
MONTACHUSETT METROPOLITAN PLANNING ORGANIZATION

PUBLIC PARTICIPATION PLAN

2016



MPO ENDORSED
MAY 25, 2016

Amendment #1
March 15, 2017

MONTACHUSETT

REGIONAL PLANNING COMMISSION

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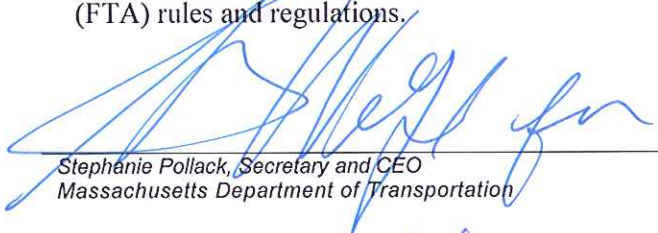


MONTACHUSETT METROPOLITAN PLANNING ORGANIZATION (MMPO) PUBLIC PARTICIPATION PLAN (PPP)

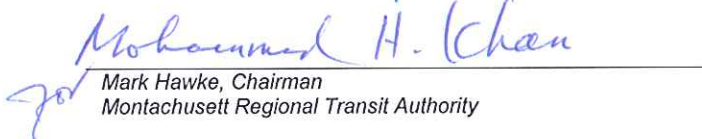
The Montachusett Metropolitan Planning Organization (MMPO) hereby endorses this Public Participation Plan (PPP) prepared for the MMPO by the Montachusett Regional Planning Commission (MRPC). The PPP seeks to ensure opportunities for any and all interested individuals to participate early and often in the transportation decision making process of the MMPO; to express their views and opinions on transportation issues; and to become active participants in the transportation decision making process.

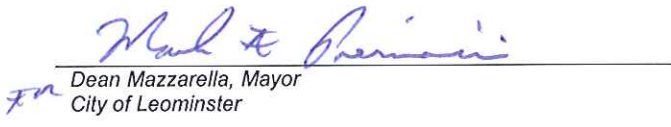
The PPP also outlines the process that the MMPO will use to reach out to persons identified under the regulations and laws of Title VI, Environmental Justice (EJ), Limited English Proficiency (LEP), the Americans With Disabilities Act (ADA) and, as well, any other traditionally underrepresented population.

In addition, this PPP will serve as the Public Participation Process for the Montachusett Regional Transit Authority (MART), a signatory member of the MMPO, as required by Federal Transit Administration (FTA) rules and regulations.

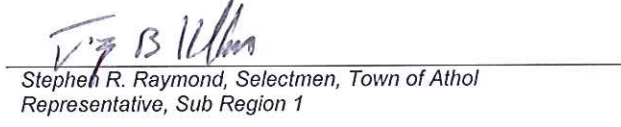

Stephanie Pollack, Secretary and CEO
Massachusetts Department of Transportation

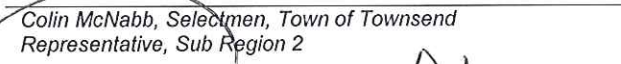

Guy Corbosiero, Acting Chairman
Montachusett Regional Planning Commission

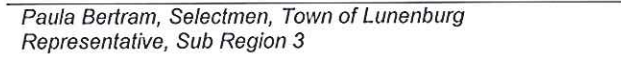

Mark Hawke, Chairman
Montachusett Regional Transit Authority

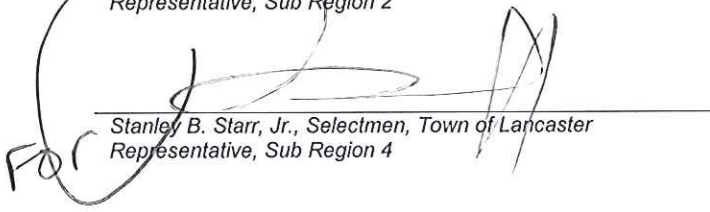

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City of Leominster


Stephen DiNatale, Mayor
City of Fitchburg


Stephen R. Raymond, Selectmen, Town of Athol
Representative, Sub Region 1


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Paula Bertram, Selectmen, Town of Lunenburg
Representative, Sub Region 3


Stanley B. Starr, Jr., Selectmen, Town of Lancaster
Representative, Sub Region 4


5/25/2016
Date

MONTACHUSETT REGIONAL PLANNING COMMISSION

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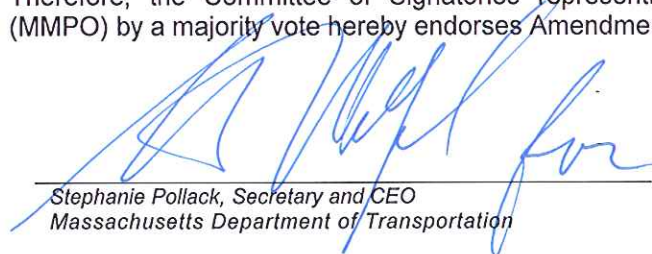


Montachusett Metropolitan Planning Organization Endorsement of Amendment #1 to the Public Participation Plan (PPP)

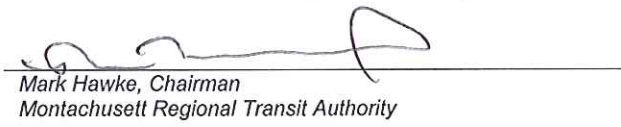
The Montachusett Metropolitan Planning Organization (MMPO) has completed its review of Amendment #1 to the Public Participation Plan (PPP) and hereby endorses Amendment #1. The PPP seeks to ensure opportunities for any and all interested individuals to participate early and often in the transportation decision making process of the MMPO; to express their views and opinions on transportation issues; and to become active participants in the transportation decision making process.

This Amendment to the PPP reduces the duration of the Public Review and Comment Period from 30 days to 21 days for key documents such as the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), the Regional Transportation Plan (RTP) and any other identified major transportation documents. This change will still allow for adequate time for comments.

Therefore, the Committee of Signatories representing the Montachusett Metropolitan Planning Organization (MMPO) by a majority vote hereby endorses Amendment #1 to the Montachusett Public Participation Plan (PPP).

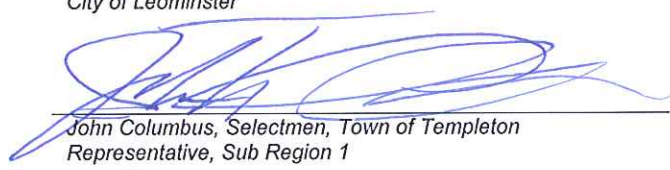

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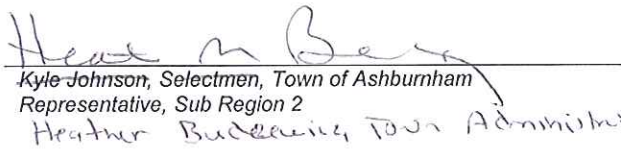

John Telepciak, Chairman
Montachusett Regional Planning Commission

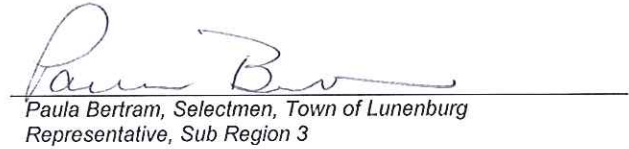

Mark Hawke, Chairman
Montachusett Regional Transit Authority

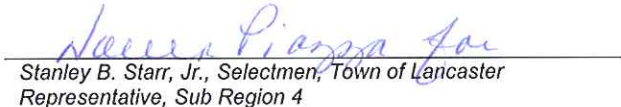

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John Columbus, Selectmen, Town of Templeton
Representative, Sub Region 1


Kyle Johnson, Selectmen, Town of Ashburnham
Representative, Sub Region 2
Heather Budekiewicz, Town Administrator


Paula Bertram, Selectmen, Town of Lunenburg
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Stanley B. Starr, Jr., Selectmen, Town of Lancaster
Representative, Sub Region 4


Date

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1. Introduction

Federal laws and regulations require metropolitan planning areas to have a Continuing, Comprehensive, and Coordinated (“3C”) transportation planning process that results in plans and programs that consider all transportation modes and supports metropolitan community development and social goals. These plans and programs shall lead to the development and operation of an integrated, Intermodal transportation system that facilitates the efficient, economic movement of people and goods.

