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Metropolitan Planning Organizations' Efforts to Meet Federal Planning Requirements





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Committee on Environment and
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United States Senate

The Honorable John W. Warner
Chairman, Subcommittee on Transportation
and Infrastructure
Committee on Environment and
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United States Senate

In response to your request, this report (1) discusses the experiences of metropolitan planning organizations (MPO) in implementing the planning requirements of the Intermodal Surface Transportation Efficiency Act of 1991 and (2) examines the extent to which the U.S. Department of Transportation's certification review process ensures that the MPOs in larger urban areas comply with the act's planning requirements. This report recommends that the Secretary of Transportation develop standard reporting formats for assessing and reporting on the MPOs' compliance with the planning requirements so that the Department can identify any nationwide patterns in planning deficiencies, the underlying causes of these planning deficiencies, and the extent to which the MPOs have made progress in implementing the requirements.

We are sending copies of this report to the Secretary of Transportation; the Director, Office of Management and Budget; and interested congressional committees. We will make copies available to others upon request.

Please contact me at (202) 512-2834 if you or your staff have any questions. Major contributors to this report are listed in appendix VI.

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Executive Summary

Purpose

Key urban issues, such as traffic congestion, air pollution, and the economic viability of neighborhoods and commercial areas, are significantly affected by decisions on how federal transportation funds are invested. These decisions, in turn, stem from the transportation planning efforts undertaken by the 339 metropolitan planning organizations (MPO) in the United States. An MPO is not a discrete decision-making body with real jurisdictional powers but can be viewed as a consortium of governments and other bodies—such as transit agencies and citizens groups—that join together for cooperative transportation planning.

The Chairman and Ranking Minority Member, Senate Committee on Environment and Public Works, and the Chairman of that Committee's Subcommittee on Transportation and Infrastructure asked GAO to review the metropolitan transportation planning requirements of the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA) and determine the challenges that the MPOs—the primary transportation planning agencies in urban areas—face in implementing those requirements. Specifically, this report (1) discusses the MPOs' experiences in implementing ISTEA's planning requirements and (2) examines the extent to which the U.S. Department of Transportation's certification review process ensures that the MPOs in larger urban areas comply with ISTEA's requirements.

Background

ISTEA began a new era in urban transportation planning by making key changes that either strengthened the planning requirements that had existed in earlier laws or were significant innovations. ISTEA retained the requirement that planners develop a 20-year plan that identifies a vision for the regional transportation system and a 3-year transportation improvement program that identifies the projects to be implemented over this period. For the first time, all of the nation's 339 MPOs must financially constrain their transportation plans—that is, they must include only those projects that can be paid for with reasonably available or projected revenues. In addition, ISTEA re-emphasized the public's involvement in transportation planning by requiring a formal and ongoing process for citizens' participation in the transportation planning process. ISTEA also requires the Secretary of Transportation to certify that the transportation planning efforts in larger urban areas conform to ISTEA's planning provisions. To meet this requirement, the Federal Highway Administration and the Federal Transit Administration jointly evaluate the planning processes in urban areas with populations over 200,000.

Results in Brief

The MPOS have found three of ISTEA's planning requirements particularly challenging to meet: requiring greater involvement by citizens, limiting short- and long-term transportation plans to reasonable revenue projections (the financial constraint requirement), and selecting transportation projects. The MPOS found that the requirement to involve citizens had ensured that their transportation plans better reflected their regions' transportation needs. The financial constraint requirement led the MPOS to obtain more reliable revenue projections from the state departments of transportation and transit agencies and to exclude those projects that could not be financed within budget constraints. ISTEA's project selection authority required the MPOS to become consensus builders, effectively working with the states, localities, and transit agencies in identifying projects. In some cases, the efforts of the MPOS and the local officials to assume greater authority have encountered resistance from the states.

Despite the difficulties encountered, the MPOS that GAO interviewed said that their efforts to meet these three planning requirements had improved their transportation plans. As a result, the 13 MPOS that GAO interviewed unanimously endorsed the continuation of the ISTEA planning requirements. In contrast, state departments of transportation officials that GAO interviewed did not uniformly support the continuation of ISTEA's planning requirements. For example, some states and the American Association of State Highway and Transportation Officials—the national organization of state transportation agencies—support the elimination of the requirement to financially constrain the MPOS' long-term plans because of the difficulty in determining reliable revenue projections over the 20-year duration of the plan.

As of January 1996, the Federal Highway Administration and the Federal Transit Administration had reviewed 55 MPOS. Twenty-three were certified without qualification, and 31 were certified subject to certain corrective actions being taken. The certification of one MPO was held in abeyance because of significant areas of noncompliance. In reviewing 55 certification reports, GAO found that the reports are of limited usefulness in assessing trends or problem areas in the ISTEA planning process. First, the certification reports vary widely in format and content because the Department did not develop standard criteria for assessing or reporting the MPOS' compliance. Second, three MPOS were conditionally certified despite significant deficiencies in their urban transportation planning processes. For example, the governing board at one certified MPO had not

met publicly since 1976 and had not developed a process to involve citizens.

GAO's Analysis

Three of ISTEA's Key Planning Requirements Posed Challenges for MPOs

ISTEA's planning requirements posed considerable challenges for the MPOs. GAO found that three were particularly challenging: (1) involving the public more extensively, (2) financially constraining transportation programs, and (3) identifying transportation projects. According to a 1992 MPO study, before ISTEA, the MPOs' efforts to involve citizens were narrowly focused and had low visibility. In response to ISTEA, the MPOs hired more staff and increased funding to effectively involve the general public. For example, the Springfield, Massachusetts, MPO hired a consultant in part to translate the jargon of technical planning into understandable terms for a newsletter aimed at the general public. The Philadelphia MPO tripled its spending on citizens' involvement, from about \$90,000 in 1991 to \$300,000 in 1995. Overall, all 13 MPOs that GAO interviewed noted that their efforts to meet ISTEA's public involvement requirements had resulted in plans and programs that were more reflective of the public's transportation needs, and hence provided broader and stronger public support.

According to several studies, ISTEA's requirement that the MPOs develop transportation improvement programs that reflect reliable revenue projections was a significant challenge. The requirement assumed that all of the MPOs could develop a list of proposed projects, in priority order, and then exclude those projects that did not fit within the budget constraint. A 1992 study found that some MPOs submitted lengthy, unconstrained "wish lists" to their state departments of transportation, deferring the real decision-making authority to the states.¹ In some urban areas, financially constraining the transportation improvement program meant abandoning 50 percent or more of the proposed projects. While many of these projects had scant prospects for implementation, deleting them was politically difficult and very unpopular with the projects' sponsors.

The MPOs' efforts to identify which transportation projects to fund posed challenges similar to those surrounding the financial constraint requirement. Because the MPOs were not traditionally strong decision-making bodies, their capacity to identify projects was in doubt at

¹Intermodal Surface Transportation Efficiency Act of 1991: Promise to Performance, Report to the Federal Highway Administration, Institute of Public Administration, Dec. 1992.

the outset of ISTEA. The planning and programming decisions were often deferred to the states or to transit operators because the MPOs generally did not have the authority to play a decision-making role. To make the transition, the MPOs had to develop a consensus-building relationship with the local communities, the transit agencies, and the states. GAO's interviews with 13 MPOs showed that a cooperative and constructive relationship with the state was especially critical.

MPOs Interviewed Believe That Efforts to Meet Planning Requirements Are Beneficial

Despite initial difficulties, the 13 MPOs that GAO interviewed support ISTEA's planning provisions and believe that the provisions have improved their transportation plans. For example, some MPOs noted that their efforts to involve citizens were valuable in educating interested members of the public and forced the planners to deal with significant public opposition to projects early in the planning process. As a result, the projects were less likely to be disrupted closer to implementation. The financial constraint requirement resulted in transportation plans that could be implemented as the planning process became more rational than political. In addition, the transportation planners started to consider innovative financing methods to help generate revenues to carry out the plans—such as toll roads—that would have been politically difficult before. Finally, 8 of the 13 MPOs that GAO interviewed said that ISTEA had a great or very great impact on enhancing their ability to select projects. Various provisions of ISTEA—including the financial constraint requirement and funding flexibility—were cited as contributing to this change.

While the state officials that GAO interviewed generally supported ISTEA's planning requirements, their support was often conditional. For example, many of these state officials supported the financial constraint requirement as long as the federal regulations allowed some over-programming—that is, allowed the total cost of the proposed projects included in the transportation improvement plans to slightly exceed the expected revenues. According to the states, this practice would enable the MPOs to undertake another project in the event that a higher-priority project ran into unexpected delays.

DOT'S Certification Reports Provide Limited Guidance for Reauthorizing ISTEA

ISTEA required the Secretary of Transportation to certify that the MPOs in larger urban areas had complied with ISTEA's planning provisions and to withhold federal transportation funds from urban areas that did not comply. GAO's review of the Department's reports on all 55 certification reviews issued between July 1994 and January 1996, as well as discussions

with MPO, state, and DOT officials, revealed two main concerns about DOT's management of the certification program. First, GAO found that the reports on certification reviews varied significantly in their depth, content, and format. Some reports went into significant detail and were richly descriptive of the MPOs' planning efforts. Other reports were cursory and summary. Second, three MPOs were conditionally certified even though their planning procedures appeared to fall significantly short in several key areas. For example, the Department certified the Worcester, Massachusetts, MPO even though the MPO's technical board had not met publicly since 1976, no process to involve citizens had been formally adopted, no local officials were members of the MPO, and neither the short-term nor the long-term plan was appropriately financially constrained. These MPOs were certified on the condition that corrective actions be taken.

Department officials stated that because of the newness of the planning requirements, the Department developed flexible criteria for federal officials to use in reviewing the MPOs' compliance and encouraged reviewers to take a flexible approach in assessing whether the MPOs had complied with the planning requirements. However, the lack of initial criteria for assessing compliance and the resulting variety in the content and format of the reports make it difficult to develop a broad overview of the MPOs' compliance with the planning requirements. Such an overview would be especially useful because the certification reviews are the most comprehensive assessment of the MPOs' performance that will likely be conducted.

Recommendation

GAO recommends that the Secretary of Transportation direct the Administrators of the Federal Highway Administration and the Federal Transit Administration to develop reporting formats for assessing and reporting on the MPO's compliance with ISTEA's planning requirements that will enable the Department to identify any nationwide patterns in planning deficiencies, the underlying causes of these planning deficiencies, and the extent to which the MPOs have made progress in meeting the requirements.

