

**NORTHERN MIDDLESEX
METROPOLITAN PLANNING ORGANIZATION**

PUBLIC PARTICIPATION PLAN

FINAL DRAFT | March 26, 2025

Prepared By
Northern Middlesex Council of Governments
Staff to the Northern Middlesex Metropolitan Planning Organization

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MPO ENDORSEMENT

2025 Public Participation Plan for the Northern Middlesex Region

This document certifies that the Northern Middlesex Metropolitan Planning Organization (NMMPO) hereby endorses its 2025 Public Participation Plan (PPP) for the Northern Middlesex Region. This PPP is being endorsed in accordance with the 3C Transportation Planning Process and complies with Title 23 Section 450 of the Code of Federal Regulations (CFR) specifying that the NMMPO develop a documented public participation plan that defines the process for providing opportunities to interested parties to be involved in the metropolitan planning process.

In accordance with federal guidelines, the 2025 Public Participation Plan was developed and submitted for a 45-day public review and comment period. Comments received have been addressed and are reflected in the final 2025 Public Participation Plan.

The Committee of Signatories representing the MPO by a majority vote hereby endorses the 2025 Public Participation Plan for the NMMPO with the chair signing on behalf of all members.

Monica Tibbits-Nutt, Secretary and CEO
Massachusetts Department of Transportation
(MassDOT);
Chair, Northern Middlesex Metropolitan Planning
Organization (NMMPO)

Date

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INTRODUCTION

The Northern Middlesex Council of Governments (NMCOG) and the Northern Middlesex Metropolitan Planning Organization (NMMPO) have developed this Public Participation Plan to establish consistent procedures to ensure that people across our region—living, working, and spending time in the communities of Billerica, Chelmsford, Dracut, Dunstable, Lowell, Pepperell, Tewksbury, Tyngsborough, and Westford—have reasonable opportunities to be involved in the agency’s regional planning and decision-making processes. This plan outlines our commitment to public engagement, providing examples of the types of tools, strategies, and techniques we use to communicate with the public and empower them to shape the future of our region.

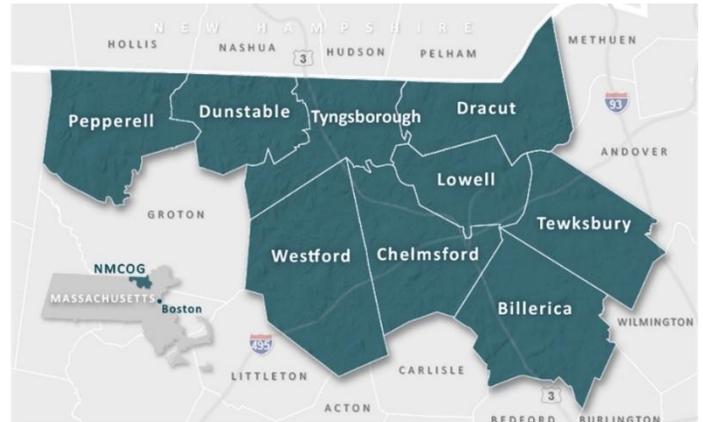


Figure 1: The NMCOG and NMMPO Region

What is NMCOG and the NMMPO?

The Northern Middlesex Council of Governments (NMCOG) is one of Massachusetts' thirteen regional planning agencies¹, dedicated to shaping a thriving Greater Lowell region. Our agency’s mission is to lead transformative change and regional growth, fostering collaborative, inclusive, and equitable planning that ensures climate resiliency, democratized data, economic opportunity, preservation of natural resources, housing abundance, municipal stability, regional coordination, and safe and accessible transportation.

We do not do this work alone. To advance our mission, NMCOG plays a pivotal role in coordinating efforts among the Northern Middlesex Metropolitan Planning Organization (NMMPO), the Lowell Regional Transit Authority (LRTA), member municipalities, and the legislative delegation. NMCOG serves as the staff for the NMMPO, which is responsible for regional transportation planning, ensuring that projects align with federal and state transportation goals. The agency also works closely with the LRTA to address transit needs, advocating for improved public transportation services that are accessible and efficient. With member municipalities, NMCOG acts as a facilitator, supporting local projects and ensuring a unified approach to regional priorities. In addition, NMCOG collaborates with the legislative delegation to advocate for policies and funding that support regional and community initiatives, aligning efforts across all levels of government to maximize impact.

What is a Metropolitan Planning Organization?

Metropolitan Planning Organizations (MPOs) are regional organizations responsible for planning and coordinating transportation systems in areas with a population of 50,000 or more. The goal of metropolitan planning is to ensure that federal funding for transportation projects is part of a continuing, cooperative and comprehensive planning process.

MPOs ensure that federal transportation funds are spent wisely, and that the region's transportation systems meet the needs of the community, both now and in the future. As the MPO for northern Middlesex county, the NMMPO is responsible for developing a long-range regional transportation plan and a near-term regional Transportation Improvement Program (TIP), which lays out how specific transportation projects will be funded over the next five years. MPOs are required to have a public participation plan.

¹ In Massachusetts, Regional Planning Agencies are established under Chapter 40B of Massachusetts General Laws. <https://malegislature.gov/Laws/GeneralLaws/PartI/TitleVII/Chapter40B>

From the development of long-range plans through implementation of local projects, we work with our communities to ensure that our plans and programming efforts represent the needs of the entire region. The *Northern Middlesex Public Participation Plan* (the PPP) defines our vision for public engagement and participation. It documents the multiple methods and strategies we employ to engage our constituencies, and it lays out processes for measuring and evaluating the success of our engagement efforts, providing the information our communities need to participate in and influence regional policy development and decision-making processes.

Why do we have a Public Participation Plan?

Beyond fulfilling federal requirements for the NMMPO, planning for a region as large and diverse as Greater Lowell requires substantial input from across many communities. The people who live, work, and visit here have varying, and sometimes conflicting, needs and priorities. Their voices must be heard if we are to develop planning policies that truly meet the needs of the region. NMCOG and the NMMPO are committed to conducting robust public outreach and engagement, which is outlined in this PPP. The purpose of the PPP is to provide a baseline policy and standards to guide outreach and engagement activities. Each individual project or program can use this PPP to build upon its unique needs, requirements, geography, and more. This will allow projects and programs to be adaptive, while still keeping a commitment to the principles and goals outlined in this plan.

For ease of navigation, we have structured this document as answers to a series of questions. We have also moved dense, legal, or technical language—such as details about statutory requirements and particulars about processes—to the appendices. This restructuring focuses the PPP on our boards' shared engagement principles, goals, strategies, methods, and tools.

In this document, you will find an outline of the tools and techniques we use to inform and engage people across the region throughout our various planning disciplines and transportation programming processes. Because our activities are federally funded, this plan must comply with federal participation plan regulations and guidelines, which ensure that all people in our region have opportunities and access to influence key transportation planning, policy, and investment decisions (see Appendix B for state and federal laws relevant to public participation). The plan also serves as a reference guide for our communities and other agencies to learn how to participate and provide input in our planning processes.

Activities outlined in this plan are coordinated with statewide transportation planning and participation efforts as described in the 2014 MassDOT Public Participation Plan², and informed by the draft 2024 MassDOT Public Participation Plan.³

Finally, this plan also lays out methods for evaluating the success of our engagement efforts. When necessary, and to best achieve our public participation goals, this plan can be updated, made available for public comment, and adopted by the NMMPO. See page 22 for details on this process.

² MassDOT Public Participation Plan (2014): accessed at <https://www.mass.gov/diversity-civil-rights-in-transportation>

³ MassDOT Public Participation Plan, Draft for Public Comment (2024): accessed at <https://www.mass.gov/doc/public-participation-plan-draft-for-public-comment/download>

WHAT ARE WE HOPING TO ACHIEVE THROUGH ENGAGEMENT? PRINCIPLES, GOALS, AND STRATEGIES

Principles Guiding Our Approach

Engagement in our planning processes is shaped by guiding principles reflective of NMCOG's commitment to ensuring inclusivity, equity, transparency, and accountability in planning. These principles ensure that public participation is meaningful and centered on the needs and voices of our region's diverse communities.

1. **Equity:** All people, regardless of race, income, age, gender identity, ability, or language, should have fair treatment and access to meaningful involvement in planning processes. Our outreach and engagement, NMCOG strives to eliminate barriers that have historically excluded marginalized and underserved communities from planning processes.
2. **Inclusivity:** We seek to engage a wide range of stakeholders, prioritizing diverse voices to reflect the full spectrum of community needs and perspectives. Our participation processes provide tailored opportunities for engagement that respect differences in language, culture, and access to resources.
3. **Transparency:** we clearly communicate how decisions are made, how public input is used, and how it impacts planning outcomes. Our information and processes are accessible, predictable, and easy to understand.
4. **Accessibility:** our planning materials, meetings, and engagement opportunities are physically, linguistically, and technologically accessible. We work to meet people where they are, both through culturally appropriate outreach and through physical attendance at local and online events.
5. **Collaboration:** We build and maintain strong relationships with local organizations, community leaders, and individuals to encourage shared ownership of planning processes and co-creation of solutions with our communities.
6. **Innovation:** we leverage new tools and technologies to broaden engagement and adapt to changing community needs.
7. **Accountability:** we regularly evaluate our participation efforts to ensure that they are achieving desired outcomes, particularly with regard to equity and inclusion. We actively listen to feedback and demonstrate how public input has influenced decisions.

Public Participation Goals and Strategies

In developing the *Northern Middlesex Public Participation Plan*, we revisited our existing goals, last updated in 2017. The goals below have been through the lens of equity and community-centered engagement, consolidating and refining them to be clearer, more proactive, and action-oriented.

Our public participation goals emphasize building long-term relationships, removing barriers to participation, and embracing innovation to reach more people in meaningful ways. By aligning our goals with the principles above, we aim to create a stronger, more inclusive foundation for decision-making across our region.

We advance these goals by implementing key engagement strategies. By using a variety of communication channels and targeted outreach strategies, we facilitate ongoing involvement, integrate feedback, and maintain a collaborative relationship with community and municipal stakeholders. These efforts reflect our commitment to inclusion and equitable access, creating opportunities for all people to contribute meaningfully to work of NMCOG and the NMMPO.

1. **Foster Trust and Build Community Partnerships:** Establish long-term relationships with local organizations, community leaders, and underserved groups to ensure their voices are central to decision-making and planning.

Strategies for achieving this goal:

- Develop and strengthen partnerships with local nonprofits, advocacy groups, and faith-based organizations.
- Host regular meetings with community leaders to understand their priorities and concerns.
- Establish community liaisons or ambassadors to act as trusted intermediaries.
- Co-host events with local organizations to leverage their networks and build trust.
- Provide long-term updates to participants on how their input has influenced decisions.

2. **Provide Inclusive Engagement Opportunities, Prioritizing Equity in Outreach:**

Offer accessible and flexible ways for all community members to participate while accommodating language, mobility, and scheduling needs. Actively focus on reaching minority, low-income, elderly, youth, Limited English Proficiency (LEP), and accessibility-challenged communities to ensure inclusive and representative participation.

Strategies for achieving this goal:

- Map and analyze demographic data to identify underrepresented communities.
- Partner with community-based organizations serving minority, low-income, elderly, and LEP populations.
- Host focus groups or listening sessions specifically for underrepresented groups.
- Ensure materials are available in plain language and in formats accessible to people with disabilities.
- Offer engagement activities in multiple formats, such as in-person meetings, virtual forums, and online and print surveys.
- Schedule meetings at varied times, including evenings and weekends.
- Use accessible venues and technology to accommodate mobility and sensory needs.
- Translate materials and provide interpretation services for non-English speakers consistent with our LEP plan (provided in Appendix D)
- Establish feedback loops to continuously check whether equity goals are being met.