As part of prior federal transportation regulations, Metropolitan Planning Organizations (MPOs) must establish a “proactive public involvement process that provides complete information, timely public notice, full public access to key decisions, and supports early and continuing involvement.” (Federal Highway Administration, Policy Guide 23 CFR 450C Sec 450.316)

The Montachusett MPO (MMPO) is the responsible organization established to meet these standards in the Montachusett Region. The Montachusett Regional Planning Commission (MRPC) serves as staff to the MMPO and is charged with the development of key documents and programs. Please refer to Section 6 of this document for a description of the MMPO and the MRPC regarding their roles and responsibilities.

In order to ensure opportunities for any and all interested individuals to participate early and often in the transportation decision making process, a Public Participation/Outreach Plan (PPP) has been developed for the MMPO. This PPP outlines the process for public involvement in, specifically, the Regional Transportation Plan (RTP), the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP) as well as any other major transportation study undertaken by the MMPO.

The PPP outlines the process that the MMPO will use to reach out to persons identified under the regulations/laws of Title VI, Environmental Justice (EJ), Limited English Proficiency (LEP), Americans With Disabilities Act (ADA) and as well as any other traditionally underrepresented population.

In addition, this PPP will serve as the Public Participation Process for the Montachusett Regional Transit Authority (MART), a signatory member of the MMPO, as required by Federal Transit Administration (FTA) rules and regulations.

This PPP is considered a living document that will change, grow and adapt in order to help the MMPO sustain its work to engage diverse community members throughout its Region. Therefore, the MMPO will modify its public participation methods and activities over time, based on ideas and feedback from community members and the MMPO’s evaluation of its public participation process and effectiveness.

The following document will present the reader with an explanation of the policies associated with public participation, moves onto the values, principals and goals of the Montachusett MPO, a

discussion of the process in detail and finally ends with a discussion of the plans, programs and organizations involved with and in the MMPO.

2. Protocols, Policies and Background

Title VI of the Civil Rights Act of 1964, Section 504 and 508 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act (ADA), establish federal nondiscrimination obligations in the categories of race, color, national origin (including Limited English Proficiency (LEP)), age, sex, and disability. In addition, Massachusetts state level protections add to the federal protections to include ethnicity, sexual orientation, gender identity or expression, religion, creed, ancestry, veteran's status (including Vietnam era veterans), and background. Through these protocols and policies federal, state, regional and local agencies seek to ensure that sufficient consideration is given to the outreach and inclusion of these groups into the public engagement process.

2.1 Title VI of the Civil Rights Act of 1964

Title VI of the Civil Rights Act of 1964, together with related statutes and regulations, provides that “no person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” The entire institution, whether educational, private or governmental, must comply with Title VI and related federal civil rights laws, not just the program or activity receiving federal funds.

FTA C 4702.1A, Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients, provides guidance on promoting inclusive public participation. This circular recommends the seeking out and consideration of the viewpoints, needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority, low-income, and LEP (Limited English Proficiency) persons “who may face challenges accessing employment and other services” when conducting public outreach and involvement activities. It identifies the following effective practices for fulfilling the inclusive public participation requirement:

- Coordinate with individuals, institutions, or organizations and implement community-based public involvement strategies to reach out to members of the affected minority and/or low-income communities.
- Provide opportunities for public participation through means other than written communication, such as personal interviews or use of audio or video recording devices to capture verbal comments.
- Use locations, facilities, and meeting times that are convenient and accessible to low-income and minority communities.
- Utilize different meeting sizes or formats or vary the type and number of news media used to announce public participation opportunities, tailoring communications to the particular community or population.

- Implement DOT’s policy guidance concerning recipient’s responsibilities to LEP persons to overcome barriers to participation.

2.2 Americans with Disabilities Act (ADA)

The Americans with Disabilities Act of 1990 (ADA) states that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” Therefore, ADA requires that locations for public participation activities, as well as the information presented, must be accessible to persons with disabilities.

ADA requires specific public participation efforts for the development of paratransit plans:

- Hold a public hearing
- Provide an opportunity for public comment
- Consult with disabled individuals

2.3 Executive Orders

Executive Orders regarding environmental justice and outreach to persons with limited English proficiency are also regulated under Title VI of the Civil Rights Act.

2.3.1 Executive Order 12898 - Environmental Justice

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued in 1994 and states that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” At its core, MPOs must seek to identify and give increased opportunity for involvement to minority, low-income and traditionally underserved groups in order to ensure effective participation.

U.S. DOT issued in 1997 its orders to address Environmental Justice in minority and low-income populations that, as DOT partners, MPOs are required to follow and embrace. The USDOT Order states, in part, that “In undertaking the integration with existing operations ...DOT (and by extension MPOs) shall observe the following principles:

- (1) Planning and programming activities that have the potential to have a disproportionately high and adverse effect on human health or the environment shall include explicit consideration of the effects on minority populations and low-income populations. Procedures shall be established or expanded, as necessary, to provide meaningful opportunities for public involvement by members of minority populations and low-income populations during the planning and development of programs,

policies, and activities (including the identification of potential effects, alternatives, and mitigation measures).

- (2) Steps shall be taken to provide the public, including members of minority populations and low-income populations, access to public information concerning the human health or environmental impacts of programs, policies, and activities, including information that will address the concerns of minority and low-income populations regarding the health and environmental impacts of the proposed action.”

2.3.2 Executive Order 13166 - Limited English Proficiency

Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency issued in 2000 requires that recipients of federal financial aid ensure that their programs and activities that are normally provided in English are accessible to persons with limited English proficiency. This expansion of the Civil Rights Act was in response to concerns that individuals with limited English proficiency were unable to successfully participate in the transportation planning process.

The U.S. DOT issued a *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons* that was modeled after the general LEP policy guidance document for the U.S. Department of Justice. As a sub recipient of federal DOT funds, all MPOs are required to implement measures to ensure meaningful access to programs and activities by LEP populations. To assess the language needs within the areas of influence by sub recipients, a four factor analysis is outlined within the guidance that is to be undertaken by the federal fund receivers to determine what reasonable steps are needed to meet LEP needs. The four factor analysis is as follows:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee.
2. The frequency with which LEP individuals come in contact with the program.
3. The nature and importance of the program, activity, or service provided by the recipient to people's lives.
4. The resources available to the recipient and costs.

An LEP plan was completed and endorsed by the MMPO in February 2013 that presented the results of the four factor analysis and outlined the steps to be taken by the MMPO to meet the needs of the LEP populations in the Montachusett Region. This LEP Plan is a living document that is reviewed on a regular basis to meet any changes or updates by federal or state agencies as well as potential population shifts.

3. Public Participation Process Values, Principles and Goals

The Montachusett MPO (MMPO) operates in cooperation with the Massachusetts Department of Transportation (MassDOT) and as such seeks to work in concert with the values, principles and

goals established in their Public Participation Plan. The following values, principles and goals are adopted by the Montachusett MPO from MassDOT.

3.1 Public Participation Process Values

The Montachusett MPO adopts the following Public Participation Values:

1. *Dedication* - The MMPO will seek to provide service in a timely and efficient manner.
2. *Respect* - The MMPO will treat the public as valued partners, and treat all individuals as the MMPO would like to be treated.
3. *Innovation* - The MMPO will improve and integrate transportation planning services using creative thinking and the best available practices and technology, while minimizing disruption to the public.
4. *Diversity* - The MMPO will promote an inclusive workforce and a culture that serves employees and community members fairly.
5. *Honesty* - The MMPO will provide the public with accurate information that is understandable and accessible.

