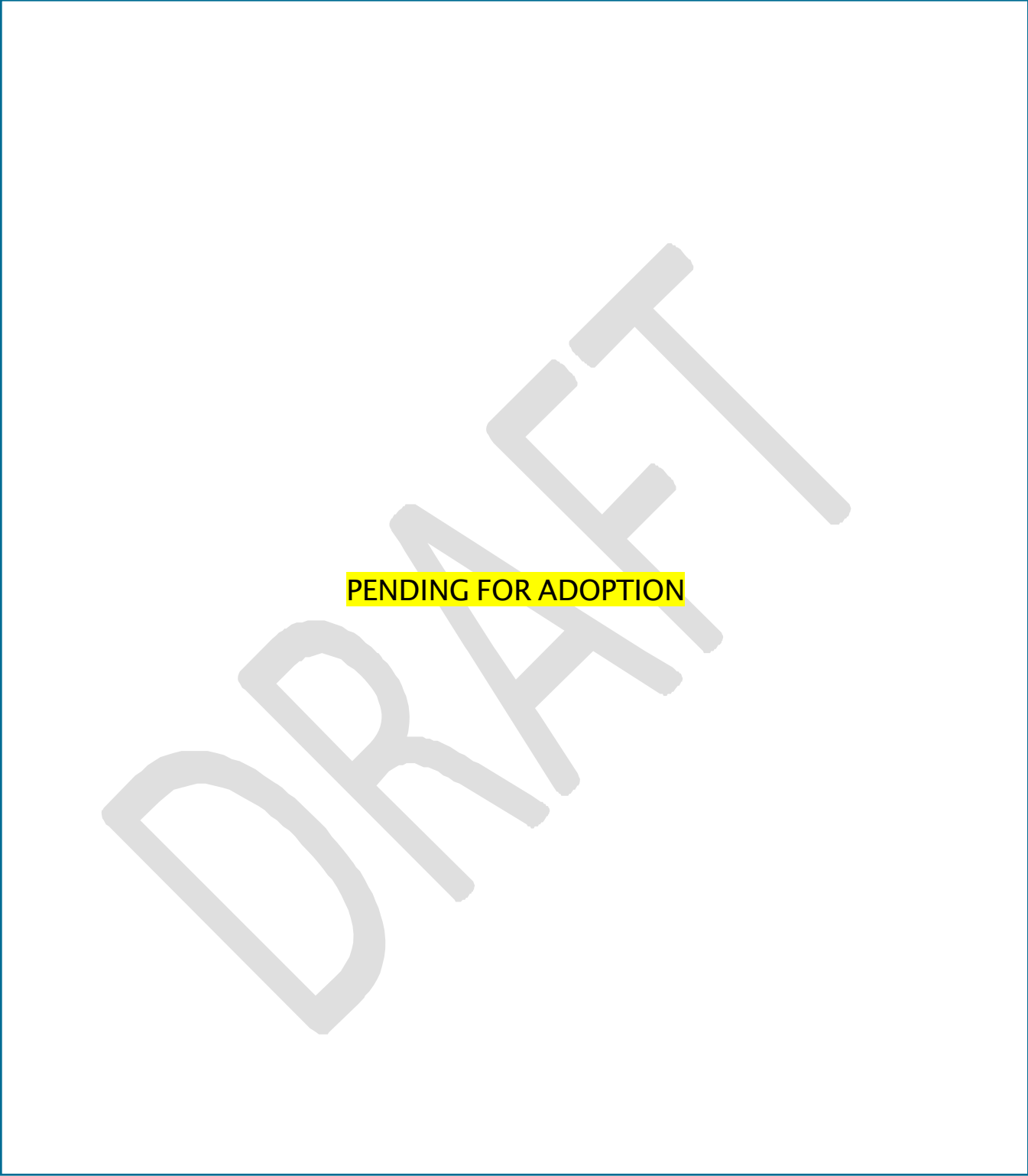
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By Raymond Lai, Executive Director

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Date

McLean County Regional Planning Commission



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## History and Context

Efforts to ensure compliance with federally funded programs managed by local or state governments are rooted in the United States Constitution. Specifically, the 5<sup>th</sup> Amendment's assurance of due process, and the 14<sup>th</sup> Amendment's extension of the Due Process Clause to the states lay the foundation. The century spanning from the ratification of the Reconstruction Amendments and the intense period of civil rights activism, advocacy, and legislative action of the 1960's witnessed considerable, albeit partial, advancements in the safeguarding equal protection under these rights.

In 1962, Congress approved, and President Kennedy signed an updated Federal-Aid Highway Act. This legislation mandated that in urbanized areas, Federal-Aid Highway projects approved after July 1, 1965, must adhere to a "Continuing and comprehensive transportation planning process carried on cooperatively by states and local communities." This is commonly known as the 3-C planning process.

The Federal-Aid Highway Act required that coordination of certain urban transportation projects funded by the Federal government across various levels of government<sup>1</sup>. This emphasis on a cooperative approach to transportation planning empowered states and local governments of a particular size, providing them with a direct involvement and the chance to express concerns and propose alternatives regarding Federal transportation projects, and other projects supported by Federal resources.

Title VI of the Civil Rights Act (42 U.S.C. 2000-1) states 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 subjected to discrimination under any program, or activity receiving Federal financial assistance."*

*The Executive Order on Environmental Justice<sup>1</sup> amplified Title VI by providing that:*

*"Each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations."*

*Executive Order 13166 on Limited English Proficiency expanded the reach of Title VI*

*"To improve access to federally conducted and federally assisted programs and activities for persons who, as a result of national origin, are limited in their English proficiency"*

<sup>1</sup> The expanding projected cost of the National Interstate and Defense Highways system, initiated by the 1956 Federal-Aid Highway Act, caused notable opposition to the interstate highway initiative. In addition, by the early 1960s, secondary impacts and their concentration in low-income and/or minority neighborhoods were evident.

However, relying solely on the 3-C process alone was not sufficient to break down the many barriers to transportation access that limited everyone's ability to freely use the transportation system. Initially, the process did not protect disadvantaged communities from disproportionate negative impacts of highways disrupting existing transportation options or dividing neighborhoods. During the development of the interstate system, local concerns did not have much influence on changing the system, as decisions were primarily based on federal goals and purposes.

To address this and other inequalities in federal authority, further federal action was needed. As the 1962 Federal-Aid Act was being implemented, the Civil Rights Act of 1964 (CRA) was introduced to address these issues.

The CRA aimed to ensure that all Americans' constitutional rights were fully protected under Federal law. It specifically applied to the numerous instances in which federal funding was applied to transportation, housing, education, economic development, and other government investments that expanded after the New Deal era and during the post-war period.

In a time when racial segregation was still accepted and openly practiced in a substantial portion of the country, and when efforts to address discriminatory policies were limited to narrow issues through legislative and judicial means, the CRA created a new kind of guarantee<sup>2</sup>.

In 1964, transportation services were regularly restricted to exclude people of color, including through the de facto use of the same "separate but equal" mindset rejected by the Brown decision. Throughout the country, state and local governments continued old practices often with the encouragement of citizens satisfaction with the status quo. However, when federal funding was used for transportation projects under the Federal-Aid Highway legislation, the power of the CRA became clear. Just as the military and industry wanted the Interstate highways to bolster Cold War readiness and facilitate the distribution of goods during the post-war economic growth, rapidly developing communities across the country wanted federal support to meet the needs and aspirations of their residents.

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<sup>2</sup> Heart of Atlanta Motel v. United States (1964) - In his concurring opinion in the Heart of Atlanta case, U.S. Supreme Court Justice Arthur Goldberg emphasized, "The primary purpose of the Civil Rights Act of 1964 ... is the vindication of human dignity and not mere economics."

The civil rights conditions tied to federal investment in community growth under the CRA served as an indirect yet powerful incentive. The influence of Federal funding, along with its associated requirements, could and was imposed on governmental bodies down to the local level. While this did not end discrimination in any sense, it did establish a pathway for seeking remedies through Congress and the courts.

This process is not yet complete, both in general and particularly concerning transportation access. Advocacy efforts have led to the recognition of needs not originally considered. As a result, additional legislation and executive actions have expanded the scope of the Civil Rights protection to include individuals limited in their use of the transportation system due to numerous factors, some of which have only recently been acknowledged. The best-known example is the Americans with Disabilities Act (ADA) of 1990, which addressed significant barriers to transportation access for people with physical, mental, and cognitive disabilities. It established an evolving framework of accessibility to resources, including different modes of transportation. Over decades this incentive to utilize Federal funding has spurred oversight and regulatory actions to fulfill the diverse aims of the CRA.

Executive orders required that when building infrastructure, careful consideration must be given to its impact on both disadvantaged areas and the natural environment. This mandate was reinforced by infrastructure programs requirements set forth by the Environmental Protection Agency. Additionally, recent recognition of access challenges faced by individuals with limited English proficiency has led to the incorporation of their needs and concerns into the transportation planning process.

Title VI Policy Statement

The McLean County Regional Planning Commission (MCRPC) assures that no person shall, on the grounds of race, color, national origin or sex, as provided by Title VI of the Civil Rights Act of 1964 and the Civil Rights Restoration Act of 1987 (PL 100.259), be excluded from participation in, denied the benefits of, or be otherwise subjected to discrimination under any program or activity.

MCRPC further assures that every effort will be made to ensure nondiscrimination in all of its programs and activities whether or not those programs and activities are federally funded. In the event MCRPC distributes federal aid funds to another governmental entity, MCRPC will include Title VI compliance language in all written agreements and will monitor for compliance.

MCRPC's Title VI Coordinator is responsible for initiating and monitoring Title VI activities, overseeing the preparation of required reports and overseeing other MCRPC responsibilities as required by Title 23 CFR part 200 and Title 49 CFR part 21.

---

By Carl Teichman, Chair

Date

McLean County Regional Planning Commission

## Section 2: DATA & ANALYSIS

To plan effectively, it's crucial to gather reliable information about the people in our area and their needs, including transportation needs. This involves gathering basic demographic information such as age, gender, race or ethnicity, nationality, disability status, English language proficiency and income status. These factors are central to the Civil Rights Act and other related legislation, executive orders, and regulations.

When conducting community surveys to collect information, we request that respondents provide some demographic details about themselves or their families. While people generally respond to these questions, some may leave them blank or object to including them all together.

Some individuals who object often say that these factors "shouldn't matter," and that decisions regarding public infrastructure or services should be made without this community context. However, it's historically evident that these considerations do matter, and public policy and practice have been and sometimes continues to be designed to exclude people from exercising rights that the law acknowledges as theirs.

### **MCRPC Data Standards**

MCRPC collects and analyzes demographic data on race, ethnicity, minority groups, income level, and language spoken at home, as well as participants and beneficiaries of federally funded programs. Our primary tool is U.S. Census data, supplemented with locally generated information, public opinion surveys, and self-identification on surveys and questionnaires.

MCRPC uses this information in transportation planning for the following reasons:

- To determine any adverse impacts or benefits of potential projects on minority and low-income neighborhoods.
- To ensure equality in evaluating project applications submitted for inclusion in the Long-Range Transportation Plan and the Transportation Improvement Program.
- To develop public outreach strategies.

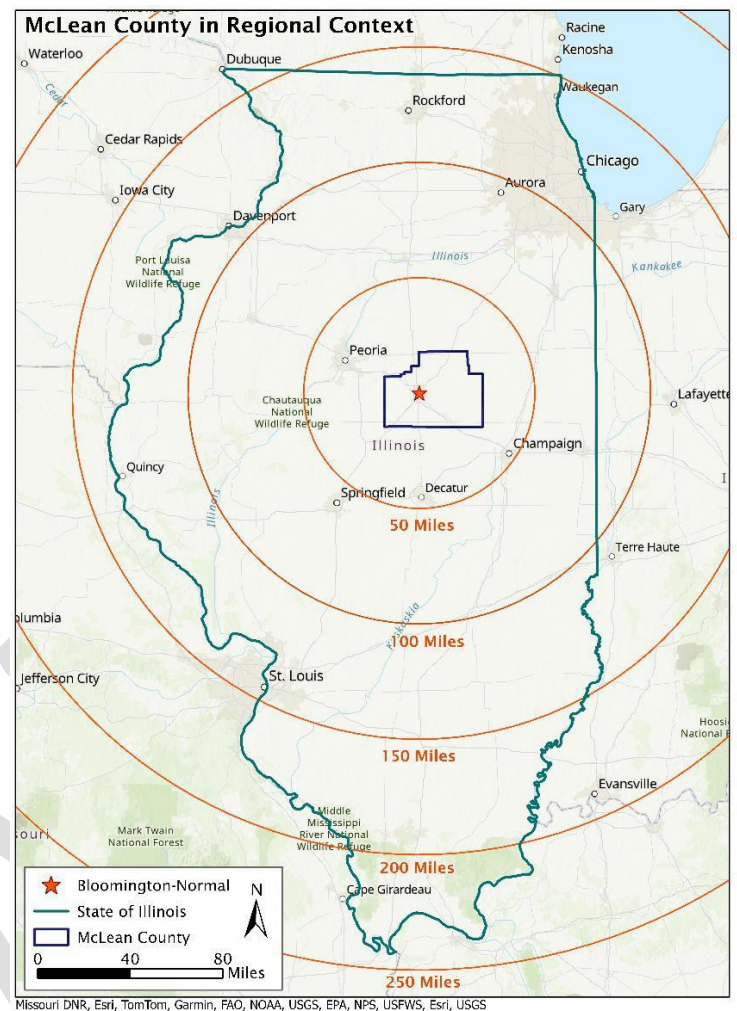
The data collected are reviewed to ensure that MCRPC continues to meet the requirements of the Title VI Program.

## Community Characteristics

The Bloomington-Normal urbanized area is located at the core of Central Illinois, and thus of the multistate Midwest region. Although as illustrated in Map 2.1, right, our urban center in McLean County is well connected to state and national transportation systems, the focus in this plan is on the transportation options available to our residents, particularly for people in groups or locations within the community that have traditionally been underserved by the transportation system.

The MCRPC Metropolitan Planning Area (MPA), initially defined by Census results and refined by the MPO and partner agencies, includes the urbanized area based on the 2020 Census, and the surrounding area which may be expected to develop over a 20-year period. The MPA is illustrated on Map 2.2 on page 11, opposite.

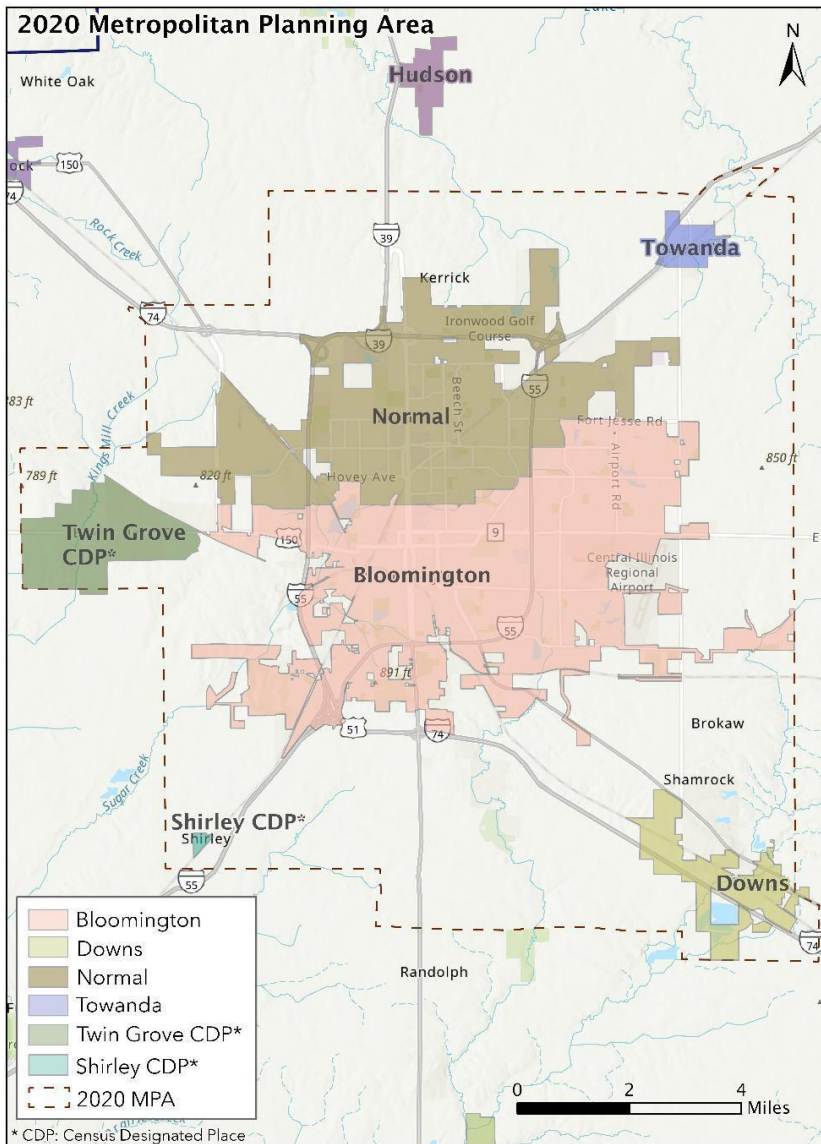
Map 2.1



It is worth noting that in the most recent comprehensive plans for Bloomington and Normal comprehensive plans, there is an emphasis on infill development. Following the 2020 Census and its definition of the urbanized area, revisions to the MPA are in progress in accordance with the comprehensive plans, and the Metropolitan Long-Range Transportation Plan 2050, adopted in late 2022. The redefined urban area, based on the 2020 Census, excludes the Village of Downs, but retains the Village of Towanda. Once confirmed by the Federal Highway Administration, revisions to the MPA, based on the updated urban area definition, will be reviewed, and approved by the MPO Policy Committee.

**Map 2.2**

## The Community



Bloomington-Normal has an estimated population of 134,100 people, comprising more than three-quarters of the population of McLean County.

Between 1970 and 2005 the best ongoing description of the Bloomington-Normal population has been “bigger.” During this period, both municipalities experienced very rapid population growth, often the fastest in Downstate Illinois. Principal drivers for this growth included the employment expansion at State Farm, and the Illinois State University transition from a small teachers’ college in the 1950s to a major State university in the 1970s.

These changes alone were substantial and created follow-on effects on the community’s demographic profile and economic development.

Each new State Farm staff member or ISU faculty member likely brought with them spouses who possibly joined the workforce, children needing schools, and everyone needing a place to live. Keeping pace with rapid growth and providing the resources and amenities to sustain it dominated development in the community for decades.

However, this presumably stable pattern of growth was radically altered by the global economic crisis that began in 2009, and the concurrent collapse of the housing market in the United States. In earlier years, the Bloomington-Normal area had been resistant to national economic trends, maintaining a steady pattern of growth despite shifts in regional and national

conditions. The global recession was an exception. Expecting a rapid recovery, businesses and residents of McLean County struggled with several years of economic and population growth stagnation.

This situation was further complicated by corporate restructuring undertaken by State Farm Insurance, announced in 2013. This process involved the transfer of a substantial percentage of employees then based in the Bloomington headquarters to regional hub offices in Atlanta, Dallas, and Phoenix. As State Farm is historically the area's largest employer, this move was seen as a further strike against the post-recession recovery, notably given its impact on the area housing market.

Later in the decade, the acquisition and re-opening of the former Mitsubishi auto plant by Rivian began a broader revitalization of the area. As of the 2020 Census, population growth in the region remained stable. However, between the 2010 and 2020 Census, there was a moderate increase in population for the entire county, as well as for the City of Bloomington and the Town of Normal.

It's premature to thoroughly assess the effects of the COVID pandemic on Bloomington-Normal and McLean County; this will remain a topic of ongoing research and analysis. Additionally, these impacts are not yet resolved, as COVID-19 cases continue to fluctuate.

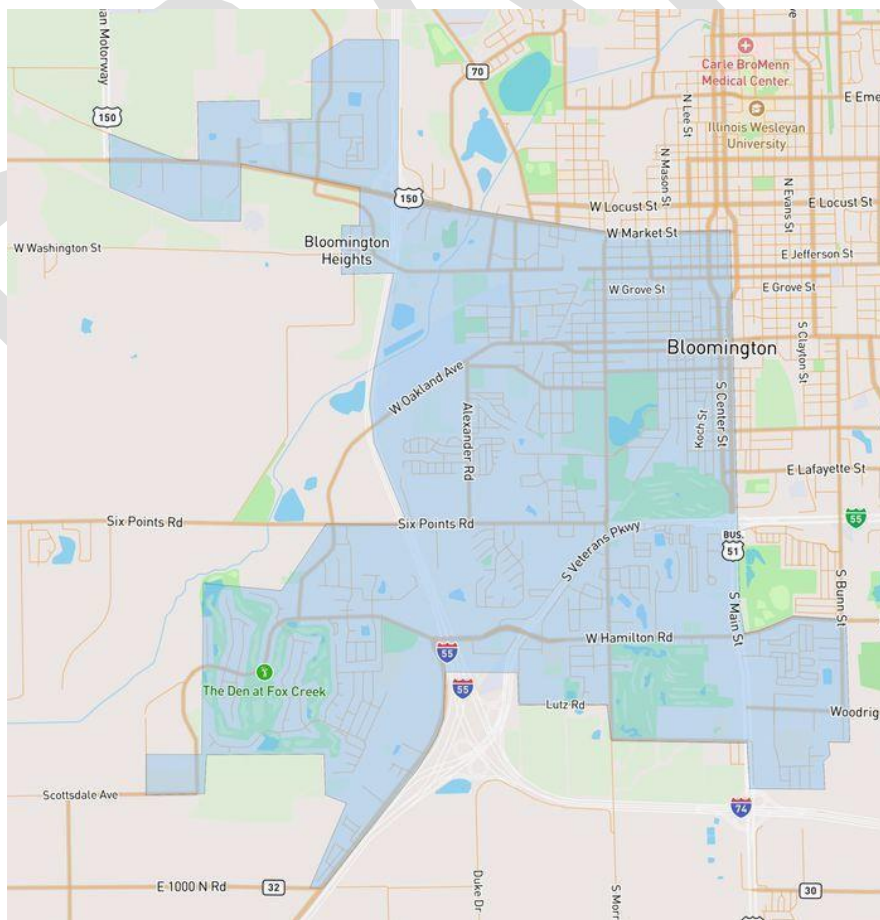
## Transit Development and Access

In the post-pandemic period, Connect Transit has implemented a series of changes to expand rider access. The fixed-route system is subject to ongoing testing and evaluation of its efficiency.

Connect Transit has also created a new category of service that provides access beyond the reach of the fixed-route network. Flex service is currently operating as a pilot project in the southwestern quadrant of the urban area, shaded in blue in the map below. The Flex system provides a form of demand-response service within the Flex zone and provides access to transfer locations on the fixed-route network. Connect Transit continues to evaluate the performance of this new category of service, and to prepare for implementation of additional Flex zones.

Map 2.3

Connect Transit Pilot Flex Zone



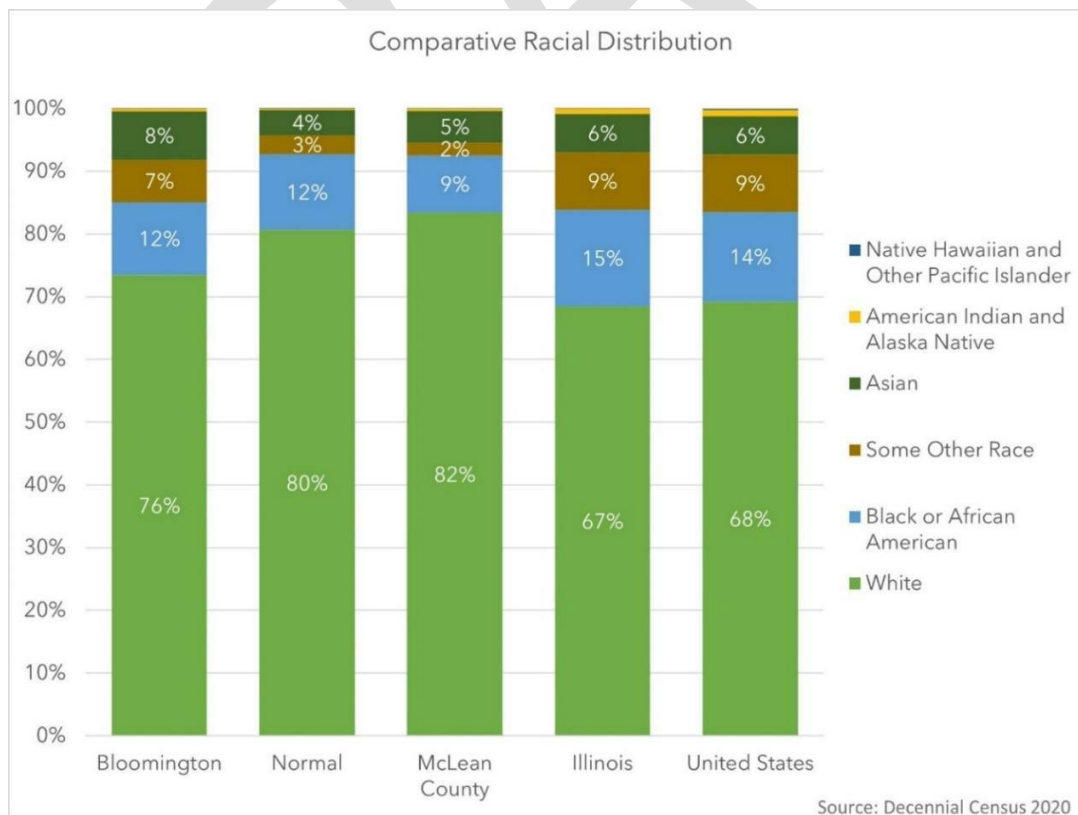
## Demographics

There is a common belief that compared to other areas in the region, Bloomington-Normal is exceptionally diverse in terms of race and ethnicity. However, this assumption is not supported by the data.

