

efforts was an interjurisdictional study involving the District of Columbia and Montgomery County. The District of Columbia changed the function of a street carrying Maryland commuters from a one-way, peak-period, reversible four-lane arterial to a two-way street with parking restrictions in the peak flow direction in order to reduce speed and volume. The facility had imposed a heavy traffic burden on a residential area for many years.

Before the change, TPB staff mailed notices to Maryland residents who were observed using the street, informing them of the impending change and encouraging them to switch to other routes, use Metrorail, or carpool. Staff also monitored the speed and volume on the route both before and after the change. The results indicated a reduction of 2000 cars in the peak period on the street and 1000 in the corridor. Travel time increased only 2 min or less over the 5-mile section.

The traffic control change was accomplished smoothly and successfully. Other routes in the District of Columbia that adversely affect neighborhoods are being reviewed for possible similar changes in order to improve neighborhood environments.

#### Data- or Process-Related Activities

The MPO process, being highly technical in nature, is, of course, heavily data and process oriented. Frequently, however, data obtained or methods used successfully at the regional level are not applicable to specific problems in local areas.

Many service requests are for specific data-collection and analysis efforts. These can include questionnaire design and data collection, such as the service project just completed for the Bethesda area in Montgomery County. This service request was originated by the Montgomery County Council to shed light on a controversial proposal to construct a new parking-garage facility near Metrorail in the business district. Close coordination and a shared work effort with local staffs were required to obtain the

necessary information at employment sites in the area.

Another data-oriented service activity is an ongoing program of collecting trip-generation data for major residential and nonresidential sites in the District of Columbia. These data are more detailed as to time of day, purpose, and mode than the conventional home-interview type of data and can serve the regional process by improving and refining basic methodology. Similarly, studies of truck travel and weekend transit use have been undertaken that enhance the overall regional data base and process.

#### INTERGOVERNMENTAL ASPECTS

Viewed from an intergovernmental perspective, the TPB/COG expanded program of service activities has greatly improved the relationship between the MPO and its participating state and local organizations in the Washington metropolitan area. TPB/COG has been able to respond to the immediate needs and concerns of constituents in a timely and professional manner. This has enhanced its credibility and led to increasing requests for service and assistance, which, in turn, has strengthened intergovernmental ties and dependencies. In addition, by using the results of service projects to update and maintain the basic work program, efficiencies and economies have been achieved in the overall transportation planning process for the region.

It is clear from TPB/COG's experience to date that an expanded program of service activities can contribute significantly to broad acceptance of the role of MPOs in urban transportation planning and can, indeed, provide "an intergovernmental plus".

#### REFERENCE

1. Operations Plans for Continuing Urban Transportation Planning. FHWA, Internal Memorandum 50-4-68, April 1968.

#### *Abridgment*

## Consistency of Comprehensive and Transportation Planning: An Intergovernmental Relations Issue

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In federally funded transportation project planning studies, the Maryland Department of Transportation has considered implementing alternatives that are contrary to local comprehensive land use plans. This is an example of a lack of consistency between the federal urban transportation planning process and local planning. Descriptions are given of both the local planning context and some of the unique state-local interactions in Maryland and how in particular this consistency dilemma comes about. This situation is an intergovernmental relations problem that needs to be understood and addressed. Several causes of this consistency dilemma are reviewed and analyzed. It is attributable to actual and perceived variations in local comprehensive planning, lack of explicit direction from the federal planning guidelines, basic differences between functional and comprehensive planning, and trends of increasing comprehensiveness. The Maryland-National Capital Park and Planning Commission has been trying for several years to seek ways to achieve and maintain consistency between these two planning processes. Several ways in which the various governmental levels can reach consistency are reviewed. These include administrative changes to action plans of state transportation departments, modifications to the proposed rules for urban transportation planning currently under review,

and potential changes in legislation. It is concluded that suggested modifications to the proposed rules could effectively enable the necessary consistency to be achieved.

It is almost 20 years since the federal government required that each urbanized area have a continuing, cooperative, and comprehensive transportation planning process. That process was to result in plans and programs that were consistent with comprehensively planned development. However, the local jurisdiction of Montgomery County, Maryland, still is experiencing a lack of consistency between federally supported transportation project planning and local comprehensive planning. The local planning agency is very concerned with this intergovernmental relations issue.

The purpose of this paper is to air these concerns as a matter of professional interest to urban transportation planners. Given the intergovernmental relations nature of the issue and the profession's keen interest in fostering improved understanding of such issues, these thoughts are offered with the hope of receiving feedback regarding their validity and importance.