3.2 Public Participation Process Principles

The Montachusett MPO adopts the following Public Participation principles:

1. *Promote Respect* - All transportation constituents and the views they promote should be respected. All feedback received should be given careful and respectful consideration.
2. *Provide Proactive and Timely Opportunities for Involvement* - Avenues for involvement should be open, meaningful, and organized to let people participate comfortably, taking into consideration accessibility, language, scheduling, location and the format of informational materials.
3. *Offer Authentic and Meaningful Participation* - The MMPO should support public participation as a dynamic and meaningful activity that requires teamwork and commitment at all levels.
4. *Provide a Clear, Focused and Predictable Process* - The participation process should be understandable and known in advance. This clarity should be structured to allow members of the public and officials to plan their time and use their resources to provide input effectively.
5. *Foster Diversity and Inclusiveness* - The MMPO should proactively reach out to and engage people with disabilities, as well as low-income, minority, limited English proficient, and other traditionally underserved populations.
6. *Be Responsive to Participants* - MMPO meetings should facilitate discussion that addresses participants' interests and concerns. Scheduling should be designed to meet the greatest number of participants possible and be considerate of their schedules and availability.

7. *Record, Share and Respond to Public Comments* - Public comments, written and verbal, should be given consideration in the MMPO decision making processes and reported in relevant documents.
8. *Self-Evaluation and Plan Modification* - The effectiveness of this Plan will be reviewed periodically to ensure it meets the needs of the public, and will be revised to include new strategies and approaches.

3.3 Public Participation Process Goals

The Montachusett MPO adopts the following Public Participation goals that seek to encompass the aforementioned values and principles:

1. *Obtain Quality Input and Participation* - Comments received are to be encouraged and reviewed to the extent they can be useful, relevant, and constructive, and contribute to better plans, projects, programs, and decisions.
2. *Establish Consistent Commitment* - The MMPO strives to communicate regularly and develop trust with communities, while helping build community capacity to provide public input, as needed.
3. *Increase Diversity* - Participants who are encouraged to participate in public engagement processes should represent, as appropriate to a project or those impacted, a range of socioeconomic, ethnic, and cultural perspectives and include people from low-income and minority neighborhoods, people with limited English proficiency, and other traditionally underserved people.
4. *Ensure Accessibility* - Every effort should be made to ensure that participation opportunities are physically, geographically, temporally, linguistically and culturally accessible.
5. *Provide Relevance* - Issues should be framed clearly and simply such that the significance and potential effect may be understood by the greatest number of participants.
6. *Foster Participant Satisfaction* - The MMPO should encourage the public to participate in project and initiative related discussions, recognizing that people who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
7. *Clearly Define Potential for Influence* - The process should clearly identify and communicate where and how participants can have influence and direct impact on decision making.
8. *Establish and Maintain Partnerships* - The MMPO develops and maintains partnerships with communities and community-based organizations through the activities described herein.
9. *Provide Opportunities to Build Trust and Compromise* - The MMPO should ensure discussions, particularly where there are conflicting views, are structured to allow for levels of compromise and consensus that will satisfy the greatest number of community concerns and objectives. The MMPO recognizes that processes which allow for consensus to be achieved are critical to enable public support for recommended actions.

4. Public Participation Process (PPP)

4.1 Public Meetings and Engagement

4.1.1 Types of Public Engagement

Outreach within the Montachusett Region is often undertaken through various forms of direct formal contact with the public. These activities include the use of public meetings, open houses, workshops, and one on one discussion.

4.1.1.1 Public Meetings

Public meetings are the most common outreach method for the MMPO, MRPC, and MART. They involve a set agenda with a single or multiple topics, presentations to a regional board, community group, organization or population and opportunities for discussion, feedback and public input, i.e. an opportunity for two way discussions. These meetings are held at specific times and locations that are usually mutually convenient for the public or specific community groups involved. Notices and agendas related to the meeting are distributed directly through emails or indirectly through posting to the MRPC website. Public meetings include meetings of the MJTC, the MRPC and the MMPO.

4.1.1.2 Open Houses

An open house is more informal in nature with no set agenda and is typically centered on one particular topic, ex. the RTP. Open houses tend to last much longer than public meetings and can be convened at many different locations. The MRPC has held open houses at its offices as well as at local retail malls and local events in an attempt to expand the outreach on regional topics like the Regional Transportation Plan. Discussions at open houses are generally one on one with information provided through exhibits, documents, slide shows and handouts. The public is encouraged to submit comments, feedback and input either directly via direct discussion or at their convenience through comment cards that can be returned by mail, email or available drop boxes. Depending on the presentation topic, surveys may also be available for the public's use in providing input. Notices related to the time and locations of open houses are distributed directly through emails and flyers or indirectly through postings to the MRPC website.

4.1.1.3 Workshops

Workshops usually involve one particular topic, are held during the development of a program or study and include a smaller group of individuals with an interest in the identified topic. Agendas set the topic and format for discussion and help to direct the flow of the workshop. Workshops require active public participation in order to guide the study direction and address concerns and potential solutions. Notices related to the time and locations of workshops are distributed directly to

targeted groups or individuals through emails or indirectly through postings usually by the community or organization involved.

4.1.1.4 One on One Discussion

Often through the public outreach process, comments and input is received outside of the formal aspects of a public meeting, open house or workshop. Staff usually receives these either by phone, email or via face to face conversation before or after a more formal event. Staff is directed to encourage the individual to submit their comment directly as part of the process or if there is a reluctance to formally participate, staff will indicate that their concern will be summarized and noted anonymously if preferred.

4.1.2 **Locations and Times**

In order to maximize potential participation by all segments of the population, public meetings, open houses and workshops are scheduled and held at times and locations that attempt to be mutually convenient for all involved.

When possible, meeting locations are selected where fixed route transit services are available nearby. Notices for these locations indicate as such the availability of the transit services. The current location for the MPO, MJTC and MRPC meetings is at MRPC Offices in the Montachusett Regional Transit Authority (MART) Maintenance & Administrative Facility at 1427R Water Street in Fitchburg, MA. Regular MART bus service (Bus Route #2) is present along Route 12 in Fitchburg/Leominster and passes approximately 300 feet from the MRPC Offices.

For meetings, open houses and workshops held outside of MRPC offices, the MMPO will utilize best judgement as well as the “Accessibility Checklist for Meeting Planners” developed by MassDOT and included in their Public Participation Plan of May 2014.

Meeting times are based upon input from meeting members as well as prior established procedures. However, the MMPO remains flexible in setting meeting times upon consideration and input from public participants. When coordinating locations and times, staff will work with the target audience to ensure that their consideration remains part of the overall process.

4.1.3 **Accessibility**

Accessibility at all meetings, open houses and workshops extends to not just the physical location of the specific gathering but also to the documents, handouts and presentations made at these events. In order to maximize accessibility, the MMPO will:

- Maintain a Limited English Proficiency Plan (LEPP) that attempts to identify potential language needs within the Region and subsequently identify potential translation needs for documents, programs and public outreach.
- Implement appropriate visualization techniques in all presentations and documents based upon the anticipated and expressed needs of the target audience.
- Engage sign language interpreters, language translation and/or interpretation services, etc. on an as needed/requested basis. Meeting notices contain information on how to request translation/interpretation services and/or special accommodations as well as the methods required to request such services.

4.1.4 Public Notice

Notices related to program development, public meetings, open houses and workshops will be posted and/or distributed at least two (2) weeks prior to an event or start time. Postings will be available on the MRPC website at www.mrpc.org. These notices will be general in nature listing anticipated topics, locations and times for any meeting or event. The notices will also contain information regarding the availability of alternative language translation and/or interpretation services as well as how to request such services. In addition, methods to request any special accommodation services will be identified and included.

As part of the MMPO Limited English Proficiency Plan (LEPP), notices will be posted and/or distributed in an alternate language when appropriate containing the same information as outlined above.

In the case of public meetings of the MJTC, MMPO, MART, MRPC and other program specific meetings, approximately one (1) week prior to the event, a detailed agenda will be distributed to the intended audience via email and the MRPC website. This agenda will include more detailed and specific meeting topics as well as the applicable notices related to translation/interpretation services and/or special accommodations and request methods.

