

NASHUA REGIONAL PLANNING COMMISSION

**SUMMARY OF RESPONSES TO CORRECTIVE ACTIONS &
RECOMMENDATIONS (SEPTEMBER 2023)**

REGARDING:

**NASHUA TMA FEDERAL CERTIFICATION REVIEW (MARCH
2020)**

CORRECTIVE ACTIONS

- **Performance-Based Planning & Programming:**
 - Develop written provisions for on-road mobile source emissions,
 - Adopt 4-year CO targets by 12/31/20,
 - Phase into TIP (2021) and MTP (2022).
 - ***NRPC developed written provisions and adopted 4-year CO targets at the September 9, 2020, NRPC Transportation Technical Advisory Committee (TTAC) meeting.***
 - ***The written provisions for the CO reduction performance measure were incorporated into the Nashua Urbanized Area Memorandum of Understanding between MPOs, transit agencies, NHDOT, MassDOT and NHDES.***
 - ***New Hampshire's CO Limited Maintenance Plan areas, which include the Cities of Nashua and Manchester, were terminated on January 29, 2021.***
 - ***The CO performance measure therefore is not included in the NRPC TIP or MTP.***

- **Environmental Mitigation** – For the next MTP update (2022) have NHDOT Natural Resource Agency & Cultural Resource Agency Coordination Meetings review & comment on proposed mitigation strategies.
 - ***The state of New Hampshire is designated as in attainment for the US Environmental Protection Agency (EPA) Ozone standards and is therefore required to update the MTP every 5 years.***
 - ***The next NRPC Metropolitan Transportation Plan (FY 2023-2050) will be adopted in December (2023).***
 - ***NRPC is coordinating with the NHDOT Natural Resource and Cultural Resource Agencies to gather feedback from those agencies during the development of the MTP.***
 - ***NHDOT point of contact staff for the Natural and Cultural Resource Agencies will be added to the NRPC TTAC mailing list.***

- **Financial Planning:**
 - For MTP update (2022), include breakdown of FHWA & FTA program funding by program category.
 - ***This was completed for the NRPC FY 2021-2024 Transportation Improvement Program (TIP) and the NRPC FY 2019-2045 Metropolitan Transportation Plan (minor update) that were adopted in February 2021. The methodology has been carried forward into the NRPC FY 2023-2026 TIP and the FY 2019-2045 MTP (minor update) that were adopted in February 2023.***
 - Include table developed jointly by NRPC & NTS depicting the public transportation O&M needs.
 - ***This was completed for the NRPC FY 2021-2024 Transportation Improvement Program (TIP) and the NRPC FY 2019-2045 Metropolitan Transportation Plan (minor update) that were adopted in February 2021. The methodology has been carried forward into the NRPC FY 2023-2026 TIP and the FY 2019-2045 MTP (minor update) that were adopted in February 2023.***

- **Nashua UZA MOU:**
 - Agreement to be completed by 12/31/20 will include MPOs: NRPC, SNHPC, NMCOG, MVRPC; Transit operators: NTS, MTA, LRTA, MVRTA; State DOTs: NHDOT, MassDOT
 - ***The Nashua UZA MOU was finalized in December 2020 .***

RECOMMENDATIONS

• MPO Structure

- Update agreements to address the Public Transit Agency Safety Plan.
 - ***This will be incorporated into the Nashua MPO – NTS sub agreement during the Nashua UZA MOU update. The sub agreement will be updated to state that NRPC will coordinate with NTS in setting transit performance targets related to Transit Asset Management and Safety performance measures. The update of the MOU will begin after the 2020 US Census boundary smoothing process is completed in late 2023.***
 - ***NRPC already includes the Nashua Transit System (NTS) 2023 PTASP targets in the NRPC FY 2023-2026 TIP. The PTASP targets will also be incorporated into the 2023 MTP update.***
- Ensure membership policies are documented in the MPO Prospectus.
 - ***The membership policies are documented in the draft MPO prospectus update that will be reviewed by the NRPC TTAC in October 2023 and adopted by the MPO Policy Committee in December 2023.***

UPWP

- NRPC should revise their UPWP's funding table by work category to clarify the use of toll credits in funding.
 - ***The UPWP funding table indicates that the Federal funding portion of the NRPC UPWP budget includes Toll Credits.***
- Break out grant funds between FHWA and FTA.
 - ***The UPWP funding table now includes this breakout.***