This paper first outlines the particular consistency dilemma as seen by a local comprehensive planning agency, the Maryland-National Capital Park and Planning Commission (MNCPPC). Some of the underlying reasons for or causes of the dilemma are then analyzed. The final section reviews several ways in which the various levels of government can work together to achieve and maintain consistency between transportation project planning and local comprehensive planning.

#### CONSISTENCY DILEMMA

In transportation project planning studies that use federal procedures, the Maryland Department of Transportation (DOT) has considered implementing alternatives that are contrary to local comprehensive land use plans. From the local planning perspective, this is an example of a lack of consistency between the federal urban transportation planning process and local planning. This lack of consistency raises many dilemmas for local government and threatens its ability to plan in a comprehensive manner. I believe that such a situation is a significant problem in federal-state as well as federal-local relations.

Any issue of consistency is a contextual matter: consistent with what? Therefore, to better understand the nature of the concern, this paper first describes the particular planning context from which consistency seems to be lacking.

MNCPPC is responsible for comprehensive land use planning in Montgomery County, one of the major suburban counties of the Washington, D.C., area. In its local comprehensive planning, land use type and density are planned to be in balance with transportation facilities. The area master plan usually specifies this balance in a staged relationship basis. These comprehensive master plans include a full range of transportation facilities and services, such as state highways, regional transit, county roads, community transit, bikeways, pedestrian facilities, and fringe parking areas. These local and countywide master plans are periodically reviewed, analyzed, and updated in a full, open, participatory manner and are adopted by the local legislative body, the Montgomery County Council.

These master plans identify specific transportation functional classes of improvement and site-specific locations for the necessary rights-of-way. These planned improvements and their locations are used by the Planning Board in administering the subdivision regulations so as to prohibit development in these rights-of-way and, when appropriate, are used to achieve right-of-way dedication. There is even an advanced land acquisition fund that can be used under certain circumstances to acquire land needed for these transportation rights-of-way.

There are several agencies at different levels of government that also plan and then implement transportation improvements in the county. The metropolitan transportation planning process functions well but, given the multistate nature of the Washington area, there is significant direct coordination between the counties and the states they are part of. In Maryland, this state-local interaction has been in effect for many years, even before the 1962 federal requirements for coordinated planning.

Maryland's Twenty-Year Transportation Needs Study process and the subsequent needs inventory and Maryland Transportation Plan have been responsive to local comprehensive planning. Fortunately, the Maryland DOT has been relying on local plans in the context of its own statewide assessments to identify candidate projects for implementation consideration.

This relation is strengthened by state laws for preparation of the Consolidated Transportation Program. Those laws initially required that before projects for the state secondary system could be added to the program they first had to be identified in the needs study. Such projects include most of the state and federally funded highways in the county. New laws have specified that the local elected officials are to establish the priorities to be followed by the state regarding the order in which project planning studies must be initiated for highways on the state secondary system. Thus, there is generally consistency between the statewide planning and programming of the Maryland DOT and the local master planning. A similar relation exists between the Montgomery County DOT and the local master planning.

It is at this stage of project planning that the consistency dilemma begins to appear. Unfortunately, due to the vagaries of interpretation of federal rules and regulations governing project planning, as soon as a project planning study has been begun by the state the local comprehensive plans in effect become nonexistent. Typically, the project planning study identifies a set of alternative locations, many of which differ significantly in location and even in function from the master-planned transportation improvement. This is especially the case for those studies for which the master-planned improvement is a new facility. The state has said that its approach to project planning follows the federal requirements that all feasible alternatives be investigated and that the detailed social, economic, and environmental effects of each be evaluated.

In many other areas throughout the nation, the approach being followed by the state may not upset local planning. However, as far as Montgomery County is concerned, it has already determined the best general location for the particular transportation improvement being studied. If the county does not believe that this is the case, then it should be amending the plans itself. A minor variation in location being considered may be alright, just like the specific alignment being decided in the design phase of a project planning study. But the master-planned location is often the result of many years of planning as well as numerous related and interdependent decisions that have already occurred that allow for the transportation improvement being implemented. Other development has been permitted nearby that would be significantly affected if the planned location were shifted. In addition, due to the particular manner in which the master plans are developed and adopted in the MNCPPC's jurisdiction, it is very important that agencies implement components of the comprehensive plan as planned; they should not unilaterally set new determinants that change the comprehensive plan.

It is very vexing to one level of government to have its plans changed by the action or inaction of another level of government. It hinders the ability of Montgomery County to carry out plans in a comprehensive manner. There are several particular points of concern, or fallacies, associated with the state's project planning approach that further illustrate this consistency dilemma:

1. One fallacy of that approach is that land



that currently may appear open and available to the project planning study team has often already been subdivided and planned for other uses.