4.1.5 Meeting Preparation

Based upon the anticipated audience as well as any services requested, i.e. sign language interpreters, language translation and/or interpretation services, etc., MMPO staff will make a reasonable attempt to accommodate all individuals to the best of their time and ability. The MRPC maintains a list of potential interpreter services that may be employed subject to adequate and timely notice as well as available funds.

4.2 Public Participation Process

The following outlines the Public Participation Process (PPP) that will be undertaken by the MMPO for the development, update or amendment of the TIP, UPWP, RTP, and any public

meetings and outreach activities related to them. Additionally, this process will be utilized as part of the development and update process for the Limited English Proficiency Plan (LEPP) and the Public Participation Plan. Please note that when referring to mailing of information, this includes email as well as regular postal service as necessary.

4.2.1 Provide Adequate Public Notice of Key Planning Activities

- At the start of the development process for key activities and/or documents, i.e. the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), the Regional Transportation Plan (RTP), and the Public Participation Process (PPP) as well as other major transportation studies, notices will be posted to the MRPC website and emailed to all stakeholders identified and included within MRPC outreach lists. Notices will be distributed as soon as available with a minimum of two weeks prior to specific meeting dates. Notices will identify any meetings, workshops, or gatherings to the extent possible where key activities will be discussed and information will be available.
- Notices will be distributed to local and regional media outlets including print, radio and local television where practical.
- Based upon the current MMPO endorsed LEP Plan, these same notices will be distributed in identified languages. In areas where a particular study, program or project may effect certain LEP populations outside of those profiled in the LEP Plan, best efforts will be made to translate critical documents into the applicable language or languages.

4.2.2 Provide Adequate Notice of Planned Public Meetings, Open Houses, and Workshops Where Input Can Be Provided – Minimum Two Weeks Prior to Event

- At least two (2) weeks prior to holding a public forum where key programs are discussed and where public feedback and input is solicited and warranted, a general notice of the meeting time, place and overall topic(s) will be posted to the MRPC website.
- The notice will include appropriate wording related to nondiscrimination, availability of translation services/interpretations and reasonable accommodations. Contact information and procedures for requesting the services mentioned will be provided.
- Based upon the MMPO LEP Plan, alternate language versions of these notices may also be developed and posted.

4.2.3 Provide Adequate Notice of Planned Public Meetings, Open Houses, and Workshops Where Input Can Be Provided – Minimum One Week Prior to Event

- Approximately one (1) week prior to the planned public event, a more detailed meeting notice may be posted that includes a specific agenda of items to be discussed and in what order. This notice will be posted to the MRPC website and, in addition, emailed to all listings contained within the MRPC Public Outreach Mailing Lists.
- The notice will include appropriate wording related to nondiscrimination, availability of translation services/interpretations and reasonable accommodations. Contact information and procedures for requesting the services mentioned will be provided.
- Based upon the MMPO LEP Plan, alternate language versions of these notices may also be developed and posted.

4.2.4 Utilize Available Visualization Techniques and Methods for Dissemination of Information

- To maximize input and to effectively distribute information at public meetings, the MPO shall employ appropriate visualization techniques and methods to describe aspects of key documents, plans, data and information.

4.2.5 Public Comment Periods for Key Activities

- Key programs and documents such as the TIP, the UPWP, the RTP and the PPP require mandated public review and comment periods that provide interested individuals with an opportunity to examine the document and to offer comments as appropriate.
- The TIP, UPWP and RTP require a twenty-one (21) day public review and comment period while the PPP requires a forty-five (45) day public review and comment period.
- To maximize potential participation in the public review and comment period for these key documents, an announcement notice will be prepared and distributed to all individuals included on the MRPC outreach lists. This notice will also be posted to the MRPC website. Distribution will occur at a minimum twenty-four (24) hours prior to the commencement of any public review and comment period. Individuals or organizations interested in being included on the MPO outreach lists should contact the MRPC. See Section 4.3.1.1 Direct Mailings later in this PPP for additional information on how to be added to the outreach lists.
- The announcement notice will identify the document to be reviewed, the duration of the public review and comment period with specific dates identified, location and availability of any draft document, instructions for submitting any and all comments

and the date, time, and location of any meetings where the key program and/or document will be discussed.

- A press release and/or legal notice will be placed in local newspapers containing the same information as presented in the announcement notice.
- Copies of the key documents will be posted online at the MRPC website to facilitate distribution. Copies will also be made available for use by the public at MRPC Offices during regular business hours.
- Based upon the MMPO LEP Plan, alternate language versions of the announcement notice will also be developed and posted.
- At the discretion of the Montachusett MPO, the MPO may vote to abbreviate the public comment period for the TIP, UPWP or RTP for a period of not less than ten (10) days under what the MPO considers to be extraordinary circumstances. Any abbreviated comment period will follow the procedures and provisions outlined in the above. Adequate time will be incorporated into the abbreviated process in order to properly notify the public. All circumstances leading to the decision by the MPO to utilize an abbreviated comment period will be identified and documented in any and all notices disseminated to the public. In addition, the use of the abbreviated comment period will be highlighted in order to adequately inform the public of the comment period change.

4.2.6 Response to Public Comments Related to Key Activities

- All comments received during the identified public review and comment period will be documented, considered and responded to within the final version of the particular document. This will include comments received verbally, by email, regular mail and through any meeting, open house, workshop, etc.
- After due consideration and review of public comments, the MPO may determine that the final version of the key document is significantly different from the draft document that was out for public review and comment. As such, the MPO may call for an additional 21 day public comment and review period as well as possible additional public meetings. This additional comment period will follow procedures as outlined above for the initial public review and comment period.
- Upon request, the MPO staff shall be available to meet with local officials, individuals, organizations or group to discuss the programs, documents and/or activities of the MPO.

4.3 Outreach

4.3.1 Methods/Forms

In order to maximize opportunities for involvement by all segments of the Regions populations, various methods and forms of outreach will be utilized, evaluated and examined on a continual basis.

4.3.1.1 Direct Mailings

The MPO will establish and maintain an outreach database of contacts that encompass communities, groups, organizations, individuals, and stakeholders within the Montachusett Region. This listing will be utilized for any mailing, both electronic and standard, as part of the Public Participation process outlined previously. Regular updates and review will be conducted to ensure that representatives of traditionally underserved populations are included within the process.

Anyone interested in participating and staying up to date and informed on MMPO activities is encouraged to join the MRPC outreach/public participation distribution list. Please send contact information to the MRPC by email at mrpc@mrpc.org (please include MMPO Outreach in the subject line); direct mail at MMPO Outreach, MRPC, 1427R Water Street, Fitchburg, MA 01420; or via phone at (978) 345-7376.

4.3.1.2 News Releases/Legal Ads

As part of the decision making process, the MPO will make use of local media outlets through the preparation and distribution of news releases and/or legal ads that present information on the development of key activities. This will include, but is not limited to, announcements of public review and comment periods, meetings, open houses, and workshops. In application of the MPO LEP Plan, alternate language media outlets will be identified for inclusion in the notification process.

4.3.1.3 Electronic/On-Line

The MRPC maintains an online website that provides information related to all of the activities of the MPO. Regular updates to the site, www.mrpc.org, will be conducted in coordination with the development and implementation of key programs, activities and documents. Notices, announcements, agendas, documents and support materials related to any public meetings, workshops, open houses, and activities associated with the development of key programs will be posted and available online. The MRPC website provides translation options through “Google Translate” for LEP populations.

4.3.1.4 Non MPO Meetings and Events

In addition to the methods listed above that focus on the MPO's effort to communicate directly with individuals, organizations and stakeholders through various outreach lists, the Montachusett MPO will seek to expand its participation with and attendance at outside events sponsored or directed by other groups or organizations that support those populations traditionally underserved in the planning process. This could include meetings of advocacy groups, sponsored community events, workshops directed by local coalitions, etc. The MPO will actively seek out such events, reach out to organizers to request the opportunity to participate in an appropriate manner and prepare materials that explain the transportation planning process and the various ways individuals or stakeholders can become involved. This would also provide the MPO with an opportunity to expand its outreach lists thus providing additional contacts for the distribution of future MPO notices.