Based on the 2020 Census results, McLean County, and the Bloomington-Normal area notably less diverse in terms of racial and ethnic identification than the state or the country. Illustrated in Chart 2.1, as of the 2020 Census the Bloomington, Normal and McLean County were more homogenous by race than the Illinois or nation. Given the imbalance in population between the urban area (78.5% of total population) and the remainder of McLean County (21.6 % of 2020 population), the urban statistics have a strong impact on the racial and ethnic distribution overall.

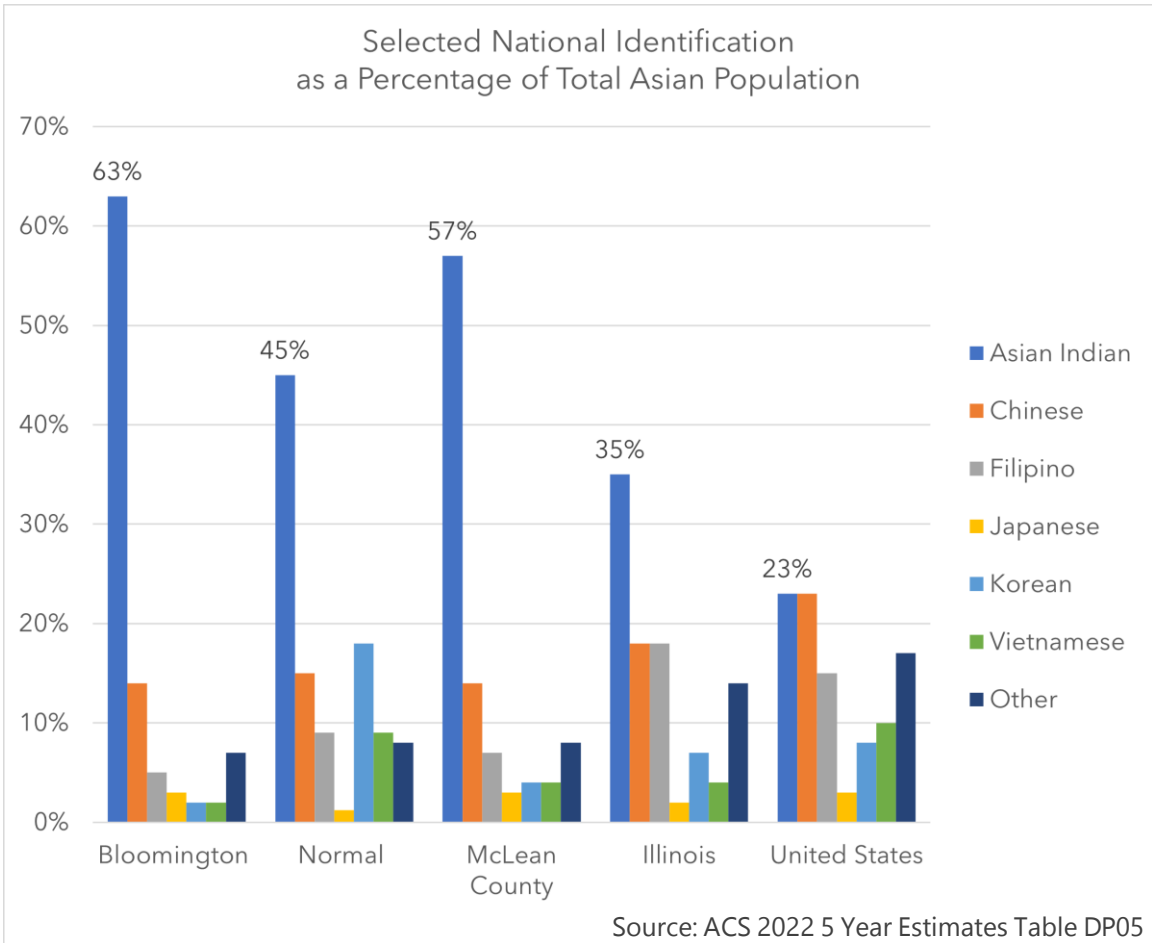
These results are not unexpected in the context of central Illinois, and the nature of the regional economy. The continuing presence of State Farm Insurance headquarters and the arrival of Rivian Automotive manufacturing plant are the most recent in a series of indicators that document shifts between manufacturing and other industrial pursuits and economic sectors focused on people working in offices and in retail. Universities and college, and two healthcare conglomerates provide a diversity in occupational type if not in race or ethnicity.

Chart 2.1



There is one ethnic group that occupies a larger section of the area population than might be anticipated, those identifying as Asian. In Bloomington, 8% the population is Asian, a higher proportion than found at the state and national levels, while Normal’s Asian population falls slightly below those levels of 5%. Shown in Chart 2.2, the total population of Asian residents is dominated by people identifying themselves as South Asian, originating predominantly from India, with a small percentage of the total from China or Korea. The remaining Asian residents identify national origins in Southeast Asia, East Asia, Japan, Vietnam, and the Philippines.

Chart 2.2



## Underserved or Challenged Population Groups

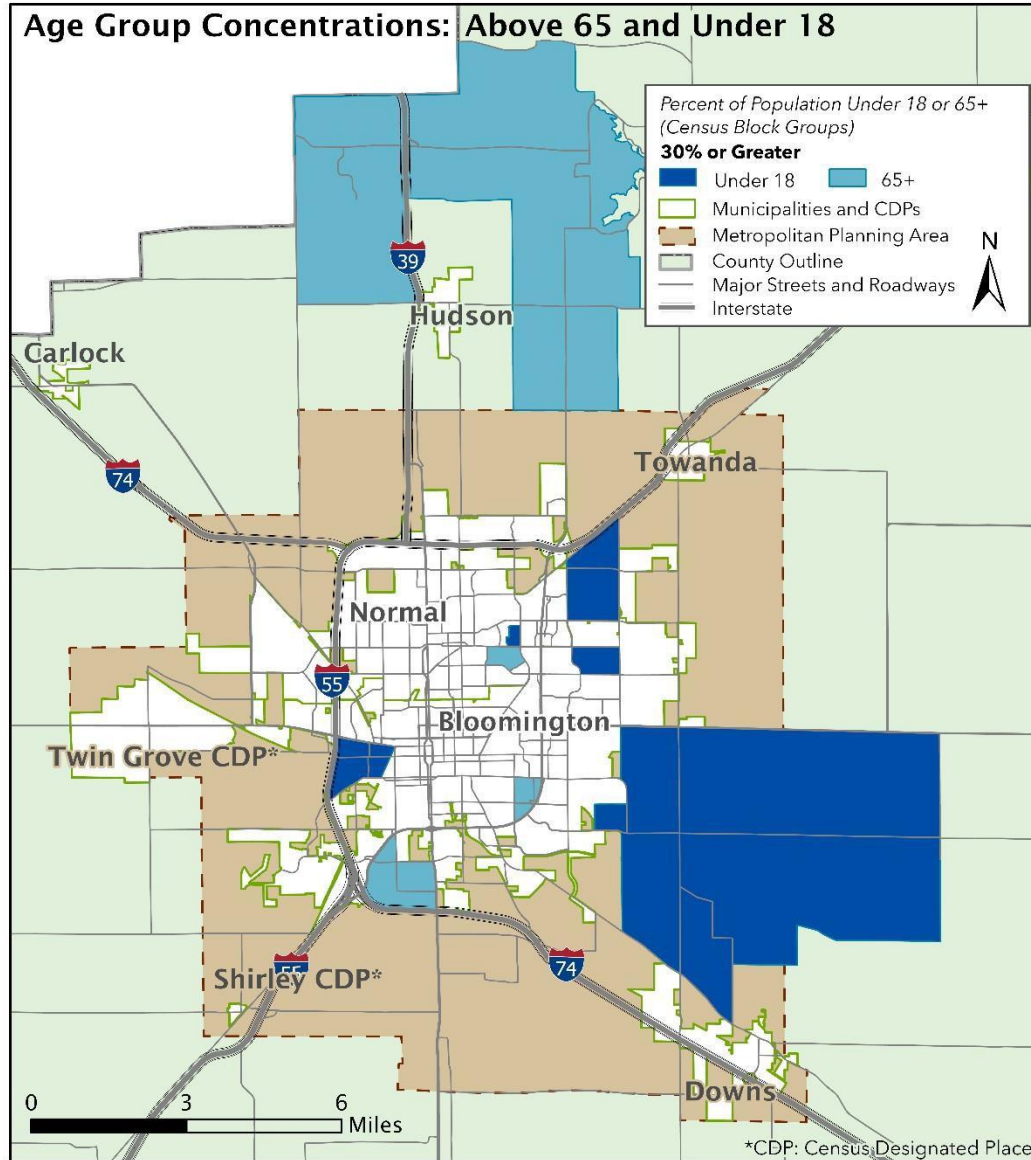
The transportation system works best when everyone in the community can easily reach the services, products, and opportunities they require, with any necessary support. Federal civil rights laws passed over the last fifty years have emphasized this principle. These laws provide protection against discrimination and unfair treatment for different groups, such as minorities, seniors youth, individuals with disabilities, and those with limited English proficiency. Over time, as these laws have developed and encountered legal tests, regulations have been adjusted and definitions of protected groups have been revised.

The law mandates that discrimination is prohibited whenever Federal funds are used. These requirements extend beyond Federal initiatives to include any activity or program receiving Federal funding, regardless of whether it's managed by non-federal governmental entities or profit or non-profit private sector organizations. The use of such funding is controlled by contracts requiring compliance with program regulations and restrictions.

For instance, a common regulation ensures that passengers using certain supported transportation programs supported by the government are not subjected to trips lasting longer than an hour. Some agencies are obligated to meet regulatory standards from multiple granting agencies, requiring compliance with various requirements for program activities. These rules are typically implemented to protect program participants or service providers. They are often established or reinforced in response to injuries or fatalities to program participants to prevent future occurrences.

This section will provide an analysis of geographical areas characterized by the concentration of disadvantaged populations. It begins with an examination of the geographical distribution of these two vulnerable populations: children 18 or under, and adults aged 65 or older, identifying where the aggregate of these groups meets or exceeds the threshold of 30% of the population in a Census block group. Map 2.4, *Age Group Concentrations*, on pg. 17 illustrates this distribution.

Map 2.4



Focusing on the Metropolitan Planning Area, locations of age group concentrations are distributed throughout and outside of Bloomington and Normal. Significant concentrations of population under 18 are identified to be immediately south of Market St, north of College along Towanda Ave, north of Fort Jesse Rd and south of college between Hershey Rd and Airport Rd, and north of Downs village limits to Empire St (Route).

The concentrations of population aged 65+ are located west of U.S 51 and north of the I-55/I-74 interchange, south of Oakland Ave between Mercer Ave and Veterans Parkway, and north of Vernon Ave between Towanda Ave and Grandview Dr.

Age group concentrations on the west side of Bloomington-Normal are not as well-served by community resources. For residents of West Bloomington, the lack of neighborhood access is made more acute by the distances to the nearest grocery stores and pharmacies, and the dangers for pedestrians in reaching those destinations.

Some areas of the 65+ population concentration include elder care facilities, such as assisted living facilities, nursing and rehabilitation for either short- or long-term care, and specialized facilities for people with cognitive conditions such as dementia. Several of these facilities are located south of Oakland and north of Vernon Ave. These facilities are often reliant upon payments from Medicare or Medicaid, and thus may be required to provide or facilitate transportation to residents, often using a vehicle obtained by the facility. MCRPC has worked to improve coordination between such facilities and paratransit service providers, through the Transportation Advisory Committee, and will continue these and other efforts as specified in the goals and strategies of this plan and its components.

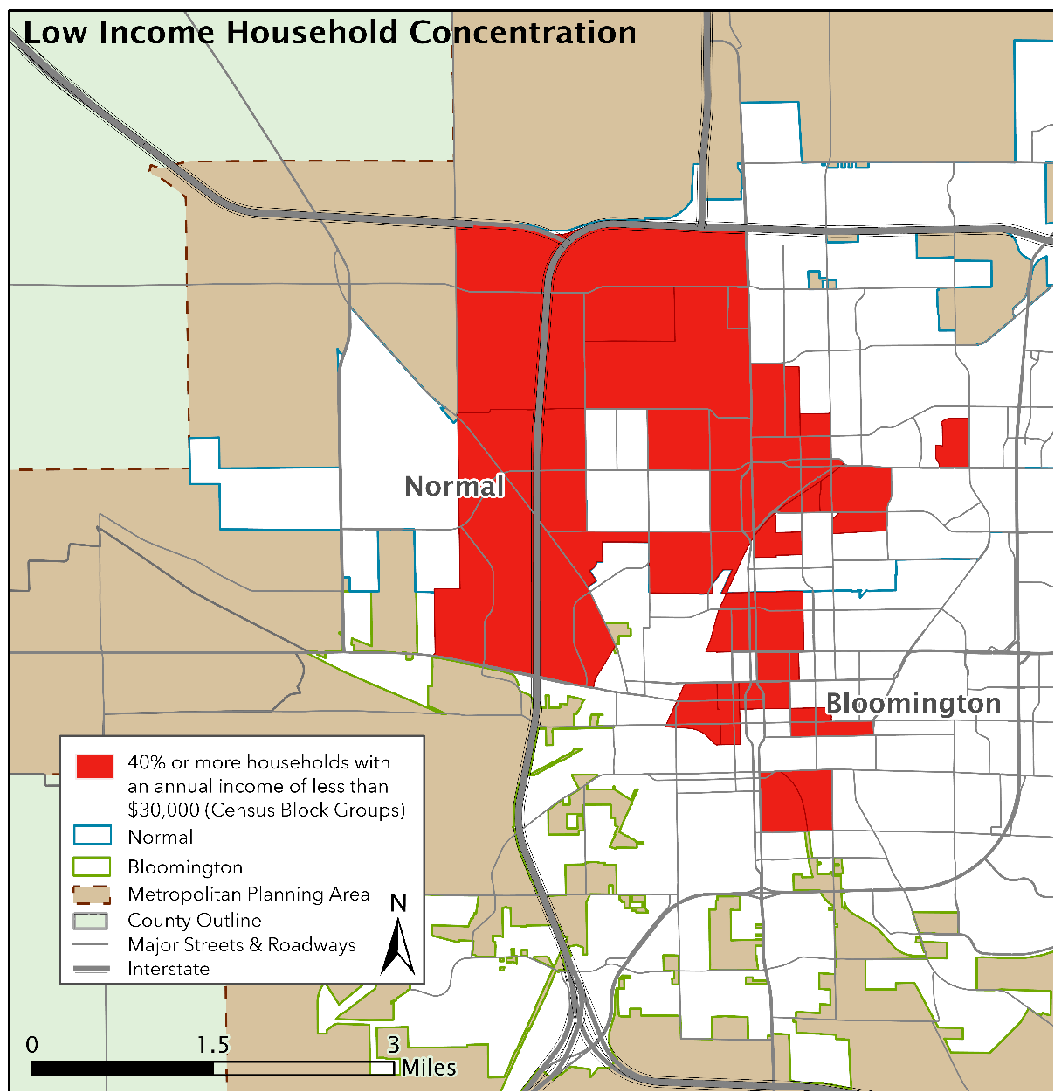
Table 2.3

	Bloomington	Normal	McLean County
Total civilian noninstitutionalized population	10%	8%	9%
<b>AGE (by percentage of total disabled individuals)</b>			
Under 5 years	4%	0%	0%
5 to 17 years	4%	4%	4%
18 to 34 years	7%	5%	6%
35 to 64 years	11%	6%	9%
65 to 74 years	19%	21%	19%
75 years and over	48%	48%	45%
<b>DISABILITY TYPE (where known)</b>			
With a hearing difficulty	2%	2%	3%
With a vision difficulty	1%	1%	1%
With a cognitive difficulty	5%	3%	4%
With an ambulatory difficulty	5%	3%	4%
With a self-care difficulty	2%	1%	1%
With an independent living difficulty	4%	3%	4%
Source: ACS 2022 5 Year Estimates Table S1810			

As shown in Table 2.3, it is estimated that 9% of the population of McLean County has some form of disability, and when broken down by age, people aged 65 and older account for as much as 64% of the total population of people with disabilities.

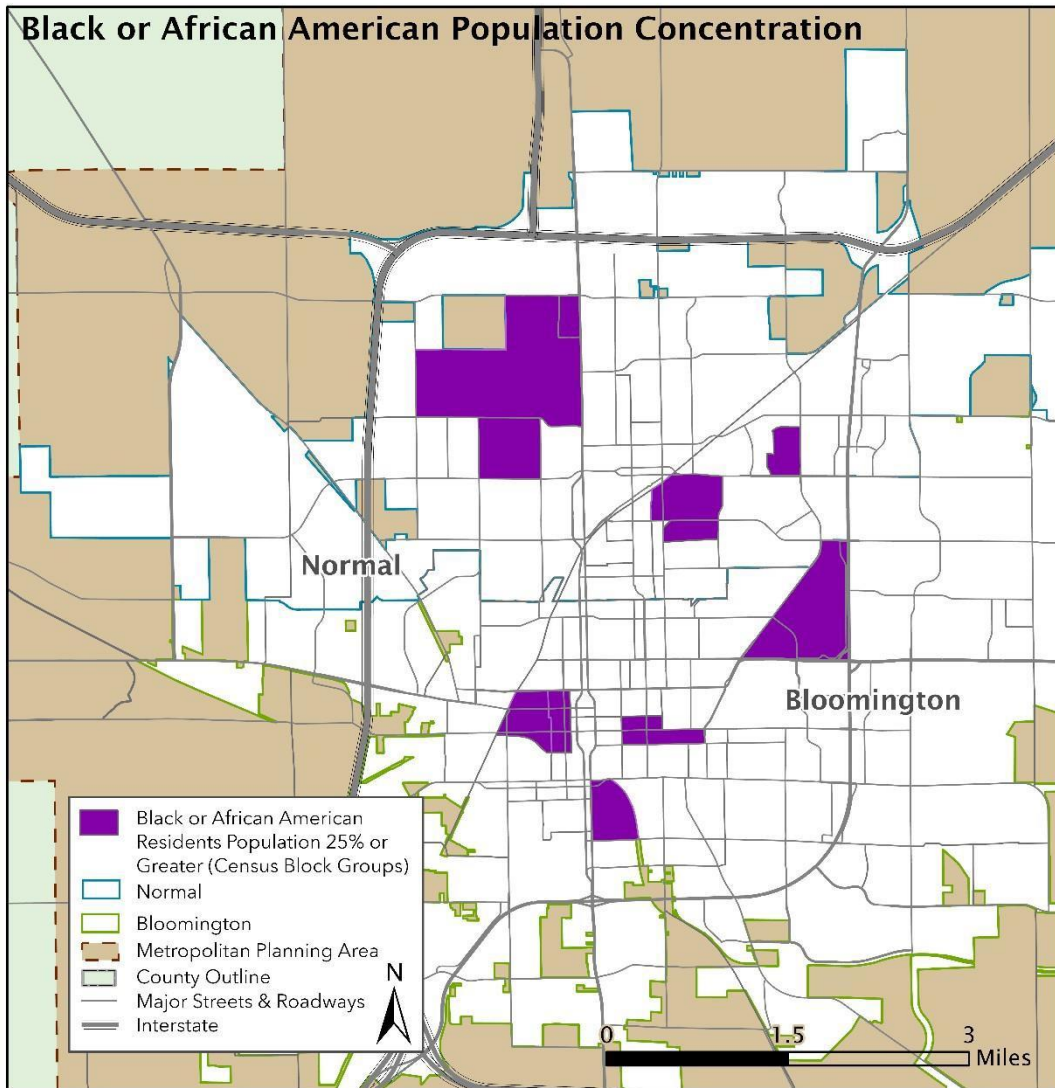
Map 2.5 illustrates the portion of Bloomington-Normal where at least 40% of households have annual incomes of less than \$30,000. Again, the west side of the community is the focus. In some instances, these households, particularly in parts of Normal, may include student households where occupants are only transitional residents and are less likely to be employed full time. Other areas include relatively dense residential developments where rental costs are more affordable or partially subsidized housing may be available. Residents in these neighborhoods may have difficulty reaching school, employment and social services.

Map 2.5



Neighborhood integration is a continuing challenge and can arise from multiple causes. Maps 2.6a through 2.6c illustrate residential concentrations of the most represented racial or ethnic groups in Bloomington-Normal, as shown in Table 2.2. The next three maps show areas of concentration by race or ethnicity, and Map 2.6 brings them together with transit and pedestrian/bicycle transportation options.

Map 2.6a



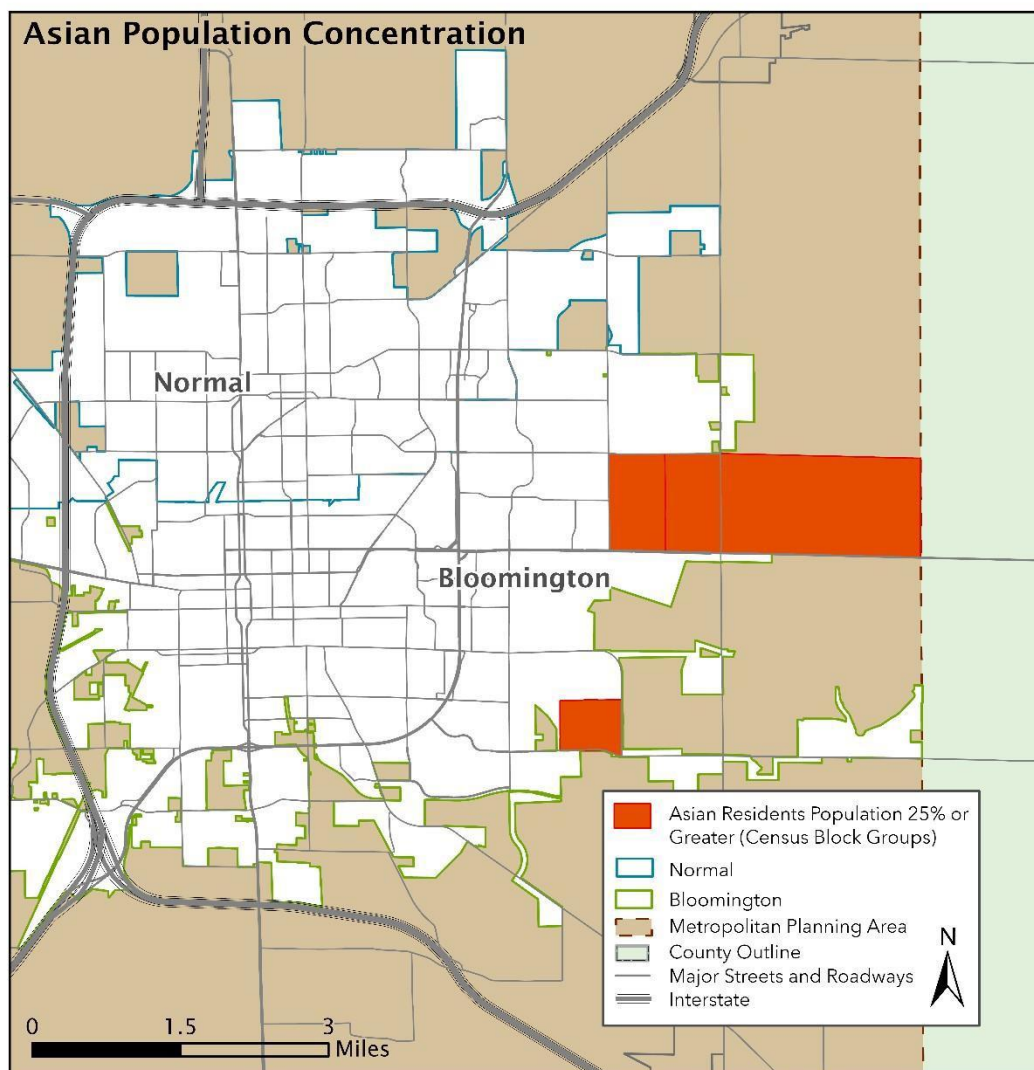
Map 2.6a locates neighborhoods where Black or African American residents are 25% of the population or greater. These include Census block groups immediately west of Downtown Bloomington, slightly east of Downtown Bloomington, south of Oakland Ave to ELafayette, north of Empire St (Route 9) to Vernon Ave, north of College Ave immediately east of Towanda Ave, southeast of W Beaufort St and northwest of Illinois State University's campus. As noted with

respect to income, some of the block groups include properties managed by the Bloomington Housing Authority, including housing for seniors and people with disabilities, as well as privately held developments with affordable units.

