



Public Participation Plan

For Transportation Planning

Adopted June 19th, 2019

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THE NASHUA REGIONAL PLANNING COMMISSION AT A GLANCE

The Nashua Regional Planning Commission (NRPC) is one of nine regional planning commissions in the State of New Hampshire. NRPC was created under New Hampshire Statutes in 1959 and serves as the coordinating agency for the planning initiatives of thirteen (13) communities in the Nashua region.

NRPC also serves as the Metropolitan Transportation Organization (MPO) for the Nashua, NH-MA Urbanized Area (UZA). Federal regulations stipulate that highway construction funds in urbanized areas can only be utilized by states with an MPO in place.

NRPC Communities

Amherst	Lyndeborough	Nashua
Brookline	Mason	Pelham
Hollis	Merrimack	Wilton
Hudson	Milford	
Litchfield	Mont Vernon	

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SECTION 1 - INTRODUCTION

NRPC believes that effective public involvement allows for an open exchange between the public and transportation decision makers. Understanding the importance of public involvement and participation in the planning process improves the quality and accuracy of regional plans and funding decisions. With public input, stakeholder approval, and an open, transparent process, public plans have a better chance for buy-in and implementation. The public should be involved early and often throughout the planning process.

Public involvement should be, and in many cases is required to be, used in the NRPC planning activities and processes. Any process that leads to a change in policy, an update to an existing plan, or allocates state or federal funds requires an opportunity for the public to provide input.

PUBLIC PARTICIPATION PLAN (PPP) FRAMEWORK

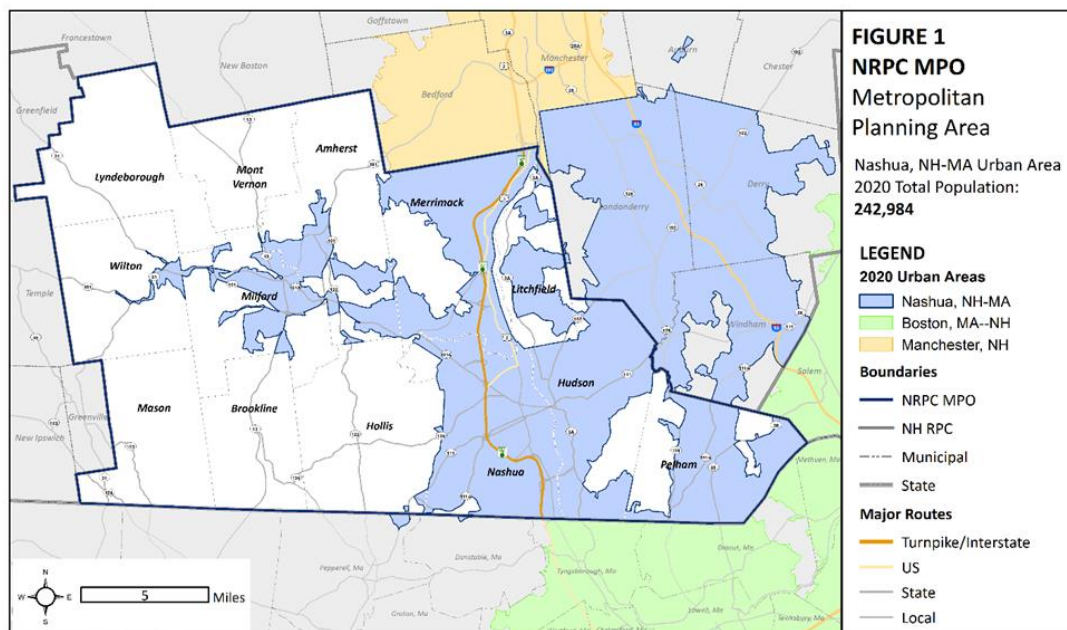
The NRPC Public Involvement Plan (PPP) provides a framework to advance meaningful public involvement in transportation planning efforts throughout the region. The PPP includes the following core components:

- Section 1 - Introduction.
- Section 2 - A list of goals and strategies to guide NRPC's public participation efforts.
- Section 3 - A summary of the MPO transportation planning process including a guide for how the public can be involved in the planning process.
- Section 4 - A description of the outreach strategies that NRPC uses to engage residents.
- Section 5 - Public outreach standards.
- Section 6 - Performance Measures to track NRPC's progress.

ABOUT THE NASHUA METROPOLITAN PLANNING ORGANIZATION

NRPC serves as the Metropolitan Planning Organization (MPO) for the Nashua, NH-MA Urbanized Area (UZA). Federal regulations stipulate that highway construction funds in urbanized areas can only be utilized by states with an MPO in place.

Figure 1. Map of the NRPC Metropolitan Planning Area



The MPO is the transportation policy-making organization for the 13-community region and is made up of between one and four representatives from each member community together with representatives from federal, state, and local governmental agencies including the Federal Transit Administration (FTA), Federal Highway Administration (FHWA), NH Department of Transportation (NHDOT), New Hampshire Department of Environmental Services (NHDES), and the Nashua Transit System (NTS). The overall purpose of the MPO is to administer the federal transportation process and ensure that investments in transportation are based on a continuing, cooperative, and comprehensive planning process.

In 2012, the Nashua MPO was designated as a Transportation Management Area (TMA). As a TMA, the Nashua MPO has a stronger voice in setting priorities for implementing projects listed in the transportation improvement program and is responsible for additional planning products. The planning processes for MPO's and TMA's also must be certified by the Secretary of the United States Department of Transportation as complying with federal requirements.

The Nashua MPO is responsible for long-term transportation planning and for programming certain federal transportation funds in a region that is home to more than 200,000 people. The MPO coordinates key planning activities involving the Federal government, the State of New Hampshire, and other MPOs while representing the interests and priorities of the thirteen municipalities the Commission serves. The MPO maintains primary documents which integrate public involvement into the regional transportation planning and programming, including:

- Metropolitan Transportation Plan (MTP) which is a minimum 20-year plan with 5-year updates that identifies how the MPO will manage and operate transportation systems to meet the region's long-term needs, growth, and sustainability goals.

- New Hampshire Statewide Ten-Year Transportation Improvement Plan (TYP), with 2-year updates, which designates funding for all state and federal transportation projects that are advanced during the next 10-year period in New Hampshire.
- Transportation Improvement Program (TIP), which is a 4 -year plan with 2-year updates for transportation projects and improvements identified in the first 4-years of the New Hampshire TYP.
- The MPO develops other transportation plans that must undertake a meaningful level of public participation to ensure these plans and programs reflect the needs and wants of the public it serves.

This PPP includes details on how the public can be engaged in the NRPC planning process. The strategies identified within this document provide guidance for the public to be engaged early and often, with an understanding of how their feedback will be incorporated into the planning process. Active participation by a range of stakeholders improves the understanding of different viewpoints, diverse needs, and concerns, and helps to identify common goals.

The Nashua Transit System (NTS), which is the FTA 5307 applicant, has consulted with the MPO and concurs that the public involvement process adopted by the MPO for the development of the TIP satisfies the public hearing requirements that pertain to the development of the Program of Projects for regular Section 5307, Urbanized Area Formula Program, grant applications, including the provision for public notice and the time established for public review and comment.

SECTION 2 - PURPOSE, GOALS AND OBJECTIVES

The purpose of the public involvement process is to ensure that the concerns and issues of everyone with a stake in transportation decisions are identified, evaluated, and responded to in a thoughtful, thorough, and timely manner.

Figure 2. Public Involvement Process Goals



PURPOSE

Public involvement is an integral part of the transportation process which helps ensure that decisions are made in consideration of and of benefit to public needs and preferences. A core function of the MPO is to provide a forum for effective regional decision-making when it comes to matters concerning transportation. The purpose of PPP, therefore, is to ensure that the concerns and issues of everyone with a stake in transportation decisions are identified, evaluated, and responded to in a thoughtful, thorough, and timely manner. Typical transportation matters include, but are not limited to, transportation policies, allocation of transportation resources, and the prioritization of regional projects.

In accordance with [23 CFR 450.316](#), federal regulations state that every MPO must develop, adopt and implement formalized procedures for effective public involvement, participation, and

consultation to be used during the development or updating of a Metropolitan Transportation Plan (MTP) or Transportation Improvement Program (TIP). The regulation also stipulates that a public involvement process shall seek out traditionally underserved populations. The Infrastructure Investment and Jobs Act/Bipartisan Infrastructure Law (IIJA/BIL) Act also emphasizes public involvement as the hallmark of the planning process. Similarly, the State of New Hampshire has several laws that require various types of public involvement concerning the planning process and access to government information ([RSA 91-A](#)).

GOALS AND OBJECTIVES

The following section covers the principal goals and corresponding objectives for the MPO's PPP.

Goal 1: Enhance public outreach with tailored strategies.

Objectives

- Incorporate public outreach early in the planning process.
- Identify and seek input from a wide variety of individuals, groups, and organizations including traditionally underrepresented populations.
- Tailor outreach strategies that engage individuals, groups, and organizations of low-income, minorities, limited-English-proficiency (LEP) populations and individuals with a disability.
- Adjust outreach strategies for effectiveness as needed based on public feedback.

