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Discussion of Resource Paper Thomas H. Roberts, Atlanta Regional Commission

Before making specific responses to various statements in Thomas' paper, let me open with a few general observations:

1. The paper stresses a great need for comprehensive planning so that transportation and other functional planning can be related to comprehensive planning. A major problem here is that there is an insufficient willingness to fund comprehensive planning. Some of the functionally oriented federal agencies are willing to fund their pro rata share of comprehensive work, others are willing but unable, and still others are unwilling. Adequate funding for transportation and other functional planning must be accompanied by adequate funding for comprehensive planning-that is, we need to fund the "glue" as well as the pieces.

2. Thomas deals with federal-state-regional-local relations from a national perspective and proposes a set of procedures and relations that would work fine on a uniform national basis, except for the fact that federal agencies, states, and regional agencies vary enormously from place to place and from time to time in their respective track records, capabilities, and status. Therefore, the imposition of any national uniform system that did not take account of these differences would do enormous damage in given instances. For example, a high-quality regional agency should not be forcefitted into a weak state context until the state capacity has been strengthened. In other words, where the tail is wagging the dog, the tail should not be weakened until after

the dog has been strengthened.

3. Another problem with implementing such a uniform national system is that the federal government is not internally structured so that agencies work together. For example, from my day-to-day metropolitan-level perspective, there is no "U.S. Department of Transportation." There is an UMTA, an FHWA, and an FAA, all with their own missions, procedures, funding rules, and guidelines. During 1969-72 there seemed to be considerable initial progress toward making the department into a cohesive department, but recent progress has not been heartening. For example, even the Integrated Grant Administration (IGA) programs are only as good as the willingness of the individual federal agencies to act in uniform or consistent fashion, in the absence of federal teeth to make them do so.

The remainder of my remarks consists of a series of paraphrased excerpts from Thomas' paper (identified as NT), followed by a response from me (identified as TR).

- NT: The private sector increasingly supports the need for growth and development policies at every governmental level.
- TR: At the same time, federal funding for comprehensive planning is decreasing.
- NT: There is a federal consensus that state governments must provide the focal point for new intergovernmental planning systems characterized by 5 tiers—national, multistate, state, substate district, and local.
- TR: There is a dilemma here. States have not been noteworthy leaders in this sort of thing in the past, so why should they be expected to come forth now? On the other hand, if they do not, the alternative is even sloppier yet—e.g., ad hoc consortiums of areawide agencies in lieu of a statewide context.
- NT: There is no central federal focal point where policy analysis can be carried out systematically. Rather, reliance is placed on individual "mission" departments and agencies to conduct analysis and then attempt to reach consensus through committees.
- TR: True. Even federal regional councils and IGAs have failed to break down departmental barriers.
- NT: The U S. Department of Transportation is making progress toward a general rational transportation policy framework to directly link transportation policies with comprehensive planning directly accountable to governors, local elected officials as members of regional councils, and local elected officials as chief executives of local general purpose governments.
- TR: From the 'bottom-up' perspective, there is no U.S. Department of Transportation. It is a figment of the imagination. There is an FHWA, UMTA, FAA, and so on.
- NT: Differential policies must be internally consistent within a general transportation policy framework at each governmental level.
- TR: Beginning in Washington.
- NT: State general transportation policy frameworks that are consistent with state general comprehensive policy frameworks are fundamental since states occupy the position of constitutional middleman.
- TR: What "state general comprehensive policy frameworks" are you referring to? How has the federal-state-local relation proved to be necessarily superior to direct federal-regional or federal-local relations across the board? As you point out, most such state agencies have "a limited, if any, capability and capacity...."
- NT: There is a growing trend linking comprehensive statewide planning agencies with

