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WAKEFIELD

March 21, 2013

Commissioner Christopher Clement  
New Hampshire Department of Transportation  
PO Box 483  
Concord, NH 03302-0483

RE: 2014-2015 UPWP Approval Letter

Dear Commissioner Clement:

This letter is to inform you that at its meeting held on Friday, March 15, 2013 the Strafford Metropolitan Planning Organization (SMPO) Policy Committee approved the Strafford MPO 2014-2015 Unified Planning Work Program (UPWP). The Unified Planning Work Program is federally required document that outlines a scope of work and budget for Strafford MPO's transportation planning activities over the two year period beginning July 1, 2013 and continuing through June 30, 2015

The Unified Planning Work Program was approved following the required 30-day public comment period that began on Wednesday, February 13, 2013 and ended March 14, 2013. The public hearing and approval meeting were held Friday, March 15, 2013.

The legal notice regarding the 2014-2015 Unified Planning Work Program was published in Fosters Newspaper. During the public comment period copies of the draft Unified Planning Work Program were made available at the Rochester and Dover Public Libraries. And digital copies of the document were made available on the Strafford Metropolitan Planning Organization's website: [www.strafford.org](http://www.strafford.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Cynthia Copeland".

Cynthia Copeland, AICP  
Executive Director

cc: Strafford MPO Technical Advisory Committee and Policy Committee, NH MPO's (via e-mail)  
Leigh Levine, FHWA  
Bill Gordon, FTA  
Bill Watson, NHDOT  
Paul Lockwood, NHDES

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## **UPWP Comments**

### NH DES Comments

In comparing the “Land Use, Economic Development & Environmental Linkages” sections of the various UPWPs, Strafford’s seems a little weak. This section should cover MAP-21 Goals, FHWA Planning Emphasis Areas and Annual FHWA/FTA Planning Reviews that suggest attention be given issues including the NH Climate Action Plan, Sustainability, Livability and A Granite State Future.

Would it be possible to expand Task 202.1 to say something like:

*“SRPC will work to identify and implement appropriate transportation and land use recommendations identified in the NH Climate Action Plan. SRPC will continue to identify transportation infrastructure vulnerable to extreme weather event and identify adaption strategies where feasible. In addition, SRPC will coordinate the development of the regional plan to ensure alignment with the revisions to the Long Range Metropolitan Transportation Plan. This effort will incorporate the six livability principles developed by the US DOT and EPA.”*

#### Work Products:

Educational Materials related to climate change and transportation  
Participation in A Granite State Future  
Participation in the New Hampshire Energy and Climate Collaborative and local energy working groups  
Updates to environmental mitigation on existing and proposed long range transportation projects

[Strafford MPO has made changes to Subtask 202.1 to include references to “Granite State Futures,” livability, and sustainability.](#)

I know some of this is covered in Task 507 but that section consists almost entirely of “passive” work items to “assist” and “collect data.” I’d strongly recommend it be moved into the more proactive Policy and Planning section.

Task 209: Transportation Air Quality Conformity and 406 Transportation Model sections look good; as my response to Tim Roaches’ question indicated, we’ll need the TDM VMTs for 2014 and every three years thereafter as well as AQA updates “as needed”

The only other minor issue we have, is that we’d like to see a little stronger language under Transportation Demand Management. Again, Nashua’s UPWP seems to best address the issue of regional TDM coordination and could serve as a basis for Strafford:

*“ **Transportation Demand Management:** SRPC will continue to coordinate efforts with the NH DOT, neighboring Regional Planning Commissions and Metropolitan Planning*

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*Organizations and other agencies within the commuting area to develop a framework to develop a TDM and ride share program to benefit the Strafford region. SRPC will coordinate with neighboring RPC's and MPO's to conduct an assessment of Park and Ride facility usage along major commuting corridors. Further, SRPC may conduct promotional events during Green Commute Week, which occurs in May in conjunction with National Bike to Work Week. Promotional events may include organized bike rides, bicycle rodeos for children, public and workplace breakfasts for commuters, and educational booths."*

Strafford MPO did not frequently use the "TDM" task in our 2012-2013 UPWP. Many of these efforts were folded into our park and ride work and assistance to Transit Agencies and RCC participation. We believe the standalone "TDM" task is not necessary for completing TDM goals and we plan on continuing our support of TDM activities throughout our other planning tasks when appropriate.

### **Comments received from FHWA**

-I would consider consolidating performance measure- related tasks – 105 and 407.  
This has been noted

-I would consider including TE still under Task 503 on pg. 13, as there are still active projects. Active TE projects are addressed using Task 501: Local Assistance. At this point we are focusing on assisting local communities implement the grants. We were told by NH DOT that there is no funding remaining for a future TE grant round making this task unnecessary.