However, Route 9 east of Bloomington-Normal is heavily traveled and carries considerable truck traffic. Attempting to navigate this area as a pedestrian or on a bicycle is a dangerous undertaking. There is some transit presence to offset this challenge.

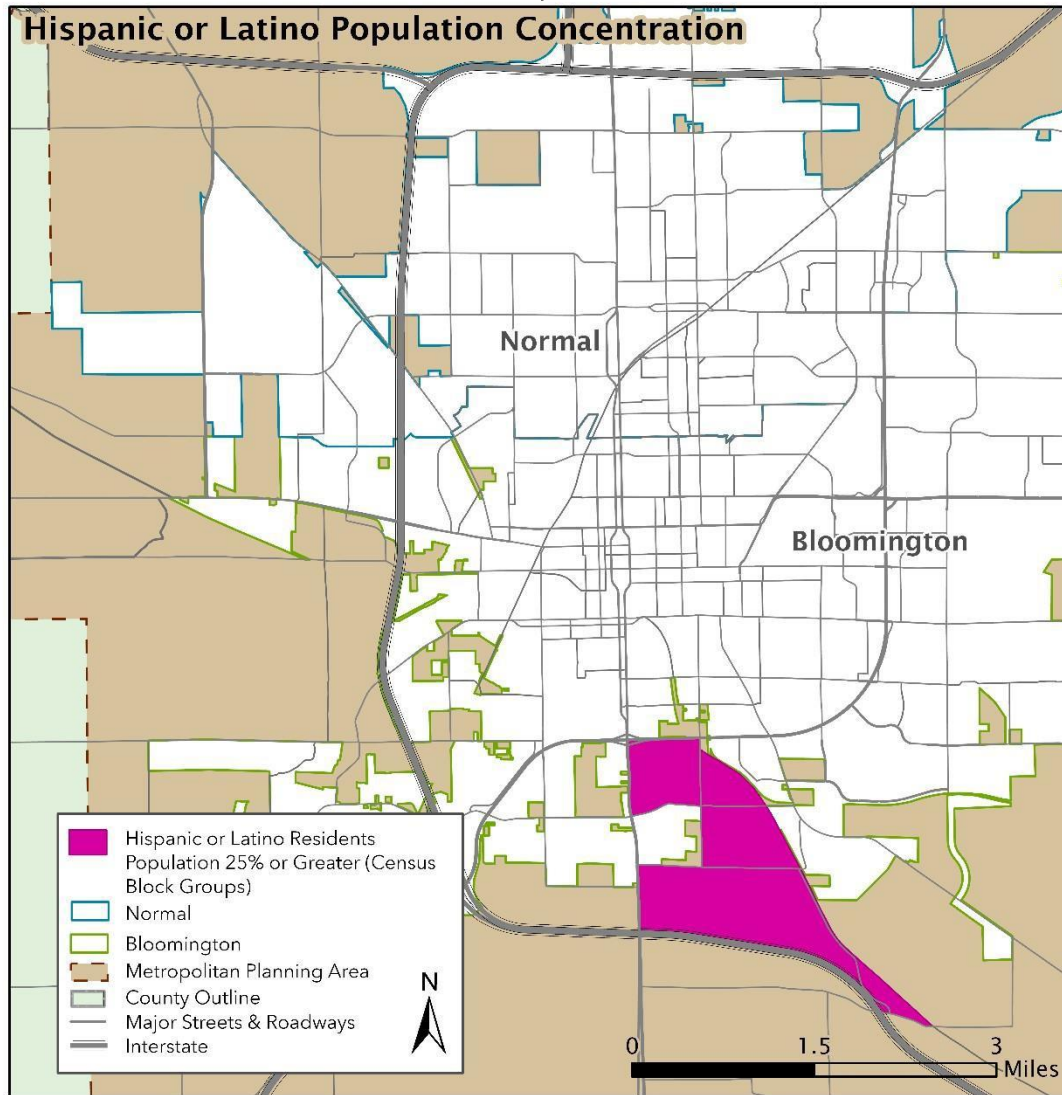
Moving to the east side of Bloomington, Map 2.6b shows neighborhoods where Asian residents constitute 25% of the population or more. These areas are clustered north of Hamilton Rd near State Farm Corporate South and north of East Empire Street (Route 9) between Airport Road and Towanda-Barnes Road. There are grocery stores and pharmacies on Oakland Avenue, and some transit service exists in this area.

Map 2.6b

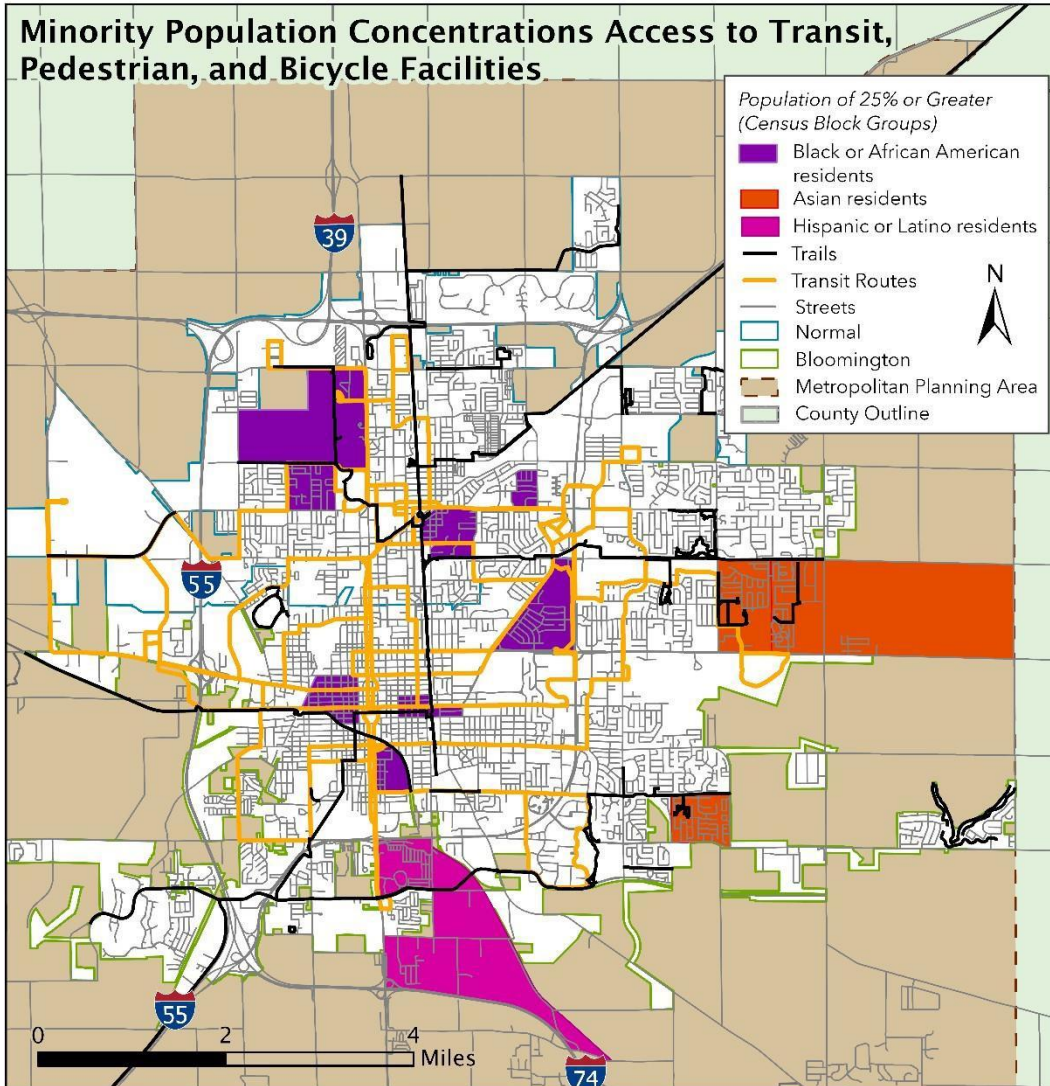


Map 2.6c illustrates neighborhoods where Hispanic residents constitute 25% or more of the local population. There is also a Hispanic neighborhood immediately south of the City of Bloomington and east of U.S. 51, which is outside of Connect Transit's fixed-route service area.

Map 2.6c



Map 2.7

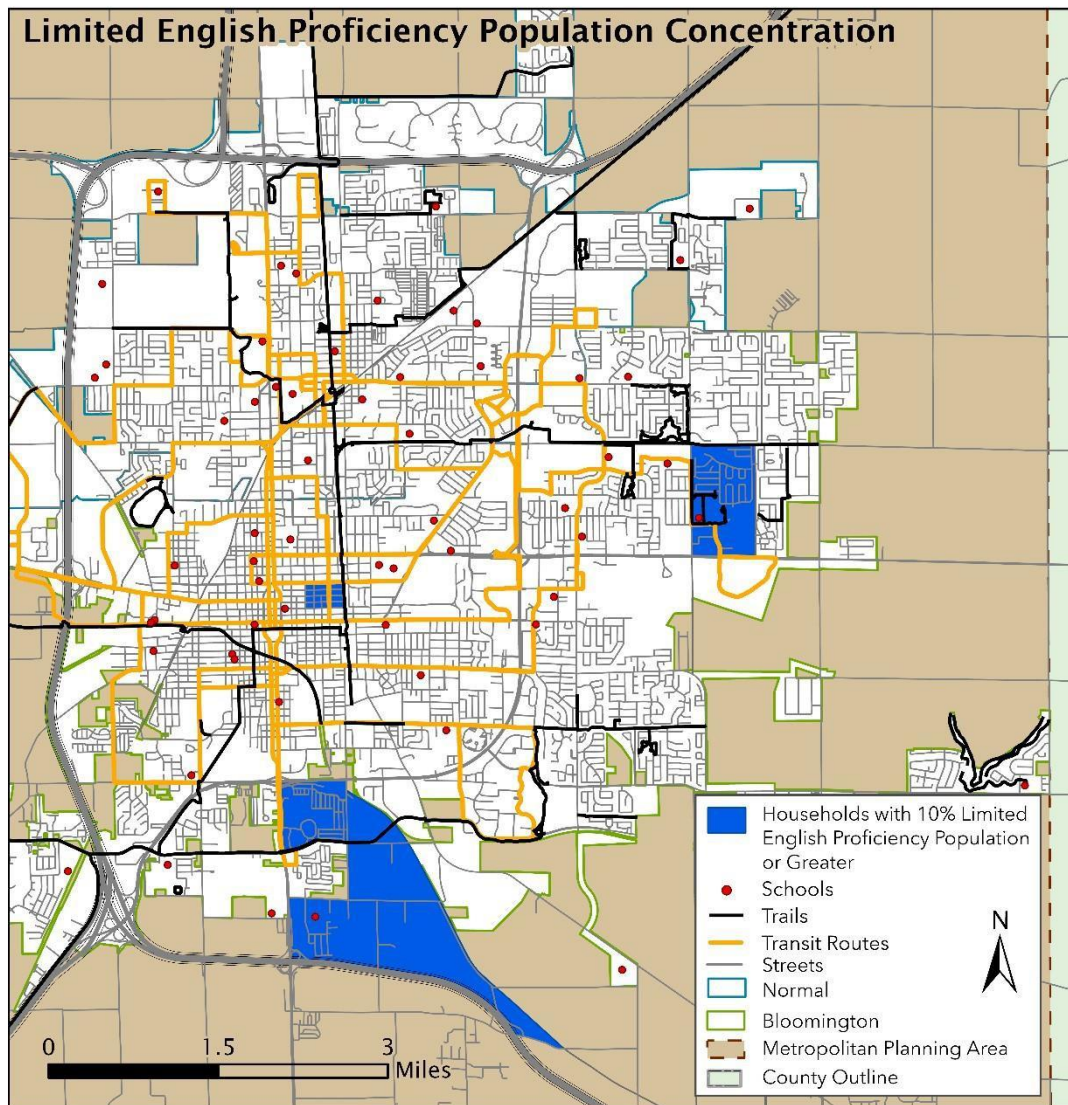


Map 2.7 consolidates the neighborhoods with concentrated populations of minority residents with pedestrian/bicycle routes and transit routes added. As noted in the previous discussion of Connect Transit, recent innovations by Connect Transit in managing fixed routes and Connect Mobility paratransit service have increased access in challenged neighborhoods. The new Connect Transit Flex service, currently operating as a pilot project in the southwestern quadrant of the urban area, provides demand- response service with the Flex zone, and provides access to transfer locations within the fixed-route network. Connect Transit continues to evaluate the performance of this new category of service, and to prepare for implementation of additional Flex zones.

Title VI protection extends to the rights of people with limited proficiency in the English language, which can create barriers and difficulties in day-to-daylife in general and access to transportation in particular.

Map 2.8 identifies neighborhoods where 10% or more of households have limited command of English. These neighborhoods include Hispanic and Asian residents. These areas have some transit service, access to the trail system, and in some instances proximity to public schools.

Map 2.8



## Disadvantaged Communities Identified by USDOT Tools

Using USDOT mapping tools, several census tracts were identified as disadvantaged by the Equitable Transportation Communities Explorer (ETC Explorer) and by the Climate and Economic Justice Screening Tool (CEJST). Those census tracts include:

### Bloomington

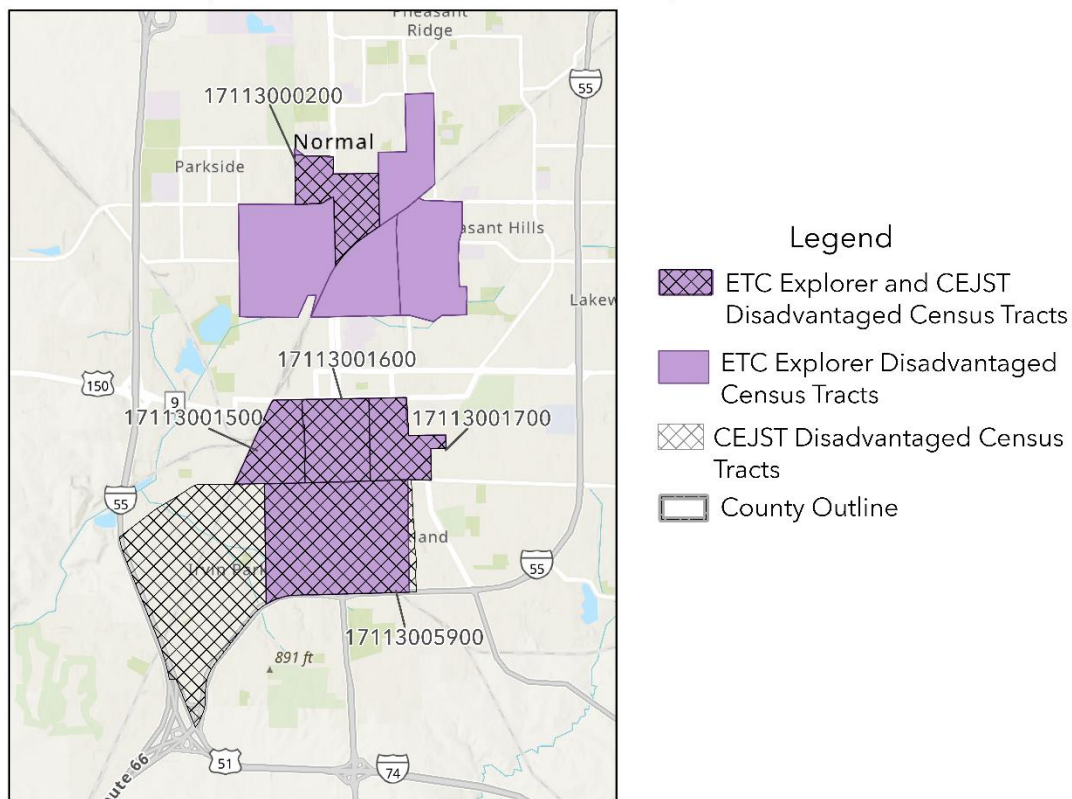
- 17113001500
- 17113001600
- 17113005900
- 1711300170

### Normal

- 17113000200

Map 2.9

ETC Explorer and CEJST Disadvantaged Census Tracts



Esri, NASA, NGA, USGS, FEMA, McGIS-McLean County GIS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

The intersection of census tracts identified by the ETC and CEJST highlight the census tracts facing the greatest challenges in the MPA and McLean County. These areas are concentrated in central Bloomington including downtown Bloomington, and one independent area of Normal encompassing the campus of Illinois State University. See Appendix F to review the complete planning and equity analysis.

## Section 3: Public Participation Plan

The Public Participation Plan, an element of the Title VI Plan, focuses on connecting, communicating, and gathering input from communities. This plan defines a process for meaningful public input into decision-making. The process includes offering an array of opportunities for the public to be informed and involved in the development of plans and programs in the metropolitan area. Strategies are designed to obtain input from the entire community including those in disadvantaged or underserved groups. This effort also involves the use of performance measures to evaluate progress and create new approaches to engaging with community members.

Two common threads run through MCRPC's public outreach approach, to move our work into the community where people gather, work, and learn, and to cooperate with our participants and partners. The first is to find people where they are, rather than summoning them to a presentation, open house, or other static event. While formal public meetings and hearings, charrettes, focus groups and similar events remain useful exercises in soliciting public input and engagement, many attendees find them uncomfortable environments in which to express their views and ask questions about the planning process. In recent years, MCRPC has found that implementing direct engagement at community events, festivals, sports, cultural activities, and other events taking place in Bloomington-Normal results in great response.



Secondly, as a small agency with limited staff, MCRPC has found that working through individual and organizational associations substantially expands our ability to reach our disparate communities, neighborhoods, affinity groups and the underserved communities that are the focus of our search for engagement from community members addressed by Title VI. The image "Your Associations," to the left, reproduces a sketch created

during an MCRPC discussion with local planning and public works staff illustrating the breadth of the information and outreach network for one person, and the possible outreach results when multiplied across the community.

## Public Participation Plan Goal

The goal of the Public Participation Plan is to have ongoing, significant public involvement, by all identified audiences and interested parties in the processes of MCRPC planning activities. The public participation process for transportation planning, including regional human services transportation planning, aligns with and is complementary to MCRPC public participation practices and policies for related projects regarding community, housing, economic development, environmental and energy planning. The goal for Title VI engagement is to provide full access to the planning process and its outcomes for everyone in the community who is part of an underserved or disadvantaged group.

## Objectives for Participation

1. To understand the planning area demographics and determine what cultural, economic, language-based or accessibility barriers exist to public participation.
2. To communicate, educate and engage with people by notification of meetings and forums for public input, in a manner that is understandable to all populations in the area.
3. To convey the information (plans, research documents and others) in various formats to reach all community members to the extent possible using different avenues.
4. To gather input from all communities including disadvantaged groups such as people with disabilities, members of ethnic, racial, or faith-based minority groups, people with limited economic resources, people of any age or educational attainment, and people with limited proficiency in understanding or speaking English by holding public meetings, events or activities in locations that are easily accessible to all area members of the community and stakeholders.

## Outreach Strategies

Based on the objectives for engagement, the outreach strategies have been divided into three groups:

- (1) strategies MCRPC uses to engage and communicate with the public,
- (2) strategies used to gather input; and
- (3) strategies to reach out to disadvantaged communities.

The following sections include an explanation of each strategy with examples; followed by a brief explanation of evaluation techniques to measure the impact different activities might have. Appendix E includes a list that is utilized as a guide for outreach as relevant to specific projects and programs, either to communicate or to gather input from the community. The list contains media outlets (newspaper and radio), public libraries and stakeholders that we have reached out to in the past for the development of different projects and plans.

## Strategies for Communicating, Educating and Engaging

The following are a series of outreach strategies MCRPC staff should consider when trying to reach our community for educational and informative activities. Strategies should be used complementary to each other and selected depending on the nature of the project.

### 1. Committee Meetings/Agency Consultation



MCRPC shall consult and coordinate with agencies and officials responsible for and related to transportation planning activities in the metropolitan area. The following is a list of ideas on how agency consultation can be considered:

- Compare metropolitan transportation plans and transportation improvement programs, as they are developed, with the plans, maps, inventories, and planning documents developed by other agencies.
- Include representatives of entities in Bloomington-Normal and McLean County from non-profits to public and private organizations in the planning consultation process.
- Additional interested and relevant parties/stakeholders shall also be involved in the planning process and should be provided with access to information about transportation issues and decision-making processes.
- Metropolitan transportation plans and transportation improvement programs shall be developed with consideration of governmental agencies and non-profit organizations receiving Federal assistance from a source other than the U.S. Department of Transportation for the design and delivery of non-emergency transportation services.

- The MPO, in cooperation with the Federal Highway Administration, shall provide all interested parties with access to an annual listing of Federally Obligated Projects.

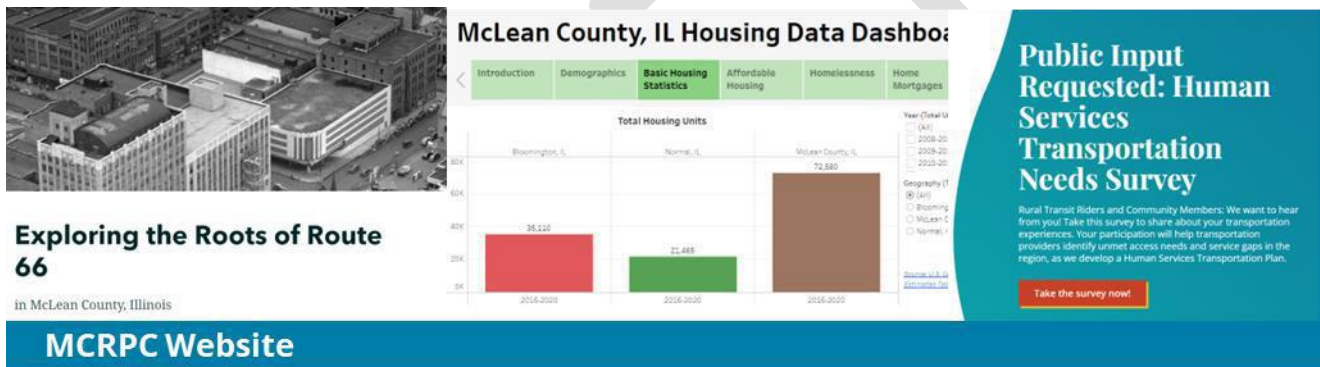
MCRPC organizes steering committees when developing plans. Members of a steering committee should be chosen from public/private agencies or additional interested parties that are interested in or potentially affected by the plan or project in development, including special or disadvantaged populations. Committee members should meet regularly during the duration of the plan development to provide feedback on the project and/or as experts on issues or as representatives of the community.

## 2. Public Notice/Press Releases

Public notices and press releases are used to inform the public of a public comment period, recent publications, and request for participation in surveys, public forums and other planning activities organized by MCRPC.

Radio, Newspaper and TV: Prepare press releases in advance and send them to several media outlets. Media Press releases have helped MCRPC communicate with the public and in many cases, media outlets have responded to the press release asking for a follow-up interview. MCRPC staff have carried out interviews with the media on topics such as recent publications and requests for public participation for surveys and public forums [See Appendix E for a list of suggested media outlets].

## 3. MCRPC Website



The MCRPC website (<https://mcplan.org/>) is used as a tool to educate people, to publish specific data about the county and to serve as a link with the community and specific data collection method. Use MCRPC's website as an important tool to communicate with the public about activities and work carried out.

StoryMaps Software: StoryMaps have been used to communicate with the public about - specific projects that have been developed by MCRPC or that are of importance in the community such as the Route 66 StoryMap. StoryMaps are interactive multimedia tools created using ArcGIS that combine maps, text, images, and multimedia content to tell a story or convey information. ArcGIS is a cloud-based mapping and analysis solution.