3. **Ensure Clarity, Transparency, and Responsiveness:** Communicate clearly how public input is used, provide multilingual and easy-to-understand materials, maintain transparency about timelines and decision-making processes, and prioritize public education to enhance community understanding of planning and how participation shapes outcomes.

Strategies for achieving this goal:

- Publish clear meeting summaries, sharing how public feedback has been integrated into plans.
- Provide FAQs and detailed timelines for major projects and initiatives.
- Use visual aids, like infographics and maps, to make technical information accessible.
- Respond promptly to public inquiries and feedback.

- Create explainer videos or educational workshops about planning processes and their impacts.

4. **Embrace Innovation to Broaden Engagement:** Use emerging technologies and creative outreach methods to make participation more interactive, meaningful, and widely accessible.

Strategies for achieving this goal:

- Use digital tools like interactive maps or polling apps.
- Leverage social media platforms for outreach and real-time feedback.
- Develop mobile-friendly platforms for surveys and project updates.
- Match text with compelling graphics and visuals, where budget allows, to help participants visualize proposed changes.

5. **Commit to Continuous Improvement:** Regularly evaluate public participation strategies, seek feedback from participants, and adapt processes to overcome barriers and better meet community needs.

Strategies for achieving this goal:

- Conduct post-engagement surveys to assess participant satisfaction and identify gaps.
- Regularly review metrics such as participation rates and demographic representation.
- Hold debrief sessions with staff and partners after each engagement effort.
- Experiment with new tools and techniques to address persistent challenges.
- Share lessons learned from evaluations to demonstrate accountability and progress.

HOW DO WE ENGAGE OTHERS IN OUR WORK? OUR FRAMEWORK, METHODS, AND TOOLS

Our Framework for Engagement

NMCOG uses diverse methods to ensure meaningful and inclusive public participation. We recognize that different engagement strategies are necessary depending on the goals and context of each project. Drawing on frameworks like Arnstein's *Ladder of Citizen Participation*, the *IAP2 Spectrum*, and the *APA Planning for Equity Policy Guide*, NMCOG's approach ranges from informing to empowering the public, adapting efforts to community needs and project complexity.

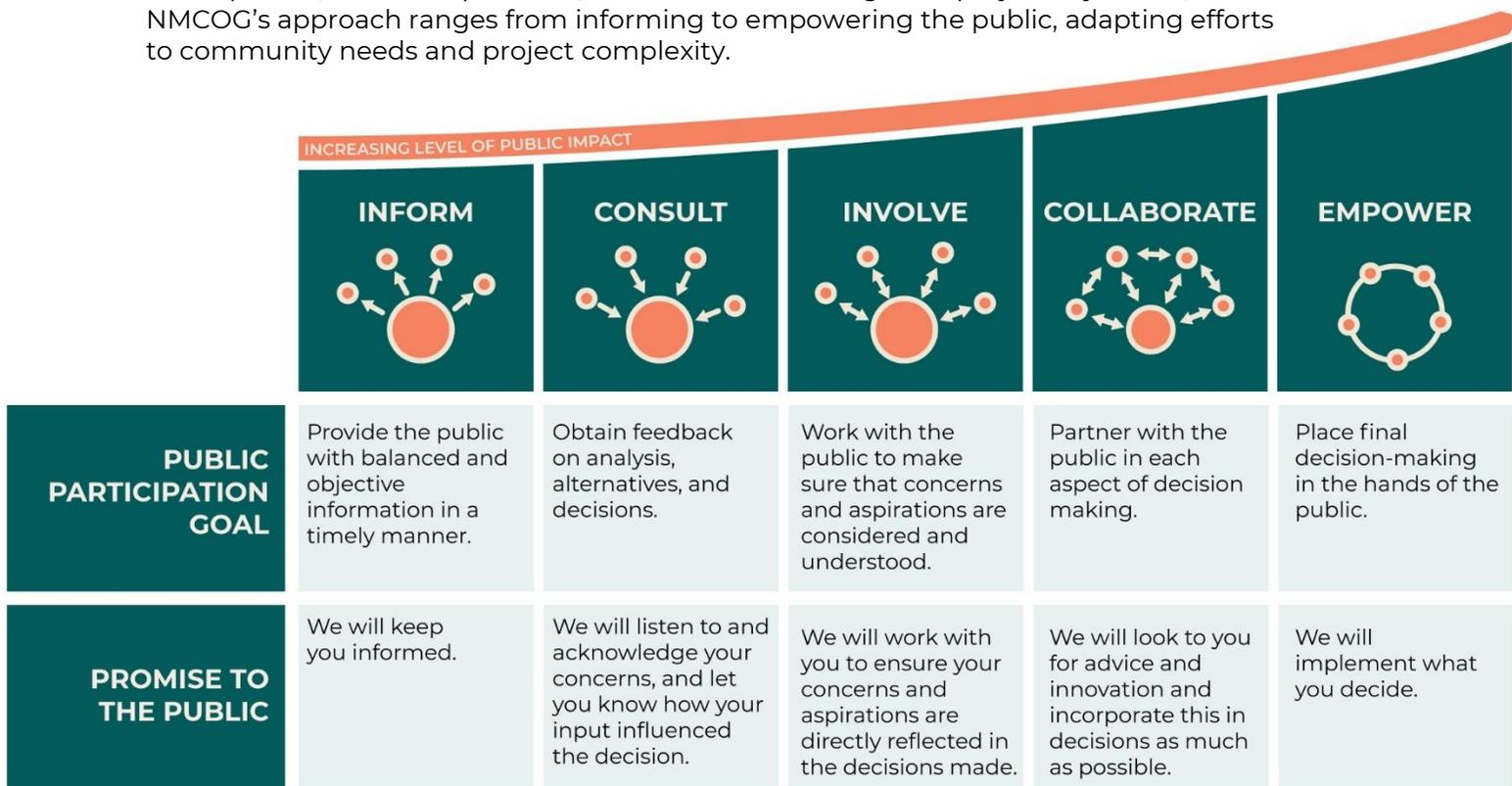


Figure 2: Spectrum of public participation (Ivis García, adapted from IAP2)

The strategies we use to foster engagement can be organized along the IAP2 Spectrum:

- **Informing** provides accessible, accurate information about projects, timelines, and opportunities for input.
- **Consulting** actively seeks community feedback through surveys, workshops, and public hearings.
- **Collaborating** involves shared decision-making through stakeholder committees and participatory planning.
- **Empowering** enables community members to lead initiatives, such as advisory groups for planning processes.

This flexible, tiered approach builds trust and ensures public participation aligns with regional planning goals.

Public Participation Methods and Tools

Public engagement at NMCOG is tailored to each project. Some projects may require only a single meeting or outreach effort, while others benefit from multiple methods of engagement. Federally mandated projects include specific requirements for public comment periods, engagement opportunities, and notifications, which staff may enhance with additional tools to improve outcomes.

By combining various engagement approaches, NMCOG ensures flexibility and responsiveness to stakeholders' diverse needs and preferences. This approach fosters trust, aligns with planning best practices, and supports the creation of equitable and inclusive communities. Engagement opportunities are structured to align with project timelines, budgets, goals, and objectives.

Below is an overview of the tools NMCOG uses to support these goals. **Table 1** highlights their application in reaching underrepresented populations. Tools marked with an asterisk (*) indicate methods familiar to staff but not yet consistently applied in NMCOG or NMMPO projects.

INFORMING

Public Gatherings and Events

- *Public Information Sessions:* In-person or virtual presentations provide overviews of projects and answer frequently asked questions without requiring extensive public input.
- *Public Hearings:* Formal meetings allow the public to hear about specific projects, plans, or policies and offer opportunities to submit comments. While primarily informational, public hearings are legally required for certain projects to document public awareness and input.
- *Public Meetings:* Open meetings provide the public with updates on planning projects and an opportunity to observe the planning process. While these meetings may allow public comments, the primary goal is to inform attendees of ongoing work.
- *Open Houses:* Open houses feature displays or boards summarizing project details, often accompanied by staff to answer questions informally.

Digital and Print Tools

Many of the tools listed below are common meeting notification methods used to invite participation in engagement opportunities higher on the engagement spectrum.

- *NMCOG Website:* Regularly updated webpages dedicated to specific projects or initiatives provide clear, accessible information. These pages include project details, timelines, and resources such as reports or maps. The website, and specific website pages, are promoted via email newsletters, social media posts, and QR codes on printed materials linking to the webpage.
- *Social Media Posts:* Short, accessible posts on platforms like Facebook, Twitter, and Instagram provide real-time updates and project highlights.
- *Newsletters and E-Blasts:* Digital newsletters or e-blasts share project updates, upcoming events, and engagement opportunities with subscribers. Sign-ups

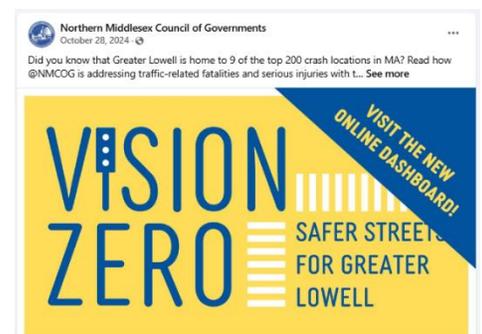


Figure 3: Social Media Post sharing details about the Greater Lowell Vision Zero Plan

are encouraged through public meetings, social media, and partnerships with community organizations.

- *Fact Sheets, Flyers, and Door Hangers*: Simple, visually engaging documents provide a high-level overview of projects, goals, and impacts. These can be distributed in print or digital formats.
- *Project Specific Brochures or Posters*: Printed brochures posted at public events and locations (e.g., libraries, municipal offices) provide detailed information about specific projects, including maps and visualizations of proposed changes.
- *Posters and Digital Signage*: Posters in public spaces and digital signage with QR codes and URLs to direct viewers to the project website at transit stops or municipal buildings provide brief, visually engaging updates.
- *Mailers*: Printed mailers sent directly to residents provide concise project updates and key information about upcoming opportunities. Mailers can be distributed through utility bills, municipal newsletters, or direct mail services.

Media Engagement

- *Press Releases and Media Kits*: Press releases or collections of shareable text, graphics, videos, and flyers sent to local media outlets inform the public about planning initiatives, significant milestones, events, or opportunities to engage.
- *Local Public Access Station, TV, or Radio Announcements**: Public service announcements or interviews on local media provide broad reach to audiences who may not engage online.

CONSULTING

Targeted Outreach

- *Interviews*: One-on-one or small group discussions provide in-depth qualitative insights from key stakeholders, such as community leaders, business owners, or residents.
- *Focus Groups*: Small, facilitated discussions gather detailed feedback from targeted groups, such as specific neighborhoods or demographics, to explore ideas and concerns in-depth.
- *Advisory Committees*: Advisory committees made up of community representatives meet regularly to provide feedback and recommendations on specific projects or initiatives.

Public Gatherings and Events

- *Workshops and Charrettes*: Interactive sessions where participants collaborate to provide input on specific design, planning, or policy issues. These are highly participatory but still primarily consultative.