Goal 2: Increase public involvement by utilizing community leaders and organizations.

Objectives

- Encourage public involvement early in the planning process to guide plan development.
- Clearly convey how those wanting to understand and participate in the process can be involved.
- Utilize community leaders and organizations to leverage higher levels of public involvement.
- Adjust involvement strategies for effectiveness as needed based on public feedback.

Goal 3: Respond to and Document Public Input & Comment.

Objectives

- Establish a process for properly collecting, storing, and disseminating public input.
- Uniformly evaluate public input as much as possible but allow for adaptability and case-by-case basis evaluations as needed.
- Incorporate both quantitative and qualitative evaluation methods and measures.
- Respond to public input in a consistent and timely manner.

Goal 4: Evaluate Public Involvement - Performance Measures.

Objectives

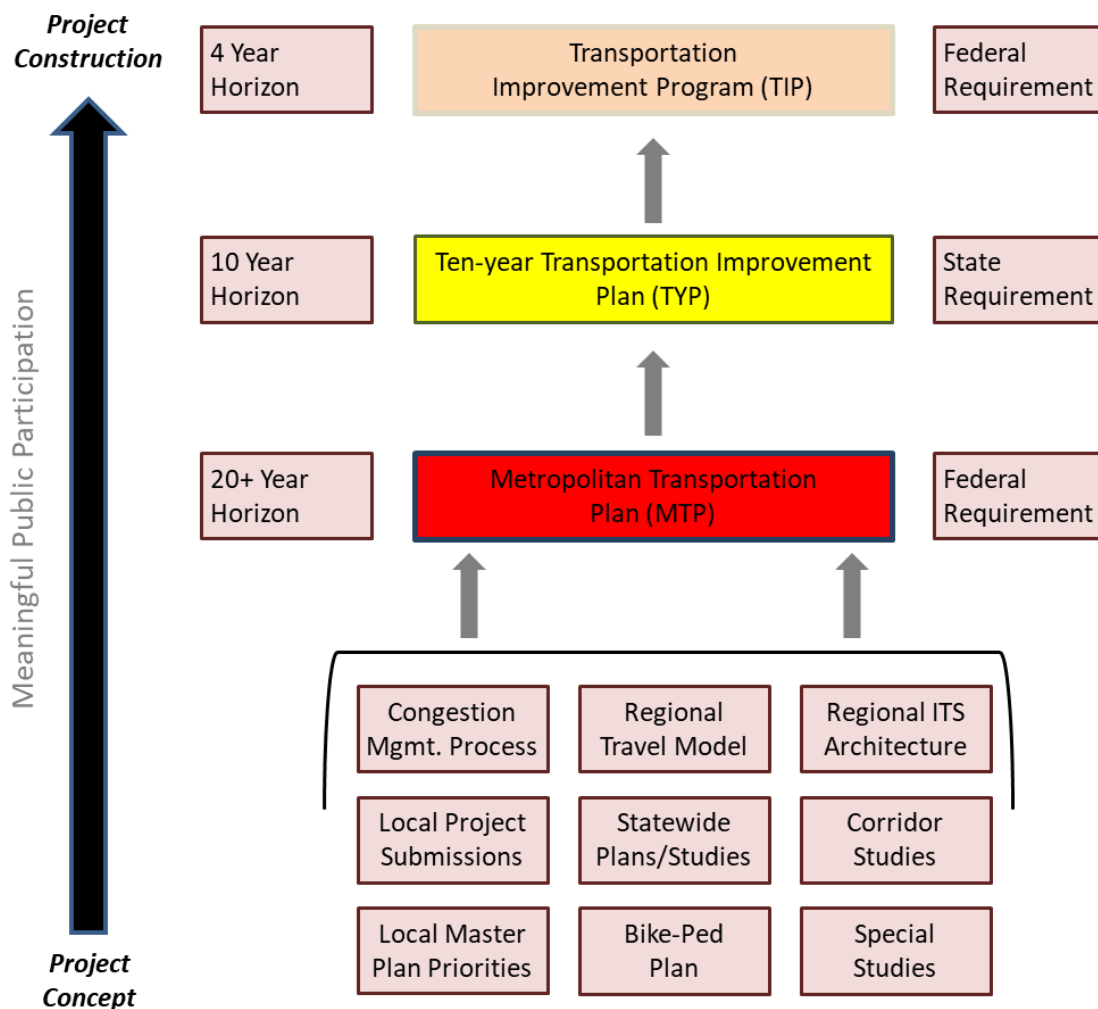
- Provide the framework for a standardized implementation schedule which guides future public outreach and involvement.
- Establish performance measures to reflect the program performance.
- Conduct regularly scheduled evaluations to monitor program effectiveness and assess public feedback.
- Utilize evaluation results to further and enhance program development.
- Synchronize the MPO's PPP with other statewide and regional public involvement processes.
- To satisfy the Nashua Transit System public participation for the Program of Projects.

SECTION 3 - PARTICIPATING IN THE NRPC PLANNING PROCESS

The goal of this chapter is to help interested parties understand the transportation planning process and the MPO procedures for public involvement and to know when and how to get involved.

NRPC continually develops and updates a range of interconnected planning documents to support continuing, cooperative, and comprehensive regional transportation planning. These documents address federal and state requirements to ensure the NRPC region can effectively program and fund a wide array of transportation improvement projects throughout the region. The graphic below shows how projects move through the transportation planning process to become eligible for funding and construction. Opportunities for public participation exist in each step in this process.

Figure 3. The Transportation Planning Process¹



¹ Adapted from the Southern NH Planning Commission Public Participation Plan

PUBLIC INVOLVEMENT STANDARDS

The federal rules governing metropolitan planning for transportation specify minimum standards that the MPO's public involvement process must strive to achieve ([23 CFR 450.316](#)). These standards form the basis of the criteria that will guide the MPO in conducting its public involvement process.

- Require a minimum public comment period of 45 days before the public involvement process is initially adopted or revised.
- Provide information about transportation issues and processes to citizens, affected public agencies, private providers of transportation and other interested parties and segments of the communities affected by transportation plans, programs, and projects.
- Provide visualizations to help describe the MTP and TIP.
- Require adequate public notice for public review and comment at key decision points, including, but not limited to, amendments to, and approval of the MTP and TIP.
- Consider the needs of those who are commonly underserved by existing transportation systems, including households with low income, minority, and disabled individuals when applicable.
- Demonstrate explicit consideration and response to the public input received during the planning and program development public hearing processes.
- Provide the opportunity for additional public comment, prior to adoption, whenever substantive changes are made to a proposed draft MTP or TIP after it is released for public comment.
- Coordinate the MPO public involvement process with the statewide public involvement process wherever possible to enhance public consideration and understanding of the issues, plans, and programs.
- Review and self-certify that this public involvement process is being followed and is effective in meeting the purpose, objectives, and criteria set forth herein.
- Ensure that all meetings concerning MPO business be open to the public and held in accessible locations that can accommodate the needs of the disabled and that the provisions of RSA [91-A](#) (Access to Public Records and Meetings) are followed.

PUBLIC INPUT VS. PUBLIC COMMENT

NRPC provides information and seeks *public input* about planning efforts through a variety of techniques including the NRPC webpage, electronic and postal mailings, electronic newsletters, informational brochures, public workshops, social media, surveys, and other methods.

- Public input is used to inform the planning process and is accepted at any time.

The purpose of *public comment* is to officially adopt a plan, program, or policy and is therefore a formal process, typically required by federal or state statute.

- Public comments are accepted only during specific publicly noticed comment periods or at publicly noticed hearings.

NRPC PUBLIC COMMENT PROCEDURES

When a draft document or planning product is developed and released, there is a defined public comment period ranging from 10 to 45 days depending on the document as detailed in Table 1. NRPC will strive for 45-day public comment periods, but some public comment periods are set by other agencies and out of NRPC's control.

- The announcement of the comment period is published in the region's newspaper of general circulation. Notice of public comment periods and public hearings are also published on the NRPC website (nashuarpc.org) in the NRPC News Center section. The announcement is published on NRPC social media platforms. Additionally, the public notice is emailed to NRPC TTAC, NRPC MPO Policy Committee, town halls, and libraries. The public is also provided with the opportunity to [opt in to email notifications](#) about public comment periods and hearings. In addition, NRPC will send a press release, with the announcement to local media outlets. NRPC also notifies several community-based service agencies that are identified in Appendix D of this plan, including disabled and elderly service agencies, underserved populations advocacy groups, and housing agencies.
- For all draft documents that are subject to public comment, a summary of public comments received is reviewed by the NRPC MPO Policy Committee, which directs staff to make any necessary revisions or edits to the documents based on the comments.
- If a final planning document, including but not limited to the Metropolitan Transportation Plan and Transportation Improvement Program, differs significantly from the version released for public comment, the NRPC MPO will provide an additional opportunity for public comment no shorter than the original public comment period.