Dashboards & Documents: Transportation, housing and general data dashboards are updated annually by MCRPC staff. Dashboards offer a quick way for the public to get information about specific topics in the county.

Link/communicating with the public about a specific activity: the website is commonly used to announce surveys/public forums and others, and as a link to access surveys designed in other software to collect public input.

**4. People Constant Contact Email Marketing Application**

Currently MCRPC has a list of more than 2,000 contacts classified into different categories based on people’s interest. People can identify their subject category of interest and add their contact details on the MCRPC website for future communications. MCRPC staff use this list to reach out to the public either to provide information or to encourage people to participate in planning activities (e.g. Surveys/Public Forums and others).

**5. Social Media**

MCRPC has different social media outlets including Facebook, Instagram and LinkedIn. Social media is helpful to communicate with the public about specific events when public input is required and to publish different activities and information created by the MPO. For example, Facebook was used to advertise the survey to develop the Human Services Transportation Plan (HSTP). Because several organizations that provide services to disadvantaged communities do not have websites, social media was used to contact them. Social media has also been used to post content such as safety videos created in 2023.

**6. Flyers**



Multilingual flyers are commonly used to promote different activities with the public. The objective is to reach all members of the community including disadvantaged populations. Because of our diverse population, flyers, surveys, and other outreach documentation should be prepared in three languages: English, Spanish and French. Flyers should be posted around town in areas people frequently visit, such as educational facilities, libraries, laundry facilities, shopping areas, restaurants, and others. Flyers should also be posted on social media and sent via email to stakeholders and to people that are in our Constant Contact list [See Appendix E for a list of suggested outreach locations]

QR codes: have been used by MCRPC on a regular basis to facilitate access to public surveys. QR codes should be created and advertised on flyers for ease of access to a link. Specific QR codes should be created to access the surveys in each language.

## 7. Videos



Videos have been used to educate the community about specific topics. Videos should be designed considering a broad target audience that includes young and older generations. For example, MCRPC created and launched a series of videos to promote road safety awareness in the county. To appeal to the broader community, short videos of about one minute, plus a longer video that included more information about safety were developed. The campaign was part of the Go:Safe McLean County Action Plan launched by MCRPC to educate the community about safe behavior on public roads.

## 8. Public Events/Information Tables

Information tables at public events have been used for two purposes, first, to communicate with the public about MCRPC and our upcoming work, second, to gather input from the community, and to make people aware of specific activities designed to gather input.



## Public Events / Information Tables

Information tables have been used to educate the community about the different projects and topics such as plans the MPO has developed including comprehensive plans and the Metropolitan Long Range Transportation Plan 2050; and transportation safety practices.

Games: Games have been used as an entertaining way to engage with the public during public events to educate people about transportation safety. To appeal to different age groups, games should be designed with different groups in mind. For example, questions can be grouped into questions for kids, teenagers, and adults. Several options of giveaways, also for kids and adults in mind have and can be used to encourage people to engage in activities.

## Strategies for Gathering Input

The following are the strategies MCRPC staff should consider when reaching out to the public to gather input. They should be used complementary of each other and selected based on the needs of a specific project.

### 9. Focus Groups



## Focus Groups/Stakeholder Workshops

Focus groups have been used to gather information from specific community stakeholders. Stakeholders are anyone either directly or indirectly affected by an outreach effort, system or service plan or recommendations of that plan. For example, meetings with specific stakeholders (Public Transportation, Freight, Health, and Social Services) were conducted by MCRPC during the development of the Long-Range Transportation Plan. Questions were planned for each group based on interest and expertise. Given the time constraints,

MCRPC identified stakeholders that should be invited and contacted them through public notices and social media, as well as digital and email platforms.

## 10. Surveys

Surveys are a common way for MCRPC to collect people's opinion. Surveys are always offered in three languages for our metropolitan area: English, Spanish and French. They are designed to collect quantitative and qualitative data.

Quantitative data usually includes basic demographic information about the person and specific questions about the topic that will facilitate the definition of goals and objectives of a project. Open ended questions are also included to allow people to elaborate on a specific theme of interest/concern to them and to gather new ideas from the public that MCRPC may be aware of. Once a survey is launched, MCRPC heavily promotes it to the community through public notices and social media.

## 11. In Person Forums



Public forums are used by MCRPC staff to collect input from the community about specific topics. In general, a public forum has two main components. First, a short presentation by MCRPC staff informs the public's expectations of the forum and background of the subject matter. Then, people are encouraged to participate using different methods and activities.

*General Participation:* Forum attendees participate as a group giving input on specific topics. In the latest Public Forum held by MCRPC, all attendees were encouraged to participate in a group SWOT analysis (Strengths, Weaknesses, Opportunities, and Threats).

*Individual participation:* People can gather in smaller groups at different tables/posters to provide their feedback about different topics/questions. This allows for all people to participate, those who feel confident to participate in an open setting can give their opinion in a large setting and those who prefer a more intimate setting are also able to participate at individual tables or poster.

## 12. Virtual Meetings/Participation

COVID-19 played a significant role in the recent transformation of planning for public meetings. A virtual option should generally be available at all public meetings. Virtual participation should be offered in a variety of formats:

*Virtual meetings:* Virtual meetings are often utilized by MCRPC staff as an opportunity to reach people where they are. Virtual meeting activities are planned on a project-by-project basis but regularly include informational overview followed by opportunities for participants to provide feedback on a topic. Recently, MCRPC utilized virtual meetings in the development of the Region 6 Human Services Transportation Plan (HSTP) since the project area covers a 5-county region. Participants shared their feedback through online poll questions and verbal discussion.

*Hybrid meetings:* People online should have access to the main event and should be able to participate in the general forum. Once the first stage of the event concludes, participants should be given the opportunity to provide input about the specific questions. During a recent public forum organized by MCRPC, virtual participants were able to provide their input of questions from each table in real time. An MCRPC moderator announced the questions one by one with a Power Point presentation and collected public comments via the chat. People were given enough time after each question to type their comments. Opinions were later incorporated with the comments provided in-person.

*In their own time:* Some members of the community are not able to attend the meetings either in-person or virtually at the time and day they happen. A recording of the public meeting should be made available to members of the community through MCRPC's website for a period of time (two weeks). People should be able to watch/listen to the video recording, write their comments and send them to staff. This modality will also allow for people who need more time to understand and write their ideas.

## 13. Public Events



MCRPC has participated in several community events to gather information from the community, such as the McLean County Fair, the Farmer's Market in Downtown Bloomington, the Sweet Corn Festival in Normal, and other family and kids' events held at parks and other venues. The objective is to make it easy and interesting for people to participate. There are two approaches used to gather information from the public.

*Interactive activities:* Plan different approaches to encourage participation such as maps or comment cards that members of the community can use to write their main ideas/comments or concerns about a specific topic.

*Conversations with the community members:* MCRPC staff should encourage participation by engaging in conversations with members of the public. Not all members of the public are willing to take the time to write a comment, however, they find it easier to engage in a conversation and talk about their ideas which can be noted by staff.

#### **14. Public Comment Periods**

Public comment periods are held for every plan before it is approved for a minimum of 30 to 45 days, as required. People can provide their opinions which will be considered for incorporation in the plan before its final approval. Public comment periods and documents should be advertised using several strategies which can include:

- dedicated email or address
- website
- regular mail
- forms using survey tool for compilation
- personal outreach at public events by staff
- All public comments are conveyed to the Technical and Policy Committees prior to decision making
- A publicly available summary report should be prepared

#### **15. Post Attendee Survey**

Post attendee surveys should be designed to get input from the community about the quality of a public meeting. Themes that should be included in the survey include, quality of the information presented, clarity of the tools used (computer-based presentations, posters, and others); clarity of the presentation; clarity of what was expected from the participants. Although the number of responses from these surveys is low, they are an efficient way to collect feedback from the community.

## Incorporating the Underserved Communities

Incorporating underserved and unserved communities for either communicating or gathering input is a Federal requirement for MPOs for the development of any Plan. The main objective when incorporating underserved communities is reaching by several means and at different locations that these communities might find more accessible.

Some of the strategies MCRPC should consider include:

- a. Offer the option to participate online:
  - i. *Public meetings*: Offer the option to join meetings by live-streaming public meetings via YouTube or other online services.
  - ii. *Public forums*: Make public forums available to the public via a link. Allow people to participate and provide input online. Comments can be collected by an online moderator allowing enough time for people to type their ideas.
  - iii. *Post recording of public forums on MCRPC's website*: This will allow people that are not able to join and provide their input on a specific day and time to listen to the recording and provide their input in their own time. This will also allow people with disabilities to provide input.
- b. Attending public events at different locations around the County: MCRPC can participate in various public events and engage with different communities. Public events include farmers market, festivals, McLean County Fair, and other activities organized by local government or organizations.
- c. Identify and create relationships with community groups such as the Friends of the Constitution Trail and the McLean County Wheelers. Leaders can help spread the word about activities and opportunities to provide input.
- d. Identify meeting places of specific groups such as churches, restaurants, libraries to use as areas where to advertise of specific events/surveys/focus groups organized by MCRPC.

Providing information and gathering input in various languages:

- a. *Document Translation*: Offer flyers and surveys in different languages. Currently MCRPC offers translations in Spanish and French.
- b. *Language interpreters*: Offer interpreters at community events and focus groups, including interpreters of American Sign Language. Encourage people from different backgrounds to attend by advertising language interpreting services.

- c. Provide childcare/child table at public events. This will encourage young mothers and young families to attend public meetings. Provide activities for children and have a staff designated to stay at the table as needed.
- d. Plan events on different days of the week and at different times to ensure participation by a wide variety of representatives and individuals within the community.
- e. Take advantage of the different groups' representation within MCRPC staff and encourage them to reach out to their contacts.

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# Summary of Public Engagement Strategies and their Applications in Planning by MCRPC

The following is a summary table of the outreach efforts when developing the different example projects by MCRPC during past years. Strategies are selected based on the requirements of the document in development.

		Long Range Transportation Plan	Unified Planning Work Program (UWP)	Transportation Improvement Program	McLean County Go:Safe Action Plan	Human Services Transportation Plan (HSTP)	McLean County Housing Recovery Plan
<b>Strategies</b>							
<b>Communicating, Educating and Engaging</b>	Committee Meetings						
	Press Releases						
	Website						
	Constant Contact						
	Social Media						
	Flyers						
	QR Codes						
	Videos						
	Public Events/ Information Tables						
	Games						
<b>Gathering Input</b>	Focus Groups						
	Surveys						
	Public Forums						
	Virtual Participation						
	Public Events/ Interactive Activities						
	Public Events						
	Public Comment Periods						
<b>Incorporating Underserved Groups</b>	Public Event/Online Participation						
	Meeting Recording Availability						
	Public Events/ Different Locations						
	Reaching to Community Leaders						
	Flyers/Surveys in Different Languages						
	Language Interpreters at Events						
	Child Care Availability						

## Tools and Measurements

The following table includes a list of ideas on how to evaluate the impact of the different strategies in various outreach efforts.

	<b>Strategy</b>	<b>Quantitative</b>	<b>Qualitative</b>
<b>Communicating, Educating and Engaging</b>	- Committee Meetings	- Number of attendees per meeting	<ul style="list-style-type: none"> <li>- Quality of comments received</li> <li>- Accessibility of the Information</li> </ul>
	- Website - Social Media - Videos	- Number of visits to the different platforms during a specific period (i.e.: survey availability)	
	- Constant Contact	- Number of contacts that opened the email	
	Public Events: - Information Tables - Games	- Approximate number of people who participated in person or virtually	
<b>Gathering Input</b>	- Focus Groups - Public Forums - Virtual Participation	- Number of participants, in person and virtually	<ul style="list-style-type: none"> <li>- Quality of comments received</li> <li>- Use of Public Input in Developing Plan</li> <li>- Public Understanding of Process</li> </ul>
	- Surveys - Public Comment Periods	- Number of surveys/ comments received	
	Public Events: - Interactive Activities - Conversations	<ul style="list-style-type: none"> <li>- Number of events attended</li> <li>- Quantity of swag given away</li> <li>- Number of comments received</li> </ul>	
<b>Incorporating Underserved Groups</b>	- Public Events - Online Participation	<ul style="list-style-type: none"> <li>- Number of online views</li> <li>- Number of comments received</li> <li>- Number of public events attended</li> <li>- Number of events at different days of the week</li> </ul>	<ul style="list-style-type: none"> <li>- Quality of the comments received</li> <li>- Accessibility of the Information</li> <li>- Suggestions on how to improve public meetings</li> <li>- Public Understanding of the Process</li> </ul>
	- Meeting Recording Availability	- Number of online views	
	- Outreach to Community Leaders	- Number of individuals reached	
	- Flyers/Surveys in Different Languages - Language interpreters	<ul style="list-style-type: none"> <li>- Number of surveys completed in other languages</li> <li>- Number of people that needed interpreters at events</li> </ul>	
	- Child Care Availability	- Number of children that joined the "kids table"	

The Public Participation Plan is reviewed every three years (from date of most recent adoption) by the staff of the Regional Planning Commission to assess the effectiveness of its procedures. Staff shall submit recommended revisions or amendments to the Transportation Technical and Policy Committees. Pursuant to 23 CFR 450.316(a)(3), action by the Technical and Policy Committees to adopt revisions to or amendment of the Public Participation Plan shall be preceded by a period of public review and comment of not less than 45 days.

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## Section 4: Language Assistance Plan (LAP)

As the home of two universities, a Fortune 50 company, an electric vehicle manufacturing company and two major hospitals with associated health care networks, among other major employers, the Bloomington – Normal area and McLean County are experienced in working with residents and businesses with employees and customers for whom English is a second (or third) language.

This Language Assistance Plan (LAP) has been prepared to address MCRPC's responsibilities as a recipient of federal financial assistance as they relate to the needs of individuals with limited language skills. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964; Federal Transit Administration Circular 4702.1B, dated October 1, 2012, which states that the level and quality of transportation service is provided without regard to race, color, national origin or any other protected status or circumstance.

Executive order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency," indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs each federal agency to publish guidance for its respective recipients clarifying their obligation to ensure that such discriminations do not take place. This order applies to all state and local agencies which receive federal funds.

MCRPC intends the LAP to identify reasonable steps for providing language assistance to persons with limited English proficiency who wish to access services provided by MCRPC. This plan outlines how to identify a person who may need language assistance, and the ways in which assistance may be provided.

### Four-Factor Analysis

To prepare this plan, MCRPC considered the elements of the four-factor Limited English Proficiency (LEP) analysis outlined below.

**Factor 1.** The number and proportion of Limited English Proficiency (LEP) persons eligible to be served in the metropolitan planning area:

A significant majority of people in McLean County are proficient in the English language. Based on aggregated American Community Survey data, only 1.1% of the McLean County population five years of age and older speak English "less than very well" – a definition of Limited English Proficiency (LEP). The proportions vary in Bloomington and Normal where 1.6% of Bloomington residents and 0.7% of Normal residents meet the definition. Asian and Pacific Island, and Spanish speaking households are more likely to face challenges in

using English, reporting that nearly 16% and 11% respectively qualify as LEP. In general, American Community Survey data suggest that even in households where English is not the language used, at least 75% of such households are comfortable using English on other contexts. Moreover, the percentage of households speaking languages other than English is small, less than 10%. Table 3.1 illustrates this and other language group findings.

Table 3.1 ACS Estimates LED Households  
ACS 2022 5 Year Estimates

Limited English Proficiency Households - ACS Estimates	Total	Percent	Limited English-speaking households	Percent limited English-speaking households
<b>McLean County</b>				
All households	68,491	(X)	735	1.1%
Households speaking --				
Spanish	2,080	3.0%	220	10.6%
Other Indo-European languages	1,806	2.6%	172	9.5%
Asian and Pacific Island languages	2,067	3.0%	324	15.7%
Other languages	363	0.5%	19	5.2%
<b>Bloomington</b>				
All households	33,885	(X)	563	1.7%
Households speaking --				
Spanish	1,245	3.7%	191	15.3%
Other Indo-European languages	1,190	3.5%	114	9.6%
Asian and Pacific Island languages	1,545	4.6%	254	16.4%
Other languages	299	0.9%	4	1.3%
<b>Normal</b>				
All households	19,658	(X)	147	0.7%
Households speaking --				
Spanish	595	3.0%	25	4.2%
Other Indo-European languages	504	2.6%	40	7.9%
Asian and Pacific Island languages	489	2.5%	67	13.7%
Other languages	52	0.3%	15	28.8%
Source: ACS 2022 5 Year Estimates Table S602				

Although there are residents of East Asian origin, including speakers of Japanese, Chinese and Korean, the more prevalent language groups are from South Asia, as noted in the chart on pg. 11. Most of these residents speak one or more of the languages originating in India. Overall, there is a large and supportive community of residents of Indian origin, creating a pool of resources for LEP persons. Additionally, MCRPC staff includes at least one Spanish speaker and has access to translators through partner agencies.

**Factor 2.** Frequency of contact by LEP persons with MCRPC’s planning programs:

MCRPC staff members rarely encounter contact with LEP persons in situations where no other speakers of their language are present to assist. In some instances, MCRPC has encountered LEP persons while engaged in outreach at a community event planning and conducted by other parties.

The only direct requests for interpreters have been for persons using American Sign Language. MCRPC has contracted with ASL interpreters on a number of occasions, usually in connection with Human Services Transportation planning activities.

Generally, the most likely connections with LEP persons will occur during public outreach activities. When advised that LEP persons are expected to attend events organized by MCRPC, staff makes every effort to ensure that resources are on hand to address needs for translation.

**Factor 3.** The importance of programs, activities or services provided by MCRPC to LEP persons:

Outreach activities, summarized in Section 3 of this Plan, includes events such as public meetings held at a myriad of locations and community gatherings. Directly and with the assistance of partner agencies, MCRPC conducts specific outreach to LEP persons to determine needs and gaps, and the manner in which they are addressed. The MCRPC website is equipped with a translation feature, and MCRPC staff maintain a contact list of qualified translators to meet needs as requested.

As noted, the MCRPC website has a translation utility available and can draw from local providers of interpretation/translation when requested. For in-person contacts, some staff members can assist with some languages on an *ad hoc* basis. MCRPC will provide assistance and direction to LEP persons who request assistance as quickly as possible.

**Factor 4.** The resources available to MCRPC and overall cost to provide LEP assistance:

#### Staff LEP Training

Resources for assistance to LEP persons are derived from MPO funding, and generally estimated for specific project requirements over the course of a program year.

MCRPC Staff orientation and training materials include information on general Title VI obligations and procedures, and specifically on responsibilities to engage with and assist LEP persons. A Language Identification Flashcard document is available to staff members, and with other Title VI resources and guidance, is included in a document archive available to all MCRPC staff. The Title VI Coordinator will maintain a record of language assistance requests received, and steps taken to respond.

#### Monitoring and Updating the Language Assistance Plan (LAP)

The Language Assistance Plan (LAP) is a component of MCRPC's Title VI Plan requirement. MCRPC will update the plan as required and evaluate its status at least every three years. The plan will be reviewed and updated when higher concentrations of LEP individuals are present in the service area. Updates include the following data and performance measurements:

1. How the needs of LEP persons have been addressed, including through MCRPC partner agencies.
2. Determination of the current LEP population in the planning area.
3. Determination as to whether the need for, and/or extent of, translation services has changed.
4. Determination whether local language assistance programs have been effective and sufficient to meet the needs.
5. Determine whether MCRPC financial resources are sufficient to fund language assistance resources as needed.
6. Determine whether MCRPC has fully complied with the goals of this LEP Plan.
7. Determine whether complaints have been received concerning MCRPC addressing the needs of LEP individuals.

The percentage of people that are considered to have the status of Limited English Proficiency in McLean County has reduced from 2.9% in 2016 to 1.1 % in 2022. The needs of the LEP people are by first identifying the concentration of LEP population and the languages they speak. MCRPC has developed outreach material in Spanish and French.

Material has been distributed in paper and online using several of the outreach strategies

mentioned in Section four. MCRPC has offered interpreting services during public meetings resulting in the collection of input for various plans and projects in Spanish. Currently, MCRPC staff translate some material and leverage our local partners to assist translation and interpreting services. MCRPC continues to comply with the LAP goals by offering translated materials, interpreting services, and consistently offering options for further accommodation. We have not received any complaints regarding LEP services.

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## Section 5: The Metropolitan Planning Organization

### MCRPC as a Metropolitan Planning Organization

Under Federal law, when an urban area reaches a population threshold of 50,000 people, a Metropolitan Planning Organization is established. This level of population was reached in the mid-1960s for the Bloomington-Normal urbanized area, and to meet the requirements of the law, the MPO was authorized in 1967 and organized in 1968.

The McLean County Regional Planning Commission (MCRPC), a recipient of Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) planning funds via the Illinois Department of Transportation (IDOT), has worked consistently to fulfill the requirements of its role as the MPO for the Bloomington-Normal urban area and the urbanizing portions of McLean County. Please see the Community Characteristics Discussion in Section 2 of this report for further details on the Metropolitan Planning Area extent, population and history.

#### **MCRPC Mission**

We bring expert planning, deep local knowledge, and vibrant public participation as we shape our future to promote opportunity, livability, and sustainability.

### MCRPC Organizational Structure

The Regional Planning Commission consists of eleven members appointed to represent local governments and agencies (see page ii). Commission members are appointed for three-year terms, and often serve multiple terms in sequence. Unlike many similar organizations in Illinois, MCRPC commission members are not permitted to be current occupants of elected office. Each of the governmental participants represented on the Commission is a partner in the transportation planning process associated with the MPO.

In its MPO function, MCRPC is governed by a Policy Committee of elected and appointed members and is advised by a Technical Committee which is made up of technical personnel from the seven member agencies. The MPO committees meet on a regular basis to discuss current progress and future needs in transportation planning. In addition to these committees, which make recommendations and decisions regarding transportation policy and programs, MCRPC administers several advisory committees, including the Transportation Advisory Committee, and the Sustainable Transportation Advisory Committee. These operate under terms set forth in the Commission bylaws.

## MCRPC Transportation Policy Committee

The MCRPC Transportation Policy Committee consists of local elected and appointed officials of those agencies that have a primary interest in transportation; this is defined as jurisdictions which have within their boundaries transportation facilities which qualify for Federal transportation funding, and which have direct control of those facilities<sup>3</sup>. Each Member is expected to reflect the official position of his or her constituent agency and/or the public interests they represent. Holders of the following positions constitute the Policy Committee:

Member Entity	Designated Office/Position
McLean County Regional Planning Commission	Chairperson
McLean County Board	Transportation Committee, Chairman
City of Bloomington	Mayor
Town of Normal	Mayor
IDOT District 5	Program Development Engineer

This committee assumes the decision-making authority for MCRPC and establishes policies that guide and form the transportation planning process. The committee has a variety of responsibilities, which range from approving the annual Transportation Improvement Program (TIP), to guiding the defined Metropolitan Planning Area boundary. The current incumbents in these positions in 2024 are:

Carl Teichman - Transportation Policy Committee and McLean County Regional Planning Commission Chairperson

James Rogal - Chair, McLean County Board Transportation Committee

Chris Koos - Mayor, Town of Normal

Mboka Mwilambwe - Mayor, City of Bloomington

Scott Neihart - Program Development Engineer, IDOT District 5

The Transportation Policy Committee members have designated proxies, usually the entities' representatives on the Transportation Technical Committee.

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<sup>3</sup> Consequently, the villages of Downs and Towanda do not have representation on the MCRPC Policy Committee, and do not have permanent staff available to serve on the Technical Committee.

## MCRPC Transportation Technical Committee

The MCRPC Transportation Technical Committee consists of technical personnel from the seven participating governments and agencies, and currently includes:

Raymond Lai	MCRPC, Executive Director, Technical Committee Chair
Jeff Jurgens	City of Bloomington, City Manager
Kevin Kothe	City of Bloomington, Director of Operations & Engineering Services
Cassy Taylor	McLean County, County Administrator
Jerry Stokes	McLean County Highway Department, County Engineer
Pam Reece	Town of Normal, City Manager
Ryan Otto	Town of Normal, Public Works & Engineering Director
Derek Bridges	IDOT District 5, Planning & Services Chief
Dan Magee	IDOT District 5, Federal Aid Coordinator
Carl Olson	Central Illinois Regional Airport, Executive Director
David Braun	Connect Transit, General Manager

The Transportation Technical Committee is the primary forum for the discussion of specific projects, intergovernmental cooperation on transportation issues and practices, oversight of planning studies and similar projects and the development of the Metropolitan Long- Range Transportation Plan, the Transportation Improvement Program, the Unified Work Program, the Annual Report of Federally Obligated Projects and other plans and reports developed by the MPO. The Technical Committee is also the primary link between the transportation planning process and local government budget development and capital improvement planning.