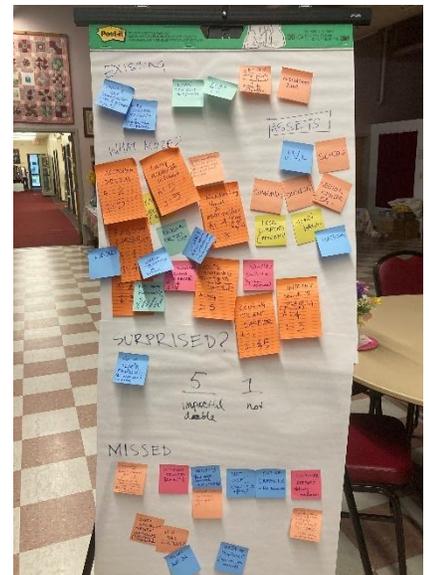


Figure 4: Output from a Digital Equity charrette in Chelmsford, MA

- *Tabling at Public Events:* Project and planners staff tables at festivals, farmers' markets, or other local gatherings to share project updates and distribute materials (inform), and engage in one-on-one conversations, administer surveys, and share interactive mapping tools with attendees.

Digital and Print Tools

- *Surveys:* Structured questionnaires collect input on specific issues, priorities, or preferences. Surveys can be distributed online, via mail, or in person to ensure broad reach. Online surveys should always have a printed counterpart to ensure equitable participation by those without internet access.
- *Polls:* Quick, focused questions gather immediate feedback on a single topic or decision. Polls can be conducted online or during meetings to gauge sentiment.
- *Public Comment Periods:* A designated period allows community members to review and provide written feedback on draft plans, proposals, or reports. Comments are typically submitted via email, online forms, or in writing.
- *Interactive Mapping Tools:* Digital platforms where residents can mark areas of concern, suggest improvements, or comment on specific locations directly on a map.
- *Comment Boards at Events:* Physical or digital boards where participants can leave sticky notes or comments during open houses or public meetings.



Figure 5: NMCOC staff tabling at a festival in Tyngsborough.

COLLABORATING

Fieldwork

- *Field Trips and Site Visits:* Participants visit project sites or areas of concern to see conditions firsthand and discuss potential solutions with planners and stakeholders. These trips encourage collaborative decision-making grounded in real-world context.
- *Walk Audits:* Facilitated walks through specific areas where participants assess conditions, identify issues, and propose improvements.

Targeted Outreach

- *Steering Committees or Advisory Committees:* Representative committees composed of stakeholders and community members who collaborate with NMCOC to guide a project from conception to implementation. Committees for longer or more in-depth planning projects may include working groups focused on topical or geographic areas.
- *Interactive Task Forces*:* Like a working group of a Steering or Advisory Committee, these temporary, project-specific groups are made up of community representatives and experts who work collaboratively to develop recommendations for plans or policies.
- *Joint Projects with Local Stakeholders:* Collaborative initiatives with local organizations, community groups, or advocacy organizations to develop and



Figure 6: Staff and participants on a Walk Audit in Dunstable, MA

implement specific components of a plan. This may include joint outreach efforts or co-creating strategies for project execution.

Public Gatherings and Events

- *Participatory Planning Workshops*: Workshops bring community members, stakeholders, and planners together to co-create ideas, plans, or solutions for specific issues. These sessions often include brainstorming, group discussions, and collaborative problem-solving activities.
- *Workshops and Charrettes*: Interactive sessions where community members collaborate with planners to develop strategies, solutions, or designs for projects. These often involve small group discussions and activities. Charrettes are typically longer (full day to multi-day) sessions where participants provide in-depth input on designs of a future space or area.
- *Collaborative Visioning Sessions*: Facilitated sessions where participants work together to create shared visions or goals for a project or area. Visioning sessions may involve small group discussions, visual tools, or idea boards to achieve consensus.
- *Collaborative Mapping Exercises*: Interactive tools, both in-person and online, allow community members to map assets, issues, and opportunities collaboratively. This method fosters shared understanding and joint identification of solutions.
- *Collaborative Goal-Setting Meetings*: Interactive sessions where participants define project goals, priorities, and success metrics together with NMCOG staff.
- *Scenario Planning Workshops**: Workshops involve participants in creating and evaluating different scenarios for future development, transportation, or environmental planning. This method helps build consensus around priorities and trade-offs.



Figure 7: A collaborative workshop to review and revise housing strategies for At Home in Greater Lowell

EMPOWER

Targeted Outreach

- *Community Steering Committees**: These are advisory groups composed of community members who have decision-making authority and guide the project or planning efforts. Members are empowered to influence the direction of planning and policy decisions. Diverse membership is recruited through direct outreach via community groups, email lists, and public notices. Application processes must be clear and accessible to ensure equitable representation.

Educational and Leadership Development Opportunities

- *Peer Education and Advocacy Programs**: Train community members to become educators or advocates for specific issues within their communities. These programs enable residents to spread information and advocate for changes to policies or planning decisions on behalf of others.
- *Leadership Development and Educational Programs on Planning**: Provide training and opportunities for residents to build their capacity to take on leadership roles within the planning process. This could involve workshops or

mentorships that empower community leaders to advocate for their neighborhoods or communities.

Public Gatherings and Events

- *Community-Led Decision-Making:* Community members take the lead in making decisions about planning, policy, or project development. In these processes, NMCOG staff facilitate community-based decision-making processes where residents are directly involved in the final decision-making and actions.
- *Resident-Led Workshops and Events*:* Community members organize and lead workshops, events, or forums around specific topics using “meeting in a box” kits or other facilitation guides. These initiatives give residents the tools and support to take on leadership roles in educating their peers and organizing community efforts.
- *Cross-Municipal Collaboration:* As a regional planning agency, NMCOG plays a pivotal role in fostering dialogue and partnerships between municipalities on issues that require regional cooperation (e.g., transportation, housing, environmental sustainability). Staff convene inter-municipal forums where local officials and residents from neighboring municipalities come together to share ideas, concerns, and resources. Resident participation is key to empowerment in this work, as working across municipalities helps them understand the broader context of their local issues, increasing their ability to advocate effectively.



Figure 8: Public engagement events for Lowell Forward and the Lowell Housing Production Plan.

Table 1 on the following page summarizes the above tools and methods, providing additional information on when in a planning process the tools are typically used, who is engaged with each tool or method, how those communities are contacted, and how to ensure that the tool or method is applied in a manner that insures inclusivity. The table is organized from top to bottom by level of engagement (inform, consult, collaborate, and empower). Additional details on each of these levels is provided in the discussion on the IAP2 Spectrum of Public Participation (page 6).

Table 1: Public engagement methods and tools.

Engagement Method	Level of Engagement	Timing	Who to Engage	Means of Contact	Other Considerations	Ensuring Inclusivity
Public Notices	Inform	Early, ongoing	General public, local stakeholders	Flyers, social media, newspaper, website	Clear, concise language, multiple platforms	Provide translated and accessible documents (e.g., large print).
Website/Online Information	Inform	Ongoing, throughout project	General public, stakeholders	Website, email newsletters, social media	Make site user-friendly, update regularly	Ensure website is ADA-compliant and offers content in multiple languages.
Social Media Posts	Inform	Ongoing, as updates are needed	General public, especially younger demographics	Facebook, Twitter, Instagram, community platforms	Use engaging visuals and concise language	Include captions for videos, alt-text for images.
Public Hearings and Meetings	Inform	During key decision-making moments	General public, local leaders	In-person meetings, virtual meetings (e.g., Zoom)	Ensure the meeting is accessible, clear in purpose	Provide translation services and assistive listening devices; ensure venue accessibility and offer virtual options.
Fact Sheets	Inform	As updates become available	General public, stakeholders	Flyers, emails, website, community boards	Simple language, clear visuals, and concise information	Provide translated and accessible documents (e.g., large print).
Surveys/Polls	Consult	Early and ongoing	General public, residents, specific interest groups	Online surveys, paper surveys, in-person outreach	Make the survey short, clear, and actionable	Provide translations, offer phone surveys, and use accessible survey platforms.
Interviews	Consult	After initial information gathering	Local leaders, community stakeholders	In-person or virtual interviews, phone calls	One-on-one interaction to capture in-depth perspectives	Ensure interviews are accessible (e.g., assistive devices, translators).
Focus Groups	Consult	After major milestones or decisions	Community members, representatives of specific groups	In-person, virtual focus groups	Small group discussions for deeper insights	Offer translation services and accessible meeting spaces.
Public Comment Periods	Consult	After key draft documents or	General public, stakeholders	Website, email, mail-in comments, public meetings	Provide clear instructions on	Ensure platforms are accessible; allow for

Engagement Method	Level of Engagement	Timing	Who to Engage	Means of Contact	Other Considerations	Ensuring Inclusivity
		plans are developed			how to submit comments	multiple submission methods.
Community Advisory Committees	Consult	Ongoing throughout project	Community leaders, local stakeholders	In-person meetings, emails, virtual meetings	Group representation of community interests	Include diverse representatives, offer translation and accessibility options.
Participatory Planning Exercises	Collaborate	Early stages of project, with follow-up	Residents, local experts, municipal leaders	Workshops, field trips, site visits, walk audits	Engage residents in active planning exercises	Provide accessible routes, translation services, and materials.
Workshops	Collaborate	Early and ongoing	General public, specific community groups	In-person workshops, virtual workshops	Ensure engaging, interactive formats with opportunities for feedback	Offer materials in various languages and accessible formats (e.g., sign language interpreters, large print).
Joint Projects with Local Stakeholders	Collaborate	Throughout project, as partnerships develop	Local organizations, community leaders	Meetings, collaboration events, shared projects	Co-create plans or actions, with a focus on shared ownership of outcomes	Ensure equal partnership and include support for accessibility needs.
Resident-Led Workshops and Events	Collaborate	Throughout project	Residents, community groups	Local community spaces, online platforms	Empower community members to organize and lead	Provide resources and support for accessibility and inclusivity.
Community-Led Decision-Making	Empower	Throughout project, especially in final stages	Residents, community leaders	Community meetings, workshops, social media	Ensure clear understanding of decision-making processes	Provide accessible formats for meetings, translate materials.
Leadership Development Programs	Empower	Ongoing	Residents, local leaders, youth	Workshops, mentoring, online resources	Focus on developing skills to lead and advocate effectively	Create inclusive programs, especially for underrepresented groups.

How Do We Ensure Inclusivity?

Engaging underrepresented populations, such as residents who make a low, minority communities, people with disabilities, and people with limited English proficiency (LEP), is critical to creating an equitable and inclusive transportation planning process. NMCOG and the NMMPO use a variety of targeted approaches to ensure these groups have meaningful opportunities to participate and provide input.

Approaches for Reaching Underrepresented Populations

- **Partnering with Community Organizations:** Collaborating with trusted local organizations helps build connections and trust with underrepresented communities. These groups can help disseminate information, encourage participation, and provide insights into effective outreach strategies.
- **Tailoring Communication Methods:** Materials are translated into relevant languages, and plain language is used to ensure accessibility. Outreach may also include visual tools, such as maps and infographics, to simplify complex information.
- **Hosting Events in Accessible Locations:** Meetings and events are held in venues that are physically accessible and located in or near communities with high concentrations of underrepresented populations. Virtual engagement tools are also utilized to accommodate varying needs.
- **Utilizing Diverse Outreach Channels:** Outreach includes social media, ethnic media outlets, community bulletin boards, and in-person tabling at local events to reach a broader audience.
- **Providing Incentives and Removing Barriers:** Offering incentives (e.g., stipends, food, or transportation vouchers) and addressing barriers like childcare or scheduling conflicts makes participation more feasible for underserved groups.
- **Facilitating Inclusive Discussions:** Bilingual staff, interpreters, and ADA-compliant technology are provided at meetings to ensure everyone can participate fully.