MTP

- Revisit MTP goals to emphasize system preservation.
 - ***The current (2023) MTP update process includes a public survey that includes the following question:***
 - ***Funding for transportation improvements is limited. Given limited funding, please indicate how important you believe each of the proposed projects below are to the region's transportation system...***
 - ***Maintaining existing streets, roads, and highways was the most popular response.***
 - ***A separate survey question asked about the most significant transportation challenges facing the Nashua Region...***
 - ***Poor road conditions and lack of maintenance were among the most popular answers.***
 - ***Additionally, the most current FHWA planning factors include emphasizing the preservation of the existing transportation system.***
 - ***NRPC will include System Preservation as a goal in the 2023-2050 MTP update.***
 - Work toward more detail in identifying operations & maintenance needs and balance with capacity and other system improvements.
 - ***The NRPC 2023-2050 MTP will include a more thorough narrative about balancing Operations & Maintenance needs with capacity and other system improvements.***
 - Various MTP data tables provide good information but would be enhanced with better use of mapping or other visualization tools.

- ***The data tables in the NRPC 2023-2050 MTP will be enhanced with additional mapping, graphics, and other visualization tools.***

Multimodal/Transit Funding

- The MPO is encouraged to enhance outreach to intercity transit providers to improve participation in the transportation planning process. The NRPC should pursue cooperative relationships with all providers of transportation in the region and incorporate any comments for proposed plans as appropriate.
 - ***The NRPC successfully applied for FTA 5305e SPR program funding to develop the June 2021 Inter-Regional Transit Expansion Study. The planning process incorporated a robust public outreach effort which included outreach to the Nashua Transit System, Lowell Regional Transit System, Middlesex 3 Coalition, U Mass Lowell, and FTA Region 1. This resulted in the consideration of four operating models for intercity public transit service being considered.***
 - ***The NRPC Regional Mobility Manager (a new staff position created in 2022) facilitates a significant public outreach effort to encourage transportation providers in the region to participate in the Nashua Regional Coordination Council (RCC) for community transportation. The Mobility Manager has made significant progress in developing relationships with providers, as evidenced by increased attendance at the monthly RCC meetings.***

Annual List of Obligate Projects

- The annual list of obligated projects must be published within 90 days of the end of the program year and should remain available at least until the following year's list is posted.
 - ***The NRPC has a process in place for ensuring that the list is posted in a timely fashion and remains posted until the following year.***

Financial Planning

- Document role of toll credits in financing transportation projects.
 - ***The Financial Analysis section of the NRPC TIP lists several Fiscal Constraint Assumptions. One of the assumptions is that for all projects requiring local match, the match will be made available in a timely manner and that toll credits will be utilized to meet the State matching requirements unless otherwise stated.***
- The TIP documentation should provide a table demonstrating the amount of toll revenue credits available and used and the amount credit used as the share of each project.
 - ***The table in Appendix A of the FY 2023-2026 TIP includes this information.***
- The TIP financial plan should show allocations for each of the FTA funding programs.
 - ***The FTA allocations for the region are documented in the NRPC FY 2023-2026 TIP in Table 6 (page 23), Table 9 (page 26), and Table 11 (page 27).***
- In future versions of the TIP, the references to need to reflect the Surface Transportation Block Grant (STBG) program and other current funding programs.
 - ***The table in Appendix A of the FY 2023-2026 TIP includes this information.***
- Address whether an under-programming of projects relative to funding exists in outer years.
 - ***For projects in the outer years of the MTP NRPC assumes level federal funding plus an assumed inflation rate. Given these assumptions, projects in the outer years of the MTP are fiscally constrained.***

- *This does not include so-called illustrative projects, which are considered aspirational and therefore not subject to fiscal constraint.*