## Advisory Committees

MCRPC endeavors to achieve diversity in the membership of advisory committees established to provide both expert and citizen insight into programs and projects pursued by MCRPC. In some instances, for example where committee membership is primarily drawn from leadership from participating organizations, or from experts located in the community, MCRPC may have limited options in recruiting a diverse pool of participants.

The current committees have the following current principal membership by race or ethnicity:

Committee	Caucasian	Latino	African American	Asian American	Other	Total
Transportation Advisory Committee*	8	0	0	0	0	8
Sustainable Transportation Advisory Committee	TBD	TBD	TBD	TBD	TBD	
Regional Housing Advisory Committee	TBD	TBD	TBD	TBD	TBD	

\*Multiple agencies and organizations participate in advisory committees

## MCRPC Staff

MCRPC staff perform the daily operations of the agency, with technical knowledge in transportation systems planning and other related areas. The staff, working in conjunction with MCRPC member agencies, collects, analyzes, and evaluates transportation data to determine the transportation system requirements of the MPO. They also prepare materials for the Technical and Policy Committee meetings, as well as any other meetings and subcommittees. MCRPC Staff participate in all MCRPC meetings and provide technical input as needed. They also represent the agency at other meetings of importance to the planning activities in the region.

At this writing the MCRPC Staff includes:

Raymond Lai, AICP – Executive Director  
 Jennifer Sicks, AICP – Senior Transportation Planner  
 Mark Adams – Community Planner  
 Tania Barreto – Community Planner  
 Francesca Lewis– Assistant Planner  
 TBD – Assistant Planner  
 Katie McShane– Office Manager

## Section 6: Complaint Process and Compliance

### MCRPC Staff Responsibilities

MCRPC Staff orientation and training materials include information on general Title VI obligations and procedures. Title VI resources and guidance are included in an electronic document archive available to all MCRPC staff.

The Senior Transportation Planner will serve as the Title VI Coordinator for MCRPC with respect to programs and outreach. Any Title VI concerns with respect to direct employment by MCRPC (excluding program-related sub-recipients) will be administered by the Human Resources department of McLean County. The Title VI Coordinator will maintain a record of complaints received, manage the review and investigation process and document outcomes.

### Your Rights Under Title VI

The McLean County Regional Planning Commission (MCRPC) posts Title VI notices on our website, and in public areas of our office.

MCRPC operates its programs and services without regard to race, color, national origin, sex, age, disability, income level or limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and related legislation and regulations. MCRPC is an equal opportunity employer.

If you believe you have been discriminated against on the basis of race, color, national origin, sex, age, disability, income level or limited English proficiency by MCRPC, you may file a Title VI complaint by completing, signing, and submitting the agency's Title VI Complaint Form.

## How to File a Title VI Complaint with MCRPC

The complaint procedures apply to the beneficiaries of McLean County Regional Planning Commission (MCRPC) programs, activities, and services.

You may file a signed, dated complaint no more than 180 days from the date of the alleged incident. The filing should contain as much detailed information about the alleged discrimination as possible. The form must be signed and dated. The complaint should include:

- Your name, address, and telephone number.
- Specific, detailed information (how, why, and when) about the alleged act of discrimination.
- Any other relevant information, including the names of any persons, if known, the agency should contact for clarity of the allegations.

You may download the MCRPC Title VI Complaint Form at [www.mcplan.org](http://www.mcplan.org) or request a copy by writing to:

Jennifer Sicks  
McLean County Regional Planning Commission, Government Center,  
115 East Washington Street, Suite M-103, Bloomington, IL 61701

Information on how to file a Title VI complaint may also be obtained by calling or emailing Jennifer Sicks at 309-828-4331 or [JSicks@mcplan.org](mailto:JSicks@mcplan.org). The above contacts can be used if information in another language is needed.

The MCRPC Title VI Complaint Form is also published as an appendix to the annual Transportation Improvement Program update, posted on the MCRPC website at <https://mcplan.org/projects-and-programs/transportation/transportation-improvement-plan>. The form is also attached as Appendix D to this report.

Complaints may be filed directly with the Federal Transit Administration, Office of Civil Rights, at:

1200 New Jersey Avenue, SE Washington, DC 20590, USA  
By telephone at 888-446-4511 or accessed at [File a Complaint with FTA | FTA \(dot.gov\)](https://www.fta.gov/submit-complaint)

MCRPC will process complaints that are complete. Once a completed Title VI Complaint Form is received, MCRPC will review it to determine proper jurisdiction, which may include consultation with the Illinois Department of Transportation, the Office of the Illinois Attorney General or the McLean County State's Attorney's Office. The complainant will receive an acknowledgement letter informing them whether or not the complaint will be investigated by MCRPC.

MCRPC will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, MCRPC may contact the complainant. Unless a longer period is specified by MCRPC, the complainant will have ten (10) days from the date of the letter to send requested information to the MCRPC Title VI Coordinator. If the requested information is not received within that timeframe the case will be closed. A case can be administratively closed if the complainant no longer wishes to pursue the case.

The Executive Director will serve as the Title VI Investigator for MCRPC. After the Title VI Coordinator reviews the complaint, the Title VI investigator will issue one of two letters to the complainant: a Closure Letter or Letter of Finding (LOF).

- A Closure Letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.
- A Letter of Finding (LOF) summarizes the allegations and provides an explanation of the corrective action to be taken.

If the complainant disagrees with MCRPC's determination, the complainant may request reconsideration by submitting the request in writing to the Title VI investigator within seven (7) days after the date of the letter of closure or letter of finding, stating with specificity the basis for the reconsideration. MCRPC will notify the complainant of the decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, MCRPC will issue a determination letter to the complainant upon completion of the reconsideration review.

## Monitoring and Documenting Title VI Complaints, Investigations or Litigation

To date, MCRPC has not received any complaints under Title VI or any other Federal statute or regulation. All Title VI complaints received will be entered and tracked in MCRPC's complaint log. Active investigations will be monitored for timely response on the part of all parties. The agency's Title VI Coordinator shall maintain the log.

### Sample Title VI Complaint Log

Date complaint filed	Complainant	Basis of complaint	Summary of allegation	Pending status of complaint	Actions taken	Closure Letter (CL)	Letter of Finding (LOF)	Date of CL or LOF

## Contracting, Sub-recipient Assistance and Monitoring

MCRPC requires that potential sub-recipients submitting responses to requests for qualifications or requests for proposals document their understanding and compliance with non-discrimination requirements. Contract language is required to include non-discrimination assurances substantially equivalent to the content of Appendix C.

If requested in connection with a program activity, MCRPC will provide the following information or materials to sub-recipients:

- Sample public notices, Title VI complaint procedures, and the recipient's Title VI complaint form.
- Sample procedures for tracking and investigating Title VI complaints filed with a sub-recipient.
- Direction regarding obtaining demographic information of population served by sub-recipients.
- Technical assistance, or referral for technical assistance.
- Reviews of Title VI Programs; follow-up as necessary.

To ensure that any sub-recipient contracting with MCRPC is compliant, MCRPC will:

- Document process for ensuring all sub-recipients are complying with the general and specific requirements.
- Collect and review sub-recipients' Title VI Programs.
- Upon request from a qualified agency, MCRPC shall request that sub-recipients who provide transportation services verify that their level and quality of service is equitably provided.

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## Index of Appendices

Appendix A: Title VI Assurances and Appendices Thereto

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Appendix C: Nondiscrimination Clauses

Appendix D: MCRPC Title VI Complaint Form

Appendix E: MCRPC Compendium of Outreach Resources

Appendix F: USDOT Planning and Equity Analysis

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## Appendix A: Title VI Assurances and Appendices Thereto

The text below is an example of the contract language used when engaging consultants or other entities in connection with an MCRPC project. Under the terms of the Illinois Grant Accountability and Transparency Act, projects undertaken by the MPO and under IDOT oversight are required to employ the contract language approved by GATA. GATA contracts must reflect the required assurances as set forth below.

The McLean County Regional Planning Commission (MCRPC), HEREBY AGREES THAT as a condition to receiving any federal financial assistance, it will comply with Title VI of the Civil Rights Act of 1964, 78 Stat. 252, 42 USC 2000d, *et seq.* (“Act”), and all requirements imposed by or pursuant to Title 49, Code of Federal Regulations and other pertinent directives, to the end that in accordance with the Act, Regulations, and other pertinent directives, no person in the United States shall, on the grounds of race, color, sex, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Recipient receives federal financial assistance, and HEREBY GIVES ASSURANCE THAT it will promptly take any measures necessary to effectuate this agreement.

MCRPC hereby gives the following specific assurances regarding its federal aid assisted programs:

MCRPC agrees to comply with all provisions prohibiting discrimination on the basis of race, color, or national origin of Title VI of the Civil Rights Act of 1964, as amended, 42 U.S.C. 200d *et seq.*, and with U.S. DOT regulations, “Nondiscrimination in Federally- Assisted Programs of the Department of Transportation – Effectuation of Title VI of the Civil Rights Act,” 49 CFR part 21.

MCRPC assures that no person shall, as provided by Federal and State civil rights laws, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity. MCRPC further ensures every effort will be made to ensure non-discrimination in all programs and activities, whether those programs and activities are federally funded or not.

MCRPC further assures that meets the objectives of the above-cited requirements including MCRPC and its third-party contractors by promoting actions that:

- A. Ensure that the level and quality of transportation service is provided without regard to race, color, or national origin.

- B. Identify and address, as appropriate, disproportionately high and adverse effects of programs and activities on minority populations and low-income populations.
- C. Promote the full and fair participation of all affected Title VI populations in transportation decision making.
- D. Prevent the denial, reduction, or delay in benefits related to programs and activities that benefit minority populations or low-income populations.
- E. Ensure meaningful access to programs and activities by persons with Limited English Proficiency (LEP).

1. That the Recipient agrees that each “program” and each “facility”, as defined in the Regulations, will be (with regard to a “program”) conducted or will be (with regard to a “facility”) operated in compliance with all requirements imposed by, or pursuant to, the Regulations.

2. That the Recipient shall insert the following notification in all solicitations for bids for work or material subject to the Regulations made in connection with federal aid assisted programs, and in adapted form in all proposals for negotiated agreements:

“The McLean County Regional Planning Commission, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000d, *et seq.*, and Title 49, Code of Federal Regulations hereby notifies all bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, sex or national origin in consideration for an award.”

3. That where the Recipient receives federal financial assistance to construct a facility, or part of a facility, the Assurance shall extend to the entire facility and facilities operated in connection therewith.

4. That where the Recipient received federal financial assistance in the form, or for the acquisition of real property, or an interest in real property, the Assurance shall extend rights to space on, over, or under such property.

5. That the Recipient shall include the appropriate clauses regarding a covenant running with the land, in any future deeds, leases, permits, licenses and similar agreements entered into by the Recipient with other parties: (a) for the subsequent transfer of real property acquired or improved under federal aid-assisted programs;

and (b) for the construction or use of, or access to space on, over, or under real property acquired or improved under federal aid-assisted programs.

6. That this Assurance obligates the Recipient for the period during which federal financial assistance is extended to the program, or is in the form of personal property, or real property or interest therein or structures or improvements thereon, in which case the Assurance obligates the Recipient or any transferee for the longer of the following periods: (a) the period during which the property is used for a purpose for which the federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits; or (b) the period during which the Recipient retains ownership or possession of the property.

7. The Recipient shall provide for such methods of administration for the program, as are found by the official to whom s/he delegates specific authority, to give reasonable guarantee that it, other recipients, sub-grantees, contractors, subcontractors, transferees, successors in interest, and other participants of federal financial assistance under such program will comply with all requirements imposed or pursuant to the Act, the Regulations, and this Assurance.

8. The Recipient agrees that the United States has a right to seek judicial endorsement with regard to any matter arising under the Act, the Regulations, and this Assurance.

THIS ASSURANCE is given in consideration of, and for the purpose of obtaining, any and all federal grants, loans, contracts, property, discounts or other federal financial assistance extended after the date hereof to the Recipient and is binding on it, other recipients, contractors, subcontractors, transferees, successors in interest, and other participants in the Federal Aid Highway Program. The person or persons whose signatures appear below are authorized to sign this Assurance on behalf of the Recipient.

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## Appendix B: Definitions, Abbreviations and Authorities (Statutes, Regulations and Guidance)

The following terms, definitions, abbreviations, and authorities may be cited with respect to Title VI programs and requirements.

**Affirmative Action** – A good faith effort to eliminate past and present discrimination in all federally assisted programs and to ensure future nondiscriminatory practices.

**Annual Work Plan** – This is an outline of monitoring and review activities determined for the next planning year and respective target dates, as well as a list of personnel assigned to activities.

**Beneficiary**– any person or group of persons (other than States) entitled to receive benefits, directly or indirectly, from any federally assisted program, i.e., relocates, impacted citizens, communities, etc.

**Citizen Participation** – an open process in which the rights of the community to be informed, to provide comments to the Government, and to receive a response from the Government are met through a full opportunity to be involved in the process and express the community’s needs and goals.

**Compliance** – condition that exists when a Recipient has effectively implemented all Title VI requirements and can demonstrate that there is no evidence of discrimination.

**Deficiency Status** – the interim period during which the Recipient has been notified of deficiencies, but has not voluntarily complied with Title VI.

**Discrimination** – the act or action, whether intentional or unintentional, through which a person in the United States, solely because of race, color, religion, sex, or national origin, has been otherwise subjected to unequal treatment under any program or activity receiving financial assistance from the Federal Highway Administration under Title 23 U.S.C.i Disparate Impact - results when rules and laws have a different and more inhibiting effect on women and minority groups than on the majority because of race, color, national origin, gender, disability or age.

This type of discrimination occurs when a neutral procedure or practice results in fewer services or benefits, or inferior services or benefits, to members of a protected group such as minorities or low-income populations. With disparate impact, the focus is on the consequences of a decision, policy or practice rather than on the intent.

**Environmental Justice** – to avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects on minority and low-income populations. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process, and to prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

**Facility** – includes all, or any part of, structures, equipment or other real or personal property, or interests therein, and the provision of facilities, including the construction, expansion, renovation, remodeling, alteration, or acquisition of facilities.

Federal Assistance – Includes:

1. Grants and loans of Federal funds,
2. The grant or donation of Federal property and interests in property,
3. The detail of Federal personnel,
4. The sale and lease of, and the permission to use (on other than a casual or transient basis), Federal property or any interest in such property without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the Recipient, or in recognition of the public interest to be served by such sale or lease to the Recipient and,
5. Federal agreement, arrangement, or other contract which has, as one of its purposes, the provision of assistance.

Good Faith Effort - affirmative action measures designed to implement the established objectives of a program or program requirements.

Limited English Proficient – an individual who does not speak English as a primary language and has limited ability to read, speak, write, or understand English.

Minority - Blacks, not of Hispanic origin; Hispanics; Asians or Pacific Islanders; American Indians or Alaskan Natives.

Non-compliance – the condition that exists when a Recipient has failed to meet prescribed requirements and has shown an apparent lack of “Good Faith Effort” in implementing all or some of the Title VI requirements.

Persons – where designation of persons by race, color, or national origin is required, the following designations ordinarily may be used: “White not of Hispanic origin”, “Black not of Hispanic origin”, “Hispanic”, “Asian or Pacific Islander”, “American Indian or Alaskan Native.” Additional subcategories based on national origin or primary language spoken may be used, where appropriate, on either a national or regional basis.

Person with a Disability -any person who: (a) has a physical or mental impairment which substantially limits one or more major life activities; (b) has a record of such an impairment; or (c) is regarded as having such an impairment.

Program – includes any project or activity for the provision of services, financial aid, or other benefits to individuals. This includes education or training, work opportunities, health, welfare, rehabilitation, housing, or other services, whether provided directly by the Recipient of Federal financial assistance or provided by others through contracts or other arrangements with the Recipient.

Protected Category – includes all categories of persons protected from discrimination under Title VI, including race, color, national origin, sex, age, disability, and income status.

Racial/Ethnic Identification – a person may be included in the group to which he or she appears to belong, identifies with, or is regarded in the community as belonging. However, no person should be counted in more than one racial/ethnic category. The following group categories will be used:

1. The category *white*, (not of Hispanic origin); All persons having origins in any of the original peoples of Europe, North Africa, the Middle East, or the Indian Subcontinent. The category *black* (not of Hispanic origin); All persons having origins in any of the Black racial groups.

2. The category *Hispanic*; All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
3. The category *Asian or Pacific Islanders*: All persons having origins in any of the original peoples of the Far East, Southeast Asia, or the Pacific Islands. This area includes, for example, China, Japan, Korea, the Philippine Islands, and Samoa.
4. The category *American Indian or Alaskan Native*: All persons having origins in any of the original peoples of North America.

Recipient – any State, territory, possession, the District of Columbia, Puerto Rico, or any political subdivision, or instrumentally thereof, or any public or private agency, institution, or organization, or other entity, or any individual, in any State, territory, possession, the District of Columbia, or Puerto Rico, to whom Federal assistance is extended, either directly or through another Recipient, for any program. Recipient includes any successor, assignee, or transferee thereof. The term Recipient does not include any ultimate beneficiary under any such program.

Secretary – the Secretary of Transportation as set forth in 49 CFR 21.17(g) (3) or the Federal Highway Administrator to whom the Secretary has delegated his/her authority in specific cases.

State Highway Agency – the department, commission, board, or official of any State charged by its laws with the responsibility for highway construction. The term State would be considered equivalent to State Highway Agency if the context so implies.

Timetable – a measure relating to calendar days.

Title VI Compliance Review - an evaluation and determination of a nonexempt direct Federal or Federal-Aid Recipient's compliance with the equal opportunity requirements established in the Authorities listed in Section II of this document.

Title VI Program – the system of requirements developed to implement Title VI of the Civil Rights Act of 1964. References in this part to Title VI requirements and regulations shall not be limited to only Title VI of the Civil Rights Act of 1964. Where appropriate, this term also refers to the civil rights provisions of the other Federal related statutes to the extent they prohibit discrimination on the grounds of race, color, national origin, sex, disability, and age in programs receiving Federal financial assistance.

Title VI Coordinator – a COG/TPB employee whose principal function is to direct the management of the Title VI Program to include developing policies, practices, procedures, and equal opportunity initiatives. The Title VI Officer provides direct support to the reviewing officers assigned to various departments within COG/TPB.

## Concept Definitions

**Legislation.** The term legislation is a law which has been promulgated (or enacted) by a legislature or other governing body. The term may refer to a single law, or the collective body of enacted law, while "statute" is also used to refer to a single law. Example document types include: 23 USC, SAFETEA-LU, NEPA, and Title VI. Additionally, court decisions are treated with same effect as legislation in the administration of the PGC.

**Regulation.** The term regulation is an agency statement of general applicability and future effect, which has the force and effect of law, that is designed to implement, interpret, or prescribe law or policy or to describe the procedure or practice requirements of an agency. Regulation is codified in the Code of Federal Regulations (CFR). Executive Orders are also considered regulation. Executive Orders are codified in 3 CFR. For example, 23 CFR and 49 CFR are commonly referenced in the PGC.

**Policy.** The term policy is an internal agency statement of general applicability and future effect, other than a regulatory action, that sets forth a course of action, plan, or procedure on a statutory, regulatory, or technical issue or an interpretation of a statutory or regulatory issue. Policy assists the agency with implementing a program, and is often cited with regulation to verify program compliance. The agency expectation is that policies will be implemented and adhered to without deviation. FHWA Policy is issued in accordance with FHWA Order 1321.1C FHWA Directives Management. Directives, Policy Memorandums, and Non-regulatory Supplements are examples of existing policy document types.

**Guidance.** The term guidance is an agency statement of general applicability and future effect, other than a regulatory or policy action, that provides advice and assistance on a statutory, regulatory, policy, or technical issue. Guidance is used to influence decisions and actions to achieve an expected program outcome. The term implies an agency expectation that the content will be considered in making specific decisions or actions that is within the user's discretion. Guidance can be either external or internal in nature. Technical Advisories and Memorandums are commonly used to transmit guidance documents.

**Information.** Information is the act of informing or giving permanent and long-lasting definite knowledge acquired. The content is educational in nature. No agency expectation is implied that the user should consider it in their actions or decisions for specific situations. However, users should be aware that the information is available if they need general background reference on the topic. Information is transmitted in a number of forms including memoranda, reports, email, guides, handbooks, primers, desk references, tool kits, questions and answers, etc.

### Abbreviations

AAP	Affirmative Action Plan
CAC	Citizens Advisory Committee
CFR	Code of Federal Regulations
CLRP	Constrained Long Range Plan

EEO	Equal Employment Opportunity
EEOC	Equal Employment Opportunity Commission
EIS	Environmental Impact Statement
EJ	Environmental Justice
EO	Equal Opportunity
E.O.	Executive Order
FAST	
FHW A	Federal Highway Administration
FTA	Federal Transit Administration
GFE	Good Faith Efforts
IDOT	Illinois Department of Transportation
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
LEP	Limited English Proficiency
MAP-21	Moving Ahead for Progress in the 21st Century
MPO	Metropolitan Planning Organization
NEPA	National Environmental Policy Act
NTP	Notice to Proceed
OEO	Office of Equal Opportunity
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act; A Legacy for Users
TEA-21	Transportation Equity Act for the 21st Century
TIP	Transportation Improvement Program
USC	United States Code
USDOJ	United States Department of Justice
USDOL	United States Department of Labor
USDOT	United States Department of Transportation

## Authorities

- 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;
- USDOT Order 1050.2;
- Executive Order #12898 (Environmental Justice);
- Executive Order #13166 (Limited-English-Proficiency).

## Federal Statutes

Infrastructure Investment and Jobs Act (IIJA) (11/15/2021)

Fixing America's Surface Transportation Act (FAST Act) (12/14/2015) Moving Ahead for Progress in the 21st Century Act (MAP-21) (07/06/2012) The Age Discrimination in Employment Act of 1967, as amended (02/20/2009) The Equal Pay Act of 1963 (02/20/2009)

Title VI of the Civil Rights Act of 1964, Pub. L. 88-352, title VI, §601, July 2, 1964, 78 Stat. 252 (42 U.S.C. 2000d) – provides 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 subjected to discrimination under any program or activity receiving Federal financial assistance.

The Age Discrimination Act of 1975 (42 U.S.C §§ 6101-6107) – prohibits age discrimination in Federally Assisted Programs.

The Federal-aid Highway Act, (49 U.S.C. § 306) – Outlines responsibilities of the U.S. DOT and the Secretary's authority to determine compliance with applicable Civil Rights statutes.

The Federal-aid Highway Act, Pub. L. No. 97-449, 96 Stat. 2421 (1983) (codified as amended at 49 U.S.C. § 306) – added the requirement that there be no discrimination on the grounds of sex in DOT financial assistance programs.

The 1973 Federal-Aid Highway Act, Pub. L. No. 93–87, 87 Stat. 250 (1973) (23 U.S.C. § 324) – added the requirement that there be no discrimination on the grounds of sex in Title 23 programs.

The Civil Rights Restoration Act of 1987, Pub L. No 100-259, 102 Stat. 28 (1988) - restored the broad, institution-wide scope and coverage of the nondiscrimination statutes to include all programs and activities of Federal-aid recipients, sub-recipients and contractors, whether such programs and activities are federally assisted or not.

The Uniform Relocation Assistance and Real Property Acquisition Policy Act of 1970, Pub. L. No. 91-646, 84 Stat. 1894 (1971) (codified as amended at 42 U.S.C. §§ 4601-4638) – provides for fair treatment of persons displaced by Federal and Federal-aid programs and projects.

The Uniform Relocation Act Amendments of 1987, Pub. L. No. 101- 246 – Updated the 1970 Act and clarified the intent of Congress in programs and projects which cause displacement.

Rehabilitation Act Amendments of 1986, Pub L. No. 99–506, 100 Stat. 1807 (1986) (42 U.S.C. § 2000d-7) – abrogated recipient state sovereign immunity from suit under Title VI.

The American with Disabilities Act, Pub. L. 101-336 – provides enforceable standards to address discrimination against individuals with disabilities.

The American with Disabilities Act, Pub. L. No. 101-336, 104 Stat. 327 (1990) (codified as amended at 42 U.S.C. § 12101 **et seq.**) – added the requirement that there be no discrimination on the grounds of disability, abrogated sovereign immunity, and provided enforceable standards to address discrimination against individuals with disabilities.

The Civil Rights Act of 1991, Pub. L. No. 102–166, 105 Stat. 1071 (1991) (codified in part at 42 U.S.C. § 1981) – in part, amended Section 1981 of 42 U.S.C. to provide a definition for the term “make and enforce contracts”, and to provide protection of the rights protected by this section against impairment by nongovernmental discrimination under color of State law.

Title VIII of the 1968 Civil Rights Act, Pub. L. No. 90-284, 82 Stat. 81 (1968) (codified as amended at 42 U.S.C. § 3601 **et seq.**) – Requires fair housing practices in the sale or rental of housing, and zoning and planning by localities.