These strategies are identified in the "Ensuring Inclusivity" column in the table above. They reflect NMCOG and the NMMPO's commitment to elevating the voices of all residents, especially those who have historically been excluded from planning processes.

Developing Inclusive Content

Traditional outreach methods may often only reach a subset of community members, typically those who are already familiar with planning process and have the time, interest, and expertise to stay up to date. As a result, many planning processes fail to adequately consider the perspectives of marginalized communities most impacted by planning decisions. This can lead to additional burdens on impacted communities, exacerbating disparities across the region. The NMMPO Title VI Plan,⁴ which includes an assessment of LEP populations within the region, provides further elaboration on inclusive outreach to these communities. To facilitate more equitable engagement, staff use the following best practices in creating content for engagement:

- Use multiple social media channels to approach different communities, paying attention to how different communities utilize different platforms such as Facebook, Instagram, and others.

⁴ Title VI Report, revised December 2023:

<https://static1.squarespace.com/static/6425d140965f0f4e44fb34a6/t/66a15c41678aff268d7c2646/1721850949868/NMCOG+Title+VI+2022+Report+Revised+2023+Final+with+LAP+Plan+2024.pdf>

- Create a variety of outreach materials and messaging to appeal to a broader, more diverse range of community members.
- Translate materials into common languages in most impacted communities.
- Where project budgets allow, create summary videos for planning projects to disseminate information broadly, including to those who have barriers to reading written material.
- Keep written text brief and use simple or appropriate language. Avoid acronyms and technical language. Avoid assumptions about a community's awareness of planning processes.
- Tailor text to focus on impacts on individuals, households, and communities.
- Create responsive content for multiple devices.
- Collaborate with staff to create/strategize/review content and messages.
- Ensure inclusive and representative messaging.

Where Do We Share and Promote Opportunities to Engage?

NMCOG employs a range of digital and print media to promote our public participation opportunities, communicate and engage with constituents, and provide updates on our work. **Table 2** below provides additional details on meeting notifications and comment periods for federally mandated plans and projects.

Digital Channels

Website

NMCOG maintains its website, nmcog.org, to ensure that the public, partners and stakeholders are kept informed about NMCOG and NMMPO plans, programs, and upcoming meetings. As of the drafting of this PPP, the agency's website is being redesigned to provide improved accessibility, language translation, and digital engagement tools, all of which will achieve our aim to ensure that our website is user-friendly and provides clear information. The updated website, when live, will provide opportunities to sign up for further information and updates via email. It also provides contact information for NMCOG staff.

Email

NMCOG issues a monthly newsletter, providing details on programs, events, grant opportunities, planning processes, and opportunities to engage. Newsletters are archived at nmcog.org/newsletter. NMCOG sends targeted communication about projects and programs on an as-needed basis.

Social Media

NMCOG maintains an active social media presence on Facebook ([@northernmiddlesexcoq](#)), Instagram ([@northernmiddlesexcoq](#)), X ([@NMCOG](#)), and LinkedIn ([Northern Middlesex Council of Governments](#)). These accounts are regularly updated to share announcements, upcoming event details, and new developments in NMCOG and the NMMPO's plans and programs.

Targeted Mailings, Flyers, and Notifications

- Work with community-based organizations to distribute flyers
- Email to targeted databases based on project interest
- Project email blasts

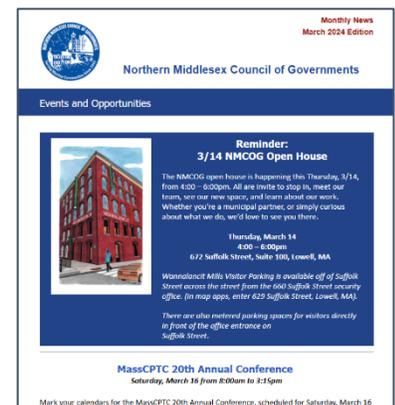


Figure 9: NMCOG monthly newsletter

- Notices disseminated through local government and community-based organizations
- Submit articles for publication in community/professional/corporate newsletters

Local Media

- Press releases
- Invite reporters to public events
- Meet with editorial staff
- Opinion pieces/commentaries
- Visit media outlets to encourage use of press releases
- Place speakers on radio/public access TV shows
- Public Service Announcements on radio and public access TV
- Legal advertisements published in local newspapers (for public hearings on 3C documents only)

Digital Access to Information

- Project webpages with updated content
- Videos explaining plans, programs or concepts
- Maintain regular presence on social media outlets
- Live broadcasts and archived recordings of public events and meetings
- Electronic duplication of open house/workshop materials
- Online surveys, commenting areas
- Access to planning data (maps, charts, background on travel models, forecasts, census data, research reports)
- Provide information in advance of public meetings

Involving Traditionally Underserved/Underrepresented Communities

- Flyers on transit vehicles, at transit hubs, and at bus stops/shelters
- Outreach in the community (at faith-based organizations, community events and festivals, health centers, schools, parks, recreational areas, grocery stores, and other places visited with high frequency)
- Direct outreach to housing organizations and service providers
- Use of community and minority media outlets to announce participation opportunities

Involving Limited-English Proficient (LEP) Populations

- Translate select documents and executive summaries into the agency's Safe Harbor (LEP languages), making them downloadable on the NMCOG website
- Provide interpreters-to be available for public meetings and workshops as needed, with 72-hour advance notice
- Partner with community-based organizations who serve these populations
- Survey LEP participants at public hearings to assess the effectiveness of the agency's language services and whether alternate services may need to be employed
- Disseminating notices of availability and press releases to print, radio and broadcast media serving minority communities
- Conduct regular reviews of languages spoken across NMCOG communities to account for the region's evolving linguistic needs

HOW DO I GET INVOLVED IN REGIONAL TRANSPORTATION PLANNING?

Public Participation in the NMMPO's Mandated Plans

The NMMPO works to ensure that community members, stakeholders, and organizations have meaningful opportunities to shape the future of transportation in our region. While this Plan describes NMCOG and the NMMPO's overall approach to public participation, there are specific times where anyone can get involved during critical decision-making points in our transportation planning processes, namely during the development of federally mandated plans: the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), and the Unified Planning Work Program (UPWP). See **Table 2** for details on public comment periods for each of these plans.

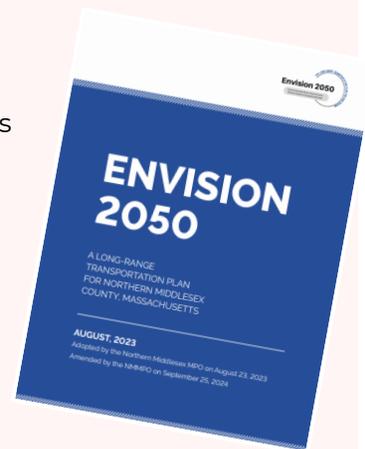
Each plan is developed through a transparent, participatory process, ensuring alignment with regional goals and compliance with federal and state regulations. Public input is vital to ensure the transportation system reflects the needs and priorities of the community.

Metropolitan Transportation Plan (the MTP)

The MTP is the region's long-term vision for transportation, outlining priorities and projects over a 20- to 25-year horizon. Our current plan, *Envision 2050*, was endorsed by the NMMPO in 2023. Development of the next MTP will begin with scoping, data analysis, and preliminary engagement in the fall of 2026.

How to Participate:

- Attend public workshops or open houses during plan development.
- Review and comment on the draft MTP during the 30-day public comment period.
- Provide input on regional goals, performance measures, and proposed projects through surveys and online tools.



Transportation Improvement Program (TIP)

The TIP is a short-term program that identifies specific transportation infrastructure projects to be funded and begin construction over the next four years. TIP development begins every February at TIP Readiness Days, where MassDOT, municipal staff, and NMMPO staff review the readiness of local projects to proceed the year in which they have been programmed. If a project is not yet programmed on the TIP but is ready to advance, NMMPO staff allocate regional priority scores according to the NMMPO's Transportation Evaluation Criteria (TEC). Using TEC scores, staff create several TIP scenarios for consideration by the NMMPO at their spring meetings.

Once the NMMPO selects a final scenario, staff develop a draft TIP for review by the NMMPO at their April meeting. If the NMMPO votes to release the draft for public review, staff share the draft during public hearings and promote the 21-day public comment period. All feedback received is incorporated into the final TIP report, which is presented to the NMMPO for endorsement in May. After endorsement, the TIP becomes active at the start of the next Federal Fiscal Year (October 1).

If a TIP project's scope, cost, schedule, or funding source changes substantially, the TIP must be amended through a 21-day public comment period. These happen periodically throughout the year; public notifications of the public comment period are issued through legal ads, posted to the NMCOG website, and shared on social media.



Public hearing agendas are also posted to municipal websites through their respective Clerks' offices.

How to Participate:

- Attend local public meetings on infrastructure improvements to weigh in on project design and construction timelines.
- Join public meetings where projects are discussed and prioritized.
- Review the draft TIP and share your comments during the 21-day public comment period.
- Stay informed through NMMPO social media and public notices about upcoming TIP amendments or adjustments.

Unified Planning Work Program (UPWP)

The UPWP outlines the NMMPO's annual work activities, including studies, data collection, and planning efforts. Every winter and spring, NMMPO staff local stakeholders solicit projects, studies, and planning activities from local stakeholders for project ideas, which staff incorporate into other state and federally required activities. Federal and state funds are allocated to each task to ensure feasibility, and a report including a summary of each task is prepared for the NMMPO. The draft UPWP is shared for public review and comment, and feedback is incorporated into the final UPWP before the NMMPO officially issues its endorsement. A new UPWP becomes effective on October 1 of each year.

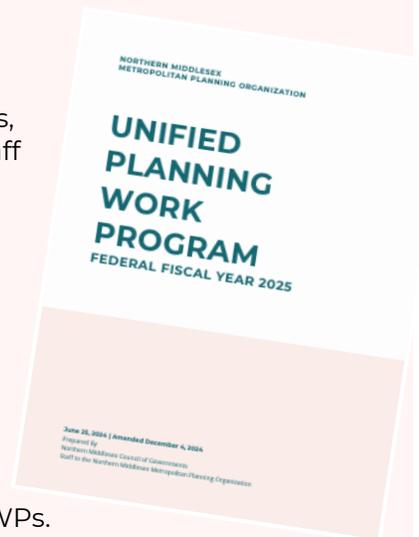
How to Participate:

- Suggest transportation issues or topics for study in upcoming UPWPs.
- Review the draft UPWP and submit feedback during the 21-day public comment period.
- Engage in MPO-sponsored workshops or outreach events tied to specific planning studies.

Stay Connected

- **Join the MPO Mailing List:** Receive updates, meeting notices, and opportunities to provide input.
- **Follow Us Online:** Connect with us on social media or visit our website for the latest updates:
 - Our website: www.nmcoq.org
 - [Facebook](#)
 - [LinkedIn](#)
 - [X \(twitter\)](#)
 - [Instagram](#)
 - [YouTube](#)
- **Attend MPO Meetings:** Participate in regularly scheduled NMMPO meetings, where key decisions are made. Meetings are posted to NMCOG's calendar at nmcoq.org/calendar.

Transportation affects us all—join the conversation and help shape the future of our region!



HOW CAN I PARTICIPATE IN NMCOG OR NMMPO MEETINGS?

NMCOG staff maintain a comprehensive calendar of upcoming opportunities for public involvement on NMCOG's website at nmcog.org/calendar. As of the development of this PPP the NMCOG website is being redesigned; by mid-2025 the NMCOG calendar of events will be available on NMCOG's calendar page as well as on the front page of the website.