Public Participation

- Ensure that translations services are available.
 - *NRPC makes a significant effort to make translation services available.*
 - *For example, NRPC participates in active collaboration with underrepresented communities through the City of Nashua Public Health Department, especially with their Hispanic and Portuguese outreach workers. Spanish and Portuguese language brochures have been made available through this collaboration.*
 - *For example, NRPC provides technical assistance with route mapping for the Nashua Transit System, including translation to Spanish.*
 - *For example, NRPC provided Spanish and Portuguese translation of the Ledge Street (Nashua) Safe Routes to School survey and provided in-person translation during a public event for this project.*
 - *Additionally, the NRPC Title VI Plan outlines how individuals with Limited English Proficiency can access translations services.*
- Social media policy that clarifies how comments are received as official & considers disadvantaged groups.
 - *The NRPC Facebook page makes the following statement: Facebook comments are reviewed by NRPC staff but are not handled as official comments; as such, they will not be incorporated into the official meeting record. NRPC reserves the right to block individuals submitting profane, disruptive, or otherwise inappropriate comments.*
 - *NRPC will provide additional clarity about how public comments from social media are incorporated into the transportation planning process in the next update to the Public Involvement Process (PIP) document.*
- Alternatives to discontinuing newspaper legal notices for public meetings, including participating in community events.
 - *NRPC actively participated in planning and attending the City of Nashua Multicultural Festival.*
 - *NRPC attends many other public events to promote transportation planning efforts.*
 - *NRPC does continue to publish information about public comment periods and public hearings in the local newspaper.*

Civil Rights/Title VI

- Complete the update of the Title VI complaint process in coordination with NHDOT's Office of Federal Compliance.
 - *NRPC collaborated with NHDOT's office of Federal Compliance and RLS Associates, Inc. (consultant for NHDOT), in the Spring/Summer of 2023 to update the NRPC TITLE VI Program documentation. The NRPC Title VI Plan was submitted to RLS Associates, Inc. for review and comments were incorporated into the updated NRPC Title VI document. The updated plan is currently in a 30-day public comment period, and it is expected to be adopted by the NRPC MPO following a public hearing on September 20th, 2023.*
- Separate Title VI documents from Environmental Justice.
 - *The Title VI and Environmental documents were separated during the 2023 update of the NRPC Title VI document.*

- NRPC is encouraged to implement their proposed TAZ-based analysis of travel times with the next MTP update.
 - ***The updated NRPC traffic model will measure how minorities, low income and the elderly will be impacted, whether positively or negatively, by transportation projects included in the next MTP. It will do so by measuring accessibility to jobs, healthcare, higher education, and retail opportunities.***
- Implement Limited English Proficiency (LEP) Four Factor Analysis.
 - ***LEP Four Factor Analysis has been implemented. A demographic profile of the NRPC MPO region is included in the updated NRPC Title VI document. The languages spoken in the thirteen (13) NRPC communities were identified and the estimated percentage of residents with Limited English Proficiency and their distribution by language group were summarized. Spanish and Other Indo-European languages were identified as those that are spoken “less than very well”. NRPC has determined the frequency with which LEP individuals encounter the NRPC Title VI program and provided a log of that frequency. NRPC realizes that an MPO’s regional planning activities impact every person in the MPO region to one degree or another. NRPC is committed to providing meaningful access and will provide written translation for any of its documents, when reasonable, effective and with reasonable resources. NRPC has identified the resources that are available to the LEP population.***

Freight Planning

- Complete development of freight related MTP goals.
 - ***Freight related goals will be incorporated into the 2023 MTP update.***
- NRPC should consider similar efforts as the Boston MPO to develop their freight modeling capacity using NH Toll Authority reports for O/D data that could be built on with truck traffic counts, including at major arterial intersections.
 - ***Staff conducted National Performance Management Data set (NPMRDS) analytics to obtain Route ID for previously run truck speeds on National Highway System (NHS) and the extended arterial network. Prepared vehicle class count spreadsheets for FHWA Freight Assessment.***
 - ***Staff attended the Regional Freight Stakeholders meeting hosted by Southern New Hampshire Planning Commission.***
 - ***Staff attended FHWA - New Hampshire Advancing Freight Planning Workshops/Webinars (October 2022, & February 2023).***
 - ***Staff reviewed truck count data obtained by the Boston MPO for several toll locations on FEE Turnpike and input it into the NRPC traffic model (TransCAD) database.***
 - ***Summarized truck count and speed data on regional arterials for analysis and freight planning.***
 - ***NRPC will consider options for using the updated traffic model to inform freight planning.***
 - ***NRPC will communicate with CSX RR and incorporate findings into 2023 MTP update.***
- Continue efforts to designate Critical Freight Corridors through further study.
 - ***NRPC will continue to collaborate with NHDOT regarding Critical Freight Corridors.***

Travel Demand Model

- Develop Regional Model documentation.