-Thank you for the Planning Factors matrix on pg. 15, PEAs matrix on pg. 17 and tasks responding to planning reviews matrix on pg. 19 – very helpful.

-I would consider including Mid-Term Review along with Annual Reports under Task 102.2 on pg. 22-23.  
Changes have been made to address the comment

-Work products under Task 103.1 (Training) appear to duplicate work products listed under 102.2.  
This doesn't appear to be the case.

-Under Task 103, I believe we discussed that the various memberships might be more appropriately considered as indirect costs.  
To "Memberships" we added "as prescribed by federal regulation"

-Tasks 207.1 Work products includes updates to regional ITS architecture and plan – As discussed, you probably don't need as much resources committed here as with last cycle. There is no specific resource allocation identified for this task (only at the category level). this task will remain as it allows up to report to our committees and make changes to the ITS as necessary. This task addressed a specific request made by our Policy Committee to have the

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opportunity to periodically review the regional ITS status and update the ITS when they feel it is necessary.

-I would consider using work of Granite State Future project (development of sustainable regional comprehensive plans) to develop alternative scenarios for the MTP under Task 210 on pg. 29.

Changes have been made to address the comment

-Under Task 210.1 on pg. 29, I believe we have agreed through interagency consultation to a 2040 horizon year for the MPO MTP updates. I would also suggest bringing the draft update before the NHDOT Natural Resource and Cultural Resource Coordinating Committees/Meetings again to help comply with resource agency consultation requirements as you develop your environmental mitigation discussion. Also you could consider using the work of NH's Granite State Future project (development of sustainable regional comprehensive plans) to develop alternative scenarios for the LRTP under this task.

Changes have been made to address the comment

-Task 211 on pg. 29 may be more of an indirect cost item? As with memberships and subscriptions, I'm not sure how you can specifically identify these with a single cost objective under the UPWP, and so this may be better allocated as indirect costs.

This was an allowable cost last UPWP cycle and has been very useful for researching transportation information and keeping up to date on FHWA and FTA programs and initiatives. For example this task was used for us to review the FHWA "INVEST" tool and to keep up to date on MAP-21 as it was moving through congress. It was very instrumental in allowing us to write our senators to have elements of MAP-21 changed through amendments before it was approved. MPO population thresholds were set to be increased, COAST funding for operations was set to be cut, and there were a number of other changes that would have negatively impacted our region that this task allowed us to research.

-Thank you for including base year update to 2010 under Task 406.1. I would encourage efforts to implement a Household Travel Survey, and maybe this could also be supported via a statewide SPR funded effort?

NH DOT told NH MPOs last UPWP cycle that they were going to do a statewide household survey. A household survey is very much our goal and necessary for NH. We look forward to working with NHDOT on a household survey in the near future.

-Under Task 407.1 – I would encourage the MPO to consider establishing a Congestion Management Process (CMP) consistent with federal requirements, though I understand this would only be required if the MPO was affected by the 2010 Boston UZA/TMA. SMPO does not have CMP requirements. We see significant value in a CMP and the effort is already being folded into data collection efforts and planning efforts. It is a goal of ours to outline our process in the MTP.

-Under Task 503.3 on pg. 43, Work product number 1 should refer to the Transportation Alternatives Program (TAP), not CMAQ.

Changes have been made to address the comment

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-Regarding Task 507.1 on pg. 45, Bill Watson has mentioned to that NHDOT is planning on updating the NH statewide bike/ped plan, and would benefit from MPO/RPC participation – you might mention this coordination as another potential activity.

[Changes have been made to address the comment](#)

-Under Task 508, if NHDOT moves forward to establish a MAP-21 compliant statewide freight plan, this could provide an opportunity for the MPO to ramp up freight planning efforts via coordination as the plan is developed. The MPO might also consider developing a regional freight advisory committee and a regional freight plan to identify and assess the condition and performance of the region's critical freight network, and help identify solutions to freight bottlenecks and other deficiencies.

[The scope of work for Task 508.1 now allows SMPO to undertake freight planning activities as mentioned in the comment.](#)

-Thank you for the per Category personnel cost breakout of hours, budget and % of total hours for each year.

-Pls. keep in mind competitive bidding requirements for use of outside vendors or procurement (as necessary), and remember to consult with NHDOT, and as appropriate, use their White Farm process for retiring outdated equipment purchased through UPWP funds.

-Please also keep in mind our guidance clarifying eligibility and criteria for use of FHWA and FTA planning funds for supporting integration of transportation, land use, and climate change: <http://www.fhwa.dot.gov/planning/plnInduse.htm>

I also have attached a memo on eligibility of activities to adapt to climate change and extreme weather events under the federal-aid highway program. Also again would encourage you to take a look at FHWA's INVEST tool to consider its use in evaluating the sustainability of your plans or projects: <https://www.sustainablehighways.org/1/home.html>