Agency Comments

After providing a draft of this report to DOT for review, GAO met with DOT officials, including the Chief, Metropolitan Planning Division, Federal Highway Administration, and the Chief, Statewide Planning Division, Federal Transit Administration. The DOT officials disagreed with GAO's conclusion that the information gathered during the certification reviews

should be used to develop an overview of the MPOS' progress in meeting ISTEA's planning requirements. They stated that the certification reviews are not intended to assess the MPOS' overall progress. Instead, they serve to assess the compliance of individual MPOS with ISTEA's planning requirements and to provide feedback on each MPO's efforts to meet the requirements. They also stated that the certification process is only one of several activities that the Department is taking to promote and assess the MPOS' compliance. As a result, DOT disagreed with the recommendation that it develop standard criteria and reporting formats for certification reviews. The officials stated that the recommendation, particularly the call for standard criteria, was too prescriptive and that GAO direct its recommendation to the Congress instead.

GAO has incorporated information into the report that describes the additional activities which Department officials stated that they have undertaken or plan to undertake to assess the MPOS' progress in meeting ISTEA's planning requirements. In addition, GAO has modified its proposed recommendation by deleting its call for standard criteria to address the Department's need for flexibility in responding to GAO's recommendation. However, GAO believes that the scope and effort that the Department has placed in the certification reviews clearly suggest that the reviews are critical elements in assessing how well the MPOS have met the requirements. A standard reporting format would not limit the Department's flexibility to tailor the certification reviews to the particular needs of each MPO. Rather, it would provide the Department and the Congress with rich sources of information that they could use to evaluate whether or not the MPO planning provisions should be continued.

DOT officials also suggested technical and editorial changes to the report, which have been incorporated where appropriate.

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Abbreviations

AASHTO	American Association of State Highway and Transportation Officials
ACIR	Advisory Commission on Intergovernmental Relations
AMPO	Association of Metropolitan Planning Organizations
CAA	Clean Air Act
CMAQ	Congestion Mitigation and Air Quality Improvement Program
DOT	United States Department of Transportation
EPR	Enhanced planning review
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GAO	United States General Accounting Office
ISTEA	Intermodal Surface Transportation Efficiency Act of 1991
MPO	Metropolitan Planning Organization
TIP	Transportation Improvement Program
TMA	Transportation Management Area

Introduction

The quality of life in urban areas is and will continue to be significantly affected by decisions on the use of federal transportation funds. Key urban issues, such as traffic congestion, air pollution, and the economic viability of neighborhoods and commercial areas, are significantly affected by the decisions on how these funds are spent. The decisions, in turn, grow out of the urban transportation planning process and the role of the nation's 339 metropolitan planning organizations (MPO).

MPOs Vary in Size and Responsibility

Since the early 1970s, MPOs have been significant players in urban transportation planning. An MPO is not a discrete decision-making body with real jurisdictional powers, such as a city or county government. Instead, an MPO is best viewed as a consortium of governments and other bodies—such as transit agencies and citizens groups—that join together for cooperative transportation planning. An MPO's organization and membership often consists of (1) a policy-making board involving elected officials from the local governments in the metropolitan area; (2) a technical committee consisting of professional staff of local, state, and federal transportation agencies; and (3) an MPO staff.² The MPO's primary mission is to develop a consensus on a long-term transportation plan for an urban area and to develop a transportation improvement program (TIP) that identifies projects to implement the plan. How each of the 339 MPOs in the United States fulfills this mission depends on its relationship with the state department of transportation and other transportation operators, the number of local governments in the region, the size and experience of the MPO staff, the growth rate of the population, and the number of transportation modes in the region.

According to a 1995 report on MPOs by the U.S. Advisory Commission on Intergovernmental Relations (ACIR), some MPO-like organizations existed in the 1950s to prepare special metropolitan planning studies in Chicago, Detroit, New York, and Philadelphia.³ In 1970, federal policy fostered the development of comprehensive urban transportation planning by requiring the creation of planning agencies in areas with populations of 50,000 or greater to carry out cooperative planning at the metropolitan level. Originally, all MPOs were treated alike under federal laws and regulations. In the mid-1980s, when funding for metropolitan planning was reduced,

²For illustrative purposes, see appendix I for a detailed description of the organization and membership of the Chicago Area Transportation Study—the MPO for the Chicago urbanized area.

³MPO Capacity: Improving the Capacity of Metropolitan Planning Organizations to Help Implement National Transportation Policies, U.S. Advisory Commission on Intergovernmental Relations, May 1995.

preference for funding was given to those MPOS in metropolitan areas over 200,000 in population, areas now known as Transportation Management Areas (TMA).

ISTEA's funding provisions also provided additional discretion and funding to those MPOS located in areas violating the federal air quality standards. ISTEA established the Congestion Mitigation and Air Quality program (CMAQ) and authorized \$6 billion over 6 years to help the areas not in attainment with the air quality standards (nonattainment areas) reach compliance with the Clean Air Act's (CAA) requirements. With CMAQ funds, the MPOS located in the areas that are not in compliance with the federal standards for ozone or carbon monoxide emissions can approve projects that help control or reduce these emissions.

The population and geographic area covered by the MPOS also determine the breadth of their responsibilities and the support they have to meet their ISTEA planning requirements. Some MPOS, such as those in New York, Chicago, and Los Angeles, plan for urbanized populations of over 6 million. Typically, these MPOS are well financed and have a dedicated professional staff of 100 or more. At the other extreme, the MPOS that plan for urban areas with populations just over 50,000 may have no staff or a single county government employee working part time for the MPO.

In addition, the MPOS' planning duties can be complicated by the boundaries of jurisdictions in metropolitan areas. As growth occurs, urbanized areas sometimes overrun the MPOS' boundaries or become so large that state and local officials establish more than one MPO to serve the area. Currently, 14 contiguous urbanized areas within a single state have two or more MPOS. In these locations, such as Florida's Tampa Bay area, cooperation and coordination among the MPOS are essential. Other urban areas cross state lines. For example, the Philadelphia MPO plans for the Pennsylvania and New Jersey portions of the Philadelphia urban area, and the St. Louis MPO plans for the Missouri and Illinois portions of the urban area. The task of these MPOS is complicated by their having to deal with two or more state governments and more than one Federal Highway Administration (FHWA) or Federal Transit Administration (FTA) region.

ISTEA Presented MPOs With New Challenges

The ACIR report noted that ISTEA brought three new, far-reaching philosophies to the administration of the federal surface transportation programs: (1) the decentralization of decision-making to the state and local governments, and particularly to the MPOS in the larger metropolitan

areas with populations of 200,000 or more; (2) stronger environmental connections, especially to the CAA; and (3) the elevation of nontraditional goals and stakeholders to new prominence in the planning and decision-making processes.

ACIR noted that the decentralization of decisions gave many MPOS a larger area to plan for, more miles of road to make decisions about, more flexibility to consider alternatives to the automobile, a lead role in allocating certain federal transportation funds, a longer horizon to consider for the planning process, and a responsibility to consider many transportation-related public policies. In 129 urban areas with populations greater than 200,000,⁴—the TMAs—ISTEA gives the MPOS the authority to select projects from the TIP, in consultation with the state. In other areas, the selection of projects is to be carried out by the state in cooperation with the MPO.

Environmental considerations have become more of a driving force in the MPOS' work as well. The MPOS in nonattainment areas must develop transportation plans that ensure that the CAA's requirements are met. In constraining the transportation plans to meet the CAA's goals, the MPOS cannot, with limited exceptions, spend any federal funds on any highway projects that will exacerbate existing air quality problems or lead to new violations of federal air quality standards. The MPO-developed transportation plans must contribute to reducing motor vehicle emissions.

The elevation of nontraditional goals and stakeholders in the MPO planning process is specified in the ISTEA section that requires the MPOS to consider 16 factors⁵ when developing their metropolitan plans. Some of the planning factors require planners to consider the effects of transportation policies on land-use development; the social, economic, energy, and environmental impacts of transportation decisions; provide for the efficient movement of freight; and ensure connections with international borders, ports, and airports and intermodal facilities. These planning factors address many of the ways that transportation relates to other values and the unintended impact of transportation and transportation facilities. ISTEA stated that these factors must be considered as part of the planning process. In addition, ISTEA and subsequent planning regulations emphasized an early and continuous effort to involve citizens that actively

⁴Three urban areas under 200,000 in population have been designated TMAs at the request of the state governor.

⁵The 16th was added as part of the National Highway System Designation Act of 1995. See appendix III for a list of these factors.

seeks input from direct stakeholders and other members of the public, including those traditionally underserved by the existing transportation systems. The public's involvement is to be sought at various points in the planning process, including the development of the plan, the TIP, and individual projects.

MPOs Must Produce Two Planning Documents

Taking into consideration all of the relevant requirements of ISTEA and the CAA, the MPOs must develop two basic planning documents—the transportation plan and the transportation improvement program. The first document—the transportation plan—is a long-term document that specifies a 20-year vision for a metropolitan area's transportation system. The plan is to include short- and long-range strategies leading to the development of an integrated and efficient intermodal transportation system. The plan is to be revised and updated at least every 3 years in those areas not meeting the federal air quality standards and at least once every 5 years in other areas. An acceptable plan must be a realistic, implementable document describing how the transportation system will serve metropolitan development objectives, address congestion and air quality concerns, and address other issues.

The TIP is a much more detailed document that specifies a list of priority projects to be implemented in each year covered. It must include all transportation projects that will receive federal transportation funding and be clearly based on the objectives laid out in the plan. The TIP covers a period of at least 3 years and must be updated every 2 years. After approval by the governor, the metropolitan TIP must be included in the state TIP,⁶ which is then subject to review and approval by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA).

ISTEA specifies that the plans and TIPS include a financial component that demonstrates how the plans will be funded and implemented. The TIP must be financially constrained each year and must include only those projects for which funding has been identified using current or reasonably available revenue sources. The state and the transit operators must provide information early in the process of developing the TIP about the amount of federal, state, and other funds likely to be available. This financial constraint requirement was a major change in federal policy. Before ISTEA, long-range plans and TIPS were often lengthy "wish lists" of

⁶Under ISTEA, the states must also develop both a long-term transportation plan and a statewide TIP. After approval by the governor, the metropolitan TIPS are to be incorporated without modification in the state TIP.

projects proposed by local governments, transit operators, and others. Because such plans and programs bore no relation to the available financial resources, many projects were never implemented. Hence, the real implementation decisions took place outside of the formal planning process. Thus, under ISTEA the financial constraint requirement ensures that the implementation decisions come directly from a systematic planning process.