- *NRPC has hired an experienced traffic modelling professional to update the NRPC traffic model, and to provide modelling services for local and regional transportation planning efforts that require traffic modelling.*
- *The appropriate regional traffic model documentation is being developed as part of the update process.*
- Conduct a regional household survey in conjunction with other NHMPOs and NHDOT.
 - *The Traffic Model Users Group (MUG) has not made progress on this and therefore none of the MPOs have participated in a joint regional household surveys.*

Congestion Management Process

- Clarify cycles for CMP reporting & biennial performance reports in the 2020 CMP update.
 - *A draft of the NRPC CMP was submitted to FHWA for comment in August 2021. FHWA comments were incorporated, and the CMP was adopted by the NRPC MPO in June 2022.*
 - *The comments that were addressed included:*
 - *Identifying causes of non-recurring congestion (crash, weather, work zone).*
 - *Describing data collection program (NPMRDS & field counts, intersections in next update).*
 - *Implementation strategies/funding.*
 - *Evaluating estimated and actual impacts of projects.*
 - *Time frame for updates (every 5 years in year preceding MTP update)*
 - *The adopted document states that the NRPC intends to update the CMP regularly in the year preceding MTP updates. This will enable the mitigation strategies resulting from the process to be continually considered for, and adopted into, the long-range recommendations of the MTP. The next NRPC MTP update is scheduled to be complete in December 2023.*
 - *NRPC uses the NPMRDS expanded data set to calculate congested period average speeds and travel time indices along critical corridors in the region. NRPC is committed to partnering with other NH MPOs to purchase the data set and continue monitoring the critical corridors. NRPC will also incorporate updates to other performance measures into the 2023 MTP, including v/c ratios, level of service, bicycle LTS, crash rates and transit congestion measures.*
- Revisit strategies in the CMP Toolbox for applicability to the region.
 - *The FHWA review of the draft CMP recommended fewer CMP strategies in toolbox. Land development & parking management strategies were removed.*
- Integrate safety data, performance measures, & targets into CMP reports.
 - *Safety measures (PM1), performance measures (PM2 & 3), and targets have been incorporated into the TIP system performance report and will be incorporated into the 2023 Metropolitan Transportation Plan (MTP) update and the 2027 CMP update.*

ITS Regional Infrastructure

- Update ITS plan every two years.
 - *The anticipated update to the NRPC ITS plan was not finalized during the FY 2022-2023 contract period because of staffing issues, including staff turnover and difficulty replacing staff.*
 - *It is anticipated that NRPC will finalize an ITS plan during the FY2024-2025 UPWP period.*

- NRPC is encouraged to seek out opportunities for ITS implementation on the network and intersection level.
 - ***NRPC collaborated with NHDOT and the Town of Pelham to incorporate an Intersection Conflict Warning System (ICWS) at the intersection of NH128 and Talant Road.***
- Implementation of ITS on the highway network using ITS checklist in project development process.
 - ***NRPC and the other MPOs met with NHDOT and FHWA to discuss New Hampshire Statewide ITS architecture and planning.***
 - ***NRPC staff attended a FHWA/NHDOT workshop in August 2023 along with other New Hampshire stakeholders. The purpose of the workshop was to clarify how ITS architecture can be used in regional and statewide transportation planning.***

Performance Based Planning & Programming

- Clarify the performance management section of the MTP is the required System Performance Report.
 - ***This has been clarified in the NRPC TIP as the “Regional System Performance” section and includes Transit Asset Management, Public Transit Agency Safety, Highway Safety, and Infrastructure Condition measures and the associated performance targets. This section will be included in the MTP 2023 update.***
- The TIP performance narrative could be enhanced by describing the anticipated effect of the TIP towards achieving the performance targets.
 - ***The TIP lists projects that address the performance measures and the funding associated with each project.***
 - ***The performance narrative will be enhanced during the 2023 MTP update and then incorporated into the next TIP update.***

Emerging Technologies

- Include Transportation Network Companies (TNCs) and Autonomous Vehicles in the planning process.
 - ***NRPC will include a discussion about TNCs and Autonomous Vehicles in the 2023 MTP update.***
- The MPO should explore opportunities to integrate emerging technologies into future planning and coordination activities with its many stakeholders.
 - ***NRPC will consider developing regional Electric Vehicle Charging Infrastructure guidelines through Task 504 (Special Projects) of the FY 2024-2025 UPWP.***