4.3.2 **Target Audiences/Groups/Organizations/Stakeholders**

On behalf of the Montachusett MPO, the MRPC continues to maintain a database of contacts within the Region. These groups, organizations, individuals, and stakeholders represent a wide variety of populations. Through the continued review and revision of regional demographics and public input, those populations identified under Title VI, Environmental Justice, and applicable Executive Orders (i.e. LEP), the MPO will continue to expand efforts to reach those traditionally underserved in the transportation planning process.

Outreach listings include but are not limited to the following:

- **Public/Private Groups** - MJTC Members, MRPC Members, Montachusett MPO Members, Mayors, Boards of Selectmen/City Councilors, Planning Departments/Boards, Town Administrators, Police/Fire/ Public Work Departments, Conservation Commissions, Area Legislators (State and Federal), Local Media, Libraries, Councils on Aging, Private Transportation Providers, Regional Transit Authority, Chambers of Commerce, State Agencies/Departments, Housing Authorities, School Districts, Hospitals/Medical Centers, Trail Advocacy Groups and Organizations, Emergency Management Agencies and Directors
- **Special Interest Groups** - Montachusett Opportunity Council, Cleghorn Neighborhood Center, Spanish American Center, MA Rehab Commission, Fitchburg Spanish Center, Local Community Development Corporations, Airport Managers, Devens Enterprise Commission
- **Interested Parties** – Individuals and Groups/Organizations that have expressed an interest in receiving information related to the transportation planning process.

4.4 Follow-up/Monitoring

The Montachusett MPO is committed to the regular review and update of the Public Participation Process in order to implement necessary changes and expand the overall scope and effectiveness of the outreach process to all individuals and populations, including those traditionally under served, within the Montachusett Region. At a minimum, the PPP will be reviewed every two years in order to incorporate the latest best practices in public involvement and outreach.

This review will include, but is not limited to, the following process:

- Review of key demographic populations within the Montachusett Region to identify any potential trends, changes or shifts in numbers or locations.
- Review of existing contact lists to correct, remove and update information and data.
- Coordination and review of outreach lists with other agencies or organizations, ex. area transit authorities, neighborhood organizations, state departments that interact with identified target populations, advocacy groups, etc.
- Examine data regarding responses to documents distributed as well as attendance at meetings held in conjunction with the PPP process. This should help identify the effectiveness of our dissemination methods as well as the outreach lists.
- Incorporate any identified best practices that may be applicable for inclusion in expanding the outreach process for the region.

5. Transportation Activities, Plans and Programs

5.1 Montachusett TIP

The Montachusett Transportation Improvement Program (TIP) is the product of a comprehensive, continuing and cooperative effort to improve the regional transportation system by local officials, the Montachusett Joint Transportation Committee (MJTC), the Montachusett Regional Transit Authority (MART), the Montachusett Regional Planning Commission (MRPC), the Massachusetts Department of Transportation (MassDOT), the Highway Division of MassDOT, various stakeholders and individuals/citizens of the Region.

The TIP is a federally required financial document that covers a multi-year period of no less than four or five years, is updated annually, and includes all projects (i.e. highway, bridge, multi/inter modal, transit, etc.) that utilize federal funds. The TIP must show fiscal constraint for the Region based on established federal aid funding targets and apportionments. For the Highway Element, the Office of Transportation Planning (OTP) of MassDOT derives funding target figures for each RPA. Transit Element funding is derived from FTA estimated apportionment funds and sub-recipient awarded FTA funds from MassDOT. These fiscally constrained highway and transit project lists are subsequently approved by the MPO, MassDOT and the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

The public participation process described herein is also used to satisfy the public participation process for the Program of Projects (POP) for federally funded projects for MART.

Development of the Montachusett TIP is typically conducted as follows:

- a) Public notification of the commencement of the TIP development process;
- b) Identification of all federal aid highway and transit projects within the Region;
- c) Local and state review of project status and funding needs;
- d) Priority ranking of projects through the Montachusett MPO approved Transportation Evaluation Criteria (TEC);
- e) Air Quality analysis of identified projects;
- f) Review of project prioritization scoring and status with MJTC, MPO, MRPC and public via meetings and/or workshops;
- g) Development of fiscally constrained funding scenarios for the various TIP years;
- h) Review of funding scenarios with MJTC, MPO, MRPC and public via meetings and/or workshops;
- i) Compilation of a Draft TIP for MPO approval for public release;
- j) Review of Draft TIP with MJTC, MPO, MRPC and public via meetings and/or workshops;
- k) Notification to public of Draft TIP availability and comment procedure;
- l) Release of Draft TIP for 21 day public review and comment;
- m) Review of any and all comments received with MJTC, MPO, MRPC for appropriate responses;
- n) Compilation of Final TIP for MPO review and endorsement;
- o) MPO endorsement of TIP;
- p) Release of MPO Endorsed TIP to public and state and federal agencies.

This public involvement process with comment period satisfies the Program of Projects (POP) requirements for transit projects.

Specifics related to outreach methods, length of comment periods and distribution of materials are outlined in prior sections of this document.

Any amendments that are required after MPO endorsement of the TIP are handled in the same manner as those promulgated for the development of the annual TIP document. Adjustments require only review and approval by the MPO. For further information on amendment and adjustment procedures, refer to 5.4 Amendment/Adjustment Procedures below.

5.2 Montachusett UPWP

The Unified Planning Work Program (UPWP) for the Montachusett Metropolitan Planning Organization (MPO) is a financial programming tool developed annually as part of the federally certified transportation planning process. This document contains task descriptions

of the transportation planning program of the MPO, with associated budget information and funding sources for the current program year.

The purpose of the UPWP is to ensure a comprehensive, cooperative, and continuing (3C) transportation planning process in the Leominster-Fitchburg Urbanized Area and the Montachusett Region. In addition, this document provides for the coordination of planning efforts between communities in the Montachusett Region.

Development of the Montachusett UPWP is typically conducted as follows:

- a) Public notification of the commencement of the UPWP development process;
- b) Identification of federal and state funds for establishment of UPWP budget;
- c) Review of federal and state points of emphasis related to latest metropolitan planning regulations and areas of concern;
- d) Outreach to local communities regarding potential project/study needs that may be applicable to UPWP;
- e) Review of task development and budget with MJTC, MPO, MRPC and public via meetings and/or workshops;
- f) Development Draft UPWP tasks based upon federal, state and local input;
- g) Compilation of a Draft UPWP for MPO approval for public release;
- h) Review of Draft UPWP with MJTC, MPO, MRPC and public via meetings and/or workshops;
- i) Notification to public of Draft UPWP availability and comment procedure;
- j) Release of Draft UPWP for 21 day public review and comment;
- k) Review of any and all comments received with MJTC, MPO, MRPC for appropriate responses;
- l) Compilation of Final UPWP for MPO review and endorsement;
- m) MPO endorsement of UPWP;
- n) Release of MPO Endorsed UPWP to public and state and federal agencies.

Specifics related to outreach methods, length of comment periods and distribution of materials are outlined in prior sections of this document.

Any amendments that are required after MPO endorsement of the UPWP are handled in much the same manner as those promulgated for the development of the annual UPWP document. Adjustments require only review and approval by the MPO. For further information on amendment and adjustment procedures, refer to 5.4 Amendment/Adjustment Procedures below.

5.3 Montachusett RTP

The Regional Transportation Plan (RTP) for the Montachusett Region is a federally mandated long range transportation plan that documents the current transportation system and assesses the continued and ongoing maintenance and improvement of the various networks and modes in the region over the next 20 to 25 year time frame.