The NRPC translates all public notices for planning products into Spanish as a regular practice because Spanish has been identified through Limited English Proficiency (LEP) analysis as an LEP language. The Safe Harbor Threshold for requiring translation is based on the threshold of 5% or 1,000 persons that speak English less than well based on the 2017-2023 ACS table. The thresholds for Spanish LEP (4,386 people) and Other Indo-European Languages (1,518 people) are exceeded in the NRPC region. Upon request, the NRPC will facilitate additional translation services for LEP persons in the "Other Indo-European" languages (also identified in LEP analysis). Interpretation services for deaf, hard of hearing, and blind persons are provided by utilizing the following resources:

- Language Bank (<http://www.thelanguagebank.org>) and Language Line Solutions (www.language-line.com) for translation services.
- Northeast Deaf and Hard of Hearing Services (<https://ndhhs.org/>) for deaf and hard of hearing interpretive services.
- Future in Sight (<https://futureinsight.org/>) for interpretive services for blind persons.

Table 1. Summary of NRPC Public Participation Strategies by Planning Product

NRPC MPO Planning Product	Description	Public Comment Period	Public Participation Strategies Always Employed	Public Participation Strategies Sometimes Employed
Public Participation Plan (PPP)	A plan outlining the goals, strategies, approaches, and performance measures to be utilized to advance meaningful public involvement in the NRPC's regional transportation planning efforts.	45 Days	Newspaper Notice, PublicHearing, MPO ReviewMeetings, TAC ReviewMeetings, Website Postings,Social Media Postings	Surveys, Newsletter Articles
Metropolitan Transportation Plan (MTP)	Long-Range (20+ year) plan identifying how the NRPC will achieve an effective multi-modal transportation system to meet the region's transportation, economic development, and sustainability goals while remaining fiscally constrained in accordance with anticipated transportation revenues. The final MTP includes a summary of public comments received and how the NRPC addressed those comments.	10-30 Days	Newspaper Notice, Public Hearing, MPO Review Meetings, TTAC Review Meetings, Website Postings, Newsletter Articles, Social Media Postings, Visualization Techniques.	Ad Hoc Committees, Public Forums/Workshops, Public Outreach Events, Surveys
Transportation Improvement Program (TIP)	Short-range (4 year) program of transportation improvement projects to be funded in the NRPC region in accordance with anticipated transportation revenues. The final TIP includes a summary of public comments received and how the NRPC addressed those comments.	10-30 Days	Newspaper Notice, Public Hearing, MPO Review Meetings, TTAC Review Meetings, Website Postings, Newsletter Articles, Social Media Postings, Visualization Techniques	Public Forums/Workshops, Public Outreach Events
Congestion Management Process (CMP)	A plan that identifies congested locations in the NRPC region, causes of congestion, and congestion mitigation strategies to improve transportation system performance and reliability	30 Days	Newspaper Notice, Public Hearing, MPO Review Meetings, TTAC Review Meetings, Website Postings, Visualization Techniques	Ad Hoc Committees, Public Forums/Workshops, Public Outreach Events, Newsletter Articles, social media Postings

NRPC MPO Planning Product	Description	Public Comment Period	Public Participation Strategies Always Employed	Public Participation Strategies Sometimes Employed
Locally Coordinated Transportation Plan (LCTP)	A plan that identifies the transportation needs of individuals with disabilities, older adults, and people with low incomes, provide strategies for meeting these needs, and prioritize transportation services for funding and implementation	30 Days	Newspaper Notice, Public Hearing, RCC meetings, MPO Review Meetings, TTAC Review Meetings	Ad Hoc Committees, Public Forums/Workshops, Public Outreach Events, Newsletter Articles, social media Postings, surveys
Unified Planning Work Program (UPWP)	A program of all transportation planning activities to be undertaken by the NRPC during a given timeframe (typically two years)	30 days	MPO Review Meetings, TTAC Review Meetings	
Intelligent Transportation System Architecture (ITS)	A framework for the integration of technology into the NRPC regional transportation system	30 Days	Newspaper Notice, Public Hearing, MPO Review Meetings, TTAC Review Meetings, Website Postings	Ad Hoc Committees, Newsletter Articles, Social Media Postings, Visualization Techniques
Title VI Program	A plan detailing how the NRPC will conduct its planning activities in accordance with Title VI of the Civil Rights Act of 1964	30 Days	Newspaper Notice, Public Hearing, MPO Review Meetings, TAC Review Meetings, Website Postings, Social Media Postings	Surveys, Newsletter Articles
MPO Prospectus	A document that describes the organization and structure of the NRPC MPO and outlines the MPO's roles and responsibilities in the planning process in New Hampshire	30 Days	Newspaper Notice, Public Hearing, MPO Review Meetings, TAC Review Meetings, Website Posting	Social Media Postings

How to Submit Public Input

There are several options that the public may use to provide input on NRPC plans and documents:

- Participation at public outreach events or various meetings.
- Email, mail, or phone to designated contact or NRPC Office.
- Completion of questionnaires, surveys, or other data collection forms.
- Use of internet-based platforms.
- Sending a direct message via NRPC social media*.

*** Comments that are made on Facebook, X, or other social media platforms are reviewed by NRPC staff but are not handled as official public comments.**

If no specific contact information is listed on MPO distributed planning documents, please direct all public comments to the NRPC Office via U.S. Mail, email, or in-person. Check the [NRPC website](#) for the most up-to-date contact information. The most current contact information listed before the publication of this document can be found earlier in this document on Page ii.

NRPC MPO public meetings and hearings are held at the NRPC office at 30 Temple Street, Suite 310, Nashua, NH, typically at 7:00 pm on the 3rd Wednesday of February, April, June, September, and November (unless otherwise noted on published public notice). Meetings are held in the NRPC conference room accessible by the main entrance. This building is ADA compliant, and the conference room is accessible by elevator. The Nashua Transit System (NTS) fixed Route 7 serves Temple Street.

When to Submit Public Comments

A Public Notice for Comment will be published to indicate the Public Comment Period and when the MPO will begin collecting and responding to public comments. Interested parties are encouraged to review the plans and submit formal, public comments for the record. Formal public comments will not be considered after the public comment period has ended – unless presented at the Public Hearing. The MPO's intention is to include public commenting periods before key decision points in the planning process.

Whenever possible, including for the MTP and TIP, the NRPC shall utilize visualization techniques to inform the public of the intent and effect of the Commission's transportation plans and programs. Much of the work at NRPC is technical and data driven, which may not always translate well to the public. Concepts that are heavily relied on in transportation planning such as ranking systems, formulas, and other measurements can be complex. Visualization techniques can help to better communicate these concepts to members of the public who may not have technical backgrounds. Visualization techniques may include maps, concept drawings, infographics, and more.

Table 2. Strategies for Getting Involved in the Public Input Process

Strategy	Action
Opt in to the NRPC public comment period and hearings notifications list	Visit this link to opt in for notifications about public comment periods and public hearings.
Follow NRPC on Facebook, X, or LinkedIn	Visit the nashuarpc.org and click the Facebook, X, LinkedIn icons.
Attend Public Meetings	- Interested parties are encouraged to attend public meetings and to check public notices and announcements. - Members of the public are welcome to attend regularly scheduled MPO and TTAC meetings. NRPC also hosts other public meetings and workshops to support a variety of planning initiatives. Everyone is welcome to attend public meetings hosted at NRPC, and there are a variety of ways to participate: - The public can attend remotely via Zoom or telephone. Links will be posted to nashuarpc.org about a week before the meeting. - The public can also attend in person at the NRPC office located at 30 Temple Street, Suite 310, Nashua NH. If you take public transit, the nearest NTS bus stop is at the corner of Temple and Spring Streets.
Attend Outreach Events	- The public is encouraged to participate in outreach events, informational meetings, workshops, charrettes, questionnaires, and surveys. These often occur at community events such as farmers markets, neighborhood celebrations, and other community events. - Interested parties should also refer to the NRPC website for the most up-to-date information about plan & project updates.
Provide Public Comment	- The purpose of the Public Comment Period is for the MPO to clarify draft or amendment information, answer questions and gather public input. - The public can provide comment via U. S. Mail, email, or by attending a public hearing.
Attend a public hearing	The public is encouraged to attend the public hearing and officially voice their comments. All questions and comments will be recorded in the hearing minutes.
Invite NRPC to join your meeting	NRPC staff are available to present information about planning projects that may be of interest to your group.
Consider joining the Commission	NRPC Commissioners are typically appointed by their community.

SECTION 4 - PUBLIC OUTREACH AND INVOLVEMENT

Public outreach is a critical component in the public involvement process. This chapter identifies potential stakeholders in the decision-making process and the methods the MPO may employ to reach them.

LIST OF AFFECTED AND INTERESTED PARTIES

The MPO shall develop and maintain a list ([Appendix D](#)) of interested and affected parties whose input will be actively sought out during plan development. This list of parties will include those required by Federal Regulation [23 CFR 450.316](#) and others the MPO deems appropriate.