- central state budget agencies so that planning coordination leads to program implementation.
- TR: Good idea. Where has it worked well and survived? In addition, there is a great need to link effective state-level comprehensive planning substate areawide planning.
- NT: The Transportation Research Board should encourage transportation interests to support making the Office of Management and Budget the focal point for policies on regionalism and for coordinating all federal functional planning assistance programs.
- TR: Great idea. But it must have teeth. Otherwise, amorphous things like federal regional councils and IGAs will not hack it.
- NT: OMB should require all federal agencies to provide all financial planning assistance and implement planning requirements through comprehensive statewide agencies.
- TR: Go slow here. This should only occur after or as the state agencies are upgraded in quality. Again, the situation varies from place to place, and this would make no sense in instances where it would subject a good regional effort to a new, substandard state effort.
- NT: Comprehensive statewide planning agencies should be required to develop and approve all federally assisted or required substate district programs.
- TR: Same comment as above. In some cases regional substate agencies have more expertise than states.
- NT: Urban highway funds should be conditioned on each state possessing a comprehensive statewide planning agency responsible for ensuring the coordination of transportation with other state functional areas such as housing and with comprehensive functional planning at the multistate and substate levels.
- TR: An excellent idea.
- NT: There is interest in a new generation of multistate regional organizations whose functions would include transportation.
- TR. What has Appalachia accomplished? This may be needed in certain limited interstate-complex situations, but is probably not necessary or desirable if good comprehensive state planning exists and is coordinated by effective comprehensive federal planning.
- NT: ACIR finds almost unanimous agreement among elected officials at all levels that they do not favor regional forms of government or greater use of special single-or multiple-purpose special districts and authorities, but that everyone—politicians and citizens alike—seems to like UMJOs.
- TR: This may change in the future if UMJOs do not hack it, and citizen groups begin calling for something that works better.
- NT: UMJOs are a politically acceptable means short of metrogovernment to coordinate jurisdictional responsibilities at every level.
- TR: Political acceptability may change if things do not work out. Success of UMJOs depends on effective ties to state agency implementation.
- NT: OMB should encourage integration of the policy boards of independent federal multijurisdictional programs into a single UMJO.
- TR: Emphasis on states has helped screw this up. To make this work, the feds will have to require mandatory pass-through of funds from the state level down to the UMJO.
- NT: OMB should insist that federal funding agencies recognize the priorities established by UMJOs composed of locally elected officials.
- TR: Absolutely.

- NT: UMJOs should be empowered to make decisions in order to resolve competing objectives and to set regional priorities recognized by both federal and state funding agencies.
- TR: This is good. The trick is to get UMJO governing bodies to do this in a technical and political context. A staff effort alone is no good.
- NT: TRB should propose state legislation for 1975 introduction by interested states that would mandate UMJOs to be the responsible substate district transportation planning agency for all state and federal purposes.
- TR: Model legislation looks good, carrot or stick is needed.
- NT: UMTA should deal with UMJOs through comprehensive statewide planning agencies. TR: No.
- NT: Federal and state governments should choose not to integrate modes until such time as each mode enjoys a position of "equalized modal competition."
- TR: What is the UMJO role?
- NT: Railroad abandonment is the kind of issue that the comprehensive statewide planning agencies and UMJOs should routinely focus on.
- TR: True. Some state legislation might be required that will reduce somewhat the independence of railroads with regard to railroad rights-of-way.
- NT: To be viable partners in transportation planning, UMJOs must have access to continued funding not totally dependent on local decision-making. A flow of state and federal funds for transportation planning must be available to UMJOs.
- TR: Yes. Funds should not have annual fluctuation and not be totally dependent on the state.
- NT: The concept of a multimodal regional transportation trust fund directly linked to transportation planning by an UMJO warrants further research.
- TR: Good idea. How about going the next step and permitting some of that money to be spent for nontransportation solutions to transportation problems (shorten or eliminate trips through other means)?
- NT: The federal government should discard references to "metropolitan" and "non-metropolitan" areawide planning agencies and rely upon the general term "areawide."
- TR: Yes.
- NT: TRB should encourage state transportation departments to publish procedures setting forth precisely how regional transportation processes must be carried out by UMJOs.
- TR: See my earlier comments. It depends on the respective competency of state and areawide entities. Besides, other state agencies and UMJOs should be involved.
- NT: TRB should conduct demonstration projects showing how states and UMJOs can be directly linked under various legal, organization and structure, financial, and local governmental circumstances.
- TR: Although there are still flaws in it, the tripartite agreement between the Atlanta Regional Commission, the Georgia Department of Transportation, and the Metropolitan Atlanta Rapid Transit Authority would be a good prototype.
- NT: TRB should work with the Atlanta Regional Commission to document how multimodal transportation planning can be carried out through formal arrangements with substate district transportation operating agencies and state transportation departments.
- TR: Okay.

- NT: Demonstration projects should be mounted with selected UMJOs to educate both employers and employees on the effect of alternative work (e.g., hours and days) and transportation (e.g., car pooling and park-ride) arrangements on congestion, accidents, and so on.
- TR: We could do this jointly with MARTA.
- NT: Congress should annually appropriate general federal revenue funds in support of multimodal transportation planning and programming through a transportation special revenue sharing with specific provisions made for fund allocations to comprehensive statewide planning agencies and UMJOs.
- TR: Okay.