2. A second fallacy is that the county has the legal authority to prohibit development only for the master-planned right-of-way. We cannot work with the state to protect rights-of-way along non-master-planned alternatives. There is also a "Catch-22" situation in that while project planning is going on federal regulations prohibit states from using federal advance land acquisition funds for right-of-way protection for any of the alternatives being studied (except in hardship cases).

3. A third fallacy of considering significant shifts in the planned location is that the interdependence with other transportation improvements would usually be thrown out of balance. This might require, for example, major additional investments by the county in supporting projects.

4. A fourth, and probably the most serious, concern regarding local comprehensive planning is that consideration of a significant change in the function or level of capacity to be made available by the project should logically call for a reconsideration of the land uses and their densities for the area. That would in effect force a change in the comprehensive plan.

Is this lack of consistency between comprehensive planning and transportation planning unique to Montgomery County and to Maryland? To address that question and to better understand the nature of the lack of consistency and how to deal with it, I will next review what I feel are some of the underlying reasons for or causes of the dilemma.

#### CAUSES OF CONSISTENCY DILEMMA

There are several basic causes of the lack of consistency between comprehensive and transportation planning. To a large degree, these causes have many intergovernmental relations aspects associated with them. These causes include (a) variations in local comprehensive planning, both actual and perceived by other levels of government; (b) specific assumptions and directions, or lack of them, in federal planning guidelines; (c) basic differences between functional planning and comprehensive planning; and (d) various trends of increasing comprehensiveness both in transportation planning and in comprehensive planning itself.

#### Variations in Local Comprehensive Planning

The first cause of the consistency dilemma relates to the wide divergence in the character and effectiveness of local comprehensive planning throughout the United States. There are many different variations in the planning process and in the authority and responsibility of local officials for planning. These very much depend on particular state laws and local enabling legislation as well as on how long local comprehensive planning has been carried out.

There are differing degrees of success in the ability to implement local comprehensive plans. It is felt that Montgomery County has been rather successful in having its local comprehensive plans implemented in accordance with the plan. This is a function of a number of institutional circumstances, including more than 50 years of comprehensive planning in a suburban county, strong legal support of local zoning laws by the state court system, well-educated and informed citizenry, and knowledgeable elected officials. Examples like Montgomery County have helped to reinforce the perception that there are indeed variations in the effectiveness of local comprehensive planning.

With regard to the causes of the consistency dilemma, the very fact that a particular local jurisdiction is doing good local comprehensive planning makes it more sensitive to other planning processes that downplay or ignore those efforts. In other words, the perception of a lack of consistency between the federal urban transportation process and local comprehensive planning in Montgomery County is in part caused by the fact that the local planning is indeed better than average.

I have made efforts to determine the degree to which this consistency dilemma is perceived as a problem by other local jurisdictions throughout the country. There was virtually no response to my request for specific examples, although I received many verbal agreements that this dilemma is indeed a real one. All this leads me to conclude that Montgomery County is in somewhat of a unique situation. However (as discussed later in this paper), I feel that more and more local jurisdictions will be developing similar concerns if this lack of consistency is not appropriately addressed.

#### Federal Planning Guidelines

A second cause of the consistency dilemma relates to the various federal guidelines that have been issued over the years regarding transportation planning. They appear to have been based in part on the presumption of the lack of good local comprehensive planning. These various federal guidelines are directives to various transportation planners at the state, regional, and local levels regarding how to carry out regional transportation planning and project planning studies. For example, Federal Highway Administration Policy and Procedure Memorandum 50-9 (1, p.8) issued in June 1967, says, "The forecasting of future land uses is subject to considerable error at best, but lacking adequate controls, 'planned' development will in most instances have little chance of becoming reality." This is one example of the presumption that most local governments are not able to implement local plans.

Recent rules proposed by the U.S. Department of Transportation (DOT) regarding urban transportation planning (2) are somewhat ambivalent with regard to consistency with local comprehensive planning. They indicate that one of the basic purposes of urban transportation planning is to have a process "that results in plans and programs consistent with the comprehensively planned development of the urbanized area." One of the four major requirements for the transportation plan itself is that "the transportation plan shall be consistent with the area's comprehensive long-range land use plan and urban development objectives...." However, a specific shortcoming of these proposed rules is that, although the purpose and the urban area transportation plan are intended to be consistent, the rules governing "corridor refinement studies" are mute on the need to be consistent with local comprehensive planning.