The list includes, but is not limited to, the following:

- Boards of Selectmen and Aldermen and Town Council.
- Members of the state legislature representing NRPC communities.
- Appropriate state and federal agencies, including the NHDOT, NHDES, FHWA, FTA, FAA, EPA, and other affected public agencies.
- Representatives from adjacent MPO's.
- Planning boards, traffic committees, public works officials/road agents.
- Public and private transportation providers.
- Representatives of public transportation employees.
- Known public transportation users and advocates.
- Pedestrian and bicycle system users and advocates.
- Representatives of traditionally underserved populations.
- Human service agencies with paratransit-eligible clients.
- Organizations concerned with economic development.
- Organizations and interest groups within the region with a demonstrated interest in transportation issues.
- Existing members of the MPO Transportation Technical Advisory Committee (TTAC) not included in the above list.
- Providers of freight transportation services.
- Freight shippers.
- Contacts from the local news media.

This list will be used to keep individuals, organizations and agencies informed about the development of the transportation plans and to notify them about specific opportunities for public involvement. The list of affected and interested parties, which is regularly updated and maintained, can be found in the NRPC Outreach List – Community-based Service Organizations section of the appendices.

OUTREACH STRATEGIES

Various techniques will be used to provide information and solicit public comment, whether in-person or virtual. Some examples of participation strategies targeted to the public are briefly described below.

Electronic Mailing Lists

The MPO actively maintains an electronic mailing list database to facilitate communication with members and interested parties. Through these mailing lists, the MPO reaches target audiences with announcements of upcoming events, meeting information, newsletters, summary reports and other information about agency activities including pending plan updates or amendments and public meetings.

Electronic Newsletter

The NRPC E-Newsletter is sent monthly to 400+ recipients who have specifically requested to receive this communication. It provides an effective way to distribute planning news and information.

Web Site and Social Media

Updates will be made continually to the NRPC website (nashuarpc.org) to keep the public informed about planning activities, pending plan updates or amendments, public meetings, and hearings and to offer another way to provide comments. The NRPC website includes a calendar of meetings, agendas, and meeting minutes; links to regional demographic, and traffic data; downloadable versions of planning documents, and extensive GIS/mapping content.

The use of social media platforms, including but not limited to Facebook and X will be a key method for public outreach, involvement, and information distribution. The MPO may tailor this strategy to more effectively reach disadvantaged groups or organizations that represent or serve such populations.

NOTE: Public input collected from social media platforms such as Facebook, X, or other social media platforms, will be used to support the planning process, however, the input will not be considered official comments of record. The MPO shall direct interested parties to submit official comments to the MPO staff via email, mail, phone, in-person, or at public meetings or hearings.

Informational Brochures

Informational brochures, postcards, and other tools in print or digital form are used by the MPO to convey information regarding current planning activities and news about the region. Brochures, flyers, or postcards may be prepared for plan or program updates, or to provide an overview of planning activities.

Partnering with other agencies

The MPO will partner with other community organizations whenever practicable to set up public outreach displays and materials on specific planning projects at various community meetings, fairs,

or other events. This strategy emphasizes a proactive approach to outreach by going directly into communities, rather than relying solely on attracting interested parties to public MPO meetings.

Opportunities for Public Input during Updates to Federally Required Plans

Public Outreach Events

Public meetings using a workshop or charrette format may be used to disseminate information, provide a setting for public discussion, and gather feedback from the community. The workshops would be structured to allow participants to interact with the project or planning staff one-on-one or in small groups. Plan or project exhibits will be displayed and available for review by the public. The workshop session may be preceded or followed by a formal presentation by project or plan staff. Workshops may be held at key points in the planning or project development process. They may be tailored to specific issues or community groups and may be informal or formal.

Public Comment Periods

The purpose of public comment is to officially adopt a plan, program, or policy and is therefore a formal process, typically required by federal or state statutes. Public comments are accepted only during specific publicly noticed comment periods or at publicly noticed hearings. When a draft document or planning product is developed and released, there is a defined public comment period ranging from 10 to 45 days. NRPC informs stakeholders of public comment periods as described on Page 9.

General Media

Media strategies include the use of press releases, legal ads, newspaper articles and, when feasible, television and radio outlets may be used. Videos may be produced and distributed to local cable access channels, uploaded to various online video platforms, and made available on the NRPC website.

Surveys and Questionnaires

The MPO may use various survey platforms such as (but not limited to) SurveyMonkey or MetroQuest to gather information for major updates to planning documents and projects. The method of data collection will vary by project and may include in-person or telephone interviews, web or social media-based questionnaires, paper survey mailings and professionally administered surveys. A list of sample questionnaire questions has been included in the appendices. The use and modification of this list may change from plan to plan.

Visualization Techniques

The MPO will implement visualization techniques and media designed to convey important information to the public. This may include regional maps showing project location and anticipated changes to the transportation system. It could also include simpler techniques such as renderings or photo simulations to show a widened roadway or bridge in context, for example, flow charts to clearly depict the transportation planning process, or graphs related to the distribution of project

funding. Visualizations can be made available through direct mail, social media, presentations at public meetings or on the [NRPC website](#).

Official Comments from Public Representatives and Agencies

The MPO may ask for and include official comments from local, state, and federal representatives and agencies on matters directly related to specific transportation issues and matters. The inclusion of official comments is to be quoted and impartial.

STRATEGIES TO REACH UNDERREPRESENTED POPULATIONS

In addition to the outreach strategies mentioned in the previous section, the MPO will be proactive and intentional regarding public outreach to underrepresented populations, including minority, low-income, LEP, transit-dependent individuals, and individuals living in EJ zones. Specific outreach strategies intended to engage underrepresented populations are included in the PPP to create a more comprehensive and inclusionary approach to transportation planning.

Translation Services

The MPO's policy is to provide, to the extent that is practical, translation services when requested. The MPO shall provide guidance throughout the planning process to those individuals or parties who request translation services. Upon receipt of a request, the MPO shall acknowledge the request, assess the feasibility of providing translation services using either in-house capabilities or outsourced services, and notify the requesting individual or party of the way the request will be handled. Contact information can be found earlier in this document on Page ii.

Strategic Distribution of Information and Multilingual Questionnaires

The MPO may strategically distribute relevant information electronically, through flyers with QR codes and/or other relevant information via direct mail to community centers and community-based organizations in identified Environmental Justice (EJ) zones, and low-income, minority or LEP areas. The identification of these neighborhoods and areas of interest is central to the strategic distribution of information to traditionally underserved populations. The next subsection will further explain the basis for identifying these potential neighborhoods and areas.

The inclusion of multilingual questionnaires, email, or hand-delivered fliers may be used as supplemental strategies to improve feedback and engagement. An example brochure which was translated in Spanish can be found in the appendices.

Outreach Events

The number and type of outreach events will be tracked as well as the number of referrals received and processed. NRPC will survey stakeholders about the perceived effectiveness of outreach events. Examples of outreach events or venues that NRPC leverages include public libraries, farmers markets, Greater Nashua Continuum of Care, SHARE Outreach (Milford), Nashua Community College, Nashua Transit Center, and other similar events and venues.

Strategically Planned Neighborhood Meetings

The MPO may use strategically planned neighborhood meetings to provide a greater level of detail to residents of specific neighborhoods that may be impacted by a plan or project. Identification of these neighborhoods may be done by utilizing data indicators from the Census and the American Community Survey (ACS). Indicators include, but are not limited to:

- Household income
- Property values
- Employment rates
- Poverty rates
- Race and ethnicity
- Language use
- Reasonable observation
- Motor vehicle availability

Residents of specific neighborhoods may be contacted by mail, email, social media, phone, or hand-delivered fliers to notify them of a meeting. While the targeted neighborhood meetings are open to the public, a broad-based advertisement might not be used. Additionally, a more targeted approach to engage underrepresented populations may include direct mailing to subsidized and income-restricted housing developments. A list of income-restricted housing developments can be found in the appendices of this plan. The MPO shall periodically update this list and potentially include more generalized maps that help visualize collective neighborhoods who are underrepresented.

Strategic Inclusion of Community Organizations and Programs

The MPO may reach out to community organizations and programs that purposefully interact with low-income, minority, LEP residents and transit-dependent individuals. Residents who are part of a specific organization or using a specific service can be contacted directly or indirectly through, or in coordination with, the community organization. Target organizations within the region may include those with services or expertise areas such as:

- transportation
- affordable housing
- community development and resource centers
- education and child development
- health and food assistance
- senior services
- employment centers
- welfare departments
- charities, foundations, and non-profits
- immigrant and refugee programs
- human rights, civil rights, and advocacy groups

- minority business groups
- minority support programs

Specific organizations and programs which might regularly interact with low-income, minority, LEP residents and transit-dependent individuals may include, but are not limited to:

- [NH Transit Association](#)
- [Nashua Transit System \(NTS\)](#)
- [Souhegan Valley Rides](#)
- [Nashua Regional Coordinating Council](#)
- [Nashua Housing Authority](#)
- [NeighborWorks Southern New Hampshire](#) (a nonprofit providing housing and neighborhood revitalization services)
- [Nashua Urban Programs](#) (sub-division of Nashua Community Development Division)
- [Arlington Street Community Center](#)
- [United Way of Greater Nashua](#)
- [Nashua Community College](#)
- [Southern NH Services](#) (a nonprofit Community Action Agency)
- [Nashua Soup Kitchen & Shelter](#)
- [Greater Nashua NAACP](#)
- [India Association of New Hampshire](#)
- [Conservation Law Foundation - NH](#)
- [Granite State Organizing Project](#)

[Appendix D](#) contains a complete list of public agencies and community organizations that may be contacted.