Objectives, Scope, and Methodology

Concerned about the abilities of the MPOS to meet the demands of ISTEA's planning requirements, the Chairman and the Ranking Minority Member, Senate Committee on Environment and Public Works, and the Chairman of that Committee's Subcommittee on Transportation and Infrastructure requested us to determine the challenges that the MPOS face in implementing ISTEA's metropolitan planning requirements. Specifically, this report (1) discusses the MPOS' experiences in implementing ISTEA's planning requirements and (2) examines the extent to which the U.S. Department of Transportation's certification review process ensures that the MPOS in larger urban areas comply with ISTEA's requirements.

To assess the challenges that the MPOS faced in meeting ISTEA's metropolitan planning requirements, we reviewed numerous surveys, reports, conference summaries, and other literature on urban transportation planning that have been published since 1991. In addition, we spoke to representatives of FHWA, FTA, and other national experts. We also obtained and analyzed the results of a 1994 nationwide survey of all MPOS in the United States conducted by the National Association of Regional Councils (NARC).⁷ On the basis of these efforts, we determined that three of ISTEA's planning provisions—(1) the requirements for involvement by citizens in developing plans and programs, (2) financially constraining the transportation improvement program, and (3) project identification—were particularly challenging for the MPOS. To further explore these key issues, we conducted in-depth telephone interviews with officials of 13 MPOS and 11 state transportation planning agencies. These organizations are listed in appendix II. The MPOS we selected included those that had great or little difficulty with planning requirements (on the basis of their responses to the NARC survey) and represented different regions in the United States. All but 1 of the 13 MPOS we interviewed represent urban areas with populations of 200,000 or greater—the transportation management areas. With each MPO, we

⁷The National Association of Regional Councils is a national advocacy group that advances the interests of regional planning organizations, including MPOS.

discussed why it did or did not have difficulty with selected planning requirements, the reasons for the difficulty or lack of it, the benefits and drawbacks of the planning requirement, and whether the Congress should reconsider these or any other of ISTEA's planning requirements.

To determine whether DOT's certification review process was ensuring that MPOS comply with planning requirements, we obtained and reviewed DOT's guidance for field staff conducting the reviews and discussed with FHWA and FTA officials the rationale behind DOT's approach to the reviews. We also obtained copies of the 55 certification reports published through January 5, 1996, and reviewed and analyzed their contents. Finally, we spoke to selected MPOS and states about their views on the advantages and drawbacks of the certification process.

We performed our work from August 1995 through July 1996 in accordance with generally accepted government auditing standards. After providing a draft of this report to DOT for review and comment, we met with DOT officials, including the Chief, Metropolitan Planning Division, Federal Highway Administration, and the Chief, Statewide Planning Division, Federal Transit Administration. Where necessary, we modified the report to address their comments and suggestions.

MPOs See Planning Provisions as Beneficial and Support Continuation

Three of ISTEA's key planning requirements—for extensive public involvement in planning and programming, for the financial constraint of TIPS, and for the MPOs' authority to select projects—posed significant challenges. Despite these challenges, the MPOs we interviewed believe that their efforts to meet these requirements have been beneficial. Furthermore, both the MPOs we interviewed and the national organization representing MPOs support continuing these three provisions. The state transportation planning officials we interviewed were less unanimously supportive of these provisions, and the American Association of State Highway and Transportation Officials (AASHTO) advocates eliminating the requirement to financially constrain the long-term transportation plans.

Efforts to Involve Citizens Improve the Acceptability of Plans and Programs

ISTEA's requirements for extensive involvement by members of the general public in the transportation planning process required considerable changes at many of the nation's MPOs. The public participation requirement has challenged the MPOs to expand the resources devoted to involving citizens and apply more effective techniques for soliciting public input. Despite the initial challenges, all 13 MPOs we interviewed believed that ISTEA's requirements were desirable and beneficial to the planning process. According to the MPOs we spoke to, effective public outreach serves to inform the public of key regional transportation issues, helps ensure that programs contain projects truly needed by the public, and identifies "problem" projects early in the planning process. According to the MPOs and states we interviewed, changes to this requirement, if any, should ensure that the MPOs have sufficient flexibility to develop those programs best suited to their local areas.

ISTEA's Requirements to Involve Citizens in the Planning Process Made New Demands on Many MPOs

According to DOT's guidance, ISTEA intended that the MPOs' efforts to involve citizens would lead to transportation plans and programs that are more reflective of a community's mobility and accessibility needs and more cognizant of the broader issues, such as the effects of transportation investments on the environment, urban neighborhoods, and the general quality of life. The efforts to involve citizens were to include an open exchange of information and ideas between transportation decision makers and the public, including all individuals and groups potentially affected by transportation decisions. Such efforts were to occur at various stages of the transportation planning process, including the development of the long-term plan, the TIP, and individual projects.

At the outset of ISTEA, the MPOs' ability to meet the act's public involvement requirements was in doubt. A 1992 study commissioned by DOT noted that public participation in transportation planning had been relatively narrow and of low visibility, except for critical episodes when contentious issues arose. The urban areas that did have extensive public participation efforts before ISTEA were those that had active civic cultures.⁸ The 1995 ACIR report found that participation by the public is one of the areas emphasized by ISTEA in which the MPOs need the most assistance.

Effective Efforts to Involve Citizens Require Greater Resources, Enhanced Expertise, and a Balancing of Interests

DOT's regulations also note that an effective effort to involve citizens requires the MPOs to provide the public with timely and relevant information on transportation planning, full public access and input to key decisions, and opportunities for the public's early and continuing involvement. These requirements have been challenging to the MPOs for a number of reasons. Specifically, we found that ISTEA's requirement for involving the public challenges the MPOs to (1) significantly expand the resources devoted to that involvement, (2) develop new methods for soliciting public input, and (3) effectively use the results of their efforts to involve the public.

First, the efforts to involve citizens required greater resources than the MPOs may have been devoting. A 1994 planners manual⁹ found that effective involvement by the public would require not only greater commitment from MPO managers and public officials, but also significant postage and publication budgets and more staff time than most MPOs would likely expect. Our interviews with the MPOs and the states clearly bore this out. Eleven of the 13 MPOs we interviewed told us they had expanded their efforts to involve citizens since ISTEA, and 7 of them said that the need for additional resources was a challenge. Typically, the MPOs told us that while they had made some limited efforts to involve the public before ISTEA, these were often cursory. For example, the St. Louis MPO's effort grew from a standing citizens committee into a multifaceted program to involve more people. This MPO's efforts to inform and educate the public now include transportation issue papers distributed to target audiences, public speaking engagements before community groups via a speakers bureau, press releases on topical transportation-related issues, and articles in MPO periodicals. The efforts to obtain input from the public include public meetings, smaller focus groups, surveys, and project

⁸Intermodal Surface Transportation Efficiency Act of 1991: Promise to Performance, Institute of Public Administration, Dec. 1992, pp. 65-66.

⁹ISTEA Planners Workbook, Surface Transportation Policy Project, Oct. 1994.

solicitations. Similarly, an official of the Philadelphia MPO told us that the MPO has tripled its spending on involvement by the public—from \$90,000 to about \$300,000 annually—and now has two full-time staffers exclusively devoted to the effort.

Second, the development and implementation of programs to involve the public may call for knowledge and skills that may not have been readily available to MPOs at the outset of ISTEA. The 1995 ACIR report also found that the MPOs needed research on the techniques that will encourage citizens' participation, especially those techniques that have been successful in highly populated areas, and the services of experts trained in such techniques. The report found that the MPOs needed to be more sophisticated in using the media to build support from the public. These issues also arose in our interviews with the MPOs and the states. In open-ended discussions, 4 of the 13 MPOs noted the difficulty presented by selecting and implementing the appropriate techniques for involving the public. For example, an official of the St. Louis MPO told us that identifying the best method is the biggest problem the MPO faces in its attempts to involve the public. The official added that the problem is an ongoing one, as the public response to individual techniques seems to diminish over time. The Springfield, Massachusetts, MPO noted that in developing transportation newsletters, simply translating the planners' technical jargon into readable language for the general public is a large task. The MPO has hired a specialist to assist with this effort. Such technical assistance may be key for many MPOs—the Milwaukee MPO, which did not have much difficulty with ISTEA's requirements for involving citizens, credited technical assistance from the University of Wisconsin's extension service as a significant factor in the program's success.

Finally, the MPOs must determine how input from the process of involving the public will influence plans and programs. Nearly all of the MPOs we interviewed found it difficult to get the general public interested and involved in transportation planning issues. These MPOs noted that, typically, "John Q. Public" will become interested in transportation planning only if a specific project will affect his well-being. He may get very involved, for example, if he believes that a road-widening project will increase the traffic near his home and hence harm the value of his property. As a result, the public's input generally may not reflect the views of a cross-section of the general public. Several MPOs said that getting input from lower-income and minority communities is particularly challenging. On the other hand, certain interest groups, often with a narrowly defined agenda, may be very active in commenting on the transportation planning

process. As a result, the interest of activists with specific agendas may dominate the process of involving the public. One MPO official noted that citizens' involvement has given professional groups a vehicle for expressing their views and dominating the public discussion. In putting together plans and programs, the MPOs must balance the input of activists with the transportation needs of the broader public.

MPOs We Interviewed Believe ISTEA's Provisions for Involving the Public Are Beneficial and Support Continuation

Despite the difficulties and imperfections inherent in the efforts to involve the public, all of the MPOs we interviewed believe that effective involvement by the public is critical to good planning. All 13 MPOs noted that their efforts to meet ISTEA's requirements for involving the public have resulted in plans and programs that are more reflective of the public's transportation needs and hence enjoy broader and stronger public support. Also, citizens' latent opposition to projects is uncovered much earlier in the planning process. For example, the Durham, North Carolina, MPO told us of a project that would widen a four-lane road to eight lanes. All of the technical analyses supported the need for this project, but the MPO ran into significant public opposition as the construction phase neared. The project was delayed for over a year, which, according to the MPO official, might well have been avoided if the public's input had been sought earlier in the planning process.

For the reasons outlined above, the 13 MPO officials we spoke to unanimously supported the continuation of the requirement for involving the public in transportation planning. However, MPO and state planning officials emphasized the importance of flexibility in selecting the appropriate techniques for inviting citizens' input and the concomitant importance of avoiding overly prescriptive federal regulations. For example, a Florida state department of transportation official stated that techniques that work well for communities in Florida's panhandle may be ineffective in the Hispanic and Caribbean communities of south Florida. An official at the St. Louis MPO stated that any one technique for involving the public has a relatively short shelf life, with diminishing returns over time. Hence, it is important to vary techniques—such as surveys, public meeting, focus groups, and so on—over time.