Regular Meetings

NMCOG Monthly Council Meetings

Most of NMCOG's plans and programs are led by decision making by its Council, a 21-member governing board of elected officials from each municipality in the region. Council members serve as representatives of their respective communities, providing input on NMCOG's strategic direction and serving as advocates for regional collaboration. They play a crucial role in helping identify local needs and priorities, ensuring NMCOG's initiatives align with each municipality's interests. Council members also liaise between NMCOG and their local governments, facilitating communication and collaboration on shared projects.

The NMCOG Council meets once a month; meetings are open to the public. Council meetings are typically held on the third Wednesday of the month at 7:00pm at NMCOG's office (672 Suffolk Street, Suite 100, Lowell, MA) and via Zoom. Specific meeting dates and times, agendas, and meeting minutes can be found on NMCOG's website. Agendas are posted one week in advance of each meeting.

Members of the public are welcome to attend and provide input by submitting a comment on an individual agenda item through the Chair or submitting notice of intent to comment at the beginning of the meeting.

NMMPO Monthly Meetings

The local transportation planning process is carried out under the authority of the NMMPO, a seven-member Board comprised of state appointed officials from the Massachusetts Department of Transportation (MassDOT), elected and appointed officials from the region, and representatives of the Lowell Regional Transit Authority (LRTA). The Federal Highway Administration (FHA) and Federal Transit Administration (FTA) comprise ex-officio non-voting members of the NMMPO.

NMCOG provides technical staff for the NMMPO, assisting the NMMPO in carrying out comprehensive transportation planning services for the region under contract with MassDOT. The NMMPO is responsible for developing three federally mandated certification documents: the Metropolitan Transportation Plan (MTP), the Transportation Improvement Program (TIP), and the Unified Planning Work Program (UPWP).

The NMMPO meets monthly to review planning studies developed under the UPWP; review TIP amendments; and prepare, review, and endorse updates to the MTP, TIP, and UPWP. Meetings are typically held on the third Wednesday of the month at 2:00pm at NMCOG's office (672 Suffolk Street, Suite 100, Lowell, MA) and via Zoom. Specific meeting dates and times, agendas, and meeting minutes can be found on NMCOG's website. Agendas are posted one week in advance of each meeting.

Members of the public are invited to attend and provide comments at the beginning of the meeting during the Open Comment period.

Public Meetings, Workshops, Community Forums and Other Events

NMCOG conducts public meetings and workshops, community forums and other events to keep the public informed and involved in various high-profile planning projects and plans and to elicit feedback from the public, interested parties and stakeholders. NMCOG holds meetings throughout the region to solicit comments on major plans and programs, such as the MTP, Regional Housing Strategy, and Comprehensive Economic Development Strategy. Meetings are located and scheduled to maximize public participation (including evening meetings). For major initiatives and events, NMCOG typically provides notice through the public outreach channels noted in the previous section.

At least once every year, typically in the fall, NMCOG convenes its Council at an Annual Meeting to bring together the representatives of NMCOG's member communities.

Targeted Communications

NMCOG maintains a database of local municipal officials and staff, other public agency staff, and interested people. The database allows NMCOG to send targeted mailings (largely via email) to ensure the public, partners and stakeholders are kept up to date on specific issues of interest. The public can join NMCOG's database by subscribing at <https://www.nmcoq.org/newsletter>.

HOW DO WE INCORPORATE PUBLIC FEEDBACK AND MEASURE ENGAGEMENT?

Incorporating Public Feedback

Public Comment Periods for Key Decisions

Feedback is always encouraged on any topic or planning process. When NMCOG and the NMMPO are seeking public comment on a particular action, staff may offer a specific public comment and review period of at least 21 days (see Appendix F). To alert our communities of public comment periods, staff use the variety of notification methods discussed in the chapter, *How Do We Engage Others in our Work?* (page 6), providing information on how to comment, the length and dates of the public comment period, and any virtual or in person public hearings scheduled to explain the project and hear feedback verbally.

Federal requirements are also taken into consideration when determining the length and number of public comment and review periods. Metropolitan Transportation Plan and Transportation Improvement Program public comment periods are a minimum of 30 days; the Unified Planning Work Program has a public comment period of 21 days; the Public Participation Plan has a minimum public comment period of 45 days.

How Public Comments Are Addressed

Written public comments received during official public comment and review periods are carefully analyzed by staff and used to inform potential revisions to plans, programs, and operations. For each public comment period, staff prepare a detailed summary of comments received and present it to the requisite decision-making body. This summary includes staff recommendations on how to address the comments and is made publicly available on the NMCOG website to ensure transparency and accountability.

To safeguard privacy, personal information such as addresses, phone numbers, and email addresses is redacted from any materials shared online or in public documents. Written comments may also be compiled and distributed to MPO board members as part of the decision-making process.

If the final version of a document differs substantially from the version distributed during the public comment period, NMCOG or the NMMPO may provide an additional opportunity for public review and comment, in accordance with federal and state requirements. This ensures the public has a meaningful opportunity to provide input at key decision-making stages and helps align plans with the needs and priorities of the region's residents.

Measuring Engagement through Performance Metrics

NMCOG and the NMMPO have established performance metrics for participation to monitor and evaluate the efficacy of our outreach and engagement efforts. By tracking performance, staff and project partners can scale engagement strategies and processes to be efficient yet ensure equitable access to our planning processes. Measuring performance also provides insight into what tools and methods are most or least effective, allowing us to recalibrate our approach as necessary.

Overall Performance Metrics

Depending on project scope and timeline, staff measure the following:

- Number of overall event attendees
- Number of opportunities to influence a plan or study (e.g., surveys, meetings, focus groups)

- Engagement across different platforms for a given project (e.g., survey participants vs. public meeting attendees)
- Number of public officials at events
- Website traffic, including traffic to project web pages
- Project-specific Public Engagement Plan (PEP) metrics, such as staffing, hours, direct and indirect costs of PEP development
- Gathering participant feedback and satisfaction with engagement activities
- How participants learned of an event or engagement opportunity
- How public input was used and how it impacted planning deliverables

Metrics to Monitor Inclusion

When possible, staff gather the following metrics to monitor the inclusion of those who have traditionally been underserved by planning processes or disproportionately burdened by planning outcomes. These metrics include:

- Demographic data on participants and survey respondents, specifically to understand representation by people most likely impacted by projects or decisions
- Rates of new participation by people previously unrepresented in planning processes
- Use of/or requests for language translation and interpretation services
- Use of/or requests for reasonable accommodations
- Modes of transportation used to arrive at engagement events

Continuous Improvement

NMCOG and the NMMPO are committed to keeping the PPP effective, equitable, and compliant with federal, state, and regional requirements through regular review and updates. This includes evaluating public engagement efforts using established performance metrics and incorporating lessons learned from past projects, such as strategies that were successful and challenges or barriers to participation that we observed.

We actively seek input from stakeholders, including underrepresented communities, to improve and refine engagement approaches. By continuously assessing and enhancing the PPP, we strive to promote inclusive, transparent, and meaningful public participation in planning processes.

POLICIES AND REQUIREMENTS FOR MEETING ACCESSIBILITY

Meeting Access Policies

NMCOG and the NMMPO are committed to ensuring that all public meetings are accessible, inclusive, and welcoming to all participants. To achieve this, the following policies guide our meeting practices:

- **Physical Accessibility:** In-person meetings are held in ADA-compliant facilities with accessible parking, entrances, and restrooms to accommodate individuals with disabilities.
- **Language Access:** Interpretation and translation services are available upon request for individuals with limited *English* proficiency. Meeting materials can also be translated into key languages spoken within the region.
- **Virtual Participation:** To increase accessibility, meetings may be held virtually or in a hybrid format, allowing participants to join remotely. Virtual platforms are selected to provide features such as live captioning and compatibility with assistive technologies.
- **Notification and Accommodations:** Meeting notices include instructions for requesting reasonable accommodations, such as sign language interpretation or assistive listening devices. Requests are encouraged at least five business days in advance to ensure availability.
- **Inclusive Timing and Locations:** Meetings are scheduled at varied times and locations to accommodate diverse schedules and geographic access, with consideration for reaching underrepresented populations.

These policies ensure that NMCOG meetings are accessible to all residents, fostering meaningful public participation in transportation planning processes.

Physical Access

NMCOG and the NMMPO make every effort to hold engagement opportunities in locations that provide appropriate accommodations for people with physical disabilities. Where possible, we strive to select engagement locations that are accessible by transit, walking, biking, and rolling. We review meeting locations prior to selection using an accessibility checklist to ensure access:

All in-person meetings are held in ADA-compliant facilities to ensure equal access for individuals with disabilities. This includes:

- Providing accessible parking spaces located near building entrances.
- Ensuring pathways and entrances are clear of obstructions and accommodate mobility aids such as wheelchairs or walkers.
- Offering seating arrangements that prioritize accessibility, including spaces for individuals using mobility devices.
- Confirming that restrooms are accessible and equipped with appropriate features such as grab bars and wide doorways.

Staff conduct site visits or hold a meeting to discuss accessibility with venue managers to verify compliance before meetings are scheduled. Staff are developing a list of accessible meeting locations, which will be added to the appendix upon completion.

Language Access

To support individuals with limited English proficiency, we offer:

- Translation of key meeting materials, such as agendas, handouts, and presentations, into commonly spoken languages in the region with advance notice or when meeting in or with communities where our region's Safe Harbor languages are spoken.
- Interpretation services during meetings for live communication, including simultaneous interpretation if needed and upon request.
- Outreach to communities in their preferred languages to promote events and ensure awareness of available language services.

Requests for language services are encouraged during the meeting registration process or at least five business days in advance.

Virtual Participation

To broaden access, NMCOG and the NMMPO offer virtual or hybrid meeting options.⁵ Key considerations include:

- Selecting platforms that support live captioning and are compatible with assistive technologies.
- Providing detailed instructions for joining and participating in virtual meetings to ensure a seamless experience for attendees.
- Recording virtual meetings and making them available online for those unable to attend in real-time.
- Offering technical support before and during the meeting to help participants troubleshoot issues.
- Assigning staff to monitor virtual meeting chats to respond to questions and comments.

Notification and Accommodations

All meeting notices include clear instructions for requesting accommodations, such as:

- Contact information for submitting requests via phone, email, or online forms.
- A list of commonly provided services, such as sign language interpreters, assistive listening devices, or large-print materials.
- Encouragement to submit requests at least five business days before the meeting to allow sufficient preparation time.

Staff follow up promptly to confirm arrangements and address any questions or concerns with individuals who request accommodations.

Inclusive Timing and Locations

To maximize participation, and based on project scope, budget, and timeline, we consider:

- Scheduling meetings at varied times, including evenings and weekends, to accommodate different work and personal schedules.

⁵ NMCOG Council, NMMPO, and committee meetings with quorum requirements must comply with Open Meeting Law, which may be subject to change.

- Selecting geographically diverse locations within the region to minimize travel burdens for attendees.
- Hosting events in venues near public transit whenever possible and clearly communicating transit options in meeting notices.
- Offering childcare options or stipends when feasible to reduce barriers for caregivers.
- When available, stipends may be provided as an incentive to attend meetings.

These additional measures reflect our commitment to fostering meaningful public participation and ensuring that all community members can engage in planning processes.