The National Environmental Policy Act of 1969, Pub. L. No. 91-190, 83 Stat. 852 (1969) (42 U.S.C. § 4321) – Requires the preparation of environmental impact statements for major federal agency actions affecting the human environment. Under NEPA, federal agencies and federal aid recipients are required to consider several alternative actions, including the “no- action” alternative, and to consider social, environmental, and economic impacts, public involvement. Title IX of the Education Amendments of 1972, Pub. L. No. 92-318, 86 Stat. 374 (1972) (20 U.S.C.A. § 1682) – makes financial assistance available to institutions of higher education.

Transportation Equity Act for the 21st Century, Pub. L. No. 105–178, 112 Stat. 107 (1999) (codified in part at 23 U.S.C. § 101) – in part, mandates expenditures in federally assisted transportation programs through Disadvantaged Business Enterprises.

#### Executive Orders

E.O. 12250, 28 C.F.R. Pt. 41, App. A (1980) – Orders DOJ Leadership and Coordination of Nondiscrimination Laws.

E.O. 12259, 46 Fed. Reg. 1253 (1980) – Orders HUD Leadership and Coordination of Federal Fair Housing Programs.

E.O. 12898, 59 Fed. Reg. 7629 (1994) – Orders Federal actions to address Environmental Justice in minority populations and low-income populations.

E.O. 13160, 65 Fed. Reg. 39775 (2000) – Orders nondiscrimination on the basis of race, sex, color, national origin, disability, religion, age, sexual orientation, and status as a parent in federally conducted education and training programs.

E.O. 13166, 65 Fed. Reg. 50121 (2000) – Orders Federal agencies and their recipients to improve access to federally sponsored programs for persons with Limited English Proficiency (LEP).

E.O. 13175, 65 Fed. Reg. 218 (2000) – Orders Consultation and Coordination with Indian Tribal Governments.

## Regulations

23 C.F.R. §200 – FHWA’s Title VI Program Implementation and Review Procedures.

23 C.F.R. Part 420.121(h) – part of FHWA’s planning regulations that specify the applicability of Title VI of the 1964 Civil Rights Act and Restoration Act of 1987 to FHWA funded planning and research activities.

23 C.F.R. Part 450 –Federal Highway Administration’s Statewide and Metropolitan Planning Regulations.23 C.F.R. Part 450.316(b) (2) & (3) – requires that the metropolitan planning process be consistent with Title VI of the 1964 Civil Rights Act and the recipient’s Title VI Assurances.

23 C.F.R. Part 633, Subpart A – specifies required contract provisions to be included in all Federal-aid construction contracts under Title VI and other federal provisions.

23 C.F.R. Part 633, Subpart B, Appendix A – specifies the types of contracts to which Title VI of the 1964 Civil Rights Act applies.

23 C.F.R. Part 771.105(f)—FHWA’s Policy on Title VI – expands on 23 C.F.R. 200.7 and names categories covered with wording similar to Title VI of the Civil Rights Act of 1964 – race, color, national origin, age, sex, handicap.

28 C.F.R. Part 35 – DOJ regulations governing nondiscrimination on the basis of disability in State and local government services.

28 C.F.R. Part 41 – Requires DOJ to coordinate the implementation of Section 504 of the Rehabilitation Act, and provides guidelines for determining discretionary practices.

28 C.F.R. Part 42, Subpart C – DOJ’s implementation of Title VI of the Civil Rights Act of 1964.

28 C.F.R. Part 42.200, Subpart D – “Nondiscrimination in Federally assisted Programs – Implementation of Section 815 (c) (1) of the Justice System Improvement Act of 1979” – implements E.O. 12138.

28 C.F.R. Part 50.3 – DOJ’s guidelines for the enforcement of Title VI, Civil Rights Act of 1964.

49 C.F.R. Part 21 – DOT’s implementation of Title VI of the Civil Rights Act of 1964.

49 C.F.R. Part 24 – DOT’s implementation of the Uniform Relocation and Real Property Acquisition Act for Federal and federally assisted programs requiring compliance with Nondiscrimination Statutes and Executive Orders.

49 C.F.R. Part 25 – DOT’s implementation of Title IX of the Education Amendments Act of 1972.

49 C.F.R. Part 26 – DOT’s implementation of Participation by Disadvantaged Business Enterprises in DOT Financial Assistance Programs.

49 C.F.R. Part 27 – DOT’s implementation of Section 504 of the Rehabilitation Act of 1973 as amended.

49 C.F.R. Part 28 – Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Department of Transportation.

49 C.F.R. Part 37 – Transportation Services for Individuals with Disabilities, implementing the transportation and related provisions of Title II and III of the ADA proscriptions included in Form FHWA 1273.

Administrative Guidance

DOT Order 1000.12C – implementation of the U.S. Department of Transportation Title VI Program.

DOT Order 1050.2 – Standard Title VI Assurances.

DOT Order 5610.2 – U.S. Department of Transportation Order to Address Environmental Justice in Minority Populations and Low-Income Populations.

FHWA Order 4710.1 – Right-of-Way Title VI Review Program.

FHWA Order 4710.2 – Civil Rights Compliance Reviews of Location Procedures.

FHWA Order 4720.6 – Civil Rights Restoration Act of 1987 in FHWA Programs.

FHWA Order 6640.23 – Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

Joint FHWA/FTA Memorandum dated October 7, 1999: Guidance on Implementing Title VI in Metropolitan and Statewide Planning.

DOJ Title VI Legal Manual (September, 1998) Processing Complaints Filed Under Title VI of the Civil Rights Act of 1964 (Title VI) and the Americans with Disabilities Act of 1990 (ADA)

DOJ Policy Guidance Document dated January 11, 2002 – Memo re: E.O. 13166, Improving Access to Services for persons with Limited English Proficiency.

DOJ Policy Guidance Document dated January 18, 2002 – Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons.

DOT Policy Guidance Document dated December 14, 2005 – Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) persons.

FTA C 4702.1B (October 1, 2012) – "Title VI Requirements and Guidelines for Federal Transit Administration Recipients." Provides FTA financial assistance recipients with guidance on implementing Title VI regulations.

## Appendix C: Nondiscrimination Clauses

The following nondiscrimination clauses are included in MCRPC Requests for Proposals and other solicitations for submission, subject to requirements by the Illinois Department of Transportation.

DBE – The McLean County Regional Planning Commission, in accordance with Title VI of the Civil Rights Act of 1964 and 78 Stat. 252, 42 USC 2000 d – 42 and Title 49, Code of Federal Regulations, hereby notifies all bidders that it will affirmatively ensure that any contract entered pursuant to this advertisement will afford minority business enterprises full opportunity to submit bids in response to this invitation, and will not discriminate on the grounds of race, color, sex or national origin in consideration for an award.

The following nondiscrimination clauses are included in FTA-funded procurements or where DBE is otherwise assessed:

DBE Assurance – The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract.

The contractor shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of USDOT assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.

The following nondiscrimination clauses are included in MCRPC contracts and subgrant agreements:

Civil Rights Requirements – 29 U.S.C. § 62, 42 U.S.C. § 2000, 42 U.S.C. § 602, 42 U.S.C. § 12112, 42 U.S.C. § 12132, 49 U.S.C. § 5332

Nondiscrimination – In accordance with Title VI of the Civil Rights Act, as amended, 42 U.S.C. § 2000d, section 303 of the Age Discrimination Act of 1975, as amended, 42 U.S.C. § 6102, section 202 of the Americans with Disabilities Act of 1990, 42 U.S.C. § 12132, and all other provisions of Federal law, the Contractor agrees that it will not discriminate against any employee or applicant for employment because of race, color, creed, national origin, sex, age or disability. In addition, the Contractor agrees to comply with applicable Federal implementing regulations.

Equal Employment Opportunity – The following equal employment opportunity requirements apply to the underlying contract:

Race, Color, Creed, National Origin, Sex – In accordance with Title VII of the Civil Rights Act, as amended, 42 U.S.C. § 2000e, the Contractor agrees to comply with all applicable equal employment opportunity requirements of U.S. Department of Labor (U.S. DOL) regulations, “Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor,” 41 CFR Parts 60 et seq., (which implement Executive Order No. 11246, “Equal Employment Opportunity”, as amended by Executive Order No. 11375, “Amending Executive Order 11246 Relating to Equal Employment Opportunity,” as amended by Executive Order No. 11375, “Amending Executive Order 11246 Relating to Equal Employment Opportunity,” 42 U.S.C. § 2000e note), and with any applicable Federal Statutes, executive orders, regulations, and Federal policies that may in the future affect activities undertaken in the course of this Project. The Contractor agrees to take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their race, color, creed, national origin, sex, or age. Such action shall include, but not be limited to, the following: employment, upgrading, demotion or transfer, recruitment or recruitment advertising, layoff or termination, rates of pay or other forms of compensation; and selection for training, including apprenticeship. In addition, the Contractor agrees to comply with any implementing requirements the funding federal agency may issue.

Age – In accordance with section 4 of the Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. § § 623 and other applicable law, the Contractor agrees to refrain from discrimination against present and prospective employees for reason of age. In addition, the Contractor agrees to comply with any implementing requirements the funding federal agency may issue.

Disabilities – In accordance with section 102 of the Americans with Disabilities Act, as amended, 42 U.S.C. § 12112, the Contractor agrees that it will comply with the requirements of U.S. Equal Employment Opportunity Commission, “Regulations to Implement the Equal Employment Provisions of the Americans with Disabilities Act”, 29 CFR Part 1630, pertaining to employment of persons with disabilities. In addition, the Contractor agrees to comply with any implementing requirements the funding federal agency may issue.

The Contractor also agrees to include these requirements in each subcontract financed in whole or in part with Federal Assistance, modified only if necessary to identify the affected parties.

Appendix D: MCRPC Title VI Complaint Form



Title VI Complaint Form  
McLean County Regional Planning Commission 115  
East Washington Street, Suite M-103  
Bloomington, Illinois, 61701

The McLean County Regional Planning Commission (MCRPC) is committed to ensuring that no person is excluded from participation in or denied the benefit of services it provides on the basis of race, color, or national origin, as provided by Title VI of the Civil Rights Act of 1964, as amended, and related federal legislation.

Title VI complaints must be filed within 180 days from the date of the alleged discrimination by MCRPC. To file a complaint this completed form must be returned to the McLean County Regional Planning Commission, located at 115 East Washington Street, Suite M-103, Bloomington, Illinois, 61701. Faxed or e-mailed forms are not accepted. Hand delivery is recommended to ensure that the complaint is received and filed within the statutory deadline. Delivery services providing delivery confirmation are also acceptable.

Section 1

Your Name: \_\_\_\_\_ Phone: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State, & Zip Code: \_\_\_\_\_

Section 2

1. Are you filing this complaint on your own behalf? Yes No

2. If you answered "No" to question 1, please describe your relationship to the person (complainant) for whom you are filing and why you are filing for a third party.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Have you obtained permission from the aggrieved party (complainant) to file this complaint on his or her behalf? Yes No

Section 3

4. Have you previously filed a Title VI complaint with the McLean County Regional Planning Commission? Yes No

5. Have you filed this complaint with any other federal, state, or local agencies? Yes No

If you answered "Yes" to question 5, please list other agencies with which this complaint has been filed. If you need more room, please attach any additional information to this form.

Agency: \_\_\_\_\_  
Contact Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_

Agency: \_\_\_\_\_  
Contact Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State, Zip Code: \_\_\_\_\_

Section 4

Which of the following best describes the reason for the alleged discrimination of this complaint? Please select any that apply.

- |                                |  |   |
|--------------------------------|--|---|
| <input type="checkbox"/> Race  | <input type="checkbox"/> Age                 | <input type="checkbox"/> Harassment             |
| <input type="checkbox"/> Color | <input type="checkbox"/> National Origin     | <input type="checkbox"/> Income Status          |
| <input type="checkbox"/> Sex   | <input type="checkbox"/> Disability/Handicap | <input type="checkbox"/> Other (please explain) |

Other Reason(s): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Date of Incident: \_\_\_\_\_

Please describe the alleged incident on which this complaint is based, and how you feel you were discriminated against, including how others may have been treated differently than you. If you require additional space or have additional written material pertaining to your complaint, please attach to this form.

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Provide the names and titles of person(s) who allegedly discriminated against you. If you require additional space or have additional written material pertaining to your complaint, please attach to this form.

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Section 5

I affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

Complainant's Signature: \_\_\_\_\_

Print or Type Name of Complainant: \_\_\_\_\_

Date: \_\_\_\_\_

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**For MCRPC Use Only**

Date Received: \_\_\_\_\_

Received by: \_\_\_\_\_ Title \_\_\_\_\_

Action by: \_\_\_\_\_ Date \_\_\_\_\_

## Appendix E: MCRPC Outreach List

Libraries
Library Name
Allin Township Library
Bloomington Public Library
Carlock Public Library District
Cheneys Grove Township Library
Chenoa Public Library
Danvers Township Library
Golden Prairie Library
Gridley Public Library
Heyworth Library
Hudson Library
Lexington Library
Martin Township Public Library
Moyer District Library
Mt Hope-Funks Grove Library
Normal Public Library
Towanda District Library

Radio and TV Stations
Station Name
WBNQ - 101.5 MHz - Top 40
W271DC (WJBC) - 102.1
WZND-LP - 103.3 MHz - Christian CHR
WGLT - 89.1 MHz - Public Radio
WBWN - 104.1 MHz - Country
WCIA TV – News - Champaign
WAND TV – News – Decatur
WEEK 25 TV – News – Peoria
WMBD CIProud – News – Peoria
WYZZ Fox TV – News – Peoria

DRAFT

Transit Providers	
Provider Name	
SHOW BUS (Rural Public Transportation)	
Faith in Action	
East Central Illinois Area Agency on Aging	
LIFE Center for Independent Living (LIFE-CIL)	
Mid Central Community Action (MCCA)	
Lifelong Access (Previously Marcfirst)	
Illinois Dept. of Human Services, Division of Rehabilitation Services	
McLean County Veterans Assistance Commission (VAC)	
Bloomington VA Clinic (US Department of Veterans Affairs)	
Illinois Department of Veterans' Affairs (IDVA)	
Homes of Hope	

Newspapers
Newspaper Name
The Normalite
The Lexingtonian Newspaper
Chenoa News
The Pantagraph (Bloomington-Normal)
Chenoa Town Crier
Heyworth Buzz
LeRoy Leader
The Quill (Carlock, Hudson and Danvers)

DRAFT

Stakeholders to Consider	
Organization or Agency Name	
Bloomington Housing Authority	
Bloomington Public Library	
Bloomington-Normal Economic Development Council	
Bloomington-Normal Sunrise Rotary	
Carle BroMenn Medical Center	
Center for Human Services	
Chestnut Health Systems	
City of Bloomington	
Connect Transit	
Country Financial	
East Central Illinois Agency on Aging	
Epiphany Catholic Church	
Evergreen FS	
Faith in Action	
Habitat for Humanity	
Heartland Community College	
Heritage Operations Group	
Hindu Temple of Bloomington-Normal	
Holy Trinity Catholic Church	
Iglesia Celebracion	
Illinois Corn Association	
Illinois Farm Network	
Illinois Soybean Association	
Illinois State University	
Illinois Wesleyan University	
Islamic Center of McLean County	
ISU Health Center	
Life CIL	
McLean County Chamber of Commerce	

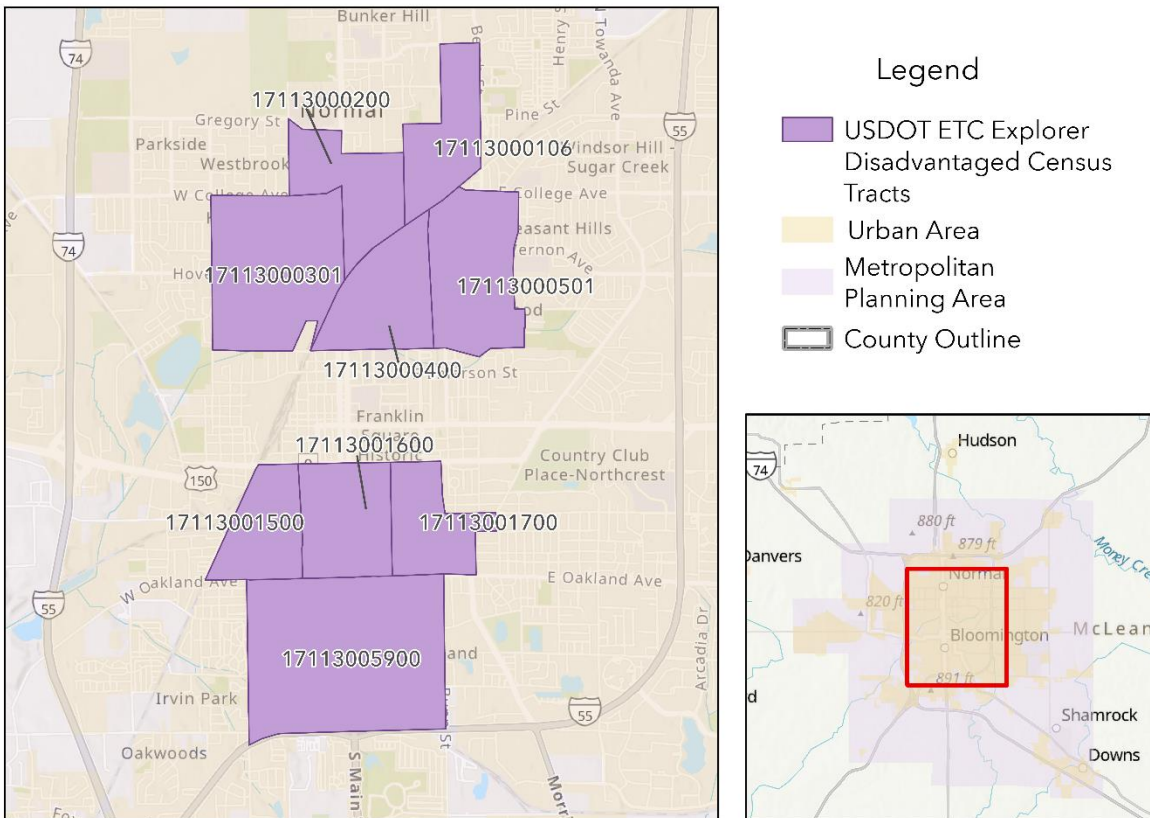
McLean County Farm Bureau
McLean County History Museum
McLean County Mayors Association
McLean County NAACP
McLean County Regional Planning Commission
Mid Central Community Action
Moses Montefiore Temple
OSF St. Joseph Medical Center
PATH
Prairie State Legal Services
Project Oz
Regional Office of Education 17
Rivian
Salvation Army
School District 87
SHOW Bus
Small Business Development Center
St Mary's Roman Catholic Church
State Farm
The Immigration Project
Town of Normal
United Way of McLean County
Vale Church
Wayman African Methodist Episcopal Church
Wesley United Methodist Church Bloomington
YMCA McLean County

## Appendix F: USDOT Planning and Equity Analysis

### USDOT Equitable Transportation Community Explorer

The Equitable Transportation Community Explorer (ETC Explorer) is an interactive web tool that can be used to understand the cumulative burden communities experience because of underinvestment in transportation relating to 5 main categories: transportation insecurity, environmental burden, social vulnerability, health vulnerability, and climate and disaster risk burden. This tool was created in support of Executive Order 14008, the Justice40 Initiative. MCRPC used this tool to identify USDOT ETC disadvantaged areas. Map X below shows the transportation disadvantaged census tracts in McLean County that were identified using the tool.

U.S Department of Transportation Disadvantaged Census Tracts  
From the USDOT Equitable Transportation Community Explorer



Esri, NASA, NGA, USGS, FEMA, Esri, CGIAR, USGS, Town of Normal GIS, McGIS-McLean County GIS, Esri, TomTom, Garmin, SafeGraph, FAO, METI/ NASA, USGS, EPA, NPS, USFWS, McGIS-McLean County GIS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

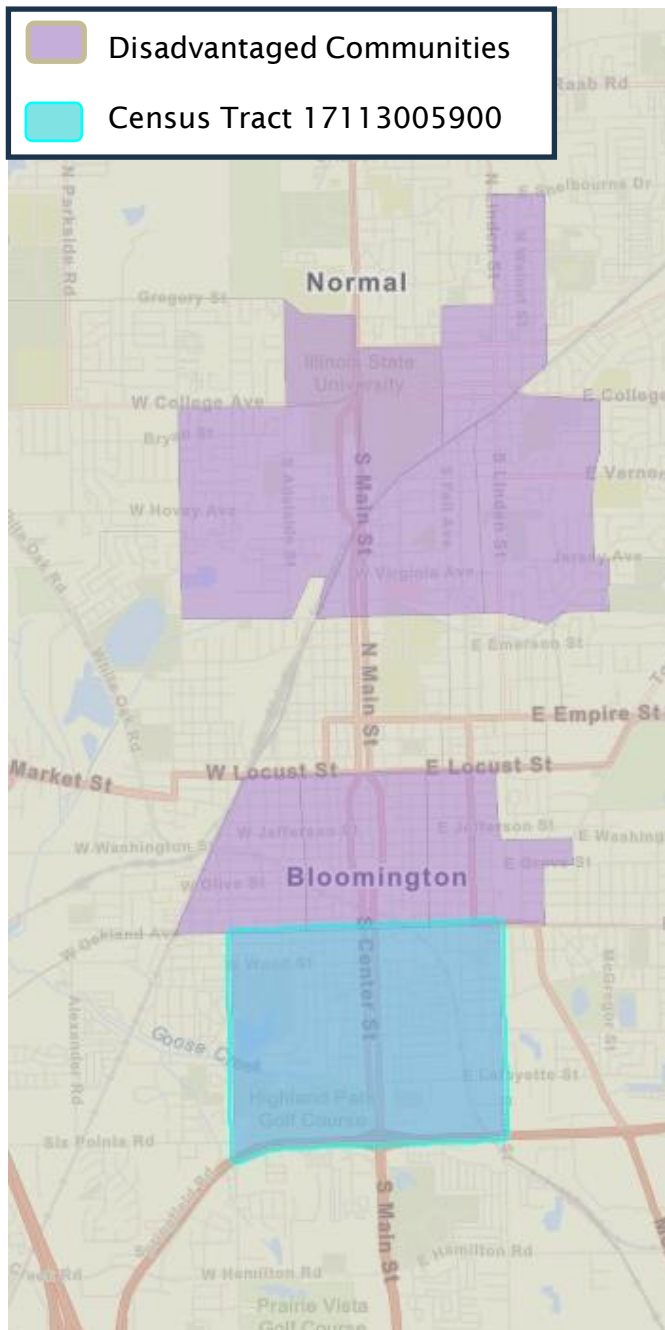
## Detailed Analysis: ETC Explorer Identified Disadvantaged Census Tracts

The USDOT's ETC tool identified 9 census tracts as disadvantaged, all of which are located within the Metropolitan Planning Area. Two conglomerates of disadvantaged census tracts are apparent with one located in Bloomington and one in Normal. In both Bloomington and Normal, disadvantaged census tracts are concentrated around the central parts of the area.

The following analysis will isolate each disadvantaged census tract and provide information and details under three major aspects of transportation insecurity: cost, access, and safety. The identified aspects of transportation insecurity serve as overarching themes that categorize the challenges and impediments individuals encounter daily while trying to access transportation and maintain mobility in their life.

## Census Tract 17113005900

This tract is located just north of Business Loop I-55. The area includes Highland Park Golf Course, Miller Park, and Miller Park Zoo to the southwest. Along U.S 51, a business corridor is present. To the east U.S 51 is Evergreen Memorial Cemetery and farther south is an area of manufacturing. There is also a significant portion of single-family housing and a smaller area of medium-density housing.