Financial Constraint Ensures Realistic Program of Projects

Financially constraining TIPS—the 3-year plan—was a new requirement for many MPOs. A 1994 planner's guide noted that prior to ISTEA, many TIPS were laden with more projects than could be afforded and that bringing these TIPS into balance was politically painful. Also, successfully

constraining a TIP requires reliable projections of revenue—projections that were not always available. Despite these difficulties, all but two of the MPOs we spoke to had developed financially constrained TIPs, and all MPOs believed that the practice was critical to meaningful short-term planning. As the requirement has forced a realization of limited resources, it has encouraged planners to explore other options for local and regional financing. The MPOs we interviewed all supported continuing the TIP constraint in ISTEA.

Development of Constrained Programs Seen as Challenging

ISTEA requires MPOs to ensure that their TIPs include a ranked list of projects and a financial plan that demonstrates how the program can be implemented with reasonably available resources. For example, a TIP featuring \$10 million in highway and transit improvements would have to show that these projects could be paid for with federal, state, local, or other funds that were demonstrably available. This requirement was a significant change to federal planning requirements. According to the National Association of Regional Councils (NARC), before ISTEA, there were pressures to include as many projects as possible in the TIP, regardless of the cost. Consequently, proposed transportation spending was sometimes more an outcome of political influence than of a rational planning process. NARC noted that by ensuring that planners develop and limit investment programs on the basis of realistic budgets, transportation spending would be a rational outcome of the planning process.

The MPOs and states we interviewed stated that the requirement to financially constrain TIPs is one of the most challenging of ISTEA's planning requirements. Because many MPOs had not financially constrained TIPs before ISTEA, both their technical ability to develop financial plans and their institutional wherewithal to exclude projects not falling within the budget were in doubt at the outset of ISTEA. A nationwide survey of MPOs conducted by the National Association of Regional Councils found that financially constraining the TIP was the most difficult of eight selected ISTEA planning requirements.

Financial Constraint Requires Developing Regional Consensus and Effective Working Relationship With the State

Our interviews with the MPOs and the states, as well as other studies of MPOs under ISTEA, reveal that the financial constraint requirement presented the MPOs with two main challenges. First, the MPOs had to develop a regional consensus as to which programs would be on the TIP. Second, the MPOs had to obtain reliable estimates of the funds available from the state departments of transportation.

Because a financially constrained TIP is a defined and realistic program of transportation spending, it must be based on a regional consensus about which projects are best suited to meet a region's transportation needs. Highways, mass transit, and other projects can be proposed by many entities, including the state, cities, counties, transit agencies, and community groups. The financial constraint requirement forces policy-makers to consider trade-offs and make choices among these alternative transportation investments. In open-ended discussions, 6 of the 13 MPOs that we interviewed noted the difficulties involved in reaching such a consensus. For example, the Atlanta MPO noted that its 1992 TIP contained about four times as many projects as could be paid for with reasonably available resources. To bring the TIP into balance, it had deleted about \$400 million worth of planned projects by 1993. This action did not please the sponsors of deleted projects, although many projects had scant chance of implementation. Similarly, the MPO for Dallas/Ft. Worth noted that the MPO and the state department of transportation had a significant dispute because a freeway improvement advocated by the state was not included in the financially constrained TIP.

A reliable estimate of available revenues is indispensable in financially constraining the TIP. Because much of the funding for urban transportation—both state and federal—comes from the state departments of transportation, the MPOs depend on their states to provide guidance on the financial resources that can reasonably be expected to be available during the TIP period.¹⁰ Most MPOs either did not raise this issue or told us that the state departments of transportation have been cooperative and have provided financial estimates with reasonable timeliness. However 3 of the 13 said that the states' lack of willingness to provide reliable estimates of the available revenues has been a hurdle in developing financially constrained TIPs. At two MPOs, the inability to obtain reliable financial information was the center of disputes between the MPO and the state department of transportation about the ability of the MPO to select projects. For example, officials of one MPO told us that the state department of transportation did not provide estimates of the available funds, except in the form of draft state TIPs. In essence, the MPO said that the state had refused to provide any estimates of the future revenues that the MPO could use to develop a local TIP.

Another MPO told us that it had submitted a TIP that was financially constrained on the basis of the revenue estimates provided by the state.

¹⁰Moving Urban America, Transportation Research Board Special Report 237, National Academy Press, 1993.

The TIP was included in the state's transportation improvement program, which was subsequently rejected by FHWA/FTA because the state's revenue assumptions included a drawdown of its unobligated balances, which is not possible without congressional action. As a result, the MPO had to develop a revised TIP with about one-third the resources of the original TIP. The state's action and the subsequent rejection of the TIP created considerable resentment among the local officials and project sponsors in the region.

MPOs We Interviewed Support Continuing the Financial Constraint Requirement Because It Has Produced Better Investment Programs

Twelve of the 13 MPOs we interviewed told us they had developed financially constrained TIPS under ISTEA. Furthermore, all of the MPOs we spoke to unanimously supported the continuation of the requirement to financially constrain the TIP, as did 7 of the 11 state transportation offices we interviewed. All of the MPOs we spoke to noted that the financial constraint requirement forces the development of TIPS that include the projects that will be implemented. Officials of the New Orleans MPO, for example, told us that before ISTEA, the system of selecting and implementing transportation projects had broken down. There was little sense of real priority in the TIP. Because the TIP is now financially constrained, its credibility and "implementability" are significantly enhanced, and the priorities spelled out in the TIP now drive investments. Similarly, an Atlanta MPO official told us that the commitment to the projects on the TIP is much greater because the TIP is now a firm program of transportation investment priorities.

In addition to establishing a meaningful program of projects, the financial constraint requirement has led to tangential benefits. Many MPOs said that the financial constraint requirement has forced regional elected officials to realize the gap between transportation needs and reasonably available revenues. As a result, regional policy-makers are examining other revenue-raising measures, including innovative financing mechanisms. For example, the staff of the Pensacola, Florida, MPO told us that the regional policy-makers were considering establishing a toll authority for that fast-growing region. Also, several MPOs noted that the financial constraint requirement is indispensable in giving the MPOs real authority to select projects. By financially constraining TIPS, the MPO produces a ranked list of projects that will drive transportation investments.

Financial Constraint of Long-Term Plan Presents Additional Difficulties

The comments we received from MPOs about the financial constraint requirement for the long-term plan to some extent paralleled those we received about the TIP requirement. However, some MPOs and states noted

that financially constraining long-range planning is particularly difficult because obtaining reliable estimates of the available resources for a 20-year period is impossible. As a result, some states and MPOs said that they have had to apply the constraint on the basis of current resources, which limits the vision of the long-term plan. As several MPO and state representatives explained, new revenue sources that the MPOs could use over a 20-year period are not easily identified at the time the plan is developed. As a result, the long-term plan may be much more conservative than it needs to be. Several MPOs have found a way around this dilemma. Three MPOs that we interviewed said that they developed two long-term plans—a constrained plan for the federal requirement and an unconstrained, or “visionary,” plan to outline a more extensive transportation agenda for the region.

MPOs’ Enhanced Authority to Identify Projects Is Derived From Various Provisions of ISTEA

ISTEA required that the MPOs—and by extension, the regional interests—in the larger urban areas have a greater influence on transportation investment decisions than other transportation planners. Key wording in ISTEA gives the MPOs in the larger urban areas substantial influence on identifying projects to be included in transportation programs as well as on the projects selected from the programs. These MPOs are responsible for identifying all projects for implementation, except projects under the National Highway System and the Bridge and Interstate Maintenance programs. While there was uncertainty about the MPOs’ ability to take on this decision-making authority at the outset of ISTEA, the MPOs and states we interviewed believe that ISTEA has enhanced the MPOs’ authority to select projects. While this enhanced authority was attributed to various provisions of ISTEA, a cooperative and constructive working relationship with the state was essential.

ISTEA Requires New Decision-Making Role for Larger MPOs

ISTEA requires that the MPOs in the larger urban areas—those with populations of 200,000 or more—take on a significantly larger role in identifying transportation projects to meet the regions’ mobility needs. Before ISTEA, the MPOs were generally seen as entities that were outside of the decision-making process; they developed lists of projects but deferred real decision-making authority to the state transportation agencies. According to the 1995 NARC study, ISTEA stressed that the MPOs be transformed from weak advisory bodies into strong decision-making partners working more closely and on an equal footing with the state transportation agencies and other key stakeholders. The MPOs were to play a pivotal role in planning as leaders, managers, and builders of consensus

among other agencies that may have different perspectives and priorities. As a result, transportation decisions—that is, project identification—would be an outgrowth of a regionally based process and hence better meet the regions’ mobility needs.

At the outset of the ISTEA era, the capacity of the MPOs to assume this leadership/decision-making role was in question. The MPOs were not traditionally strong decision-making bodies, and federal policy had de-emphasized urban transportation planning during the 1980s. As a result, the planning capacity of many MPOs deteriorated during this time. As the Institute of Public Administration noted in 1992, the MPOs’ budgets, functions, staffs, and technical capacities dwindled during the 1980s. Perhaps as a result, DOT analysts conducting comprehensive planning reviews between 1991 and 1993 found that important metropolitan planning and programming decisions were determined primarily by the states or by transit operators. The MPOs were generally not assuming a decision-making role.¹¹ At the start of the ISTEA era, therefore, the MPOs needed to strengthen their ability to forge consensus on both project financing priorities and the development of TIPS.¹²

MPOs’ Working Relationships With States and Localities Are Key to Project Identification Authority

In our interviews, we found that political and institutional factors—that is, an MPO’s working relationship with the state department(s) of transportation, regional transit agencies, and local governments—were the key difficulty in the MPOs’ assuming the authority for selecting projects. Six of the 13 MPOs we spoke to noted that forging a consensus among the disparate interests in the metropolitan area was a challenge. For example, the Atlanta MPO said that it was very difficult to get all the relevant parties—the state, the local government, the transit agencies, and so on—working together to develop a unified TIP. While the pre-ISTEA TIP was not really a document that drove investment decisions, the participants perceived that under ISTEA, the development of the TIP would have a real and lasting impact.

It was clear from our discussions with MPOs that a cooperative and constructive relationship with the state departments of transportation is essential in expanding the MPOs’ authority. Nine of the 12 large MPOs we

¹¹Lyons, William M. *The FTA-FHWA MPO Reviews—Planning Practice Under ISTEA and the CAA*. Volpe National Transportation Systems Center, U.S. Department of Transportation, Jan. 1994, p. 6.

¹²Institute of Public Administration, p. 22.

interviewed¹³ said that the states had facilitated the MPOs' project identification, although in some cases several years passed before a constructive working relationship developed. For example, a representative of the St. Louis MPO said that the Missouri department of transportation was not at first cooperative with the MPO's effort to assume more decision-making authority. More recently, however, the MPO and the state have signed a memorandum of agreement spelling out the agencies' respective roles and recognizing the more prominent role the MPO will play in selecting projects.