APPENDICES

Appendix A: List of Acronyms

Appendix B: Laws and Requirements Relevant to Our Public Participation Process

Appendix C: Title VI and Limited English Proficiency Plan

Appendix D: Public Comment Log

Appendix E: Stakeholders in our Planning Processes

Appendix F: Timelines for Developing Federal Certification Documents (MTP, TIP, UPWP)

APPENDIX A: LIST OF ACRONYMS

3C	Continuous, Comprehensive, and Cooperative
ADA	Americans with Disability Act
BIL	Bipartisan Infrastructure Law
EJ	Environmental Justice
FFY	Federal Fiscal Year (October 1 through September 30)
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GIS	Geographic Information Systems
IJA	Investment in Infrastructure and Jobs Act
LRTA	Lowell Regional Transit Authority
M.G.L.	Massachusetts General Law
MassDOT	Massachusetts Department of Transportation
MeVA	Merrimack Valley Transit Authority
MOU	Memorandum of Understanding
MTP	Metropolitan Transportation Plan
MVP	Municipal Vulnerability Preparedness
NAAQ	National Ambient Air Quality
NMCOG	Northern Middlesex Council of Governments
NMMPO	Northern Middlesex Metropolitan Planning Organization
NMSC	Northern Middlesex Stormwater Collaborative
OTP	Office of Transportation Planning
PL	Metropolitan Planning Funds or Public Law Funds (FHWA)
PM	Performance Measure
PPP	Public Participation Plan
RPA	Regional Planning Agency
RTA	Regional Transit Authority
TEC	Transportation Evaluation Criteria
TIP	Transportation Improvement Program
UPWP	Unified Planning Work Program

APPENDIX B: LAWS AND REQUIREMENTS RELEVANT TO OUR PUBLIC PARTICIPATION PROCESS

Federal Laws and Regulations

- **Title 23 CFR Section 450.316.** Outlines the federal requirements for public participation in the transportation planning process. The regulation emphasizes the importance of transparency, inclusivity and meaningful public involvement by requiring that all MPOs develop and use a documented PPP.

The PPP must define processes for engaging stakeholders, with a particular emphasis on involving traditionally underserved populations; describe how the public will be provided with timely access to information used in the transportation planning process; outline public meeting and public comment periods processes and promotion; describe how public input is evaluated and incorporated; demonstrate how public participation is coordinated with statewide planning processes, Title VI of the Civil Rights Act, and other nondiscrimination laws; and specify how the PPP can and will be reviewed and updated regularly to remain compliant with federal requirements.

- **Bipartisan Infrastructure Law/ Infrastructure Investment and Jobs Act Public Law No: 117-58, November 15, 2021 (BIL / IIJA).** The BIL/IIJA is the current federal transportation enabling legislation. It emphasizes the importance of public involvement of all sectors and users of the transportation network in the transportation planning process.
- **Americans with Disabilities Act of 1990, 42 USC 126 and 49 CFR 27.19 (ADA).** States that "no qualified individual with a disability shall, by no reason of such disability, be excluded from participation in or be denied the benefits of services, programs or activities of a public entity." The law requires that locations for public participation and the information provided must be accessible to persons with disabilities.
- **Title VI of the Civil Rights Act of 1964, 23 USC 140, 23 CFR 200, and 49 CFR 21** – prohibits discrimination on the basis of race, color or national origin in carrying out planning and programming activities. States that "no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance."
- **Department of Transportation Title VI regulations at 49 CFR Part 21** ("Non-discrimination in Federally Assisted Programs of the Department of Transportation- Effectuation of the Title VI of the Civil Rights Act of 1964"). Prohibits discrimination in programs and activities that receive federal financial assistance from the United States Department of Transportation.
- **28 CFR section 50.3** (U.S. Department of Justice Guidelines for Enforcement of Title VI of the Civil Rights Act of 1964); **Civil Rights Restoration Act of 1987.** Outlines the Department of Justice's guidelines for enforcing Title VI. The guidelines state that the heads of agencies with Title VI responsibilities should work to ensure prompt compliance with the law. The legislation prohibits agencies and organizations that receive federal funding from discrimination per Title VI, in all operations, regardless of whether a program or division is funded with federal aid.

Executive Orders

- **Executive Order 14008, Tackling the Climate Crisis at Home and Abroad.** Signed February 1, 2023 by President Joseph R. Biden. Created the first-ever White House Environmental Justice Advisory Council, charged with providing independent advice and recommendations on how to address current and historic environmental injustice.

- **Executive Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.** Signed January 20, 2021 by President Joseph R. Biden. Advances racial equity and support for marginalized and underserved communities by allocating resources to advance fairness and opportunity by promoting equitable delivery of government benefits and opportunities, including advancing meaningful engagement with all communities.
- **Executive Order 13166 — Improving Access to Services for Persons with Limited English Proficiency (LEP).** Signed August 11, 2000 by President William J. Clinton. Requires that federal agencies publish guidance to clarify LEP obligations for their recipients. Prohibits conduct that has a disproportionate effect on LEP persons, meaning different treatment based upon an individual's inability to speak, read, write or understand English as it may constitute a type of national origin discrimination.
- **Executive Order 12898 — Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.** Signed February 11, 1994 by President William J. Clinton. Emphasizes in the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies. Directed federal agencies to develop environmental justice strategies to help address disproportionately high and adverse human health or environmental effects of their programs on marginalized minorities and low-income populations.
- **Executive Order 12372 — Intergovernmental Review of Federal Programs.** Signed July 14, 1982 by President Ronald Reagan. Fosters an intergovernmental partnership by relying on state processes and on State, areawide, regional, and local coordination for review of proposed Federal financial assistance.
- **Executive Order 12250, Leadership and Coordination of Nondiscrimination Laws, 28 CFR Part 42, Subpart F).** Signed November 2, 1980 by President Jimmy Carter. Ensures that federal agencies effectively enforce nondiscrimination laws in programs receiving federal funding by centralizing coordination under the Department of Justice.

State Requirements

- **Massachusetts Open Meeting Law, MGL Chapter 30A, Sections 18-25.** Requires that all meetings of public bodies, including MPOs, be open to the public, with adequate notice provided to ensure transparency and public access to decision-making processes.
- **State Executive Office of Energy and Environmental Affairs (EEA) Policy on Environmental Justice (2017).** Requires MPOs to actively involve Environmental Justice (EJ) populations, including minority, low-income, and LEP communities in transportation planning.
- **Massachusetts Public Records Law, MGL Chapter 66 and Chapter 4, Section 7(26).** Ensures that documents and materials related to public participation and MPO activities are available to the public upon request, supporting transparency in transportation planning processes.

APPENDIX C: TITLE VI AND LIMITED ENGLISH PROFICIENCY PLAN

The NMMPO is committed to ensuring equitable access to its programs, services, and activities in compliance with Title VI of the Civil Rights Act of 1964 and related federal and state nondiscrimination laws and regulations.

The NMMPO has developed a [Title VI and Limited English Proficiency \(LEP\) Plan](#) to guide its efforts in:

1. **Ensuring Nondiscrimination:** The Title VI Plan outlines procedures to prevent discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance.
2. **Providing Language Assistance:** The LEP Plan identifies strategies to communicate effectively with individuals who have limited proficiency in English, ensuring they have meaningful access to information and opportunities to participate in the transportation planning process.

Key elements of the Title VI and LEP Plan include:

- Identification of LEP Populations: Regular assessment of the region's demographics to identify communities that may require language assistance.
- Language Assistance Measures: Provision of translated materials, interpretation services, and notices in languages other than English where appropriate.
- Public Outreach and Engagement: Targeted efforts to engage traditionally underserved populations, including LEP individuals, through culturally relevant outreach methods.
- Complaint Procedures: Clear processes for individuals to report discrimination or language access issues.

The Title VI and LEP Plan is integral to the NMMPO's Public Participation Plan (PPP) and ensures that all residents have the opportunity to participate fully in the regional transportation planning process. Copies of the Title VI and LEP Plan are available on the NMCOG website at nmcog.org/civil-rights-title-vi or upon request at the NMCOG office.

For additional information or assistance, individuals may contact:

Kelly Lynema, Deputy Director
Title VI Coordinator
Northern Middlesex Council of Governments
672 Suffolk Street, Suite 100, Lowell, MA 01854
978-454-021
klynema@nmcog.org

The NMMPO welcomes feedback to improve its efforts to ensure equitable access and public involvement for all community members.

APPENDIX D: PUBLIC COMMENT LOG

Following the NMMPO vote to release the draft Public Participation Plan for public comment, a 45-day public comment period was held beginning January 22, 2025; staff extended the public comment period through March 12, 2025 to ensure adequate time for community review and response. No public comments were received.

NMCOG staff conducted an additional review during the same time period and provided the following comments and related adjustments:

- Comment: clarify public participation for individuals with limited access to the internet or limited digital literacy.

Response: Staff ensured a balance of public engagement methods in the suite of engagement tools, adding language to ensure that online surveys are always complemented by an opportunity for community members to obtain and complete a print survey.

- Comment: conduct a regular review of languages spoken across the region to understand evolving linguistic needs of residents and workers.

Response: staff conduct this review based on decennial Census data as part of the Limited English Proficiency (LEP) Plan. Additional reviews will be coordinated between decennial Censuses using school district and American Community Survey data when possible to track the need for translation and interpretation.

- Comment: incorporate flow charts and clarity around public comment periods and promotion of public comment period availability.

Response: Flow charts have been added to Appendix F.

APPENDIX E: WHO DO WE ENGAGE? STAKEHOLDERS IN OUR PLANNING PROCESSES

Stakeholder Identification and Engagement

Effective public participation requires identifying and engaging the people and organizations impacted by or interested in a given planning process. Stakeholders bring diverse perspectives, knowledge, and concerns, making their involvement essential at every stage of planning. To achieve our goals, we engage with stakeholders to ensure that all voices are heard, particularly those from underrepresented and marginalized communities. We also engage residents, municipal officials, business leaders, nonprofit organizations, and advocacy groups. Actively involving stakeholders from various sectors helps create more inclusive, effective, and sustainable planning outcomes.

NMCOG maintains a regularly updated database of stakeholder groups or “interested parties,” who are notified of opportunities to participate in planning processes based on the project’s scope, timeline, and location. This database evolves as organizations and staff roles change, ensuring ongoing engagement. Key stakeholder groups, organized by type, are integral to our planning efforts. Thoughtful engagement with these groups fosters strong partnerships that reflect the diverse needs of the communities we serve.

Community Members and Residents

- General Public: All residents within the region, with a focus on underrepresented and marginalized communities.
- Vulnerable Populations: Including people who make a low income, elderly residents, youth, and individuals with disabilities.
- Limited English Proficiency (LEP) Communities: Individuals and families who may need language assistance for effective engagement.

Local Government and Municipal Representatives

- Municipal Leaders: Mayors, town managers, select board members, city councilors, and other elected officials responsible for making decisions that affect local communities.
- Planning and Zoning Boards: Local boards that oversee land use and zoning decisions.
- Public Works and Engineering Departments: Staff responsible for infrastructure planning, maintenance, and development.
- Other Local Agencies: Including health departments, school systems, housing authorities, libraries, and parks and recreation.

Community-Based Organizations and Advocacy Groups

- Nonprofit Organizations: Groups focused on social justice, environmental sustainability, affordable housing, and public health.
- Advocacy Groups: Organizations representing specific interests, such as transit riders, environmental advocates, or business owners.
- Civic Associations: Neighborhood associations and community groups that represent local residents' concerns and ideas.