### Cost Burden Summary

- **Poverty Level** - 48.54% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$30,536.00.
- **Transportation Cost Burden** - The average household in this tract spends 28.45% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$9,689.00 on transportation.
- **Housing Cost Burden** - 33.47% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

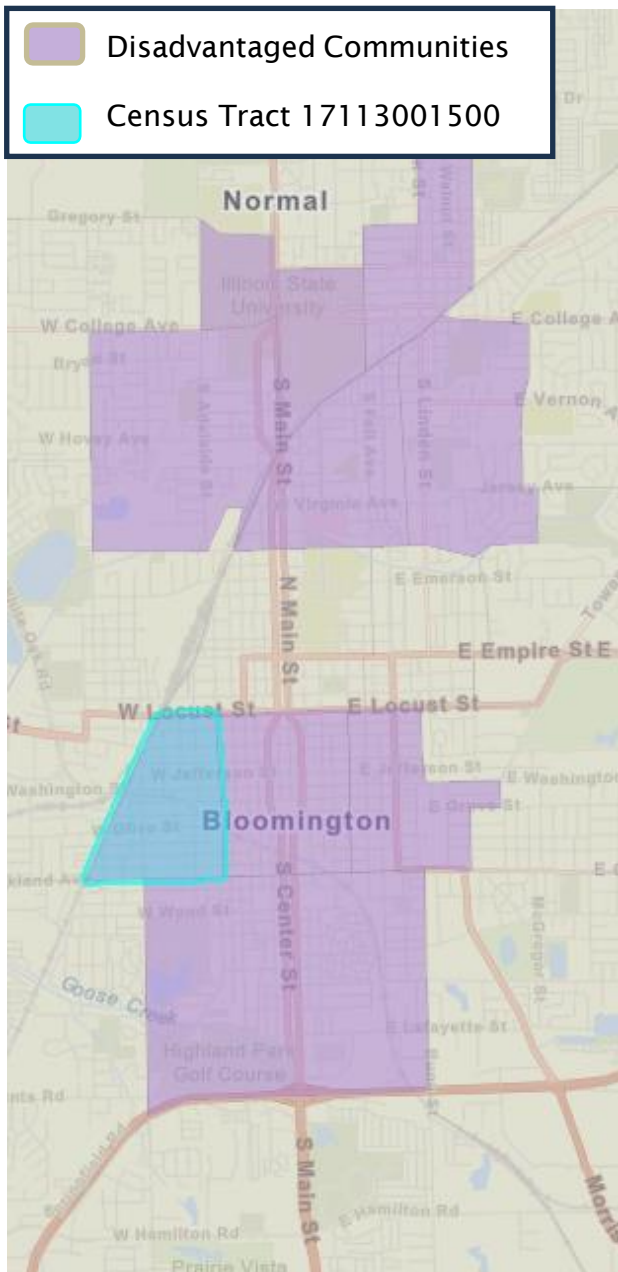
- **Number of Households with no Personal Vehicle** - An estimated 20.00% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by some transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - [Adult Education](#) - 40 minutes
  - [Grocery Stores](#) - 5 minutes
  - [Medical Facilities](#) - 3 minutes
  - [Parks](#) - 2 minutes
- **Points of Interest within a 15 Minute Walk?**
  - [Adult Education](#) - No
  - [Grocery Stores](#) - No
  - [Medical Facilities](#) - No
  - [Parks](#) - Yes
- **Broadband Access** - 31.90% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 15.63 per 100k people annual average between 2016-2020.

## Census Tract 17113001500

This census tract is located to the west of downtown Bloomington south of Locust St. The area includes mainly medium-density, single-family and manor multi-family and iconic building housing, but is also home to several churches and a few parks.



### Cost Burden Summary

- **Poverty Level** - 57.94% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$32,568.00.
- **Transportation Cost Burden** - The average household in this tract spends 26.38% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$9,743.00 on transportation.
- **Housing Cost Burden** - 35.75% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

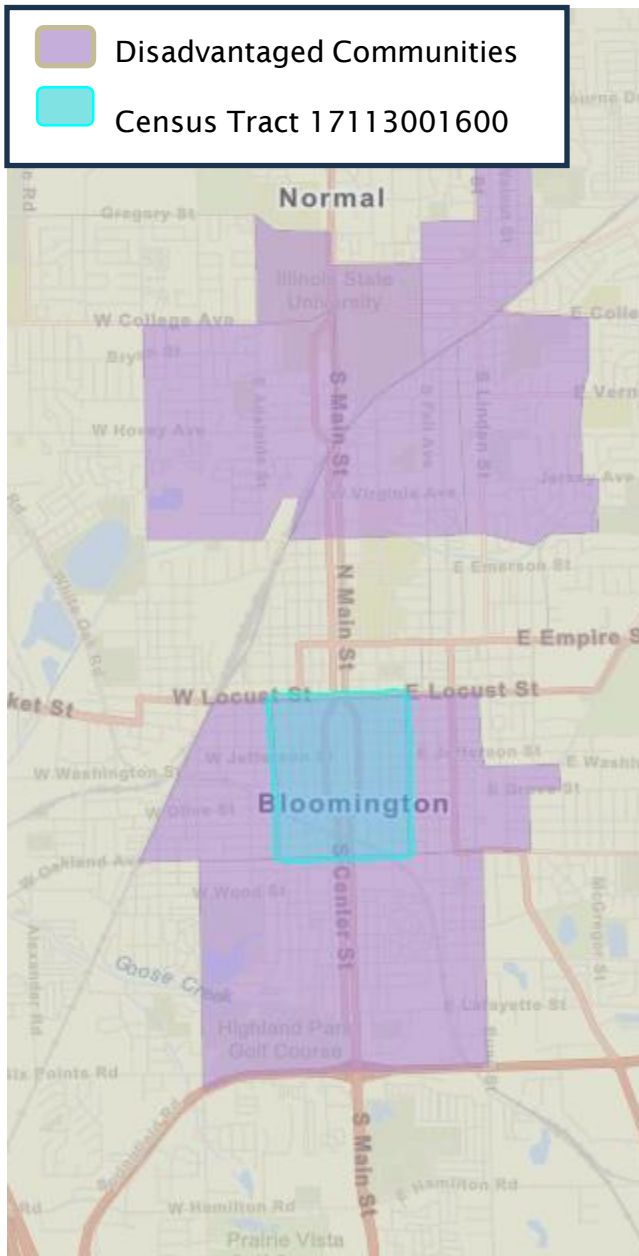
- **Number of Households with no Personal Vehicle** - An estimated 20.20% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by some transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
- **Points of Interest within a 15 Minute Walk?**
  - Adult Education - No
  - Grocery Stores - No
  - Medical Facilities - Yes
  - Parks - Yes
- **Broadband Access** - 30.60% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.23 per 100k people annual average between 2016-2020.

## Census Tract 17113001600

This census tract is in the heart of the city, downtown Bloomington. While this area is home to Bloomington's central business and office district, included is also various public institutions to the southeast of downtown and various types of residential housing along the outskirts of the tract.



### Cost Burden Summary

- **Poverty Level** - 56.22% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$26,355.00.
- **Transportation Cost Burden** - The average household in this tract spends 32.23% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$9,549.00 on transportation.
- **Housing Cost Burden** - 36.27% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

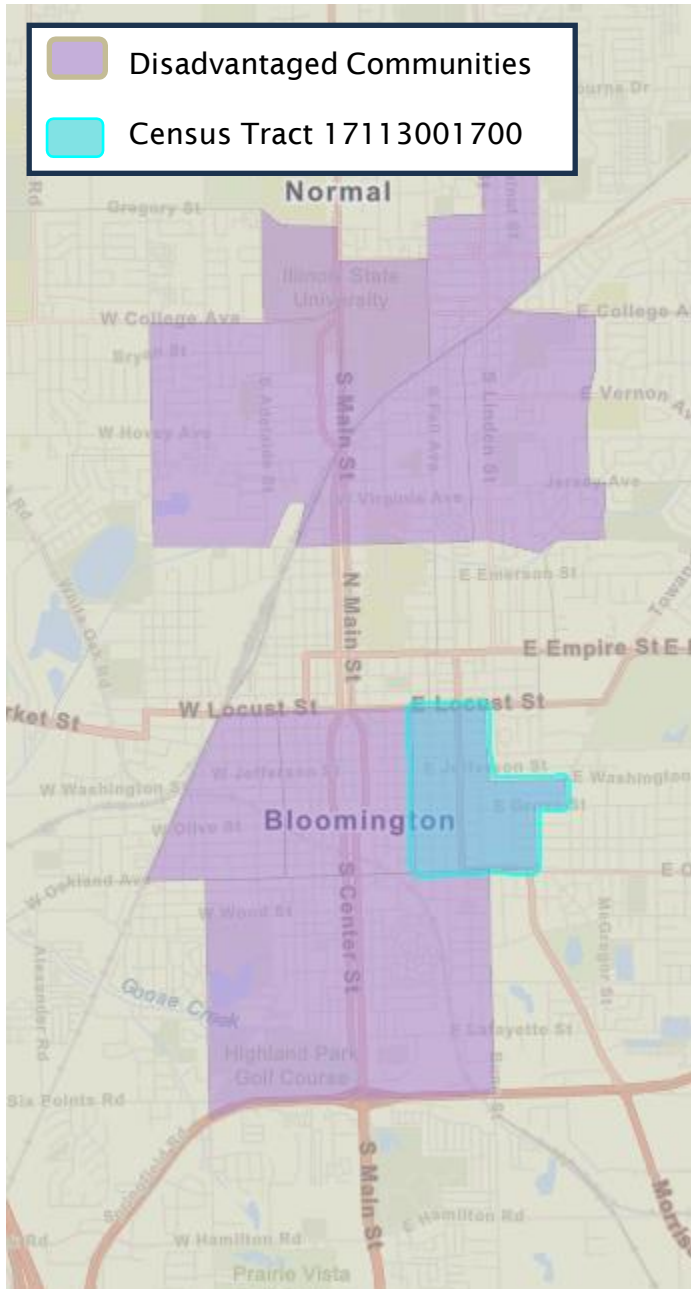
- **Number of Households with no Personal Vehicle** - An estimated 27.50% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by lots of transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - Adult Education - 40 minutes
  - Grocery Stores - 2 minutes
  - Medical Facilities - 1 minutes
  - Parks - 1 minutes
- **Points of Interest within a 15 Minute Walk?**
  - Adult Education - No
  - Grocery Stores - Yes
  - Medical Facilities - Yes
  - Parks - Yes
- **Broadband Access** - 20.50% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.23 per 100k people annual average between 2016-2020.

## Census Tract 17113001700

This census tract is located immediately east of downtown Bloomington. The tract contains mostly mixed-use and single-family housing along with a few parks, an area of manufacturing to the southwest and several businesses operating along E Washington St and U.S 150.



### Cost Burden Summary

- **Poverty Level** - 44.46% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$47,850.00.
- **Transportation Cost Burden** - The average household in this tract spends 17.91% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$9,727.00 on transportation.
- **Housing Cost Burden** - 32.43% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

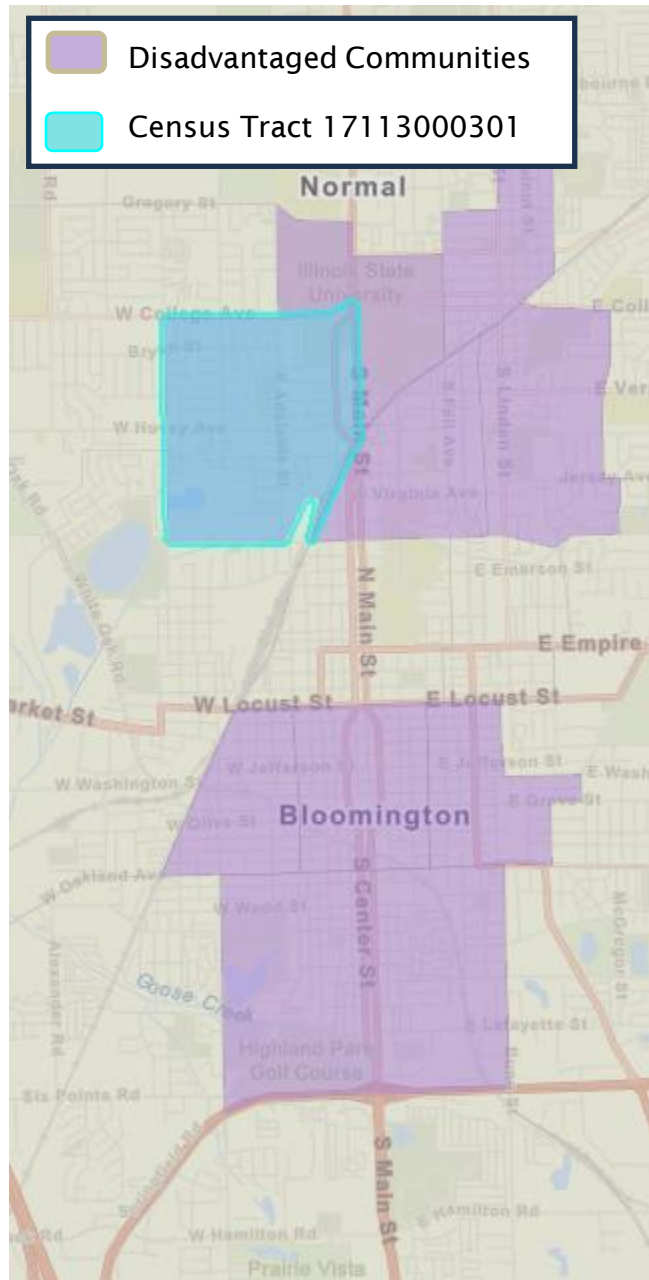
- **Number of Households with no Personal Vehicle** - An estimated 14.60% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by lots of transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - Adult Education - 41 minutes
  - Grocery Stores - 4 minutes
  - Medical Facilities - 2 minutes
  - Parks - 1 minutes
- **Points of Interest within a 15 Minute Walk?**
  - Adult Education - No
  - Grocery Stores - No
  - Medical Facilities - Yes
  - Parks - Yes
- **Broadband Access** - 16.80% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.21 per 100k people annual average between 2016-2020.

## Census Tract 17113000301

This census tract is located on the southwest side of Normal, adjacent to Illinois State University's campus. The tract consists of mostly medium density single family housing, but also includes Oakdale Elementary School, Kinglsey Jr High School, general businesses along U.S 51 and some areas of manufacturing near Sugar Creek.



### Cost Burden Summary

- **Poverty Level** - 47.84% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$32,691.00.
- **Transportation Cost Burden** - The average household in this tract spends 26.81% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$10,153.00 on transportation.
- **Housing Cost Burden** - 31.54% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

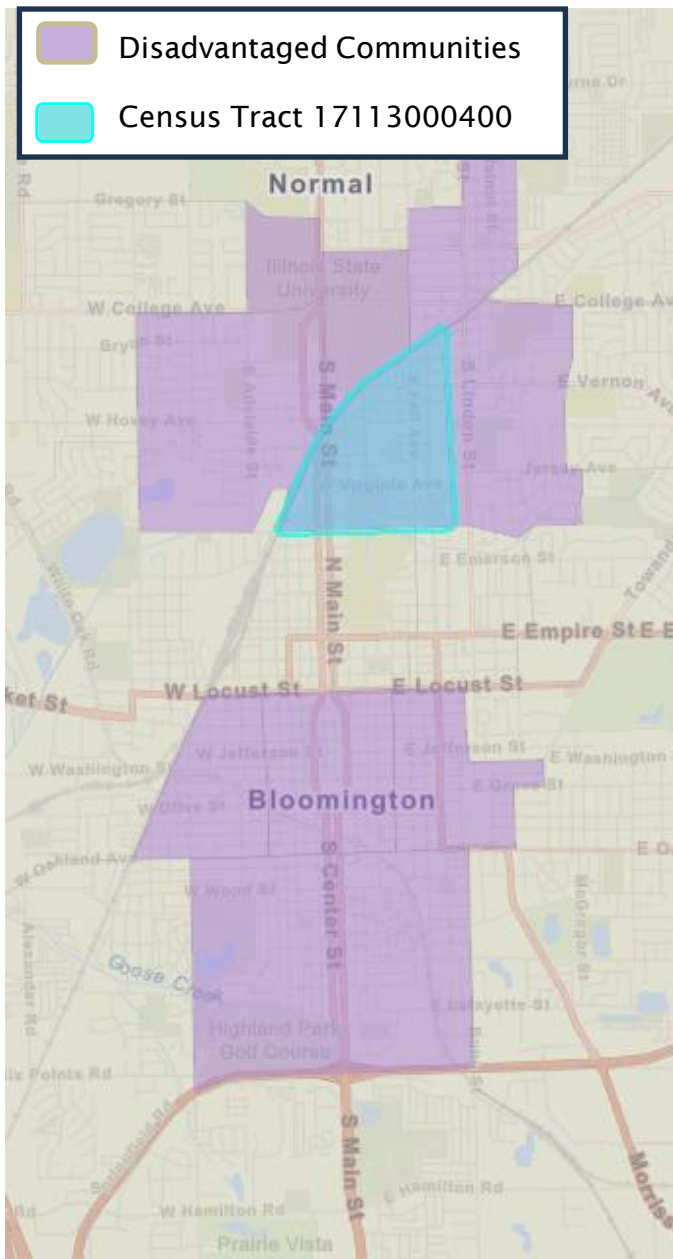
- **Number of Households with no Personal Vehicle** - An estimated 15.10% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by some transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - [Adult Education](#) - 41 minutes
  - [Grocery Stores](#) - 3 minutes
  - [Medical Facilities](#) - 4 minutes
  - [Parks](#) - 4 minutes
- **Points of Interest within a 15 Minute Walk?**
  - [Adult Education](#) - No
  - [Grocery Stores](#) - No
  - [Medical Facilities](#) - No
  - [Parks](#) - No
- **Broadband Access** - 32.90% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.38 per 100k people annual average between 2016-2020.

## Census Tract 17113000400

This census tract is located just south of Illinois State University's campus. The tract is comprised of residential areas, but also includes Glenn Elementary School and the Carle Medical Center. It also has a variety of businesses concentrated in the southwest corner of the tract.



### Cost Burden Summary

- **Poverty Level** - 53.81% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$31,887.00.
- **Transportation Cost Burden** - The average household in this tract spends 27.83% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$10,551.00 on transportation.
- **Housing Cost Burden** - 40.78% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

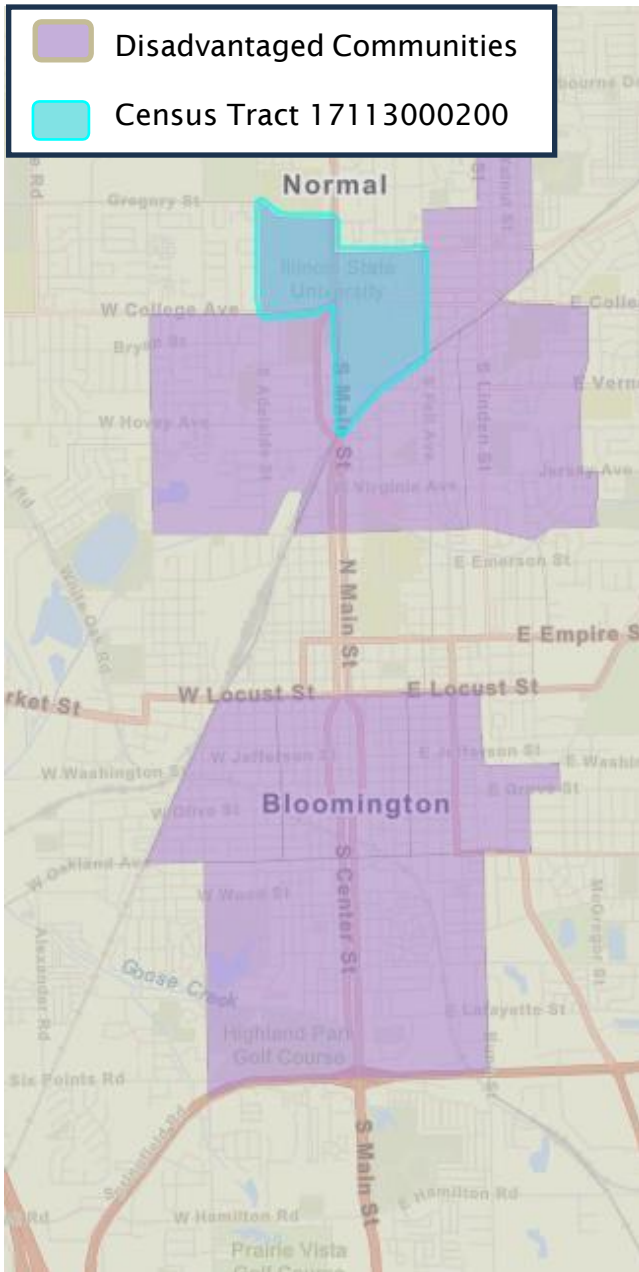
- **Number of Households with no Personal Vehicle** - An estimated 1.30% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by lots of transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - Adult Education - 42 minutes
  - Grocery Stores - 3 minutes
  - Medical Facilities - 1 minutes
  - Parks - 3 minutes
- **Points of Interest within a 15 Minute Walk?**
  - Adult Education - No
  - Grocery Stores - No
  - Medical Facilities - Yes
  - Parks - Yes
- **Broadband Access** - 38.40% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.34 per 100k people annual average between 2016-2020.

## Census Tract 17113000200

This census tract is home to Illinois State University campus. The tract contains mostly University District with some high-density multi-family residential and general business areas.



### Cost Burden Summary

- **Poverty Level** - 16.10% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$7,801.00.
- **Transportation Cost Burden** - The average household in this tract spends 112.09% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$13,813.00 on transportation.
- **Housing Cost Burden** - 66.40% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

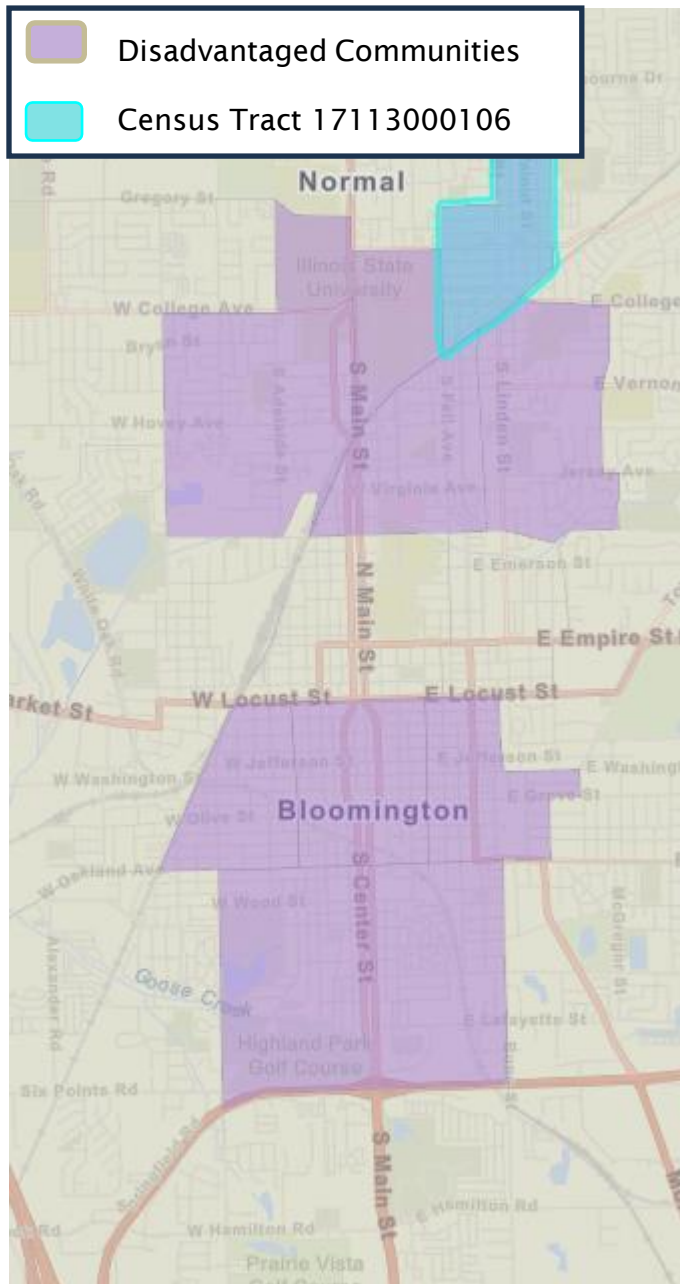
- **Number of Households with no Personal Vehicle** - An estimated 15.40% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by lots of transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - [Adult Education](#) - 40 minutes
  - [Grocery Stores](#) - 3 minutes
  - [Medical Facilities](#) - 3 minutes
  - [Parks](#) - 2 minutes
- **Points of Interest within a 15 Minute Walk?**
  - [Adult Education](#) - No
  - [Grocery Stores](#) - No
  - [Medical Facilities](#) - No
  - [Parks](#) - No
- **Broadband Access** - 70.80% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.25 per 100k people annual average between 2016-2020.

## Census Tract 17113000106

This census tract is northeast of Illinois State University campus. The area encompasses Uptown Normal to the south and single and multi-family housing to the north. This census tract also includes Fell Park, Hammit School, Eugene Field Elementary School, Sprague's Super Service and is home to a portion of the Constitution Trail.