Two MPOs said that the states continue to resist the MPOs' and regional interests' efforts to assume greater authority over project identification. In both cases, the difficulties were rooted in the fundamental disagreements between the MPO and local officials on the one hand and the MPO and the state government on the other hand about the appropriate level of the MPO's and the local government's influence on the development of the TIP. One MPO said that the state's TIP process did not allow the MPO to participate fully in the process of selecting projects. For example, the state had limited certain federal funds for pedestrian projects in a manner that the MPO believed was inconsistent with ISTEA. An official of the state department of transportation told us that it gets extensive input and advice from the MPO and other regional interests in determining the projects to be included in the state's plans. However, the state agency is opposed to suballocating federal and state transportation funds to the MPOs. At the other MPO, we found that by dominating the voting power on the MPO's decision-making body, the state transportation department was in effect the MPO. As a result, the voice of municipal governments and other regional interests were not effectively represented in developing TIPS.

MPOs We Interviewed Believe Their Authority Has Increased and Support ISTEA's Delegation of the Authority to Select Projects

Most MPOs we interviewed—8 of 12—said that ISTEA had a great or very great impact on their authority to select projects. Their comments revealed that no single provision of ISTEA can be credited with this change. As table 2.1 reveals, several of ISTEA's provisions have contributed to this change. For example, ISTEA states that projects in urban areas with populations of 200,000 or greater shall be selected by the MPO in consultation with the state, except projects under the National Highway System and the Bridge and Interstate Maintenance programs. The MPOs typically stated that this provision had some impact but was mainly symbolic. For example, one official told us that the selection of projects

¹³One of the 13 MPOs we interviewed—the Reading, Pennsylvania, MPO—does not plan for a transportation management area and hence was not granted project selection authority by ISTEA. Because of this, we discussed the project selection issue with only with 12 MPOs.

from a financially constrained TIP was little more than an administrative sign-off. Of much greater significance was the development of a financially constrained TIP. As an official of the Albany, New York, MPO explained, all of the projects in a financially constrained TIP are intended for implementation; consequently, the development of the TIP is the real decision point for project identification.

Table 2.1: ISTEA’s Provisions Influencing MPOs’ Authority to Identify Projects

ISTEA provision	Impact on MPO’s planning authority	Caveats
MPO’s selection of projects from TIP	Signals ISTEA’s intent that MPOs and regional interests have greater influence on transportation investments	Mainly of symbolic value; MPOs and others noted that because all implemented projects must come from TIP, TIP development is project identification
MPO’s development of ranked, financially constrained TIP	Ensures that TIP will be limited to only those projects for which funds are available and commitment is serious	Requires state cooperation and acceptance of MPO-developed TIP
STP-urban ^a and CMAQ ^b programs	Urban-oriented programs for which MPOs have project selection authority	Requires state concurrence that MPO will have authority to target these funds
Funding flexibility	Gives MPO decision-makers a wide latitude in choosing highway, transit, or other projects	Expands MPO’s authority only if project identification authority is established

^aSurface Transportation Program.

^bCongestion Mitigation Air Quality Program.

Source: GAO’s interviews with MPOs.

Four of the 12 large MPOs that we interviewed said that ISTEA had only little or some influence on their authority to select projects. Two of these noted that their influence increased only minimally after ISTEA because they had an acceptable level of influence before ISTEA. For example, the Milwaukee MPO told us that it has long had a constructive working relationship with the Wisconsin Department of Transportation. Although the MPO noted that ISTEA had some impact on its authority, it said that it did not just wrest authority from the state and present its decisions as a *fait accompli*; a cooperative working relationship with the state was critical. As discussed above, two other MPOs had different experiences. Despite the range of views on ISTEA’s impact, the MPOs we interviewed unanimously supported

both the ISTEA language that delegates the authority to select projects to larger MPOs and the other provisions that have enhanced the MPOs' authority.

States and MPOs Have Different Perspectives on Planning Provisions

MPOs and states to some extent have differing views on continuing ISTEA's planning provisions. While the MPOs we interviewed unanimously endorsed the continuation of the public participation, financial constraint, and project selection requirements, some states opposed the continuation of these requirements. Furthermore, AASHTO and the Association of Metropolitan Planning Organizations (AMPO) have taken differing views.

As table 2.2 indicates, AASHTO and AMPO have differing positions on continuing certain planning provisions of ISTEA. AMPO cited ISTEA's requirements for involving the public as a model piece of legislation for ensuring broad-based involvement by citizens and local elected officials. While noting the benefits of involving the public, AASHTO stated that the regulations on such involvement are too detailed and prescriptive. It emphasized state and local flexibility in developing the process of involving the public. It also noted that the detailed requirements in federal regulations and guidance can lead to substantial delays on projects and to court challenges. Nearly all the state officials we interviewed supported the continuation of the requirements to involve the public that are contained in the legislation. However, as noted earlier, some states also expressed concern about the impacts of overly prescriptive regulations.

Table 2.2: Comparison of AASHTO's and AMPO's Positions on Selected Planning Provisions of ISTEA

ISTEA's planning provision	AMPO's position	AASHTO's position
Involvement of the public	Supports continuation	More emphasis on flexibility in developing public involvement approaches
Financial constraint of TIP	Supports continuation	Allow for overprogramming
Financial constraint of long-term plan	Supports continuation	Eliminate legislative requirement
MPOs' authority to select projects	Extend decision-making role to all MPOs, except those wishing to defer to the states	Increase population threshold from 200,000 to 1 million

Sources: GAO's presentation of data from AASHTO's Reauthorization Policy Statements, Interim Report, Dec. 1995, and ISTEA II: Building a Coalition, Association of Metropolitan Planning Organizations, Jan. 1996.

According to AMPO's policy statement, ISTEA's requirements for financially constrained plans and programs are consistent with sound business practices and strongly supports the continuation of the requirements. AASHTO's states that in financially constraining TIPS, MPOs should have the flexibility to program at a level that enables them to deal with the uncertainty of project schedules and with fluctuating levels of federal funding. State officials expressed similar concerns. Four of the 11 state planning officials we contacted opposed the retention of this requirement. While they support the principle of financially constraining the TIP, they believe that the regulatory interpretation is too strict. Three of the four stated that the planning regulations should allow some over-programming. As one MPO explained, delays are inevitable on some projects because of environmental permitting or other reasons. Because the process of amending a TIP—for example, adding a new project—is very time consuming and administratively difficult,¹⁴ this delay can be substantial. Several states we interviewed noted that a modest over-programming of the TIP—for example, by 10 percent—would circumvent this problem by including a short list of “ready to go” projects that could be funded in the event that other, higher-priority TIP projects were delayed.

AMPO supported the financial constraint requirement for the long-term (20-year) plan. AASHTO, however, stated that the implementing regulations do not take into account the difficulty of predicting the amounts and sources of funding over a 20-year period. AASHTO noted that the requirement was unrealistic and could prevent MPOs from taking advantage of fiscal partnering arrangements. As a result, AASHTO calls for eliminating the ISTEA requirement to financially constrain long-term plans. In addition, 5 of the 11 states we interviewed opposed the continuation of this requirement. Typically, the states said that it is not possible to develop a reliable estimate of revenues over a 20-year period and that financially constraining the long-term plan inhibits a vision for the regional transportation system.

AMPO and AASHTO's are perhaps in clearest disagreement over the issue of the MPOs' authority to select projects. AMPO favors extending decision-making authority to all of the MPOs that desire to assume it. Potentially, this action would increase from 129 to 339 the number of MPOs with the authority to select projects. AASHTO's proposal to raise the threshold for the transportation management area to 1 million people would take the authority to select projects away from about 94 MPOs that

¹⁴Among other things, an amended TIP must undergo a 30-day comment period and be tested for conformity with the state's air quality plan.

currently have it. AASHTO contends that raising the threshold would restrict the authority to those urbanized areas likely to have the resources to meet the burdens this authority implies. AASHTO's position on this issue was not well reflected in our interviews—only 2 of the 11 state officials we contacted opposed the retention of ISTEA's current wording. Not surprisingly, these two states are the ones where we encountered a significant disagreement between the state and the MPO on the question of selection authority.

Conclusions

The desirability of ensuring adequate involvement by the public and financial constraints on transportation programs was not disputed by the MPOs and states we interviewed, nor by AASHTO and AMPO. Furthermore, the difficulties of financially constraining long-term plans is clearly a challenge that some states and MPOs have met. In view of the benefits of these provisions, the problems faced in meeting these requirements may not require legislative changes. The key dispute we encountered among the three issues we explored—the delegation of the authority to select projects to a greater or lesser number of metropolitan planning organizations—is essentially an issue to be resolved through congressional deliberations.

FHWA's and FTA's Certifications of MPOs

To ensure that urban transportation plans and programs are an outgrowth of the planning process that ISTEA prescribes, ISTEA required the Secretary of Transportation to conduct planning certification reviews at the MPOs in transportation management areas. The MPO and state officials we spoke to generally supported the certification process and described it as helpful and constructive. However, in reviewing 55 certification reports, we found that the reports are of limited usefulness in assessing trends or problem areas in the ISTEA planning process. First, the certification reports vary widely in format and content because the Department did not develop standard formats for assessing or reporting the MPOs' compliance. Second, three MPOs were certified despite significant deficiencies in the urban transportation planning process. Accordingly, the results of the certification reviews cannot be used to develop a reliable understanding of the MPOs' progress in meeting ISTEA's planning requirements. This is an especially critical issue because the certification reviews are by far the most in-depth assessments of the MPOs' performance in transportation planning.

Certification Reviews Supplement Self-Certification

ISTEA requires that the Secretary of Transportation certify that metropolitan transportation planning conforms with ISTEA's planning provisions. Specifically, at least once every 3 years, FHWA and FTA must jointly review and evaluate the planning processes for each of the nation's 129 MPOs located in TMAs. If, on the basis of their joint review, FHWA and FTA determine that the planning process meets or substantially meets the planning requirements, they may either jointly certify the planning process or conditionally certify the process subject to specified corrective actions. If FHWA and FTA find that the planning process in a TMA does not meet the requirements, certification is denied, and FHWA and FTA may withhold all or part of the apportioned federal highway and transit funds, or withhold their approval of certain projects.

This requirement was a significant change in federal oversight policy. Since 1983, the urban transportation planning regulations have required that the state and the MPO "self-certify" that the urban transportation planning process is in conformance with the continuing, cooperative, and comprehensive (3-C) process called for in the law and the regulations. Self-certification was intended to grant increased responsibility for transportation planning to the states and MPOs. Under ISTEA, the MPOs and the states will continue to self-certify annually.