Business and Economic Development Interests

- Local Businesses: Small businesses, business districts, and commercial property owners who are affected by planning decisions.
- Chambers of Commerce: Regional and local business networks advocating for economic growth and development.
- Real Estate Developers and Investors: Entities involved in housing, commercial, and mixed-use development projects.

Environmental and Sustainability Groups

- Environmental Organizations: Groups advocating for sustainable planning, environmental protection, and climate resilience.
- Conservation Commissions: groups focused on preserving natural resources and open space.
- Green Building, Energy, and Sustainability Experts: Consultants, firms, and organizations specializing in energy efficiency, net zero development, and environmental planning.

Regional and State Agencies

- State Government Agencies: Including the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA), Department of Transportation (MassDOT), and Massachusetts Bay Transportation Authority (MBTA).
- Regional Planning Agencies: Other regional planning agencies and commissions, metropolitan planning organizations (MPOs), and regional transit authorities.
- State Environmental and Health Agencies: Agencies involved in climate action, health planning, and environmental regulations.

Academic and Research Institutions

- Universities and Colleges: Academic institutions that provide research, data, and expertise on a variety of planning topics, institutions serving as commuting and employment destinations for multimodal users of all ages. Engage with student, staff, and faculty of institutions such as UMass Lowell and Middlesex Community College.
- Research Institutes: Organizations that produce data, reports, and policy analysis to inform planning decisions.

Transit and Transportation Stakeholders

- Public Transit Authorities: Organizations responsible for the operation of local, regional, and statewide public transportation systems (e.g., LRTA, MeVA, MBTA).
- Bicycle and Pedestrian Advocates: Groups focused on non-motorized transportation and improving mobility for all (e.g., MassBike, Safe Routes to School coordinators).
- Automobile and Freight Stakeholders: Groups focused on roadways, parking, and freight transport issues.

Cultural and Social Institutions

- Faith-Based Organizations: Religious groups that often serve as community hubs and can help engage hard-to-reach populations.
- Cultural Centers and Arts Organizations: Institutions that contribute to the cultural fabric of a region and can provide insight on community identity and public spaces.

Special Interest Groups

- Historic Preservation Societies: Groups that advocate for the protection of historical buildings and cultural heritage.
- Affordable Housing Advocates: Organizations and stakeholders focused on the development and preservation of affordable housing.
- Healthcare Providers: Hospitals, clinics, and public health organizations that can provide insights into health-related issues in the community.

Regional Coalitions and Collaborative Groups

- Multi-Stakeholder Partnerships: Groups that bring together various community members, organizations, and agencies to address specific regional challenges.
- Advisory Committees: Groups of appointed individuals who provide input, guidance, and recommendations on specific planning projects.

APPENDIX F: TIMELINES FOR DEVELOPING FEDERAL CERTIFICATION DOCUMENTS (MTP, TIP, UPWP, PPP)

The Metropolitan Transportation Plan (MTP)

The MTP guides future transportation projects that use federal funding and must meet federal, state, and regional requirements. Updated every four years, the MTP is developed in consultation with agencies and stakeholders involved in land use, economic development, environmental protection, and freight.⁶

Public Participation in the MTP

Engaging the public is essential for effective transportation planning in the NMCOG region. NMCOG and the NMMPO prioritize involving diverse stakeholders early and often during the MTP update process, with a focus on underrepresented and underserved communities.

MTP public outreach goals include:

- Notify the public about MTP meetings and updates.
- Educate residents about their role in transportation planning.
- Provide accessible opportunities for participation.
- Focus on including underrepresented groups.
- Continuously improve outreach methods.

Public Outreach Tools

To keep the public informed and engaged, NMCOG uses tools such as email updates, social media, surveys, public meetings, and interactive forums. Visualization techniques and fact sheets also help explain complex topics. See the chapter, *How Do We Engage Others in our Work?*, for specific methods and tools for engagement.

Pre-Plan Development Activities

Before drafting the MTP, NMCOG gathers input from local governments, organizations, and residents by:

- Forming an advisory committee to discuss regional transportation goals.
- Conducting surveys to identify community needs and priorities.
- Hosting a dedicated MTP webpage with updates, resources, and opportunities for public comment.
- Creating informational materials to explain the planning process.
- Attending local meetings to gather feedback from officials, businesses, and community groups.
- Using social media and other tools to reach diverse audiences.

Public Comment and Plan Updates

Once the draft MTP is approved, a 30-day public comment period begins, during which:

- Notices are shared in newspapers, online, and at municipal offices.
- At least two public meetings are held.
- Comments can be submitted by mail, email, or phone.

⁶ See 23 CFR 450.316 (3)(b) for regulatory requirements.

Public feedback is reviewed and incorporated into the final plan where appropriate. The NMMPO votes to endorse the updated MTP, which is then posted online and shared with stakeholders. Any future amendments to the MTP will include a 21-day public comment period following a similar process.

The Transportation Improvement Program (TIP)

The TIP lists transportation projects that use federal funding. After approval by the NMMPO, the regional TIP is added to the Statewide Transportation Improvement Program (STIP). The TIP is updated every year and may be changed more frequently if needed. Developing the TIP involves working with state and local agencies responsible for land use, economic development, environmental protection, and freight.⁷ These steps ensure public review and input throughout the process.

Public Participation for the TIP

Federal and state regulations require opportunities for public review and comment during TIP development.⁸ The NMMPO ensures:

- Access to the TIP and related materials;
- Public notification of its availability;
- The public's right to review and provide feedback; and
- A 21-day public comment period before the TIP is adopted.

Public Outreach Tools

NMCOG uses several tools to share information and gather input about the TIP, including:

- Email distribution lists;
- Newspaper legal ads;
- NMCOG website;
- Social media;
- Project fact sheets;
- Meetings with local groups, nonprofits, and special interest organizations;
- Public meetings and forums; and
- NMCOG and NMMPO meetings.

Announcing the TIP

Notices about the TIP's availability and public comment opportunities are published in the *Lowell Sun* and promoted to the *Lowell Sun* and other local or foreign-language newspapers. They are also posted at Town and City Clerk offices and on the NMCOG and LRTA websites. Social media announcements and emails to stakeholders ensure broader awareness. Copies of the draft and final TIP documents are shared with NMMPO members, stakeholders, and other interested parties.

Public Comment Process

A 21-day public comment period starts once the NMMPO approves the draft TIP. At least one public meeting is held to gather feedback. Comments can also be submitted via mail or email.

⁷ See Title 23 CFR 450.316 (3)(b) for regulatory requirements.

⁸ See Title 23 CFR Section 450.324 and 310 CMR 60.03(6)h

After the comment period, staff review all feedback and make changes to the TIP as appropriate. The final TIP includes a summary of comments, responses, and actions taken. The NMMPO votes on the final TIP, which is posted on the NMCOG website and shared with stakeholders.

Unified Planning Work Program (UPWP)

The UPWP outlines the scope, budget, and transportation planning activities of the NMMPO staff for the upcoming year. Updated and endorsed annually by the NMMPO, the UPWP development process ensures public review and input.

Public Participation for the UPWP

Federal and state regulations require opportunities for public review and comment during UPWP development.⁹ The NMMPO ensures:

- Public access to the UPWP and supporting materials;
- Notification of the UPWP's availability;
- The public's right to review and provide feedback; and
- A 21-day public comment period before UPWP endorsement.

Public Outreach Tools

NMCOG uses several methods to share information and gather input for the UPWP. These tools also provide updates on ongoing UPWP projects and include:

- Emails;
- Calls for projects from member communities;
- Newspaper legal ads;
- NMCOG website and social media;
- Project fact sheets;
- Meetings with neighborhood groups, nonprofits, and special interest organizations;
- Public meetings and forums; and
- NMCOG and NMMPO meetings.

Announcing the UPWP

Notices about the UPWP's availability and public comment period are published in the *Lowell Sun* and promoted to the *Lowell Sun* and other local or foreign-language newspapers. Notices are also posted at Town and City Clerk offices and on the NMCOG and LRTA websites. Social media and emails to the NMMPO's outreach list further ensure the public is informed. Draft UPWP copies are shared with NMMPO members, stakeholders, and interested parties.

Public Comment Process

A 21-day public comment period begins after the NMMPO approves the draft UPWP. At least one public meeting is held to gather feedback. Comments can also be submitted via mail, email, phone, or social media.

At the end of the comment period, all feedback is reviewed and incorporated into the UPWP as appropriate. The final UPWP includes a summary of comments, responses, and actions taken. The NMMPO then votes to endorse the final UPWP, which is posted on the NMCOG website and shared with stakeholders.

Any substantive changes or amendments to the UPWP follow the same process, including an additional 21-day public comment period.

⁹ See Title 23 CFR Section 450.324 and 310 CMR 60.03(6)h

Public Participation Plan (PPP)

The Northern Middlesex MPO (NMMPO) follows federal rules requiring a minimum 45-day public comment period before adopting or revising its Public Participation Plan (PPP).

Notice and Public Comment Opportunities

- Public Notification: Notices about the draft PPP and how to comment will be published in the Lowell Sun and other local news outlets. Notices will also be posted at Town and City Clerk offices in all municipalities.
- Online Access: The draft PPP and meeting notices will be available on the NMCOG website (www.nmcog.org) and linked on the LRTA website (www.lrta.com).
- Stakeholder Distribution: Copies of the draft PPP will be sent to NMMPO members, stakeholders, and interested parties.
- Public Hearing: At least one public hearing will be held during the 45-day comment period.
- How to Comment: Comments can be shared in writing, by email, mail, or at the public hearing.

Finalizing the PPP

After the comment period ends, the NMMPO will review and consider all relevant feedback. If needed, changes will be made before the NMMPO votes to approve the final PPP.

Future Changes

Any major updates to the PPP will require another 45-day public comment period and follow the same notification and public involvement process.

Transportation Planning Studies outlined in the UPWP

NMMPO staff conduct transportation planning studies addressing all modes of transportation, as outlined in the Unified Planning Work Program (UPWP). These studies, often technical in nature, are typically initiated at the request of local communities to address specific transportation challenges, deficiencies, or concerns. They assess current conditions and forecast future needs within the study areas.

Public Outreach in UPWP Studies

Public outreach is integral to UPWP studies and employs various tools to engage stakeholders effectively. These tools include:

- Surveys of affected residents and businesses,
- Public meetings to present study findings, gather input, and review recommendations,
- Open house-style events,
- Newsletters, and
- Email updates to stakeholders.

For instance, the recently completed Westford Center Parking and Safety Study featured multiple public meetings with neighborhood residents, individual stakeholder consultations, and presentations to local boards and organizations such as the Select Board, Library Trustees, and Historic Commission. Stakeholder input was incorporated into the study findings and recommendations. Additionally, community members unable to attend public meetings were encouraged to submit comments via email.

Outcomes of UPWP Studies

UPWP studies provide critical insights for NMMPO decision-making, support future transportation improvement projects, and address regional congestion and safety concerns. These studies contribute to enhancing quality of life, increasing mobility, promoting economic development, and reducing environmental impacts through improved transportation systems and lower emissions. Public and community input is incorporated into all studies, with special attention to Environmental Justice considerations in crafting improvement recommendations.

Section 5307 Grants

The Federal Transit Administration's (FTA) Urbanized Area Formula Funding program¹⁰ allocates Federal funds for transit capital and operating assistance, as well as transportation planning activities in urbanized areas with populations exceeding 50,000.