Updated every four years, the RTP considers all of the regions' systems (i.e. highway, transit, safety, freight, multi-modal), identifies deficiencies, needs and challenges and seeks to provide recommendations and alternatives to address identified issues. Project specific improvements as well as continued operating and maintenance costs are assessed in order to produce a fiscally constrained document based upon funding data provided to the Region by MassDOT. In order for projects to receive federal funding and migrate through the TIP process, they must be reflected within the MPO's RTP.

Development of the Montachusett RTP is typically conducted in a manner that seeks to maximize public involvement by all individuals in the Region. Meetings, workshops, webpages, targeted mailings, and notices are some of the methods that are typically utilized to encourage those interested to take an active role in the RTP process and to provide their input, feedback and opinions on transportation issues that are important to them. The following outlines the RTP process:

- a) Public notification of the commencement of the RTP development process;
- b) Identification of various agencies, organizations and stakeholders that may wish to be part of the process;
- c) Identification and scheduling of public meetings/workshops around the Region to present the RTP, identified issues, current status information, and to solicit user input/feedback/viewpoints;
- d) Review of outreach process with MJTC, MPO, MRPC;
- e) Update and/or expand public outreach process based on feedback, requests and need in order to maximize involvement;
- f) Establishment of online tools/surveys/webpage that can be used for public feedback;
- g) Compilation of RTP elements based upon federal and state guidance;
- h) Review and presentation of RTP elements and status with MJTC, MPO, MRPC, and public via meetings and/or workshops;
- i) Development of fiscally constrained RTP;
- j) Review of Draft RTP with MJTC, MPO, MRPC and public via meetings and/or workshops;
- k) Seek MPO approval for public release of Draft RTP;
- l) Notification to public of Draft RTP availability and comment procedure;
- m) Release of Draft RTP for 21 day public review and comment;
- n) Presentation of Draft RTP with MJTC, MPO, MRPC, and public via additional meetings and/or workshops as well as online;
- o) Review of any and all comments received with MJTC, MPO, MRPC for appropriate responses;
- p) Compilation of Final RTP for MPO review and endorsement;
- q) MPO endorsement of RTP;
- r) Release of MPO Endorsed RTP to public and state and federal agencies.

5.4 Amendment/Adjustment Procedures

MPO endorsed documents can be revised, corrected or altered at any time during their particular life span. These changes would then be reflected in either an amendment or an adjustment to the document with each treated in a different manner.

An amendment occurs due to what is deemed a significant change or modification. This could involve a change or alteration to a project, a program budget, available funds or scope of work. An amendment would then be subject to a process similar to the adoption of the original document, i.e. formal release of a draft, a public review and comment period, response to comments received and endorsement by the MPO at a dully constituted meeting.

An adjustment is considered a minor modification and is handled through an administrative process, i.e. the MPO confirms the adjustment action at a dully constituted MPO meeting and informs all interested parties through notification and public posting. No draft or comment period is required or held.

In all cases, the MPO will decide if any proposed action is to be an amendment or an adjustment after consideration and vote at a dully constituted meeting. For more detailed information on the amendment/adjustment procedures for the TIP, UPWP, RTP, PPP, etc., please see the individual document or contact the MRPC.

6. Committees, Organizations and Groups

6.1 Montachusett MPO

The Montachusett MPO is the forum for cooperative decision-making by principal elected officials in the Region and is also responsible for planning and programming financial resources for a multi-modal transportation system for the Region.

6.1.1 Organization of the Montachusett MPO

The voting members of the Montachusett Metropolitan Planning Organization are comprised of the following officials or their designees:

- the Secretary and CEO of the Massachusetts Department of Transportation (MassDOT)
- the Administrator of the Highway Division of the Massachusetts Department of Transportation (MassDOT)
- the Chairman of the Montachusett Regional Planning Commission (MRPC)
- the Chairman of the Montachusett Regional Transit Authority (MART)
- the Mayor of the City of Fitchburg
- the Mayor of the City of Leominster
- the Mayor of the City of Gardner

- Four Selectpersons representing four groups of towns in the MRPC region on a sub-regional basis

6.1.2 Functions of the Montachusett MPO

The MPO performs all functions as required in federal or state law including endorsement and/or certification of:

- a) the Transportation Improvement Program (TIP) and its Amendments - a program of federal highway and transit funding;
- b) the Unified Planning Work Program (UPWP) - the budget and task listing for “3C” Transportation Planning activities for the MRPC;
- c) the Regional Transportation Plan (RTP) - a comprehensive inventory and assessment of the region's highway and transit resources and needs;
- d) the Public Participation Program (PPP);
- e) air quality conformity determinations for the TIP and RTP; and
- f) the “3C” planning process in the Montachusett Region.

6.2 Montachusett RPC

The Montachusett Regional Planning Commission (MRPC) was created under Chapter 40B of the General Laws of Massachusetts. MRPC is one of thirteen regional planning agencies in the state.

The MRPC is composed of 22 communities including: Ashburnham, Ashby, Ayer, Athol, Clinton, Fitchburg, Gardner, Groton, Harvard, Hubbardston, Lancaster, Leominster, Lunenburg, Royalston, Petersham, Phillipston, Shirley, Sterling, Templeton, Townsend, Westminster and Winchendon as well as the planned development area of Devens.

Membership in the MRPC consists of local planning board members and alternates appointed by the chief elected officials of MRPC’s member communities.

6.3 Montachusett JTC

The Montachusett Joint Transportation Committee (MJTC) is the transportation advisory committee of the MRPC and the Montachusett MPO.

6.3.1 Organization of the MJTC

The MJTC is a transportation planning advisory group to the Montachusett MPO, established under agreements amongst its co-sponsoring agencies; MRPC, MassDOT Highway Division, and MassDOT. Membership in the MJTC consists of two representatives from each community; one appointed by Mayor or Selectmen, the other by the planning board. Organization members such as representatives from private and public institutions also serve on the MJTC. Organizations that wish to be a voting member of the

MJTC are always encouraged to request formal membership. Ex-Officio members consist of representatives from MassDOT Highway Division, MassDOT, MRPC and MART.

The MJTC meets monthly on the third Wednesday of the month. All meetings are open to the public and interested parties are encouraged to attend. Representatives to the group have an opportunity to express their expectations and concerns about transportation and the regional planning process.

6.3.2 Functions of the MJTC

The principal mission of the MJTC as an advisory body to the Montachusett MPO is to foster broad and robust participation in the transportation planning process by maintaining a forum that brings together representative of cities and towns, citizens concerned with the transportation planning process, other public agencies, and transportation providers thereby facilitating the consistency of transportation plans and programs for the Region with policies, priorities, and plans of affected state and regional agencies, local communities, private groups, and individuals within the region.

The MJTC participates in all Montachusett MPO meetings to advise and comment on matters being discussed.

MJTC provides the mechanism for an open and broadly participatory intermodal transportation planning process with involvement on the part of local communities, officials and citizenry. This leads to a program implementing the recommendations of the MJTC toward an eventual transportation system that will provide for the most efficient movement of people and goods at a minimum cost.

The principal task of the MJTC is the review and the provision of local input into the:

- a) Transportation Improvement Program (TIP) and its Amendments;
- b) Unified Planning Work Program (UPWP);
- c) Regional Transportation Plan (RTP); and
- d) MRPC and the MPO.

6.4 Montachusett RTA

The Montachusett Regional Transit Authority (MART) is one of fifteen regional transit authorities that provide urban and rural transit services in the Commonwealth of Massachusetts. MART is a signatory member of the MMPO and is an integral partner in the MPO process. MART's transit projects also have a significant impact in the various planning documents of the MPO.

The Authority is governed by an Advisory Board and its Administrator, as prescribed by Massachusetts General Law Chapter 161B. MART's member communities include the cities of Fitchburg, Gardner, and Leominster and the towns of Ashburnham, Ashby, Athol, Ayer,

Bolton, Boxborough, Hardwick, Harvard, Hubbardston, Lancaster, Littleton, Lunenburg, Royalston, Shirley, Sterling, Stow, Templeton, Westminster, and Winchendon.

MART receives federal and state grants for the provision of all transit services and to undertake capital improvement projects for infrastructure that supports fixed route bus and para-transit systems, and along commuter rail systems in their region.