The FHWA and FTA certification reviews are comprehensive. First, they cover all 129 TMAS with the results of the reviews reflective of large urban areas. Second, the reviews cover a range of planning topics focusing on six areas:

- incorporation of the 15 planning factors in the planning process,
- development of early and continuing involvement by the public,
- completion of detailed alternative studies when considering major transportation investments in a corridor,
- development of a congestion management system incorporating measures to reduce travel demand,
- assurance that plans and programs conform with air quality plans and the Clean Air Act Amendments of 1990, and
- development of financial constraints on plans and programs.

Certification reviews consist of a desk audit, during which FHWA and FTA staff review pertinent files and supporting documentation pertaining to the planning process; a site visit that includes extensive meetings with members of the MPO's governing board and technical staff, state transportation officials, and other local officials; a public meeting to allow members of the general public to share their impressions of the planning process; and the preparation of a report on the certification review. The on-site reviews can last 5 days and include eight or more representatives of FHWA and FTA staff from headquarters, the regions, and field offices.

In commenting on a draft of this report, DOT officials stated that although the certification reviews are the formal mechanism for ensuring compliance, DOT uses a number of other means as well. For example, DOT reviews and approves planning work programs for all metropolitan areas, assesses the TIP and TIP amendments for conformity with that state's air quality plan in areas not meeting federal air quality standards, and reviews and approves state TIPS. DOT is also conducting a series of enhanced planning reviews (EPR) in a much more limited number of urban areas. According to an official of DOT's Volpe Transportation Center, the EPRs are intended to be less judgmental and regulatory oriented than the certification reviews.

MPOs and States Have Mixed Views on Certification Process

The MPOs and the states have differing views on the certification review process. The MPOs and states we interviewed generally see the process as constructive and helpful and support its continuation. However, some also noted that the reviews could be done more efficiently and the results

reported in a more timely manner. AASHTO has called for the elimination of the certification reviews because they are time consuming.

Five of the 12 large MPOs we interviewed had been certified as of May 1996. Each of these MPOs told us that the certification review was constructive and helpful and stated that the requirement for certification by DOT should be continued. For example, the representatives of the Milwaukee MPO said that the process was constructive and that it would be unwise for the federal government to dole out money with no accountability for compliance with the federal planning guidelines. Also, the certification review provides local elected officials and MPO staff the opportunity to meet with federal officials and get a better feel for what is expected, as well as useful critiques of how the MPO staff approach their job. The Springfield, Massachusetts, MPO staff told us that FHWA and FTA reviewers helped begin the movement toward greater regional control of the MPO. For example, the certification review began a dialogue on the need to give regional officials greater representation on the MPO's board.

On the other hand, one MPO noted that the on-site reviews could be completed in less time. For example, the planning staff of the Pensacola MPO said that the on-site visit took almost a full week and could have been done in a day and a half. Attributing the length of the visit to the fact that it was a first-time effort, they said that the visits would likely be briefer in subsequent reviews.

Officials from 8 of 11 states we contacted had experiences with the process of MPO certification reviews. Four of them supported the continuation of the process, one opposed continuation, and two were neutral or had no opinion. While most of these state officials supported the process, several noted that DOT should emphasize a constructive process rather than a fault-finding audit approach. A Texas official noted that the reviews, in contrast to the practice of self-certification, give the planners an objective assessment of their performance. AASHTO advocates eliminating the certification reviews. It asserted that the reviews are too time consuming and cumbersome for many states and do little to improve the planning process.

DOT Has Certified Nearly All Planning Processes Reviewed

As of January 12, 1996, DOT had issued certification reports on 55 MPOs. Twenty-three MPOs were certified without qualification, and 31 were certified subject to certain corrective actions being taken. To date, one MPO has not been certified—the MPO for the Boston metropolitan area; its certification was held in abeyance.¹⁵ The overriding issue in this case was the insufficient role that local elected officials had played in the planning process. For example, in meetings between FHWA and FTA staff and 12 local elected officials, the local officials unanimously complained that they had virtually no opportunity to be part of the decision-making process. While Boston was the sole instance in which DOT postponed certification of the planning process, our review of the reports on certification reviews indicate that conditional certifications were issued for some MPOs in serious noncompliance with ISTEA's planning requirements. For example, the reports on other Massachusetts MPOs noted insufficient local representation and state dominance of the planning process. The Worcester, Massachusetts, MPO was certified even though it had no local officials on its policy body, the MPO's technical board had not met publicly since 1976, no public involvement process had been formally adopted, and TIPS and transportation plans were not appropriately financially constrained. In addition, although the Springfield, Massachusetts, MPO's policy body had not met in 14 years and included no local elected officials, the MPO was certified.

Numerous instances of noncompliance were also identified in the report for the Louisville, Kentucky, MPO. The over-arching issue was a lack of communication and cooperation among the key regional planning entities. The states of Kentucky and Indiana, as well as the city of Louisville, were carrying out many planning activities outside of the MPO process, prompting the reviewers to state that they found parochialism far more prevalent than regionalism. FHWA's review noted that the entities in the urbanized area were more concerned with getting their "piece of the pie" than with the good of the region. As a result of these concerns, the reviewers recommended that the MPO be conditionally certified for 1 year.

DOT certified these MPOs because of its flexible approach in the first round of reviews. According to an FHWA headquarters official, the current round of reviews began 3 years after ISTEA's passage but only a year after the final planning regulations were issued. As a result, DOT felt that a phase-in of requirements and a lenient approach in the first round of reviews were appropriate. This was particularly true during the pilot reviews, which

¹⁵FHWA and FTA allowed the MPO's self-certification to stand, thereby allowing the urban area to receive federal highway and transit funds.

included the reviews of Worcester and Louisville. Decertification, the official said, would have occurred only in the case of egregious noncompliance, such as the failure to submit a TIP.

Format of Reports Not Conducive to Nationwide Assessment of MPOs' Progress

Because the certifications must be completed every 3 years, FHWA and FTA regional and divisional offices are devoting considerable resources to the certification reviews. For example, officials in FHWA's Region 4 estimated that FHWA and FTA had spent a total of 1,105 staff days in conducting and reporting the results of 19 certification reviews within their region, averaging 58 staff days per review. In addition, FHWA and FTA personnel in two other regions we contacted spent 420 staff days and 408 staff days, respectively, completing the certification reviews in their own jurisdictions over the same period. This accounting does not include the travel and per diem costs involved in the reviews. A certification review can last 5 days and include 8 or more representatives from FTA and FHWA headquarters and regional and field offices.

Despite this large resource commitment, in our review of the 55 reports on certification reviews published through January 12, 1996, we found that the reports on certification reviews were not documented in a way that allows comparisons between one MPO and another, or a meaningful assessment of the progress that the MPOs are making in meeting the planning requirements. The reports vary significantly in format, depth, and content. In one FHWA region, for example, all six of the reports on certification reviews that we examined were four pages or less in length, were written in a very summary fashion, and contained limited discussions of how the MPOs complied with the six focal areas under review. By contrast, the certification reports from several other FHWA regions were quite lengthy, as long as 29 pages and averaging over 15 pages. As a result, a national overview of the MPOs' progress in meeting the planning requirements would be quite difficult to develop.

Variations also exist in the use of the key terms of certification reviews, such as "corrective action required" or "corrective action recommended." For example, one region's reports clearly distinguish corrective actions as areas where steps are needed to correct a regulatory deficiency from those which are optional recommendations for improvement. In some certification reports from other regions, however, it was not possible to distinguish corrective actions from recommendations. For example, the cover letter of one report stated that the MPO was certified subject to certain corrective actions. However, the body of the report did not name

the corrective actions that the MPO was to undertake. Instead, it included a discussion of 11 recommendations, although it was not clear if these recommendations were required for certification or whether they were left to the discretion of the MPO.

According to FHWA headquarters officials, the certification reviews were not intended to help assess a trend toward improvements in metropolitan transportation planning efforts. Instead, the purpose was to assess whether an individual MPO had substantially complied with the planning requirements. Furthermore, DOT wanted to avoid a defined format, so as to give certifying officials the flexibility to conduct the reviews in a way best suited to the MPO and its unique circumstances. Also, DOT wanted to encourage innovation and experimentation in conducting the reviews.

Conclusions

Although DOT provided its certification reviewers with the flexibility to assess the MPOS' compliance with ISTEA planning requirements, the result of this flexibility has been that the certification reports provide limited information on how well MPOS have met these important ISTEA provisions. For example, the certification reports do not allow the Department to determine if the difficulties faced in financially constraining TIPS were similar across most MPOS, or whether these reasons had similar root causes. Given the resources going into the effort and the resultant depth of the reviews, collecting consistent data for an overall assessment is important and would not preclude the Department's need for flexibility. Collecting these data is further justified since the certification reviews are by far the most comprehensive reviews of the MPOS' performance that are likely to be conducted.

Recommendation

We recommend that the Secretary of Transportation direct the Administrators of the Federal Highway Administration and the Federal Transit Administration to develop reporting formats for assessing and reporting on the MPOS' compliance with ISTEA's planning requirements in such a way that the Department can identify any nationwide patterns in planning deficiencies, the underlying causes of these planning deficiencies, and the extent to which the MPOS have made progress in meeting the requirements.