Public Hearing Requirements for Section 5307 Grants

The NMMPO's public review process for the TIP satisfies the public hearing requirements for most routine Section 5307 grants.¹¹ However, grants requiring additional considerations—such as environmental analysis, land acquisition, or unresolved environmental factors under Section 106 or Section 4(f)—will necessitate a separate Section 5307 hearing process. These cases will be addressed individually in consultation between the FTA and the grant applicant. For the majority of Section 5307 grants, the NMMPO TIP public involvement process will fulfill the necessary public hearing requirements.

LRTA and NMMPO Public Involvement Coordination

As the designated FTA Section 5307 applicant/recipient, the Lowell Regional Transit Authority (LRTA) has consulted with the NMMPO and agrees that the public involvement process used by the NMMPO for TIP development meets the public hearing requirements for developing the Program of Projects under Section 5307. This includes ensuring public notice and providing adequate time for public review and comment.

Additional Requirements for Non-Routine Projects

For FTA projects deemed non-routine—such as Section 5307 grant applications requiring an environmental assessment or environmental impact statement—the TIP public involvement process is insufficient. These projects will require additional public involvement in compliance with the joint FHWA/FTA environmental regulations before FTA grant approval.¹²

Public Participation Procedures Changes to Federal Certification Documents

The NMMPO's Federal Certification Documents, such as the TIP, UPWP, and MTP, are updated as needed throughout the year. Changes are classified as either **amendments** or **administrative adjustments**, each with different requirements for public participation. See the decision tree below regarding requirements for public hearings.

Amendments:

- Require public comment (typically a 21-day period).
- Include public notices, postings on the NMCOG website, and distribution via email and social media.
- Include consideration of all comments received before a vote.

¹⁰ 49 U.S.C. 5307

¹¹ As outlined in Section 5307 Circular C-9030.1B

¹² Outlined in 23 CFR Part 771

- Can require second public comment period if significant changes are made during review.

Administrative Adjustments:

- Do not require public comment or formal MPO action.
- May include a public comment period if deemed necessary by the NMMPO.

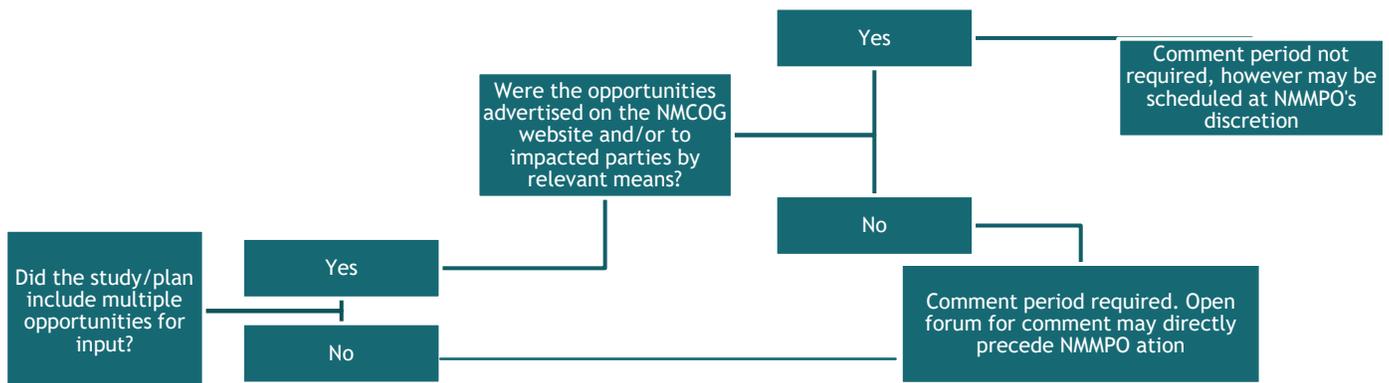
Aspect	Amendments	Administrative Adjustments
Public Comment	Required (21-day period; can be extended or shortened to 10 days in extraordinary circumstances)	Not required, unless the NMMPO votes to allow public comment
Examples of TIP changes	Adding/deleting a project, advancing a project from an outer year to Year 1, increasing cost by more than 10%, or major scope changes	Minor scope/description changes, funding changes by less than 10%, moving a project from Year 2 to Year 1, or changing a funding source
Examples of UPWP changes	Adding or deleting a task, increasing a task area’s budget by more than 25%	Moving funds between subtasks to reflect changes in effort
Examples of MTP changes	Adding projects or changing funding availability	Generally rare and treated as amendments
Approval process	Requires NMMPO vote after public comments are received and staff present how comments are proposed to be incorporated	Does not require NMMPO action, unless a public comment period is added

Key Notes

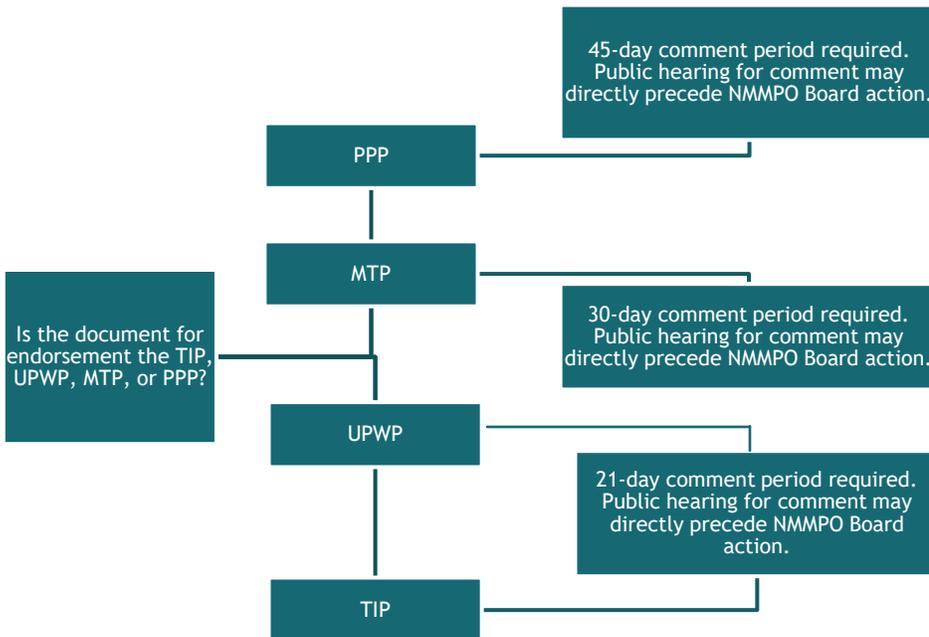
- Public notifications for amendments are widely distributed, including on the NMCOG website, social media, email lists, and local newspapers.
- All comments, whether received in meetings, by email, or other methods, are documented and considered.
- Significant changes during public review can trigger a second 21-day comment period.
- Administrative adjustments are simpler and focus on minor updates or corrections.

Public Comment and Hearing Decision Trees

Studies, Plans, and Other Non-Certification Documents



Endorsement of Certification Documents



Amendment of Certification Documents

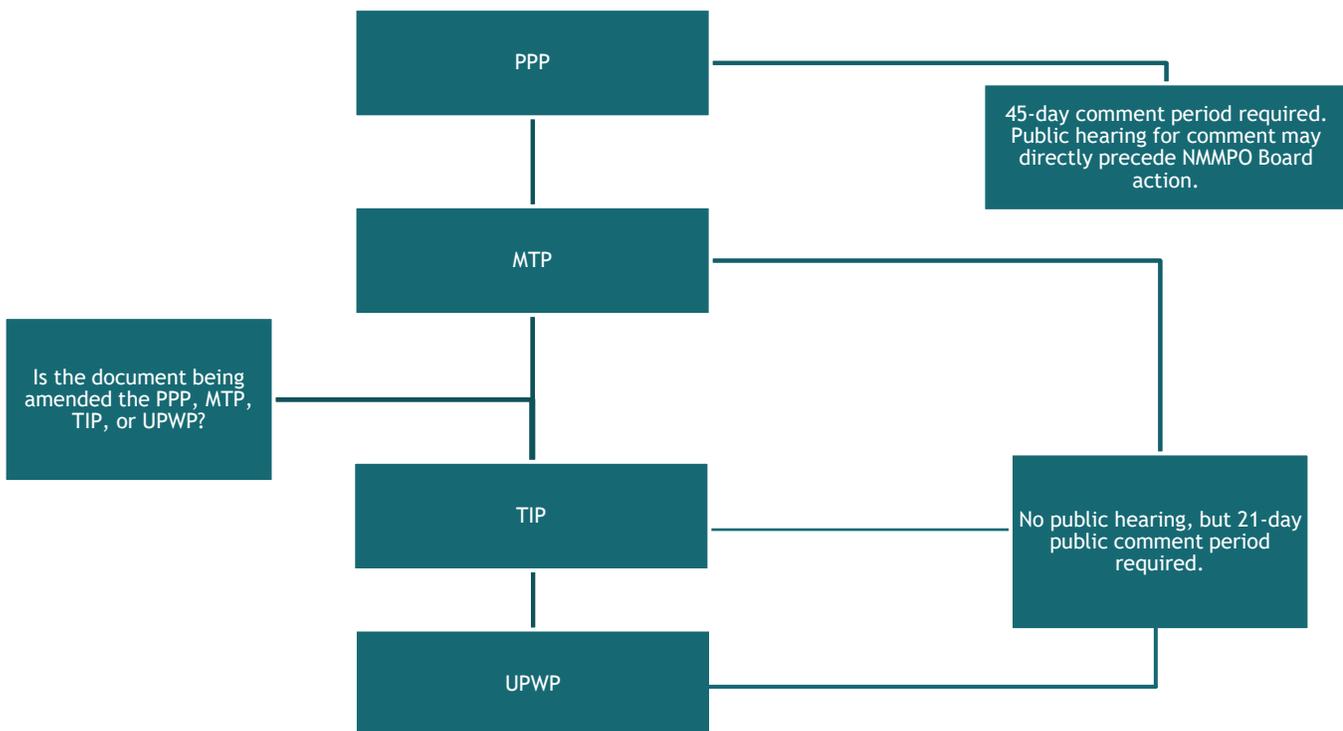


Table 2: Public Comment Periods and Notifications for Federally Mandated Plans

Plan or Project	Plan Phase	Public Comment Period Length	Where notifications are posted	How to share comments	Notes
Public Participation Plan	New or substantial updates	45 days*	NMCOG website NMCOG social media accounts (Facebook, X, and Instagram) Lowell Sun** NMMPO email distribution list Public hearing agendas shared with municipal clerks	Public hearing (via Zoom) Mail to NMCOG office (672 Suffolk Street, Suite 100, Lowell, MA 01854) Email to publiccomments@nmcog.org	Plan may be amended at any time, but should be updated every three to five years
Metropolitan Transportation Plan (MTP)	Draft plan	30 days*			A new MTP is developed every four years
Transportation Improvement Program (TIP)	Draft plan	21 days*			Developed annually between February and June, becomes active October 1
Transportation Improvement Program (TIP)	Amendments to an endorsed TIP	21 days*			TIP Amendment summaries are posted to the NMCOG website
Unified Planning Work Program (UPWP)	Draft plan	21 days*			Developed annually between February and June, becomes active October 1
Unified Planning Work Program (UPWP)	Amendments to an endorsed UPWP	21 days*			Amendment memos are shared with the NMMPO distribution list in advance of NMMPO meetings

* Public comment period begins immediately after the NMMPO votes to release for public comment; votes typically take place at monthly meetings of the NMMPO. Public hearings may directly precede NMMPO Board action.

** For endorsement of certification documents only (PPP, MTP, TIP, UPWP) and amendments to the PPP; not required for amendments to MTP, TIP, or UPWP.