7. Summary

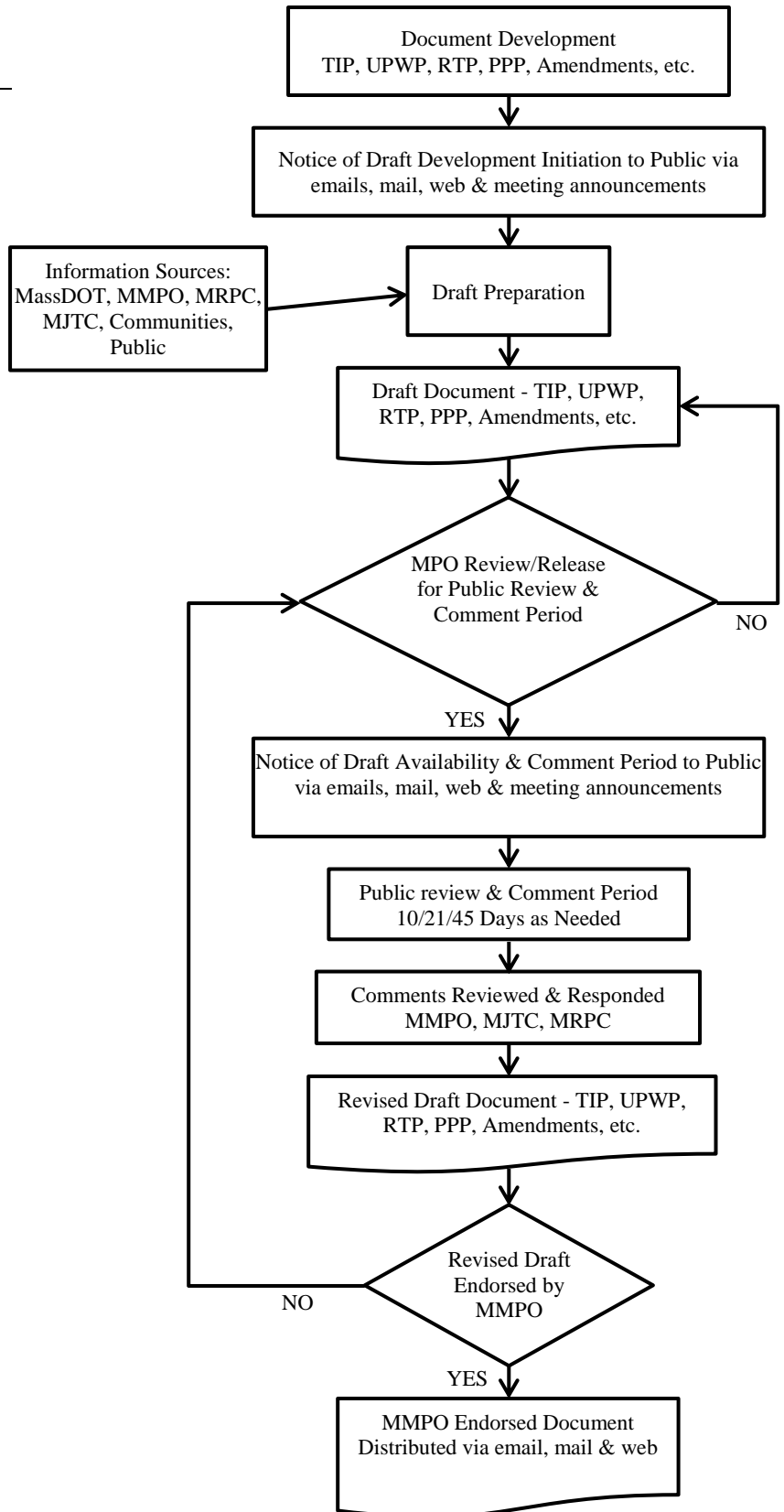
The PPP for the Montachusett MPO is a continually evolving and “living” document that will be reviewed and monitored so that best practices can be incorporated and implemented as they arise. As stated, the goal of the PPP is to maximize participation by all individuals in the transportation planning process and to encourage those identified as traditionally underserved.

The following table and flowchart seek to illustrate the technical outreach process associated with the development of the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), the Regional Transportation Plan (RTP), the Public Participation Plan (PPP), the Limited English Proficiency Plan (LEP) and/or any other major transportation/transit study or program conducted on behalf of the Montachusett Metropolitan Planning Organization (MMPO).

Outside of the dry, technical process identified below, the MMPO continually monitors the changing and evolving demographics of the region in an attempt to expand its outreach abilities in order to serve and reach as much of the area’s population, regardless of socio-economic characteristics, as possible. Towards this end, staff continues to encourage community members encountered to participate at whatever level they feel comfortable and, in addition, to help spread the word to others that may wish to become involved. This process continues throughout each program year as individuals, organizations, advocacy groups, etc. are identified, contacted and added to the MMPO’s knowledge database.

The Public Participation Process as it Relates to Major MPO Products

1. Notice to public of initiation of draft document development
 - a. Direct emails
 - b. Web posting
2. Development of draft document by MPO staff (MRPC)
 - a. Input and review at MPO, MJTC and MRPC public meetings
 - b. Special input meetings, workshops, open houses, etc.
3. Release of draft documents for public review and comment period
 - a. Announcement of public review and comment period
 - i. Direct emails
 - ii. Web posting
 - b. Public comments received
 - i. Email
 - ii. Mail
 - iii. Phone
 - iv. Public meetings (MPO, MJTC, MRPC, special meetings, etc.)
 - v. Web
4. End of public review and comment period
 - a. Review and response to comments received
 - i. Public meetings (MPO and MJTC)
 - b. Revisions to draft document by MPO staff
5. Review of revised draft document by MPO
 - a. Decision to
 - i. Re-release for additional public review and comment period
 - ii. Endorsement
6. Distribution of MPO endorsed document
 - a. Direct mailing
 - b. Web posting



Appendix A – Comments and Responses

Comments Received

1. Comment From Eric Rodriguez, Fitchburg Cleghorn Center

My name is Eric Rodriguez and I am a bus rider, working with other bus riders to bring awareness to the lack of adequate access to public transportation in the Montachusett region. I am submitting a public comment as a bus rider, tax payer, resident of the city of Fitchburg and on behalf of the United Neighbors of Fitchburg. I will try to keep my comments/suggestions brief regarding the Public Participation Plan, but I intend to touch on many issues bus riders have been actively asking for at several public hearings (when made reasonably public, which I will touch on in this comment also).

ADA/LEP Populations:

In regards to reaching these groups, there should be an active effort by MRPC to reach out to key organizations and agencies that work with these populations. Specifically, municipal disability commissions (throughout MRPC service area) should be contacted directly and offered an opportunity to work with their constituents to either form a focus group or accessible survey (with consideration to people with disabilities needs, such as hearing or vision). The same should be done with the LEP populations. Trusted organizations such as the United Neighbors of Fitchburg, the Spanish American Center, and other organizations should be able to form focus groups to be active participants in the decision-making process. This has been done in the past, but should be done with more frequency with ample notice so that residents can attend and participate. This engagement strategy should be done in conjunction with trusted community organizations, not solely delegated to them. In order to engage these populations, contact should not end after soliciting information, but must continue on an ongoing basis after decisions (based on community input) have been made.

Notice and outreach regarding public meetings:

I would like to recommend that public meetings be shared with representatives from all of the above mentioned organizations/groups as well as healthcare providers and employers. The MRPC website itself is not sufficient to reach most people, especially low income service users. I would suggest direct emails to social service organizations and government agencies. Additional outreach should include flyers at bus stops and community spaces (such as lobbies in hospitals, community centers, municipal offices), as this form is more likely to get the daily service user. Social media is also a very major platform to get information out, specifically Facebook and Twitter are more likely to get different groups who do not always have access to the local paper or email. Ethnic media, particularly non-English newspapers, are key in this effort. Communication should be translated by a professional translator, competent in the languages and dialects spoken in our region. Google translate is not an accurate tool as it doesn't translate properly and can even cause confusion. In addition, it shows a lack of care and respect for the intended audience as well as a lack of interest from the originator of the message.

