CHAPTER 6

MAJOR NATIONAL POLICY ISSUES

The nine metropolitan areas subjected to assessment in this study conducted major transit system planning studies at various times over the past 25 years. Changes in the Federal program, in professional planning theory, and in the general climate of public concern during this period led to numerous differences in the ways these nine metropolitan areas performed their planning efforts.

Because each metropolitan area faced unique circumstances, no single planning effort provides a model worthy of emulating in its entirety. However, the cumulative experience in the nine cases points to a number of significant issues that should be addressed by public policy to provide a context in which communities can plan transit systems best suited to their needs. These issues have been described in Part II of this report. They are summarized in this chapter under the three chapter headings used in Part II: institutional context, technical planning process, and financing.

The description of the issues under each heading is introduced by a brief account of the Federal policy that has been in effect while these issues have arisen. The issues themselves are grouped in categories corresponding to the guidelines used in assessing the metropolitan experience. The issues all derive from observations in the nine metropolitan study areas, as the examples cited in Part II indicate. Following each group of issues is a discussion of how Federal policy might address them.

At the conclusion of the sections describing the issues is a discussion of one major issue for Federal policy that underlies all of them, which is the need for developing criteria that can be used to measure progress toward national transit goals.

INSTITUTIONAL ISSUES

In spite of efforts by the Federal Government to create a structure for effective, coordinated regional planning, the context for transit decisionmaking in all the metropolitan areas examined falls short of this mark. Several major issues for national policy remain unresolved.

Since the early 1960s the Federal Government has been encouraging local governments in urban regions to cooperate in planning for the future development of their metropolitan areas. Within the past 15 years several Federal agencies have introduced requirements calling for existing or newly created organizations to take on regionwide planning responsibilities. The regulations were intended to help coordinate among a proliferating number of Federal programs aimed at urban development of various types and to help counter a trend toward fragmentation of local governments that was accelerating with the growth of suburban population and employment during the 1950s.

In advance of the Federal requirements, during the 1950s, local governments in many urban areas began forming metropolitan-scale organizations to undertake land use and comprehensive planning. The activities of these planning agencies and, later, those of regional councils of government were supported by a succession of Congressional acts during the 1960s, primarily the several housing acts. The plans attempted to cover a full range of urban concerns, at least in broad terms, including land use/zoning, water supply/sewerage, and aspects of transportation. With rare exceptions, the comprehensive planning agency was not responsible for putting any part of the plan into effect.

"Meanwhile, in many areas, Federal requirements led to creation of other organizations to deal with specific elements of areawide plans. Following enactment of the Federal-Aid Highway Act of 1962, regional "3-C" agencies were set up to assure that highway planning was part of a "continuing, comprehensive transportation planning process. . . carried on cooperatively by state and local governments. In many areas, as local governments purchased failing private transit operations, new public agencies were created to plan for and operate mass transit.

By the end of the 1960s, an institutional structure characterized in many cases by overlapping responsibilities, wasteful competition, and poor coordination had grown up. To a large extent, this fragmentation resulted from the proliferation of Federal programs with separate policies and separate administration. These separate programs provided differing amounts of funds, from different sources, and at different intervals of time, to agencies at the state, regional, and local levels of government.

In 1969, the Office of Management and Budget issued Circular A-95 ~/ in an attempt to clarify the relationships between the regional agencies responsible for Federal programs.' This regulation called for designating the region's comprehensive planning agency to take on the responsibility for reviewing whether area projects proposed for Federal capital assistance were consistent with the region's comprehensive plan. The governing boards of these "A-95" agencies had to be comprised of local elected officials or of other officials appointed by elected officials. The plans reviewed were to be made with extensive citizen input.

In 1974, responding to the mandate of the Federal-Aid Highway Act of 1973, the U.S. Department of Transportation moved to strengthen the links between transportation planning (including transit planning) and other regional planning efforts.

~/ Circular A-95 was the final regulation for implementing directives contained in the Demonstration Cities and Metropolitan Development Act of 1966.

A new regulation, published in final form in September 1975, 1/ required designation of a Metropolitan Planning Organization In each area to take charge of assembling the requests for Federal highway and transit assistance into one application, and to distribute the Federal grants when they were made. Wherever possible, the A-95 agency was to be designated the Metropolitan Planning organization to encourage coordination between transportation] planning and land use planning.

Although the Federal Government has attempted in these ways to put regional transportation and land use planning on a sound basis, its efforts have not had great success. The major Federal policy issues rooted in these institutional inadequacies are grouped under three categories corresponding to the guidelines for assessment of the institutional context: forum for decision-making, accountability of decisionmakers, and public involvement.

Forum for Decisionmaking

Although on paper the organizational structure of the decisionmaking forum in each metropolitan area is well defined, assessment findings show that in practice decisionmaking authority and responsibility is fragmented among a great number of local, regional. and state agencies of government. The separate responsibilities of each of the levels of government are not clearly enough defined for any one agency to have decisive authority either for setting policy or for obtaining financing and other commitments necessary to implement a plan. Experience shows this kind of fragmentation may lead to the following types of problems:

- Inability to set priorities and distribute resources. In the absence of a single lead agency with power to set and implement policy, competition often develops over the power to set priorities among the transit improvement projects proposed for a region. The pressure of competition can lead to development of extensive transit plans. While such plans may offer something for everyone, they tend to be financially inefficient and to ignore community- or neighborhood-level needs (as these needs might be measured by a well-structured rational set of criteria).