Therefore, another basic cause of this consistency dilemma is the federal guidelines that direct the manner in which project planning studies should be carried out. The experience of Montgomery County with project planning studies that tend to ignore local planning seems to be the result of an ingrained presumption that no local planning is worthy of being given appropriate consideration in project planning efforts.

#### Relations Between Functional and Comprehensive Planning

A third cause of the consistency dilemma is some of

the inherent differences between various functional planning activities and comprehensive planning. Transportation planning is a type of functional planning. There are many functional planning activities at each level of government. Other functional planning activities include water and sewer systems, health care systems, air quality, and parks and recreation. However, because of the very nature of the transportation function in this complex urban society, transportation planning tends to be carried out in a rather comprehensive manner, particularly at the regional and local level.

Many of these functional planning activities are carried out by "line departments" at various levels of government. Most of the planning coordination tends to occur between the same functional departments across different levels of government. There is a strong tendency for each functional group to seek to maximize objectives common to that particular function.

Even where "staff departments" operating at a particular governmental level are responsible for planning coordination or comprehensive planning, it is difficult at best to achieve coordination among functional departments at any one level of government. It is even more difficult to achieve coordination between different functional departments at different levels of government. Comprehensive planning seeks to optimize the overall public interest in cooperation with private interests. In doing so, it may often be necessary to seek and obtain trade-offs among competing objectives of different functional interests.

These basic differences between functional and comprehensive planning are a cause of the particular lack of consistency between transportation and comprehensive planning identified here. The particular maximization of objectives of concern to the transportation project planning study may be contrary to the overall optimization of objectives being sought in the comprehensive planning process. Several of the fallacies discussed earlier are examples of this situation; for example, the decision of transportation agencies to make significant shifts in the location of a transportation improvement from that in the local master plan may require major additional investments by other agencies in support of transportation projects or in other public facilities such as sewer lines.

There is also a particular intergovernmental relations aspect to this cause of the dilemma. The lack of consistency is heightened by differences in responsibility among the different levels of government. The federal and state levels play a major role in the funding and implementation of the major transportation infrastructure, in the county. On the other hand, the regional, and particularly the local, levels (in this case, the county) play major roles in comprehensive planning and coordination of public facilities and private development. Relatively speaking, the state and federal levels do little comprehensive planning. Similarly, although the local level funds and implements transportation infrastructure, this is generally for improvements only of a local nature. Thus, although the local levels have the authority and ability to plan comprehensively, they are very much dependent on the state and federal levels to fund and implement transportation improvements as planned. Unfortunately, the federal and state transportation functional agencies have not structured their project planning process to be dependent on effective local comprehensive planning as the basis of implementation.

#### Trends of Increasing Comprehensiveness

A fourth cause of the consistency dilemma relates to trends of increasing comprehensiveness in transportation planning and in comprehensive planning itself. Each of these trends could be expected to cause this lack of consistency between transportation and comprehensive planning to become more apparent and intense in the future.

An increasing number of requirements have been placed on transportation planning at both the system and project planning levels: conformity with air quality standards, transportation system management, President Carter's urban policy concerns, and so on. Although these might cause transportation planning to strive to be more comprehensive, they actually may narrow and constrain planning and decisionmaking by transportation agencies. Agencies may not be able to exercise enough flexibility to provide solutions that would remain consistent with local comprehensive planning and still satisfy all of the federal requirements. Solutions that satisfy the federal requirements may be contrary to local comprehensive planning.

Local governments and other levels of government have been improving and are continuing to improve on their ability to plan comprehensively. Coordinated capital programming and budgeting, growth management planning, community development block grants, and joint development planning are examples of more comprehensive planning. As local governments do a better job of planning, they should increasingly expect the other levels of government to coordinate and integrate local plans in the planning done by those other levels. Thus, over time, more and more local governments should be perceiving this lack of consistency between transportation project planning and comprehensive planning.

#### WAYS TO ACHIEVE AND MAINTAIN CONSISTENCY

Several causes of the lack of consistency between transportation project planning and comprehensive planning have been identified. At some point, the basic approach to transportation project planning must be modified and comprehensive planning accepted as the serious and vital governmental function that it is.

There is a need to pursue appropriate ways to make transportation project planning and comprehensive planning more consistent. MNCPPC has been concerned with this need for several years and has tried to work within the system of federal guidelines to seek consistency. It has concluded that in order to achieve consistency explicit changes are necessary in the guidelines governing project planning. Several ways in which consistency can be obtained and maintained are discussed below.