Along with the above suggestions about forms of outreach for public meetings, ample time is also required. Two suggestions with regards to time are as follows:

(a) Reasonable amount of time should be given between when public notices are issued and the actual meeting, so that residents with transient life circumstances can make accommodations to make these meetings (such as childcare, or work schedule). This should be more than 48 hours. The PPP's mention of a 2 week period between notices and meetings should be reconsidered and extended to a full month.

(b) Timing of public notice issuance: Public notices should be issued the beginning of a work week, as opposed to a Friday before a holiday or Thursday. Residents often need advance notice to make accommodations to their lives to attend public meetings, and scheduling a public meeting notice before a holiday will lessen the chances of people being able to know about it.

1. Comment From Eric Rodriguez, Fitchburg Cleghorn Center (cont.)**Surveys/Data Collection:**

Not specifically mentioned in the PPP but should be included is forms to give feedback to MRPC regarding modes of communication/meeting availability. Feedback regarding aspects of services or the process of giving feedback should be accessible to not only bus riders, but others who made be in need of using services, but unable due to lack of access. The very website/form I obtained this public comment notice on is cumbersome/not accessible for many residents. With every public notice/comment or survey there should be a link to an online form (such as a Google form or Survey Monkey) so that data can be captured directly, making it easier on both the survey participant/commenter, but also MRPC staff, as this data would be captured into a database, versus an email account, thus making unnecessary work. Surveys and public comments should also be provided in physical form with fields with write-in spaces and directions on who and where to bring forms back. All forms should be accessible in the major spoken/written languages of service users and also reflect regional demographics. Surveys and public comments should be coordinated with regional stakeholders, such as others mentioned above, with reasonable time, so that constituents and clients can fill out forms/surveys with organizational staff if further assistance is needed.

I hope that MPO, MRPC, and the MJTC will take my comments into consideration. If there are any questions regarding my comment, please feel free to reach me at 978-342-2069 ext. 212 or by email at eric_r@cleghorncenter.org. I look forward to hearing about the next steps in the process of implementing the PPP are.

Response from MPO May 25, 2016**1. Response from MPO**

Thank you for the comment letter regarding the Public Participation Plan. I will present this to the full Montachusett Metropolitan Planning Organization (MMPO) at its meeting on May 25th at 1:00 PM here at the MRPC offices at which time the MMPO will decide whether or not to formally endorse the PPP.

In regards to your comments, I would like to add the following responses.

- The MRPC works closely with the Montachusett Regional Transit Authority (MART) on various transit planning issues. We will forward your comments to MART for their review. As signatories to the MMPO, their input and feedback to the PPP is important. Additionally, the PPP serves as the RTA's PPP so they are bound by the same policy.
- It is our hope that we can continue to reach out to all populations and individuals within the Region to ensure an adequate opportunity to participate in the transportation planning process. Towards that end, we actively seek out and request that any interested person or organization provide us with the most appropriate contact information so that we can continue to expand our outreach. If you, or one of the organizations you mentioned, would like to be included in our outreach efforts, I would ask that you send along to us their contact information. We try to review and update our lists on a regular basis but unfortunately, we are not always as comprehensive as we would like. The MRPC will take steps to contact the United Neighbors of Fitchburg and the Spanish American Center in order to invite them onto our outreach lists and include them in the planning process.

1. Response from MPO (cont.)

- The MRPC would be interested in continuing discussions related to how to best work together in order to maximize outreach and public input whether through focus groups, one-on-one discussions, membership in the Montachusett Joint Transportation Committee (MJTC) or additional meetings.
- In regards to social media, the MRPC maintains a presence on Facebook and Twitter. News items that are added to our main website, www.mrpc.org, are automatically linked to Twitter and then posted to our Facebook site. The MRPC will continue to review the various aspects of social media to determine if and what improvements can be made.
- As with our outreach outlined above, all notices regarding meetings, public comment periods and project/study development are distributed to all within our mailing/contact lists. Currently this includes some 200 to 300 individuals, organizations, public agencies/departments, media outlets, legislators, local/state/federal officials, etc. We seek to meet all regulations related to the posting of public meetings as developed by the Commonwealth of Massachusetts. In reference to points a and b of your comments;
 - a) Agendas are often not finalized or determined until one week before the scheduled meeting. Because of this, we have established a regular scheduled meeting date for the Montachusett Joint Transportation Committee (MJTC), the MMPO and the MRPC. These meetings are set for:
 - MJTC – Third Wednesday of the month at 7:00 pm.
 - MMPO – the second Wednesday of the month at 1:00 pm.
 - MRPC – the last Tuesday of the month at 7:00 pm.We hope individuals will be able to utilize this schedule to make arrangements to attend a meeting if they desire. When the agendas are then compiled and posted one week prior, they can then hopefully get a sense of what will be discussed.
 - b) Your comment regarding the timing of public notices and the beginning of work weeks is important feedback and is something the MRPC strives to prioritize and accommodate when possible. However, sometimes the timing of our public notices is often dictated by the constraints of the process and can be related to state and federal deadlines as well as our various meeting schedules. This can sometimes necessitate a release announcement on a Friday, near a holiday, etc. The MRPC strives to issue these announcements as conveniently as possible and following the work week is ideal but we are often hamstrung by the process.
- We seek to make it convenient and easy for any individual to participate in the transportation planning process. How that is accomplished depends upon the particular task, study or project. We have made use of online forms and surveys in the past (in various languages) for several studies. We also seek to make use of services that will enhance the feedback process. We welcome any suggestions that may assist us in this matter.
- In regards to language translations, we have completed a Limited English Proficiency (LEP) Plan that seeks to identify the major non-English languages in our region. This federally required document helps us to identify what languages are prevalent and what translational services we may need to utilize. From our prior report, Spanish was the language that appeared in significant numbers for our region. Because of limited resources and the costs associated with translation services, we often translate the vital documents identified in our LEP Plan. That being said, we

1. Response from MPO (cont.)

seek to make participation as easy as possible for any interested individual. Persons in need of language services or assistance are encouraged to contact us to make appropriate arrangements. It is preferable that language and accessibility requests are made ten days prior to a meeting to allow sufficient time to secure necessary services. The translations of documents, besides those documents identified in our LEP Plan, are addressed on a case by case basis.

- As a final note, the PPP is an ever-evolving document that the MMPO seeks to update as necessary to reflect changes in regional characteristics as well as available technologies. As we move forward, the PPP will change and adapt in order to better serve the region.

Appendix B – Amendment #1 & Comments and Responses

**Montachusett Metropolitan Planning Organization (MMPO)
Amendment #1 to the
PUBLIC PARTICIPATION PLAN (PPP)**

Comment Period: January 30, 2017 to March 15, 2017

Reason for Amendment: To change the duration of the Public Review and Comment Period from 30 days to 21 days for key documents such as the Transportation Improvement Program (TIP), the Unified Planning Work Program (UPWP), the Regional Transportation Plan (RTP) and any other identified major transportation documents. This change will still allow for adequate time for comments without impacting the MMPO meeting schedule. In addition, this will also provide staff with additional time to review, present and address comments with the MMPO. Please note that this change will not affect the mandated 45 day public review and comment period required for the Public Participation Plan and its amendments.

Various sections within the PPP, will be changed from the 30 days’ notation to 21 days. In particular, section **4.2.5 Public Comment Periods for Key Activities** is the key notation within the PPP regarding comment periods and will be changed to read as follows:

4.2.5 Public Comment Periods for Key Activities

- Key programs and documents such as the TIP, the UPWP, the RTP and the PPP require mandated public review and comment periods that provide interested individuals with an opportunity to examine the document and to offer comments as appropriate.
- The TIP, UPWP and RTP require a **twenty-one (21) day public review and comment period** while the PPP requires a forty-five (45) day public review and comment period.

Comments and Responses

Comments	Responses
None Received	