Agency Comments

DOT officials disagreed with our conclusion that the information gathered during the certification reviews should be used to develop an overview of

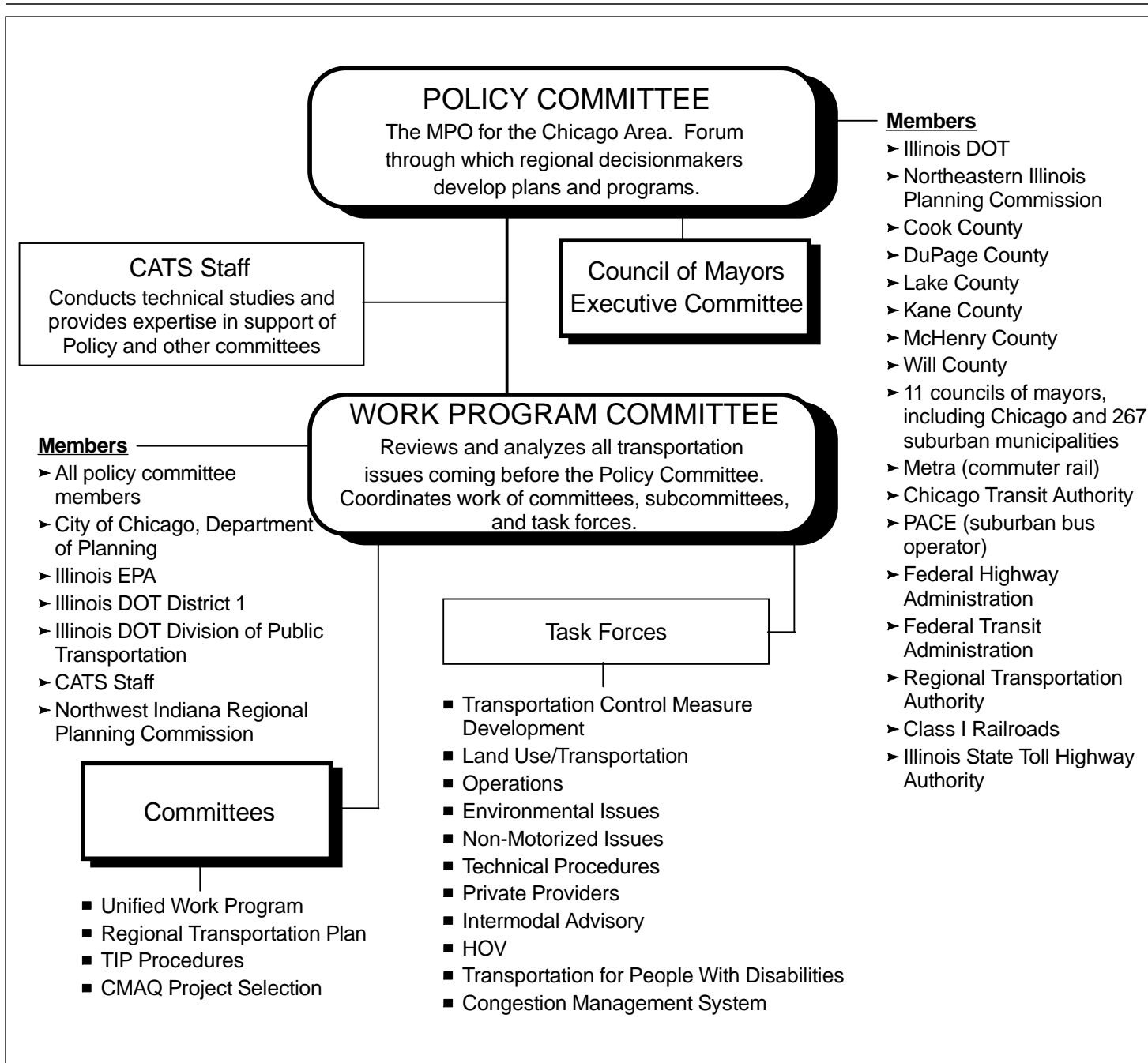
the MPOs' progress in meeting ISTEA's planning requirements. DOT officials stated that the certification reviews were not intended to assess the MPOs' overall progress; rather, they were intended to review the efforts of individual MPOs and provide those MPOs feedback on what they must do to fully meet ISTEA's planning requirements. In addition, officials stated that the certification process is one of several activities that the Department has or plans to take to determine the MPOs' compliance with the planning requirements and thereby assess the MPOs' overall progress in meeting the requirements. These additional activities include the Department's approval of TIPS and their conformity with state air quality plans; the sponsorship of studies, focus groups, and conferences on the MPOs' progress; and the use of enhanced planning reviews. The Department will use this body of information to assess the MPOs' compliance with the planning requirements and thereby provide the Congress with information on whether the MPO planning provisions should be continued in ISTEA's successor legislation. As a result of these concerns, DOT officials disagreed with the recommendation in our draft report that it develop standard criteria and reporting formats for its certification reviews so that the Department could assess and report on the MPOs' compliance with ISTEA's planning requirements. DOT officials stated that the recommendation was too prescriptive, particularly in its call for standard criteria, and suggested that we direct our recommendation to the Congress instead.

We have incorporated information in the report that describes the additional activities that Department officials stated they have undertaken or plan to undertake to assess the MPOs' progress in meeting ISTEA's planning requirements. In addition, we have modified our proposed recommendation by deleting our original call for standard criteria to address the Department's request for more flexibility in responding to our recommendation. However, we disagree with the Department's characterization of the certification reviews as only one element in a broader effort to assess the MPOs' compliance and progress. The scope and effort that the Department has placed in the certification reviews clearly suggest that the information obtained through the reviews is critical in assessing how well the MPOs have met the requirements. The certification reviews cover all 129 MPOs in the nation's largest urban areas, assess the MPOs' progress in six key planning areas, and require significant FHWA and FTA headquarters and regional staff time to complete. In contrast, the enhanced planning reviews as well as DOT-sponsored studies have reviewed only a small number of MPOs. Given this investment, we believe it is appropriate for the Department to develop standard formats for documenting the results of the certification reviews. A standard reporting

format would not limit the Department's flexibility to tailor the certification reviews to the particular needs of the MPO. Rather, it would provide the Department and the Congress with rich sources of information that they could use to evaluate whether or not the MPO planning provisions should be continued.

DOT officials also suggested technical and editorial changes to the report. Where appropriate, we incorporated these changes.

Organization and Membership of the Chicago Area Transportation Study (CATS)



List of MPOs and State Agencies Interviewed

State	Urbanized area	MPO name
Arizona	Phoenix	Maricopa Association of Governments
Florida	Pensacola	West Florida Regional Planning Council
Georgia	Atlanta	Atlanta Regional Commission
Illinois	Chicago	Chicago Area Transportation Study
Louisiana	New Orleans	Regional Planing Commission
Massachusetts	Springfield	Pioneer Valley Planning Commission
Missouri	St. Louis	East-West Gateway Coordinating Council
New Jersey	North Jersey	North Jersey Transportation Coordinating Council
New York	Albany	Capital District Transportation Committee
North Carolina	Durham	Durham/Chapel Hill/Carboro MPO
Oregon	Portland	Metropolitan Service District
Pennsylvania	Philadelphia	Delaware Valley Regional Planning Commission
	Reading	Berks County Planning Commission
Texas	Dallas/Ft. Worth	North Central Texas Council of Governments
Washington	Seattle	Puget Sound Regional Council
	Vancouver	Southwest Washington Regional Transportation Council
Wisconsin	Milwaukee	Southeast Wisconsin Regional Planning Commission
	Madison	Dane County Regional Planning Commission

Note: We interviewed 13 MPOs and 11 states in **bold** print using a standard set of questions. We interviewed other MPOs and states in a more preliminary phase of our work.

ISTEA's 16 Planning Factors

In developing plans and programs, MPOs are to consider the following 16 factors.¹⁶

1. Preservation of existing transportation facilities and, where practical, ways to meet transportation needs by using existing transportation facilities more efficiently.
2. The consistency of transportation planning with applicable federal, state, and local energy conservation programs.
3. The need to relieve congestion and prevent congestion from occurring where it does not yet occur.
4. The likely effect of transportation policy decisions on land use and development and the consistency of transportation plans and programs with the provisions of all applicable short- and long-term land-use development plans.
5. The programming of expenditures on transportation enhancement activities as required in the Surface Transportation Program.
6. The effects of all transportation projects to be undertaken within the metropolitan area, without regard to whether such projects are publicly funded.
7. International border crossings and access to ports, airports, intermodal transportation facilities, major freight distribution routes, national parks, recreation areas, monuments and historic sites, and military installations.
8. The need for connectivity of the roads within the metropolitan area with the roads outside the metropolitan area.
9. The transportation needs identified through the use of the management systems required by section 303 of Title 23 of the U.S. Code.
10. Preservation of rights-of-way for construction of future transportation projects, including identification of unused rights-of-way which may be needed for future transportation corridors and identification of those corridors for which action is most needed to prevent destruction or loss.

¹⁶ISTEA specified the first 15 planning factors. The 16th was added by the National Highway System Designation Act of 1995.

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11. Methods to enhance the efficient movement of freight.
 12. The use of life-cycle costs in the design and engineering of bridges, tunnels, or pavement.
 13. The overall social, economic, energy, and environmental effects of transportation decisions.
 14. Methods to expand and enhance transit services and to increase the use of such services.
 15. Capital investments that would result in increased security in transit systems.
 16. Recreational travel and tourism.

Phone Interview With MPOs on Selected Aspects of Metropolitan Transportation Planning

**PHONE INTERVIEW WITH MPOs ON
SELECTED ASPECTS OF METROPOLITAN TRANSPORTATION PLANNING**

COMPLETE AS MUCH AS POSSIBLE BEFORE BEGINNING INTERVIEW

Date & Time of Interview:

Interviewer(s):

Name of MPO:

Interviewees (names, titles, phone numbers):

INTRODUCTION

I'd like to reiterate why we're doing this interview. The Senate Committee on Environment and Public Works has asked us to review issues MPOs have faced in implementing the metropolitan transportation planning provisions of the ISTEA of 1991. Specifically, the committee is interested in experiences MPOs have had in implementing these provisions, and lessons learned since passage of ISTEA. The Committee will use this information during its 1996 deliberations on the reauthorization of federal surface transportation legislation.

As part of our work, we are interviewing representatives of approximately 15 MPOs and their respective state DOTs. We judgmentally selected MPOs based on their responses to the National Association of Regional Council's 1994 survey of MPOs. Our discussion will focus on three aspects of MPO responsibilities under ISTEA, which we have identified as among the most difficult. Specifically, we will be inquiring about 1) MPO efforts to establish an effective public involvement process, 2) the process of financially constraining the TIP and long-term plan, and 3) project selection--both for the TIP and from the TIP.

**Appendix IV
Phone Interview With MPOs on Selected
Aspects of Metropolitan Transportation
Planning**

In answering most questions, we will use the list of response ranged that I faxed to you. After most questions, I will also ask you to elaborate on the reasons for your selection from the range.

BACKGROUND

1. By way of background, please briefly describe how selection of federally funded transportation projects occurs in your metropolitan area.

PUBLIC INVOLVEMENT

The following questions pertain to public involvement efforts.

2. Please rank the overall difficulty your organization has had in establishing a public participation program under ISTEA. Please select from the following.
 - extreme difficulty (skip to 3A)
 - very great difficulty (skip to 3A)
 - moderate difficulty (skip to 3A)
 - little difficulty (skip to 3C)
 - no difficulty (skip to 3C)
3.
 - A. In your opinion, what were the reasons your MPO had some difficulty with this requirement? (Then proceed to question 3B.)
 - B. Has progress been made since passage of ISTEA? (Then proceed to question 4.)
 - C. Why do you think your MPO encountered little to no difficulty with this requirement?