Contact Local Government Planners, Staff, and Elected Officials

The MPO will contact local government Town/City Managers, welfare administrators, planners, staff, and elected officials as needed. Local government staff and elected officials may have a better understanding of the community and be able to provide vital information for reaching underrepresented populations. Direct interaction and involvement with community leaders, groups and neighborhoods may result in an approach that is more organic, rather than data driven.

Recruit Advocates

The MPO may actively recruit advocates to participate in the planning process. The MPO's emphasized involvement with advocates within the community may lead to an increase in overall community involvement and a strengthened relationship with the MPO. This very direct, targeted approach may prove to be very effective but will greatly hinge on the abilities of the advocate.

SECTION 5 – RESPONDING TO PUBLIC INPUT AND COMMENT

The MPO has established a process for managing public input and comments and includes collecting, evaluating, responding, and documenting those comments. Public input and public comment are different in the sense that *Public Input* occurs during the early development of transportation plans, programs, and policies. Public input is accepted by NRPC staff at any time. The purpose of *Public Comments* is to officially adopt a planning document and is therefore a formal process, typically required by federal or state statute. Public comments are accepted only during specific publicly noticed comment periods or at publicly noticed hearings.

COLLECTING PUBLIC INPUT AND COMMENT

Public input happens at any time during the outreach phase when NRPC develops transportation plans, programs, and policies. During this timeframe public input is collected through informational meetings, charrettes, surveys, questionnaires, and the other techniques described in this Plan. Public input is documented as practically as possible and incorporated into the draft transportation plan, program, or policy.

The collection of public comments happens during the publicly noticed comment period and at the public hearing that happens after the public comment period has ended. The length of the public comment periods for the MTP, TIP, and PPP are established by federal requirements and announced to the public via Notice for Public Comment. Amendments to the MTP and TIP require a minimum 10-day public comment period followed by a public hearing. Updates to the PPP require a 45-day public comment period followed by a public hearing. Comments received during a public comment period are reported during the public hearing and incorporated into the appendix of the associated planning document.

RESPONDING TO PUBLIC COMMENT

The MPO responds via email to all public comments received during the official public comment period. Those public comments are reported at the public hearing associated with the public comment period. Public comments received during a public hearing are responded to at the hearing. Public comments received, either during the public comment period or at the public hearing are summarized in a report that is incorporated into the appendix of the document.

DOCUMENTING OF PUBLIC INPUT AND COMMENT

The collection and storage of public comments are to be mandatory for all Comment Periods and Public Hearings. All public comments are to be directly associated with one specific planning document. The collection of public comments submitted during each plan's Comment Period, their corresponding summaries and responses, and their collective comments evaluation report are to be included in the final plan which is published.

The MPO assumes the responsibility of collecting and storing all public comments, summaries, responses, and evaluations associated with each adopted plan. The MPO will store all public

comment records until at least a new draft or amendment replaces an older one or for at least 8 years, whichever is longer, or as may otherwise be required under [RSA 91-A](#).

Meeting Minutes

All public meetings and hearings will have minutes that officially document what was discussed or what happened at the meeting or hearing. All notes, materials, tapes, or other sources used for compiling the minutes will be kept on record until the official minutes are published.

Audio or Visual Recording

The MPO may utilize audio and or video recordings during outreach sessions, public meetings, and hearings.

Various Data Collection Forms

The MPO may document public input using various data collection methods such as questionnaires, surveys, or other data collection forms. The forms can be tabulated, categorized, or organized in any sensible manner for the purpose of presenting and analyzing the results.

Public Comments

The MPO shall include all public comments, their summarizations, and responses in the final draft or report sent to be approved. All public comments collected for this PPP are in the appendices under Record of Public Comments.

General Filing for Public Input

The collection of public input – excluding official Public Comments submitted during the Public Comment Period – may be cumbersome, random or free-flowing. Given this nature of public input before the Comment Period, it is acceptable for input to be more generally filed with associated plan documents.

PUBLIC REVIEW OF PLANNING DOCUMENTS

Copies of draft plan updates and amendments are made available electronically through the [NRPC website](#). Paper copies may be available upon request. Those needing translation services should reach out to the listed contact person or the NRPC office directly.

Minutes will be taken at all public meetings and hearings, and be made publicly available per RSA [91-A](#), concerning access to public records and meetings. In addition, all meeting minutes may be accessed on the [NRPC website](#).

SECTION 6 – PROGRAM EVALUATION - PERFORMANCE MEASURES

PERFORMANCE MEASURES

A performance measure (PM) is an indicator that helps organizations track their progress toward achieving their goals. The US Department of Transportation [Promising Practices for Meaningful Public Involvement in Transportation Decision-Making](#) provides guidance for how to identify effective performance measures.

The guidance says that effective public engagement requires continuous evaluation of outreach is key to the success of the project. This means that NRPC should measure not only the **immediate outputs** of public engagement efforts, but also the **longer-term outcomes** that public engagement has on a project's planning process.

Engagement Output and Outcome Metrics

OUTPUTS of an engagement activity can be assessed as soon as the activity is complete and are easily observable. Output metrics include:

- Counting the number of people who attend an event.
- Average response time to inquiries from the public.
- The presence of public officials at each event.
- Number of website hits.

OUTCOMES of an engagement activity describe the changes in the planning process resulting from the outputs of an engagement activity. Outcome metrics include:

- Whether the participants felt they had adequate notice of a public engagement activity.
- Whether participants felt their input was valued in the process.
- Tracking how public input was used.
- Whether public input affected the resulting planning documents.

Table 4 on the following page summarizes NRPCs outreach strategies and identifies performance measures for measuring both outputs and outcomes of the outreach strategies. By regularly updating and reviewing these PMs, NRPC can gain insight into the effectiveness of outreach strategies, pinpoint potential challenges, and uncover new opportunities for enhancing public participation in our region. NRPC staff will internally review PM data on a semi-annual basis, and publicly report on progress at least once a year.

Table 4. Performance Metrics²

General Outreach Strategies		Metric	
Outreach Strategy	Performance Measure	Output	Outcome
Electronic Mailing Lists	Maintain updated lists	X	
Electronic Newsletter	# of subscribers	X	
	# of subscribers who open at least one article.	X	
	# of subscribers who say they learned something valuable		X
Web Site & social media	Continual website updates & transportation-related social media posts	X	
	Monitor public comments		X
Informational Brochures, General Media, Surveys, questionnaires, Visualization Techniques.	Continually update these various outreach strategies.	X	
	Document responses and periodically ask stakeholders for input about the effectiveness of these tools.		X
Seek input from a wide variety of individuals, groups, and organizations	Attendance tracking at standing monthly meetings (MPO, TTAC, RCC) - # of members that attend meetings.	X	
	Survey members once per year to gauge effectiveness of meetings.		X
Partnering with community organizations	Updated contact list of partner organizations	X	
	# of meetings attended	X	
	# of advocates recruited	X	
Opportunities for public input during updates to federally required plans (TIP, MTP, PPP, LCTP, CMP).	Early public outreach events to explain the plan purpose & receive public feedback - # of early events	X	
	# of individuals that attend an event	X	
	Ask attendees to evaluate effectiveness of the event		X
	Public comment period - Encourage the submission of public comments	X	

² Adapted from the Southern NH Planning Commission Public Participation Plan

	Public hearing - provide an accessible setting for public discussion prior to plan adoption	X	
	Analyze feedback, effectiveness of outreach strategies, & processing of input		X
Outreach Strategies to EJ/Underserved Communities		Metric	
Outreach Strategy	Performance Measure	Output	Outcome
Translation Services	Maintain a standing list of translated (Spanish) documents	X	
	Translate into other languages on request.	X	
Strategic distribution of information & questionnaires	Track the distribution of information.	X	
	Evaluate the effectiveness of the outreach		X
Public outreach events & meetings	# of events targeting underserved communities & advocacy groups	X	
	# of participants at outreach events	X	
	Ask attendees to evaluate effectiveness of the event		X
Strategic inclusion of community organizations & programs	# and type of organization or program contacted & for what reason	X	
	Summary of input received	X	X
	Surveys to gauge effectiveness of the outreach		X