### Cost Burden Summary

- **Poverty Level** - 68.75% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$24,783.00.
- **Transportation Cost Burden** - The average household in this tract spends 35.99% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$10,815.00 on transportation.
- **Housing Cost Burden** - 41.00% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

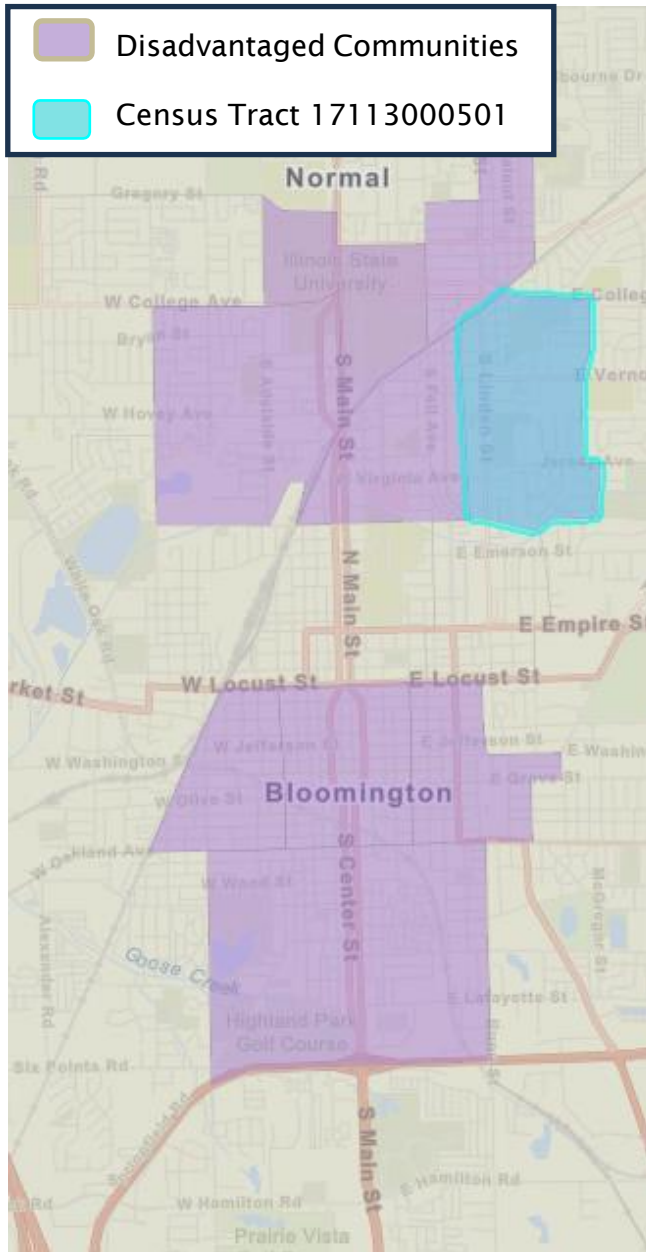
- **Number of Households with no Personal Vehicle** - An estimated 0.00% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by some transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - Adult Education - 42 minutes
  - Grocery Stores - 5 minutes
  - Medical Facilities - 3 minutes
  - Parks - 2 minutes
- **Points of Interest within a 15 Minute Walk?**
  - Adult Education - No
  - Grocery Stores - No
  - Medical Facilities - No
  - Parks - Yes
- **Broadband Access** - 26.60% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.33 per 100k people annual average between 2016-2020.

## Census Tract 17113000501

This census tract is located to the southwest of Uptown Circle. The tract consists of mostly low- density single-family housing but does include a significant portion of medium density housing off of Vernon Ave. This area also includes Underwood Park, Anderson Park, Chiddix Jr High School, Colene Hoose Elementary School, and a small area of businesses in the northeast area.



### Cost Burden Summary

- **Poverty Level** - 57.80% of the population in the tract are at or below 200% of the federal poverty line.
- **Median Household Income** - The median household income in this tract is \$35,266.00.
- **Transportation Cost Burden** - The average household in this tract spends 24.78% of their household income on transportation.
- **Estimated Cost of Transportation** - The average household in this tract spends an estimated \$9,941.00 on transportation.
- **Housing Cost Burden** - 44.34% of households in this tract spend more than 30% of their income on housing.

### Access Burden Summary

- **Number of Households with no Personal Vehicle** - An estimated 12.40% of households within this tract do not own vehicles.
- **Transit Availability** - This tract is likely served by some transit.
- **Estimated Drive Distances** - Estimated drive distances to various points of interest are summarized below:
  - Adult Education - 43 minutes
  - Grocery Stores - 4 minutes
  - Medical Facilities - 2 minutes
  - Parks - 2 minutes
- **Points of Interest within a 15 Minute Walk?**
  - Adult Education - No
  - Grocery Stores - No
  - Medical Facilities - Yes
  - Parks - Yes
- **Broadband Access** - 27.20% of households in this tract lack internet access.

### Safety Summary

- **Total Fatalities** - Traffic fatalities in this tract are estimated to be 0.20 per 100k people annual average between 2016-2020.

## Summary: USDOT ETC Identified Disadvantaged Census Tracts

The USDOT ETC identified 9 census tracts as disadvantaged in the Bloomington-Normal Metropolitan Planning Area. The census tracts are separated into two clusters, one concentrated in Bloomington and the other in Normal. In the analysis of indicators used to measure transportation insecurity several patterns appeared.

### Housing Cost Burden

In Bloomington, in disadvantaged census tracts between 32% and 36% of residents are spending more than 30% of their total income housing. Compared to Normal's disadvantaged census tracts where between 40% and 66% of residents are spending more than 30% of their total income on housing, with the exception of census tract 17113000301 at 32%.

### Access Burden

In Bloomington, only disadvantaged census tract 17113001600 and 17113001700 indicated they are likely served by lots of transit. Other disadvantaged census tracts identified indicate their transit availability to be served by some transit. A similar condition appears in Normal, as only disadvantaged census tracts 17113001200 and 17113000400 are designated as being served by lots of transit, the other identified disadvantaged census tracts are labeled as being served by some transit.

In the entire MPA, only one disadvantaged census tract in Bloomington, 17113001600 has access to a grocery store within a 15-minute walk. No census tracts have adult education within walking distance, and all have a driving time of 39 minutes or more to access adult education facilities. All disadvantaged census tracts in the MPA indicate a significant portion of households lack internet access, especially tracts 17113005900 and 17113001500 in Bloomington and 17113000301, 17113000400, and 17113000200 in Normal, which all have more than 30% of household without internet access.

### Safety Burden

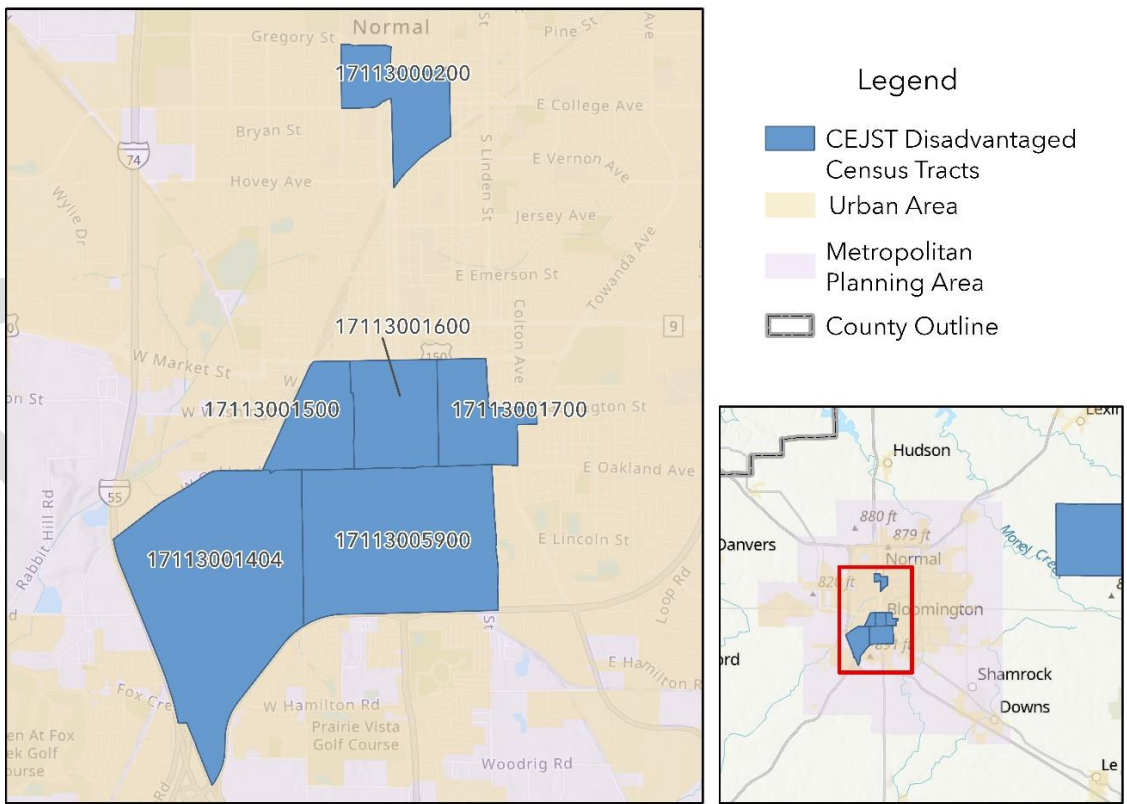
One disadvantaged census tract in the MPA stands out among the rest regarding safety. Census tract 17113005900 has an estimated 15.63 traffic fatalities per 100,000 people annual average between 2016-2020. This estimate is drastically higher than the other identified disadvantaged census tracts in the MPA (less than 0.4 per 100,000 people) because there were multiple fatal crashes within tract 17113005900 within the 5-year period. While the estimated rate is notably high in Tract 17113005900, it's essential to acknowledge that this does not imply the absence of other fatal and serious injury crashes within the surrounding MPA area.

# Climate and Environmental Justice Screening Tool (CEJST)

The Climate and Environmental Justice Screening Tool (CEJST) hosts datasets that identifies disadvantaged communities that are marginalized, underserved, and overburdened by pollution. This tool was created by the White House Council on Environmental Quality (CEQ) to support Executive Order 14008. The CEJST interactive map includes data on indicators of 8 categories: energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development. Several census tracts in McLean County, Illinois have been identified by the CEJST as disadvantaged areas, as they have been overburdened and underserved in one or more of these categories.

Map X and Y below and to the following pages, show the identified Climate and Economic Justice (CEJ) Disadvantaged Census Tracts in McLean County. The first map displays disadvantaged census tracts in the MPA. There are 6 identified disadvantaged CEJ census tracts in the Metropolitan Planning Area and 1 identified in the rural area of McLean County.

Climate and Economic Justice Disadvantaged Census Tracts in Metropolitan Planning Area (McLean County, IL)  
From the Climate and Economic Justice Screening Tool (CEJST)



Esri, CGIAR, USGS, Town of Normal GIS, McGIS-McLean County GIS, Esri, TomTom, Garmin, SafeGraph, FAO, METI/McGIS-McLean County GIS, Esri, TomTom, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, EPA, NPS, USDA, USFWS

## Detailed Analysis: CEJST Identified Disadvantaged Census Tracts

CEJ disadvantaged census tracts in the MPA are mainly concentrated in southwestern Bloomington and in central Normal near the campus of Illinois State University. The tool considered, disadvantaged census tracts as such based on various indicators and burdens each area experiences. The following analysis reviews each disadvantaged census tract, pinpointing specific indicators or burdens that categorize them as disadvantaged due to surpassing the national percentile threshold for those indicators.

In the census tract to the west, along I-55 (census tract 17113001404), the CEJST indicates that the area ranks above the 65<sup>th</sup> percentile for low-income population or people in households where income is less than or equal to twice the federal poverty level, not including students enrolled in higher education, at the 84<sup>th</sup> percentile. The area also ranks at the 90<sup>th</sup> percentile which is the threshold for low life expectancy. While not meeting or exceeding the threshold for share of people in households where income is at or below 100% of the Federal poverty level, this tract is closely approaching the 90<sup>th</sup> percentile, currently at the 85<sup>th</sup> percentile.

Just to the east, census tract 17113005900, which borders Oakland Ave on the north end, ranks above the 65<sup>th</sup> percentile for low-income population, at the 85<sup>th</sup> percentile. This area ranks above the 90<sup>th</sup> percentile for underground storage tanks and releases, at the 95<sup>th</sup> percentile. This indicator considers the formula of the density of leaking underground storage and the number of active underground storage tanks within 1,500 feet of the census tract.

Regarding workforce and development, this census tract is above the national percentile for high school education (10%) indicating that in the area, 14% percent of people ages 25 years or older have less than a high school diploma.

Moving slightly northeast, census tract 17113001500 is located immediately west of downtown Bloomington. This area ranks above the 65<sup>th</sup> percentile for low-income population, at the 94<sup>th</sup> percentile as well as, above the 90<sup>th</sup> percentile for low life expectancy at the 98<sup>th</sup> percentile. This area ranks above the 90<sup>th</sup> percentile for the share of homes that are likely to have lead paint and underground storage tanks and releases, at the 96<sup>th</sup> percentile and 91<sup>st</sup> percentile respectively. In regard to workforce development, the area ranks 90<sup>th</sup>, meeting the percentile threshold for poverty or people in households at or below 100% of the Federal poverty level. This area also ranks above the national percentile for high school education (10%), indicating that 17% of people ages 25 years or older have less than a high school diploma. While not meeting or exceeding the threshold for share of people in households making less than 80% of the area median family income and spending more than 30% of income on housing, this tract is closely approaching at the 90<sup>th</sup> percentile, currently at the 85<sup>th</sup> percentile.

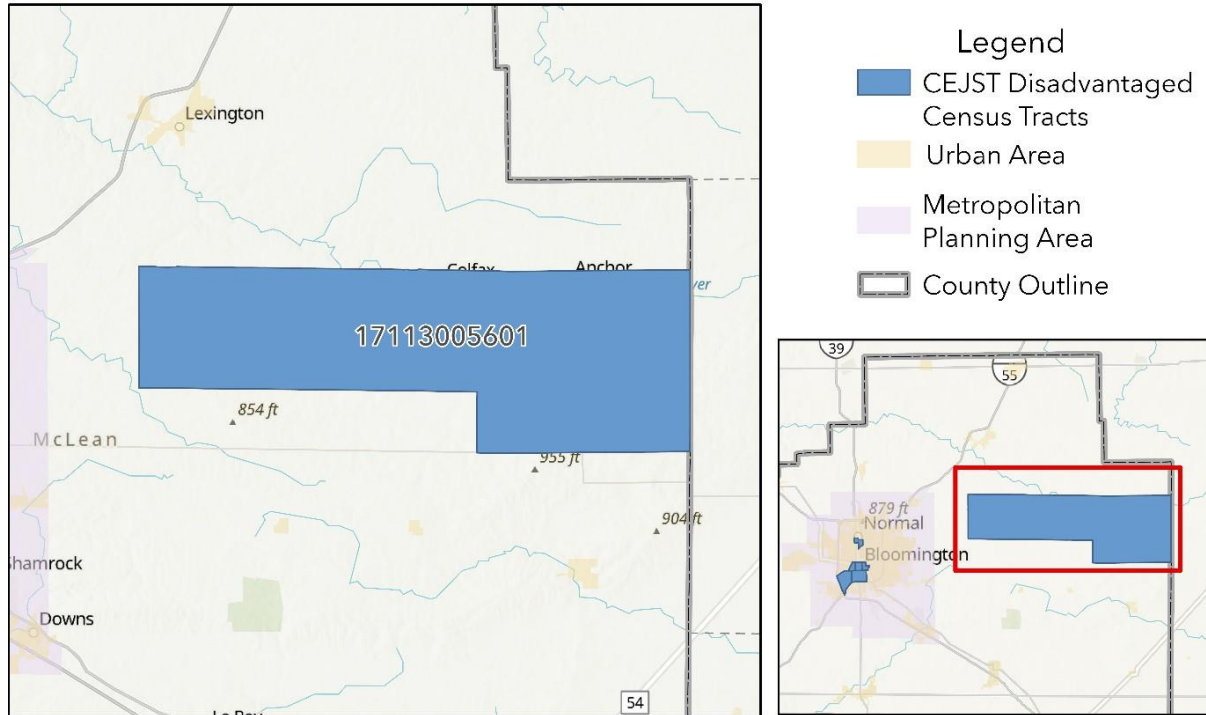
Moving to the heart of the City of Bloomington, census tract 17113001600 encompasses downtown Bloomington. This tract ranks above the 65<sup>th</sup> percentile for low income population, at the 90<sup>th</sup> percentile. It also ranks above the 90<sup>th</sup> percentile for lack of green space, at the 93<sup>rd</sup> percentile. This census tract also ranks above the national 90<sup>th</sup> percentile for underground storage tanks and releases at the 94<sup>th</sup> percentile. This tract ranks 90<sup>th</sup> for share of people in or below 100% of the Federal poverty level, meeting the percentile threshold exactly. While not yet meeting or exceeding the 90<sup>th</sup> percentile threshold of homes likely to have lead paint and share of unemployed people as a part of the labor force, this tract is closely approaching at the 86<sup>th</sup> and 88<sup>th</sup> percentile respectively.

Just east of downtown Bloomington, census tract 17113001700 ranks above the 65<sup>th</sup> percentile for low-income population, at the 73<sup>rd</sup> percentile, as well as above the 90<sup>th</sup> percentile for homes that are likely to have lead paint at the 95<sup>th</sup> percentile. This area ranks above the 90<sup>th</sup> percentile for underground storage tanks and releases, at the 93<sup>rd</sup> percentile. This tract also ranks slightly above the national percentile for high school education (10%), indicating that 12% of people ages 25 years or older have less than a high school diploma. While not yet meeting or exceeding the threshold for share of people in households making less than 80% of the area median family income and spending more than 30% of income on housing, this tract is closely approaching at the 90<sup>th</sup> percentile, currently at the 86<sup>th</sup> percentile.

In Normal, census tract 17113000200 encompasses the majority of the Illinois State University campus and some residential areas. This area ranks above the 90<sup>th</sup> percentile for energy cost, indicating a higher average annual energy cost in relation to household income. Also, regarding housing, the area ranks above the 90<sup>th</sup> percentile for housing cost and lack of indoor plumbing, both at the 99<sup>th</sup> percentile respectively. This area also ranks above the 90<sup>th</sup> percentile for the share of people diagnosed with asthma, at the 99<sup>th</sup> percentile. Th tract also surpasses the 90<sup>th</sup> percentile for underground storage tanks and releases at the 97<sup>th</sup> percentile. Regarding workforce development, this area is above the 90<sup>th</sup> percentile for share of people in households where income is at or below 100% of the Federal poverty level. The area also has a slightly higher percent of people ages 25 years or older have less than a high school diploma at 13% compared to the average of 10%. In contrast to the other disadvantaged census tracts in the MPA, this tract is well below the 65<sup>th</sup> percentile for low-income population, at the 2<sup>nd</sup> percentile, indicating the area's population does not have a significant number of people living at or below twice the federal poverty level. This does not account for students enrolled in higher education which is likely a large portion of people living in this proximity to Illinois State University. While not meeting or exceeding the threshold for lack of green space, this tract is closely approaching at the 90<sup>th</sup> percentile, currently at the 89<sup>th</sup> percentile.

# Climate and Economic Justice Disadvantaged Census Tracts in Rural McLean County, IL

From the Climate and Economic Justice Screening Tool (CEJST)



McGIS-McLean County GIS, Esri, TomTom, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS, USFWS, Esri, NASA, NGA, USGS, Esri, CGIAR, USGS

In rural McLean County, the identified disadvantaged census tract (17113005601) is located in east-central part of the County, encompassing a significant portion of farmland and the small, rural communities of Anchor, Colfax, and Cooksville. This census tract is the largest disadvantaged census tract in terms of geography and the smallest in terms of population. It is above the 90<sup>th</sup> percentile for lack of green space, at the 99<sup>th</sup> percentile and above the 65<sup>th</sup> percentile for low-income population, at the 69<sup>th</sup> percentile. The census tract also has the presence of one or more abandoned mine land within the area. While not meeting or exceeding the current threshold, the tract is close to the 90<sup>th</sup> percentile for transportation barriers, at the 85<sup>th</sup> percentile, indicating a relatively high average cost and time spent on transportation.

The table below and on next page, highlights some of the key indicators used in the (CCEJST) to calculate and identify disadvantaged census tracts. This table contains data on the 7 disadvantaged census tracts in McLean County. Much of the data is calculated in terms of percentiles, or rankings, which compare our local census tracts to the rest of the Nation. Additionally, a small number of indicators are percentage based.

**CEJST Disadvantaged Areas: Climate and Economic Justice Key Indicators Table**

Key CEJST Indicators	CEJST Disadvantaged Areas						
	Census Tract 1711300 1600	Census Tract 1711300 1500	Census Tract 1711300 1700	Census Tract 1711300 5601	Census Tract 1711300 1404	Census Tract 1711300 5900	Census Tract 1711300 0200
Coronary heart disease among adults aged greater than or equal to 18 years (percentile)	0.59	0.66	0.23	0.67	0.51	0.74	0
Current asthma among adults aged greater than or equal to 18 years (percentile)	0.65	0.82	0.6	0.37	0.57	0.73	0.99
Diagnosed diabetes among adults aged greater than or equal to 18 years (percentile)	0.64	0.82	0.25	0.58	0.57	0.74	0
Diesel particulate matter exposure (percentile)	0.71	0.69	0.7	0.18	0.53	0.6	0.6
DOT Travel Barriers Score (percentile)	0.05	0.14	0.19	0.85	0.05	0	0.56
Energy burden (percentile)	0.46	0.59	0.59	0.57	0.38	0.32	0.97
Expected agricultural loss rate (Natural Hazards Risk Index) (percentile)	0	0	0	0.71	0.22	0.14	0
Expected building loss rate (Natural Hazards Risk Index) (percentile)	0.76	0.76	0.76	0.75	0.76	0.76	0.76
Expected population loss rate (Natural Hazards Risk Index) (percentile)	0.67	0.67	0.67	0.7	0.68	0.68	0.67
Housing burden (percentile)	0.84	0.85	0.86	0.41	0.63	0.68	0.99
Leaky underground storage tanks (percentile)	0.94	0.91	0.93	0.15	0.63	0.95	0.97
Linguistic isolation (percentile)	0.74	0.67	0.52	0.12	0.63	0.12	0.12
Low life expectancy (percentile)	0.83	0.98	0	0.73	0.90	0.78	0
Percent age 10 to 64	0.78	0.77	0.82	0.64	0.71	0.72	1
Percent age over 64	0.11	0.08	0.1	0.15	0.11	0.16	0
Percent age under 10	0.09	0.13	0.07	0.19	0.16	0.11	0
Percent American Indian / Alaska Native	0	0	0.01	0	0	0	0
Percent Asian	0.02	0	0.03	0	0	0.02	0.01

Percent Black or African American	0.3	0.22	0.13	0	0.14	0.16	0.19
Percent Hispanic or Latino	0.07	0.24	0.1	0.13	0.08	0.03	0.1
Percent individuals age 25 or over with less than high school degree	0.09	0.17	0.12	0.03	0.06	0.14	0.13
Percent Native Hawaiian or Pacific	0	0	0	0	0	0	0
Percent of individuals < 100% Federal Poverty Line (percentile)	0.9	0.9	0.74	0.34	0.85	0.9	0.99
Percent of individuals below 200% Federal Poverty Line, imputed and adjusted (percentile)	0.9	0.94	0.73	0.69	0.84	0.85	0.02
Percent other races	0	0.02	0.02	0.01	0.02	0	0
Percent pre-1960s housing (lead paint indicator) (percentile)	0.86	0.96	0.95	0.78	0.47	0.82	0.13
Percent two or more races	0.02	0.02	0.03	0.01	0.03	0.05	0.02
Percent White	0.57	0.5	0.7	0.85	0.73	0.74	0.67
Proximity to hazardous waste sites (percentile)	0.77	0.6	0.74	0.06	0.45	0.65	0.72
Share of homes with no kitchen or indoor plumbing (percentile)	0.62	0.8	0.21	0.55	0.21	0.21	0.99
Share of properties at risk of fire in 30 years (percentile)	0.33	0.33	0.33	0.33	0.33	0.33	0.33
Share of properties at risk of flood in 30 years (percentile)	0.57	0.77	0.48	0.7	0.6	0.19	0.15
Share of the tract's land area that is covered by impervious surface or cropland as a percent (percentile)	0.93	0.77	0.83	0.99	0.52	0.66	0.89
Total population	2,736	2243	2,158	2,054	4,311	4,045	4,419
Traffic proximity and volume (percentile)	0.83	0.57	0.7	0	0.51	0.72	0.76
Unemployment (percent) (percentile)	0.88	0.36	0.79	0.56	0.72	0.6	0.18
Wastewater discharge (percentile)	0.39	0.31	0.37	0	0.71	0.59	0