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4. A. How, if at all, have the requirements for public involvement benefitted the process of developing plans and programs?
- B. How, if at all, have the requirements for public involvement been a drawback to the process of developing plans and programs?
5. Did the MPO establish a public involvement program before ISTEA made it a requirement?
- yes
 no
6. Does your MPO support or oppose retention the ISTEA provisions of the requirements to ensure public involvement in ISTEA's successor legislation? Please choose an answer from the following.
- Strongly support
 Moderately support
 Neither support nor oppose
 Moderately oppose
 Strongly oppose
 Not sure/no opinion
- Please discuss reasons for your response.
7. Based on your MPO's experience with this requirement, what if any lessons would you like to share with Congress or other MPOs?

FINANCIAL CONSTRAINT

That completes the series of questions pertaining to public involvement. The following questions pertain to financial constraint of plans and programs.

8. The MPO database prepared by the National Association of Regional Councils indicates that your MPO ranked "financially constraining your TIP" as an ISTEA requirement presenting
- extreme difficulty (skip to 9A)

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- very great difficulty (skip to 9A)
- moderate difficulty (skip to 9A)
- little difficulty (skip to 9C)
- no difficulty (skip to 9C)

9. A. In your opinion, what were the reasons your MPO had some difficulty with this requirement? (Then proceed to question 9B.)
- B. Have these difficulties been overcome since the time you responded to the NARC questionnaire? (Then skip to question 10.)
- C. Why did your MPO encounter little to no difficulty with this requirement?
10. Has your MPO submitted a financially constrained TIP under ISTEA?
- yes
 - no
11. A. What, if any, benefits or drawbacks have occurred as a result of the requirement to financially constrain the TIP?
- B. What, if any, benefits or drawbacks have occurred as a result of the financial constraint requirement for the long term plan?
12. Does your MPO support or oppose retaining the requirement to financially constrain the TIP in ISTEA's successor legislation? Please choose an answer from the following.
- Strongly support
 - Moderately support
 - Neither support nor oppose
 - Moderately oppose
 - Strongly oppose
 - Not sure/no opinion

Please discuss the reasons for your response.

**Appendix IV
Phone Interview With MPOs on Selected
Aspects of Metropolitan Transportation
Planning**

13. Does your MPO support or oppose retaining the requirement to financially constrain the long term plan in ISTEA's successor legislation? Please choose an answer from the following.

Strongly support
 Moderately support
 Neither support nor oppose
 Moderately oppose
 Strongly oppose
 Not sure/no opinion

Please discuss the reasons for your response.

14. Based on your MPO's experience with this requirement, what if any lessons would you like to share with Congress or other MPOs?

PROJECT SELECTION

That concludes the series of questions focusing on financial constraint. The following series of questions pertain to project selection.

15. The MPO database prepared by the National Association of Regional Councils indicates that your MPO ranked "prioritization and selection of projects for the TIP" as an ISTEA requirement presenting:

extreme difficulty (skip to 16A)
 very great difficulty (skip to 16A)
 moderate difficulty (skip to 16A)
 little difficulty (skip to 16C)
 no difficulty (skip to 16C)

16. A. In your opinion, what were the reasons your MPO had some difficulty with this requirement? (Then proceed to question 16B.)
- B. Have these difficulties been overcome since the time you responded to the NARC questionnaire? (Then skip to question 17.)

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C. Why did your MPO rank this requirement as posing little or no difficulty?

17. In addition to extending MPO authority to develop the TIP in consultation with the state DOT, Congress granted MPOs in transportation management areas authority to select projects from the TIP for implementation. How much, if at all, has this provision changed the MPO's decision-making authority? Please choose an answer from the following.

very significant change
 significant change
 moderate change
 some change
 no change

Please discuss the reasons for your response.

18. In general, to what extent has ISTEA promoted your MPO's ability to influence the selection of federally-funded transportation projects? Please choose an answer from the following.

To a very great extent (skip to 19A)
 To a great extent (skip to 19A)
 To some extent (skip to 19A)
 To a little extent (skip to 19B)
 To no extent (skip to 19B)

19. A. Which aspects of ISTEA have promoted your MPO's ability to influence the selection of federally-funded projects? (Then skip to question 20.)
- B. In your opinion, why has your MPO's influence over project selection not changed under ISTEA?

Appendix IV
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20. How easy or difficult would you characterize your MPO's efforts to develop a consensus among the localities and transit agencies regarding the projects to be implemented? Please choose an answer from the following.

very difficult
 moderately difficult
 neither easy nor difficult
 moderately easy
 very easy

Please discuss the reasons for your response.

21. In general, how has the state DOT facilitated or impeded the MPOs efforts to assume this decision-making authority? Please choose an answer from the following.

significantly facilitated
 somewhat facilitated
 facilitated more than impeded
 somewhat impeded
 significantly impeded

Please discuss the reasons for your response.

22. A. Does your MPO support or oppose retention of the ISTEA provision that MPOs in TMA have authority to select projects from the TIP? Please choose an answer from the following.

strongly support
 moderately support
 neither support nor oppose
 moderately oppose
 strongly oppose
 not sure/no opinion

Please discuss reasons for your response.

- B. Does your MPO support or oppose retention of the other ISTEA provisions that have promoted MPO decision-making authority? Please choose an answer from the following.

strongly support
 moderately support
 neither support nor oppose
 moderately oppose
 strongly oppose
 not sure/no opinion

Please discuss the reasons for your response.

**Appendix IV
Phone Interview With MPOs on Selected
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23. Based on your MPO's experience with this provision, what if any lessons would you like to share with Congress or other MPOs?

OTHER

That completes the series of questions pertaining to project selection. Before closing, I would like to ask you to comment on three general issues.

27. A. Please discuss any other aspects of ISTEA's planning requirements with which your MPO has had a positive experience.
- B. Please discuss any other aspects of ISTEA's planning requirements with which your MPO has had a negative experience.
28. Which, if any, ISTEA provisions do you believe Congress should reconsider in its reauthorization deliberations, and why?

Phone Interview With State DOTs on Selected Aspects of Metropolitan Transportation Planning

PHONE INTERVIEW WITH STATE DOTs ON
SELECTED ASPECTS OF METROPOLITAN TRANSPORTATION PLANNING

COMPLETE AS MUCH AS POSSIBLE BEFORE BEGINNING INTERVIEW

Date & Time of Interview:

Interviewer(s):

State Organization:

Interviewees (names, titles, phone numbers):

INTRODUCTION

I'd like to reiterate why we're doing this interview. The Senate Committee on Environment and Public Works has asked us to review issues MPOs and states have faced in implementing the metropolitan transportation planning provisions of the ISTEA of 1991. Specifically, the committee is interested in experiences MPOs and states have had in implementing these provisions, and lessons learned since passage of ISTEA. The Committee will use this information during its 1996 deliberations on the reauthorization of federal surface transportation legislation.

As part of our work, we are interviewing representatives of approximately 15 MPOs and their respective state DOTs. We judgmentally selected MPOs based on their responses to the National Association of Regional Council's 1994 survey of MPOs. Our discussion will focus on three aspects of ISTEA's planning provisions which we have identified as among the most difficult. Specifically, we will be inquiring about 1) MPO efforts to establish an effective public involvement process, 2) the process of financially constraining the TIP and long-term plan, and 3) project selection--both for the TIP and from the TIP.

Public Involvement

The following questions pertain to public involvement efforts.

**Appendix V
Phone Interview With State DOTs on
Selected Aspects of Metropolitan
Transportation Planning**

1. In your opinion, what have been the benefits and drawbacks of ISTEA's requirement for extensive public involvement in the metropolitan transportation planning process?

2. Does your agency support or oppose retention of the public participation requirements in ISTEA's successor legislation? Please choose a response from the following.

- Strongly support
- Moderately support
- Neither support nor oppose
- Moderately oppose
- Strongly oppose
- Not sure/no opinion

Please discuss reasons for your answer.

Financial Constraint

That completes the questions pertaining to public involvement. The following questions pertain to financial constraint of plans and programs.

3. A. In your opinion, what have been the benefits and drawbacks of ISTEA's requirement for financial constraint of TIPs?

B. In your opinion, what have been the benefits and drawbacks of ISTEA's requirement for financial constraint of the long term plan?

4. Does your agency support or oppose retention of the requirement to financially constrain the TIP? Please select a response from the following.

- Strongly support
- Moderately support
- Neither support nor oppose
- Moderately oppose
- Strongly oppose
- Not sure/no opinion

Please discuss your reasons for this response.

**Appendix V
Phone Interview With State DOTs on
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5. Does your agency support or oppose retention of the requirement to financially constrain the long term plan? Please choose a response from the following.

Strongly support
 Moderately support
 Neither support nor oppose
 Moderately oppose
 Strongly oppose
 Not sure/no opinion

Please discuss reasons for your response.

Project Selection

6. In your opinion, has the project selection authority of MPOs in TMAs increased in your state since passage of ISTEA? Please choose a response from the following.

To a very great extent (go to 7A)
 To a great extent (go to 7A)
 To some extent (go to 7A)
 To a little extent (skip to 7C)
 To no extent (skip to 7C)

7. A. To what do you attribute this change? Specifically, what aspects of ISTEA have contributed to this change? (Then skip to 7B)
B. What have been the benefits and drawbacks of this expanded MPO authority?
C. Why have MPOs' project selection authority not increased.
8. Does your agency favor or oppose retention of TMA MPOs project selection authority in ISTEA's successor legislation? Please choose a response from the following.

Strongly support
 Moderately support

**Appendix V
Phone Interview With State DOTs on
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- Neither support nor oppose
- Moderately oppose
- Strongly oppose
- Not sure/no opinion

Please discuss reasons for your response.

9. Does your agency favor retention of the other aspects of ISTEA that have expanded the decision-making authority of TMA MPOs? Please choose a response from the following.

- Strongly support
- Moderately support
- Neither support nor oppose
- Moderately oppose
- Strongly oppose
- Not sure/no opinion

Please discuss reasons for your response.

DOT Certification Reviews

10. Has your state DOT participated in a federal DOT certification review?

- yes (go to q. 11)
- no (skip to q. 12)

11. What benefits and/or drawbacks did the review yield from the standpoint of state planning officials?

12. Does your agency favor or oppose retention of the certification process in ISTEA's successor legislation?

- Strongly support
- Moderately support
- Neither support nor oppose
- Moderately oppose
- Strongly oppose
- Not sure/no opinion

Please discuss reasons for your response.

**Appendix V
Phone Interview With State DOTs on
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Transportation Planning**

Other

13. Please discuss any other issues or concerns regarding ISTEA's metropolitan transportation planning requirements that we have not already covered.

This concludes the discussion. Thank you very much for your participation.

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