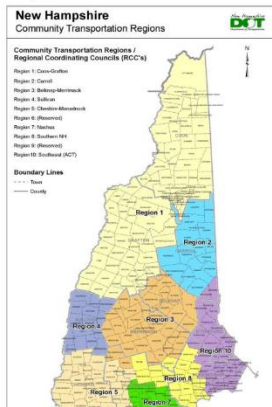
APPENDIX A – LIST OF ABBREVIATIONS

ACS	<u>American Community Survey</u>
EPA	<u>Environmental Protection Agency</u>
FAA	<u>Federal Aviation Administration</u>
IIJA/BIL	<u>Infrastructure Investment and Jobs Act/Bipartisan Infrastructure Law</u>
FHWA	<u>Federal Highway Administration</u>
FTA	<u>Federal Transit Administration</u>
LEP	<u>Limited-English-Proficiency</u>
MPO	<u>Metropolitan Planning Organization</u>
MTP	<u>Metropolitan Transportation Plan</u>
NHDES	<u>New Hampshire Department of Environmental Services</u>
NHDOT	<u>New Hampshire Department of Transportation</u>
NRMTP	<u>Nashua Regional Metropolitan Transportation Plan</u>
NRPC	<u>Nashua Regional Planning Commission</u>
NTS	<u>Nashua Transit System</u>
PBP	<u>Pedestrian and Bicycle Plan</u>
PPP	<u>Public Participation Process</u>
RSA	<u>Revised Statutes Annotated</u>
STIP	<u>State Transportation Improvement Program</u>
TIP	<u>Transportation Improvement Program</u>
TTAC	<u>Transportation Technical Advisory Committee</u>
UZA	<u>Urbanized Area</u>

APPENDIX B – SPANISH LANGUAGE BROCHURE



El Consejo de Coordinación Regional del Gran Nashua (RCC7) es uno de los ocho consejos regionales que dependen del Consejo Estatal de Coordinación para el Transporte Comunitario. Juntas, estas organizaciones se esfuerzan por desarrollar un sistema estatal sostenible de transporte comunitario coordinado que proporcione una mejor movilidad local e interregional y acceso para todos.



Gestión de la movilidad

El Programa de Gestión de la Movilidad es una oportunidad para promover un transporte comunitario sostenible, coordinado y centrado en el cliente que sea accesible para todos, incluidos los adultos mayores, las personas con discapacidades, los veteranos, las personas de bajos ingresos y otras poblaciones vulnerables.

Por favor, únase a nosotros:

Reuniones: el 4º jueves de cada mes a las 10 de la mañana con opciones presenciales y online.

En la oficina de la Comisión de Planificación Regional de Nashua
30 Temple Street, Suite 310
Nashua, NH 03060
www.nashuarpc.org



Para obtener más información o asistencia con el transporte, comuníquese con:
Donna M. Marceau
Gerente Regional de Movilidad
RCC 7
(603) 417 6571
donna@nashuarpc.org



RCC-7

Gran Nashua

Transporte

Guía de



Aprovechar los esfuerzos y recursos de muchas organizaciones e individuos diferentes para trabajar en colaboración en estrategias coordinadas para mejorar los servicios de transporte para todos los residentes que necesitan asistencia.

APPENDIX C - INCOME-RESTRICTED HOUSING DEVELOPMENTS IN THE NRPC REGION

Location Name	Address
6 Summer Street	6 Summer St, Nashua
Ahepa 35 Manor	681 W. Hollis St, Nashua
Amherst Park	525 Amherst St, Nashua
Apartments at Cotton Mill	30 Front St, Nashua
Arel Manor	57 Tyler St, Nashua
Beaver Brook Commons	21 Beaver Brook Way, Pelham
Beechbrook	80 Adams St, Milford
Brentwood Manor Apartments	18 Merrimack St, Nashua
Buttercup Hill	51 Webster St, Hudson
Casimir Place	119 Temple St, Nashua
Clocktower Place	2 Clocktower Pl, Nashua
Coliseum Seniors Residence	7 Coliseum Ave, Nashua
Darrah Village	1 Stark Ln, Litchfield
Davidson Landing	143 Ledge St, Nashua
Davidson Landing II	145 Ledge St, Nashua
Edgewater Estates	5 Howard St, Wilton
Gatewood Manor	27 Will St, Nashua
Granite Square	161 Bridge St, Milford
Harbor Avenue House	60 1/2 Harbor Ave, Nashua
Harbor Homes Group Home	3 Winter St, Nashua
Harbor Homes II	30 Allds St, Nashua
Harbor Homes III	156 Chestnut St, Nashua
Hollis Village	6 Market Pl, Hollis
Ledge McLaren	48 Ledge St, Nashua
Linsey Landing at Milford Mill	40 Bridge St, Milford
Marshall Street Apartments	4,12,16 and 20 Marshall St, Nashua
Mary's House	40 E Pearl St, Nashua
Maynard Homes	165 Pine St, Nashua
Milford Mill	40 Bridge St, Milford
Millette Manor	72 Vine St, Nashua
Mountain View Pheasant Run	1 Danforth Rd, Nashua
Nashua Children's Home	123 Amherst St, Nashua
Park View Apartments	31 Greeley St, Nashua
Parkhurst	2 Veterans Rd, Amherst
Pelham Terrace	25 Windham Rd, Pelham
Pine Valley Lofts	37 Wilton Rd, Milford
Pratt Homes	583 W. Hollis St, Nashua

Salmon Brook	21 Lovell St, Nashua
Streeter Shores	76 Temple St, Nashua
Village Gate	49 Spit Brook Rd, Nashua
Vine Street	65 Vine St, Nashua
Wagner Court	101 Burke St, Nashua
Wentworth Place Apartments	1 Coventry Ct, Merrimack
Xavier House	25 Morgan St, Nashua

APPENDIX D - NRPC OUTREACH LIST (COMMUNITY-BASED SERVICE ORGANIZATIONS)

Note: the following is a categorized listing, aligned with [23CFR 450.316](#), of organizations for which NRPC has a contact name AND email in the NRPC Outreach Contacts database which will allow for future email outreach.

Each organization is listed **once** and categorized by their **primary mission**—for example, an agency primarily focused on medical services but also provides transportation services would be classified as medical.

Transportation Providers (includes ports and freight services)	
•	Souhegan Valley Rides
•	Nashua Transit System
•	NH Transit Association
•	Gentle Care Rides
•	Community Volunteer Transportation Company
•	Commute Smart New Hampshire
•	NH Motor Transport Association
•	Milford-Bennington Railroad
•	Boston Express
•	Greyhound
•	Concord Coach Lines
•	CSX Railways
•	Nashua Express Transportation
•	Boston-Manchester Regional Airport
•	Nashua Airport – Boire Field
Users of public transportation, pedestrian walkways, and bicycle transportation facilities	
•	NH Bike-Walk Alliance
•	Goodales Bike Shop
•	Amherst Bicycle and Pedestrian Advisory Committee
•	Town of Merrimack Town Center Committee
Disabled and Elderly Service Agencies	
•	Council on Aging
•	St. Joseph's Community Services
•	The PLUS Company, Inc.
•	Easter Seals NH
•	Hollis Seniors
•	Life Coping
•	Nashua Senior Activity Center
•	Meals on Wheels
•	NH Department of Health and Human Services Bureau of Elderly and Adult Services
•	Nashua Center (disabilities)

• The Care Givers
• Granite State Independent Living
• Nashua Adult Day Health
• St. John Neuman Day Away
• Toward Independent Living and Learning
• NH Commission on Aging
Language, Cultural, and Minority and Underserved Population Advocacy
• Building Community in NH (formerly Bhutanese Community in NH)
• City of Nashua Urban Programs
• Southern NH HIV/AIDS Task Force
• India Association of NH
• Greater Nashua NAACP
• Granite State Organizing Project
Crisis Relief (includes homeless services, emergency clothing, food pantries, domestic services)
• Nashua Soup Kitchen and Shelter
• SHARE Outreach
• Bridges Domestic and Sexual Violence Support
• Open Cupboard Food Pantry
• Anne-Marie House
• Family Promise of Southern NH
• Tolles Street Mission
• Southern NH Rescue Mission
• The Front Door Agency
Non-Emergency Housing Agencies
• NH Housing and Finance Authority
• Nashua Housing Authority
• Harbor Care
• Keystone Hall – a Program of Harbor Care
Major Educational Institutions
• Nashua Community College
• Rivier University
Medical and Public Health
• Dartmouth-Hitchcock
• Southern NH Medical Center
• St. Joseph's Hospital
• Radiation Center of Greater Nashua
• Greater Nashua Public Health Network Services
• Local Community Health/Welfare Agencies
Youth and Family Services
• Greater Nashua YMCA
• Boys and Girls Club of Souhegan Valley
• Nashua Police Athletic League (PAL)

Other	
•	Southern NH Services
•	Opportunity Networks
•	Gateways Community Services
•	Wilton Community Center
•	Arlington Street Community Center
•	United Way of Greater Nashua
•	Salvation Army Community Center
•	Conservation Law Foundation - NH

APPENDIX E - 23 CFR 450.316: INTERESTED PARTIES, PARTICIPATION, AND CONSULTATION

(a) The MPO shall develop and use a documented participation plan that defines a process for providing individuals, affected public agencies, representatives of public transportation employees, public ports, [freight shippers](#), providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), representatives of [users of public transportation](#), representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process.