#### State Action Plan

The initial approach that MNCPPC took in addressing the consistency dilemma was to work within the context of the Maryland DOT Action Plan. That is the document that the federal government requires each state transportation or highway department to produce that gives the specific administrative and procedural details of how the state agency would carry out the federal planning requirements related to project planning. Several years ago, the Maryland DOT sponsored a workshop to bring together officials from several of the larger counties in Maryland to address this specific concern. Language was drafted to amend the Action Plan to facilitate improved planning coordination between the state and county. While an updating of the Action Plan is now

under way that could result in desirable administrative changes in Maryland, it is expected that other approaches will be necessary to fully achieve consistency.

#### Proposed Rules for Urban Transportation Planning

Some of the federal rules governing project planning for major urban transportation investments, now called corridor refinement studies, have recently come under review by DOT (2). The Montgomery County Planning Board prepared general comments as well as some suggested changes to Appendix C in the proposed rules: Procedures for the Administration of Corridor Refinement Studies.

The suggested changes would make the following explicit requirements:

1. In the request for approval of a corridor refinement study, the description of reasonable alternatives would have to show how each alternative is consistent with local planning.
2. During this scoping process, the agency doing the study would have to consult with local planning officials on aspects of the study, including the specific range of alternatives to be studied.
3. These alternatives would each have to be supportive of and consistent with the comprehensive planning for the local area.

Such explicit changes would be fully in keeping with the intent and spirit of the proposed rules. This would take as an explicit basic presumption that there is "good" local planning. Such changes might be sufficient to achieve consistency between transportation project planning and comprehensive planning. However, if the final rules do not incorporate such changes, another possible approach is to seek changes in legislation at the federal level.

#### Potential Changes in Legislation

There are several features that could be incorporated into a legislative approach to help achieve consistency. One feature would be to incorporate into the governing legislation the appropriate language to require that consistency be achieved. Such an approach has been successfully followed with regard to the relation between transportation and air quality planning.

A second feature that could be part of new legislation would be to facilitate the acceptance of local planning as the basis for location decisions in corridor refinement studies. Some of the changes to the Maryland Action Plan referred to above are of this nature. However, such an approach would not necessarily be easy to apply in practice. The following remarks by Maryland Secretary of Transportation James J. O'Donnell illustrate this point:

One solution to the problem would be a more in-depth investigation of transportation alternatives during master plan development. Consideration would have to be given to all alternatives, including Transportation Systems Management and the environmental impacts of each analyzed. The selection process for each transportation facility would need to be fully documented. Not only would the project have to be consistent with the prevailing standards, but also with those standards which could reasonably be expected to be in

effect at the time of project implementation.

Following such a process in plan development would require a very substantial increase in effort required to develop a master plan. In most planning areas, several major transportation facilities of State responsibility would be involved. In effect, initial systems planning and project planning would be required for these projects.

A third feature that could be part of new legislation would be to (a) require the federal representatives to be more active partners in the planning while the initial decisionmaking is occurring and (b) reduce the sequential review and approval by federal officials to a review that closely parallels the decisionmaking of local officials and proposing agencies. Such a feature would tend to involve state and federal officials more closely in the decisionmaking, the point at which necessary trade-offs are usually made between competing objectives. This would tend to reduce one of the major causes of the consistency dilemma--the differences between functional planning and comprehensive planning.

#### CONCLUSIONS

One part of the federal laws for urban transportation planning says that the planning should be consistent with local comprehensive planning. Being able to do good local comprehensive planning requires that specific actions of the transportation agencies be supportive of and consistent with the local planning. Consistency between comprehensive and transportation planning is an objective important to both governmental efforts.

Unfortunately, it has been the experience of the MNCPPC that transportation project planning studies and the recommendations resulting from them have not always been consistent with its adopted plans. This situation has been hindering the ability of Montgomery County to continue to plan and to carry plans out in a comprehensive manner. We have been trying within our normal sphere of influence to rectify this situation. The Maryland DOT has said that it has little choice regarding changing its procedures for project planning; it must follow federal guidelines. In sum, what we have is a true intergovernmental relations issue.

I have analyzed the underlying reasons for this lack of consistency between transportation and comprehensive planning and have concluded that the basic approach to transportation project planning needs to be modified to recognize the full value of supporting and then relying on good local comprehensive planning. Suggestions have been made to federal officials as to specific ways to achieve the necessary consistency. It is hoped that those suggestions will be given due consideration and that appropriate actions will remove one significant barrier to effective intergovernmental relations.

#### REFERENCES

1. Policy and Procedure Memorandum 50-9: Urban Transportation Planning. FHWA, June 21, 1967.
2. U.S. Department of Transportation. Proposed Rules for Urban Transportation Planning. Federal Register, Vol. 45, No. 212, Oct. 30, 1980, pp. 71995-71996.