(1) The MPO shall develop the participation plan in [consultation](#) with all interested parties and shall, at a minimum, describe explicit [procedures](#), strategies, and desired outcomes for:

(i) Providing adequate public notice of public participation activities and time for public review and comment at key decision points, including a reasonable opportunity to comment on the proposed [metropolitan transportation plan](#) and the TIP;

(ii) Providing timely notice and reasonable access to information about transportation issues and processes;

(iii) Employing [visualization techniques](#) to describe [metropolitan transportation plans](#) and TIPs;

(iv) Making public information (technical information and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;

(v) Holding any public meetings at convenient and accessible locations and times;

(vi) Demonstrating explicit [consideration](#) and response to public input received during the development of the [metropolitan transportation plan](#) and the TIP;

(vii) Seeking out and considering the needs of those traditionally underserved by existing transportation systems, such as low-income and minority households, who may face challenges accessing employment and other services;

(viii) Providing an additional opportunity for public comment, if the final [metropolitan transportation plan](#) or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts;

(ix) Coordinating with the statewide transportation planning public involvement and [consultation](#) processes under [subpart B](#) of this part; and

(x) Periodically reviewing the effectiveness of the [procedures](#) and strategies contained in the participation plan to ensure a full and open participation process.

(2) When significant written and oral comments are received on the draft [metropolitan transportation plan](#) and TIP (including the financial plans) as a result of the participation process in this section or the interagency [consultation](#) process required under the EPA transportation [conformity](#) regulations ([40 CFR part 93](#), subpart A), a summary, analysis, and

report on the disposition of comments shall be made as part of the final [metropolitan transportation plan](#) and TIP.

(3) A minimum public comment period of 45 calendar days shall be provided before the initial or revised participation plan is adopted by the MPO. Copies of the approved participation plan shall be provided to the FHWA and the FTA for informational purposes and shall be posted on the World Wide Web, to the maximum extent practicable.

(b) In developing [metropolitan transportation plans](#) and TIPs, the MPO should consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation (including [State](#) and local planned growth, economic development, tourism, natural disaster [risk](#) reduction, environmental protection, airport operations, or freight movements) or coordinate its planning process (to the maximum extent practicable) with such planning activities. In addition, the MPO shall develop the [metropolitan transportation plans](#) and TIPs with due [consideration](#) of other related planning activities within the metropolitan area, and the process shall provide for the design and delivery of transportation services within the area that are provided by:

(1) Recipients of assistance under title [49 U.S.C. Chapter 53](#);

(2) Governmental agencies and non-profit organizations (including representatives of the agencies and organizations) that receive Federal assistance from a source other than the U.S. Department of Transportation to provide non-emergency transportation services; and

(3) Recipients of assistance under [23 U.S.C. 201-204](#).

(c) When the MPA includes Indian Tribal lands, the MPO shall appropriately involve the Indian Tribal government(s) in the development of the [metropolitan transportation plan](#) and the TIP.

(d) When the MPA includes Federal public lands, the MPO shall appropriately involve the Federal land management agencies in the development of the [metropolitan transportation plan](#) and the TIP.

(e) MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under [§ 450.314](#).

APPENDIX F - RECORD OF PUBLIC COMMENTS

2019 Public Participation Process (PPP)					
Significant Individual Public Comments					
From Comment Period (4/26-6/10) and Public Hearing (6/19)					
Date	Organization	Individual(s)	Type of Comment	Comment Summary	Response/Actions
4/29 – 5/2	Nashua Transit System (NTS)	Julie Chizmas, Camille Pattison	Addition	Add language similar to the 2012 PPP which acknowledges that “NTS, which is the FTA 5307© applicant, has consulted with the MPO and concurs that the public involvement process adopted by the MPO for the development of the TIP satisfies the public hearing requirements that pertain to the development of the Program of Projects for regular Section 5307, Urbanized Area Formula Program, grant applications, including the provision for public notice and the time established for public review and comment.	The summarized language in the Comment Summary section of this document was added section 2.1 Purpose. The objective: “to satisfy the Nashua Transit System public participation process for the program of projects” was added to section 2.2 Goals and Objectives (goal 4, objective 6). Individuals/organizations of the comment were informed of the change and the revised version was uploaded to the NRPC website.

5/30	NRPC	Gregg Lantos	Verification, addition	At the Freight Planning seminar, “they” mentioned including freight interests in the PPP contact list.	NRPC to verify freight industry-related organizations are mentioned in the document. NRPC to review other RPC PPP plans for reference to freight organizations and to look over the contact list and add appropriate contacts. DOT – no specific freight Strafford – no specific freight Rockingham – no reference to freight at all SNH – no mention of specific freight organizations within MTP or TIP NRPC to include the following organization (s) within Public Agencies and Community Organizations list: NH Motor Transport Association, Pan Am Railways and Milford-Bennington Railroad Co.
Collective Public Comments					
From Comment Period (4/26-6/10) and Public Hearing (6/19)					
- It was clarified that translation services will be implemented as MPO resources allow. It is possible for the MPO to recommend third-party translation services to interested parties when requested. - It was clarified that the Public Agencies and Community Organizations list within the PPP can be adjusted and updated as needed. - It was noted that the PPP document may be too lengthy and will be considered in future amendments and updates.					

2024 Public Participation Process (PPP) Individual Public Comments From Comment Period (5/3/2024 - 6/17/2024) and Public Hearing (6/19/2024)		
Commenting Entity	Comments	NRPC response/Action
Tim Tenhave	In reading the May 3 rd draft of the PPP on the NRPC website, I noticed Table 1 lists the “PPP” on two different rows in the Table. First row on page 10 and eighth row on page 11. Likely only need it listed once in that Table.	this has been corrected
Emma Rearick	Change "linked in" reference to "Indeed"	this has been corrected
FHWA - Larisa	add various hyperlinks for ADA compliance and accessibility	Hyperlinks added
FHWA - Larisa	<u>Page ii:</u> Change "Translation" to "Translation & Interpretation Services" because the translation is written, and the interpretation service is oral/verbal. Note that it is a free service.	Completed
FHWA - Larisa	<u>Figure 1, page2:</u> Great job on adding the alt text to Figure 1 on Page 2, however, the text states “A map of the state of Alberta.” The alt text of Figure 1 should also include more information, beyond just the title of the map.	Completed - Added alt text: <i>Figure 1 is a map of the Nashua Metropolitan Planning Area. The population of the planning area was 242,984 at the 2020 Census. The map shows the boundaries of the Nashua, Boston, and Manchester urban areas. It also shows the NRPC boundary and roads in the region.</i>
FHWA - Larisa	<u>Figure 2, page 4:</u> Add alt text for ADA compliance and accessibly.	Completed - Added alternate text: <i>Figure 2 shows the 4 goals of the public participation process.</i>
FHWA - Larisa	<u>Page 5, Goal 1, third bullet:</u> Change "disabled" to "individual with disability. “Terms such as “handicap” or “disabled” that emphasize person’s disability first, should be avoided whenever possible to ensure sensitive and appropriate communication with individuals with disabilities. These terms can also be offensive to some individuals, as well as condescending and dehumanizing. A better term for “handicap parking” is "accessible parking space." "https://www.ada.gov/topics/parking/	Completed - Changed to individuals with a disability.

FHWA - Larisa	<u>Figure 3 page 7: add alt text</u>	Completed - Added alt text: <i>Figure 3 shows how transportation projects progress from the conceptual phase to construction. Projects are initially proposed for the metropolitan long range transportation plan. The current long range plan extends to the year 2050. Projects then move into the outer years of new Hampshire ten year transportation plan through a competitive selection process. federal and or state funding is committed to project in the the year plan. The first four years of the ten year plan are referred to as the NRPC Transportation Improvement plan.</i>
FHWA - Larisa	<u>Page 9, first bullet; The announcement of the comment period is published in the region's newspaper of general circulation:</u> Recommendation: Local papers , town and library newsletters/offices, etc. should be considered. MPOs are encouraged to utilize "USDOT's Promising Practices for Meaningful Public Involvement in Transportation Decision-Making guide in their PIP plans and process. https://www.transportation.gov/priorities/equity/promising-practices-meaningful-public-involvement-transportation-decision-making	The bolded language has been added. Additionally, the public notice is emailed to NRPC TTAC, NRPC MPO Policy Committee, town halls, and libraries. NRPC also notifies several community-based service agencies that are identified in Appendix D of this plan, including disabled and elderly service agencies, underserved populations advocacy groups, and housing agencies. The public notice will be included in free publications (shopper news, flyers, etc.) when possible.

FHWA - Larisa	Page 9, paragraph 2; The NRPC translates all public notices for <u>planning products into Spanish as a regular practice</u>. This is great! Just a requirement reminder that in order to ensure a meaningful access to programs and services, as well as ensure strong evidence of compliance, you must identify/refine languages spoken in your service area for the purposes of identifying if any of the vital documents (i.e. public notices, brochures, plans, outreach materials, PIP materials, etc.) would need to be translated into those languages. The vital document translation should occur for each eligible LEP language group that constitutes 5% or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or if there are fewer than 50 persons in a language group that reaches the 5% trigger, the recipient does not translate vital written materials but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost (HYPERLINK "https://www.govinfo.gov/content/pkg/FR-2005-12-14/html/05-23972.htm"LEP Guidance).	The bolded text has been edited to reflect Matt's conversation with Larisa: The NRPC translates all public notices for planning products into Spanish as a regular practice because Spanish has been identified through Limited English Proficiency (LEP) analysis as an LEP language. Upon request, the NRPC will facilitate additional translation services for LEP persons in the “Other Indo-European” languages (also identified in LEP analysis). Interpretation services for deaf, hard of hearing, and blind persons are provided by utilizing the following resources: •Language Bank (http://www.thelanguagebank.org) and Language Line Solutions (www.language-line.com) for translation services. •Northeast Deaf and Hard of Hearing Services (https://ndhhs.org/) for deaf and hard of hearing interpretive services. •Future in Sight (https://futureinsight.org/) for interpretive services for blind persons.
FHWA - Larisa	Page 10 Table 1: <u>Summary of NRPC Public Participation Strategies by Planning Product</u>. I did not check but please ensure that this table (and other tables in this document) is ADA compliant and that the individuals with visual disabilities who use readers can read the content of this	NRPC reviewed the criteria for ADA compliant tables (sec 508 ADA for making tables). The tables meet the criteria.

FHWA - Larisa	<u>Page 12</u> : Include a TTY/TDD number and email.	Matt reached out to the Governor's Commission on Disability (Louise McBride) who connected Matt with the Northeast Deaf & Hard of Hearing, Inc (Michelle). Matt spoke with Michelle on 8/8/2024. Michelle says that TTY/TDD is rarely used anymore. Most individuals just use the internet (Various Apps). she suggested that NRPC simply say "Please contact NRPC if you need accommodation for deaf or hard of hearing services. She said that NRPC could reach out to Northeast DHHS for assistance in accommodating individuals. Also, captioning on Zoom screen (during hybrid meetings) is a strategy. Also, her agency could provide a workshop/training. Also, it is helpful to ask deaf and hard of hearing individuals "how do you prefer to communicate?"
FHWA - Larisa	Page 12: NRPC meetings and hearings... Larissa said this is excellent .	n/a
FHWA - Larisa	<u>Page 13, Table 2</u> : add hyperlink to appendices	Completed
FHWA - Larisa	<u>Page 14, NRPC Outreach List – Community-based Service Organizations section of the appendices</u> . Add a hyperlink to the appendices or your website.	Completed

FHWA - Larisa	<u>Page 15, Other Strategies:</u> These are great but how are these strategies effective in your reaching out to LEP or ASL population? What kind of outreach has been done to these groups to notify them of these lists, newsletters and opportunities? Also, I did not see "Google Translate" on your website. Google translate is a useful tool to access some of the information on the website but it should not be solely relied upon as machine translations typically provide very literate translations which at times can be a source of misunderstandings. Additionally, documents that are posted on the website, do not automatically get translated into the language selected through the "Google Translate." This poses a concern for the translation of vital documents requirements. Vital presentation documents (presentations, printed materials, etc.) should be translated in prevalent languages if those languages are spoken by a 1,000 people or 5% of the population (whichever is less) in the service area."Google Translate" should be placed in the upper part of the page where its commonly found, and easily located, i.e., header or the navigation bar/main menu.	Completed
FHWA - Larisa	<u>Page 17: Strategies to reach underrepresented populations.</u> refers to comment from page 15	Completed
FHWA - Larisa	Page 18: add hyperlinks	Completed
FHWA - Larisa	Appendix A - add hyperlinks	Completed
FHWA - Larisa	Appendix B: This image is not ADA compliant. A hyperlink to the brochure on the website would be a potential solution.	Completed
FHWA - Larisa	Appendix D: add hyperlinks	Completed
FHWA - Larisa	Appendix E : add hyperlinks	Completed
FHWA - Larisa	Appendix F: Record of public comments - see Larisas comments	

FHWA - Leigh	Page 1, last paragraph – Metropolitan Transportation Organization (MPO) should be Metropolitan Planning Organization (MPO).	This has been updated.
	Page 5, 1st paragraph - update FAST Act reference to IIJA/BIL.	This has been updated.
	Page 5, 2nd paragraph is duplicate of Page 3.	This has been updated.
	Page 9 – MPO use of social media to announce public comment periods isn't referenced here, but Table 1 Summary shows that it is. These should be consistent.	This has been updated.
	Table 1 includes duplicate PPP reference.	This has been updated.
	Table 1 – MPO could consider more robust strategies for the UPWP.	yes, TBD when strategies are updated in the next UPWP
	Page 12 – MPO contact information should include an e-mail address for public comments. If there is a staff person with public involvement/engagement as a primary focus, you could indicate who that is.	Completed
	Table 2 – this is a good resource for providing “how-to” information to readers that are wondering how they can engage in the MPO process. You might want to include/highlight it earlier in the document.	considered but it needs to stay where it is because of formatting
	Page 15 – note on public input collected from social media platforms is duplicate of same information provided on pg. 12.	Matt W thinks that it would be ok to leave this note in both places.
	Page 15-16, Partnering with other agencies and events – MPO public outreach displays and materials could include mapping of current TIP and MTP projects for awareness and information.	this has been corrected

FHWA - Leigh	Table 4 – Performance Measures – most of these measures are output vs outcome-based. Might consider other outcome-based measures such as whether participants felt they had adequate notice of a public engagement activity, whether participants felt their input was valued in the process, tracking how public input was used, and whether public input affected the resulting planning documents. These outcome metrics and others can be helpful in determining which strategies are most effective and impactful. A reminder (as noted with the recent 2024 Nashua TMA Certification Review Report) that under 23 CFR 450.316(x), the required MPO documented participation plan must be periodically reviewed for the effectiveness of the procedures and strategies contained int the participation plan to ensure a full and open participation process. More outcome-based measures could help demonstrate compliance with this requirement.	Language about Outputs and Outcome has been added. Additional Outcome-based measures have been added. More to come.
	Page 25 – Appendix A – List Of Abbreviations should include IJJA/BIL versus FAST. STIP and TIP Abbreviations should be Program, not Plan.	this has been corrected

FHWA - Leigh	Page 29 – Appendix D – might also indicate how these organizations align with categories specifically called out under 23 CFR 450.316(a): individuals, affected public agencies, representatives of public transportation employees, public ports, freight shippers, providers of freight transportation services, private providers of transportation (including intercity bus operators, employer-based commuting programs, such as carpool program, vanpool program, transit benefit program, parking cash-out program, shuttle program, or telework program), representatives of users of public transportation, representatives of users of pedestrian walkways and bicycle transportation facilities, representatives of the disabled, and other interested parties. Also, as noted with the recent 2024 Nashua TMA Certification Review Report, the MPO’s support for the RCC7 Mobility Manager’s public outreach activities is notable and has helped connect traditionally underserved individuals and communities with transit services, especially for medical appointments. A reminder that the federal agencies also recommended that NRPC take steps to identify and engage local and state organizations who represent underserved population in the region as primary planning documents are developed, including the MTP.	The heading of each section in the table indicates how the listed entities align with 23 CFR 450.316(a)
	Page 32 – Appendix E – consider making this a complete list of elements, including 450.316(a). Also notice that (c), (d) and (e) are not included.	Completed

CLF, GSOP, NAACP	Implement an EJ advisory board	NRPC is concerned that creating an official committee of NRPC with membership limited to a relatively small proportion of the region would infringe upon the representative structure of the NRPC as established in NH RSA 36:47.
		Further, NRPC lacks the capacity to effectively staff an additional committee of the NRPC, given limitations of staffing, funding, and the requirements of NH RSA 91-A.
		Perhaps it makes sense for NRPC to consult further with CLF/GSOP/NAACP and the organizations listed in Appendix D of the plan about enhancing our outreach strategies and for input about ways to improve the transportation planning process.
		What would make sense is that NRPC should consult with the organizations listed in Appendix D for input into the effectiveness of our outreach strategy, into alternatives for enhancing our outreach strategies and for input into ways to improve the transportation planning process
		NRPC will ask stakeholders how we are doing in our outreach to underserved. Is it effective?
	Enhance Language Access	this has been addressed
	Extend the minimum public comment period for all relevant documents to 45 days	We strive for 45 days, but there must be flexibility on for some of the comment periods (i.e. TIP Amendments, which often are rushed by NHDOT). NRPC has no control over some of the comment periods; they are determined by NHDOT and Federal agencies. This could be addressed by developing a standard structure for updating critical planning documents, where public involvement is baked into the planning process.