1/ Federal Highway Administration and Urban Mass Transportation Administration, Department of Transportation, "Planning Assistance and Standards: Urban Transportation Planning," Federal Register, Vol 40, No. 181, September 17, 1975, pp. 42976-42984.

- Underemphasis on use of highways for transit. Institutional fragmentation also leads to lack of effective integration among planning for different transportation modes. Both transit agencies and highway/street agencies avoid planning for improvements they do not have the authority to put into effect. only rarely do institutions with responsibility for highway and street planning and management also have responsibility for transit planning and operations. Due to this situation, important opportunities have been lost for improving transit service through highway management techniques.

- Ineffective integration of transit planning and land use planning. The fragmentation of decisionmaking responsibilities also affects the degree to which transit plans can be integrated with land use plans. At present, municipal and county governments jealously guard their authority over zoning and other development controls, and there is no coordinated, comprehensive development planning on a regionwide basis. In the absence of strong regional land use planning, the burden of coordinating transit and land use planning has fallen to the agency responsible for transit planning. It is unrealistic to expect a transit agency to control land use, and no transit agency has effectively done so.

Implications for public policy. The experience in the nine case metropolitan areas indicates that Federal policy to date has been unsuccessful in improving the adequacy of the institutional arrangements for metropolitan transit decisionmaking.

The assessment findings provide no indication that Metropolitan planning organizations will be more successful than previous Federal attempts to consolidate the institutional context for transit decisionmaking. The effort to create MPOs ignores the fundamental reality that numerous agencies with separate legal authority and responsibility, and separate financing, are already in existence. Any agency such as an MPO that is superimposed on the existing structure must have legal authority and responsibility for these programs and a secure source of financing to implement them (or, through use of financing incentives, to elicit cooperation among agencies that do have implementation powers) .

Experience in the metropolitan areas shows several different approaches that hold potential for eventually becoming effective transit decisionmaking forums. Increased participation at the

state level looks promising in some cases where states have traditionally been deeply involved in metropolitan affairs; in at least one case (Minneapolis-St. Paul) a multipurpose regional organization is making headway; in still other cases, single purpose transit agencies appear to be more appropriate to provide the forum. No single type of decisionmaking forum would appear likely to succeed in every metropolitan area, due to the wide variety of governmental structures that exist in different areas.

Based on a review of the variety of decisionmaking arrangements in the nine metropolitan areas, four alternative models have been developed for how decisionmaking authority might be effectively distributed. The decisionmaking forums in the nine metropolitan areas have been evolving in these four directions, although none have achieved the ideal conditions represented by the four models.

The four alternative models identify the division of decisionmaking responsibilities among (1) the metropolitan planning agency, (2) the state, (3) the metropolitan transit operating agency, and (4) city and county governments. Within each alternative scheme, an agency at one of these levels of government would be delegated the lead decisionmaking role, and the other three would be given appropriate supporting roles. Each scheme would provide the principal agency with the necessary authority and financing powers to carry out its transit responsibilities effectively.

In each of the alternative approaches, the agencies would be assigned primary or shared responsibility for nine basic decisionmaking tasks:

- Comprehensive planning
- Long-range regional transportation planning
- Areawide transit planning
- Transit programming and budgeting
- Highway programming and budgeting
- Transit project planning

. Transit financing

- Final design, implementation, operation and maintenance

, Development plan implementation and land use controls

(The scope of each of these tasks and the current agencies responsible for them were outlined in Chapter 3.)

Under each alternative, the lead agency would be exclusively responsible for transit programming and budgeting, although the other agencies could contribute advice. Responsibility for the remaining tasks would be divided among the agencies or shared in such a way that the lead agency always had principal, or at least shared, decisionmaking authority for highway programming/budgeting, areawide transit planning, and transit financing. Table 7 shows the assignment of responsibilities more specifically.

Following is a summary of the circumstances under which each of the four models would be appropriate and the general extent of the effectiveness of each in providing a strong base for transit planning:

- Alternative 1: Strong Local Government Role. A local government may be appropriate to take the role of lead transit decisionmaker in regions with a strong central city or county government that holds jurisdiction over most of the region's population. This alternative offers the advantage of potential close liaison between transit policy and traffic management/parking policy, the latter of which usually is the prerogative of local governments. In addition, most local governments also have ultimate authority over land use policy and urban development controls, and thus this alternative provides the opportunity for better coordinated transportation/land use policy. The local government would not be able to raise sufficient financing for its transit projects and would have to rely on the state. It would need to share responsibility for certain regionwide projects, such as comprehensive planning and multimodal transportation planning, with regional agencies.

- Alternative 2: Strong Metropolitan Transit Authority. In cases in which the metropolitan transit authority has a representative and politically accountable board and a good track record for project implementation, it

is a candidate for the role of lead decisionmaker. The advantages of putting the transit authority in the lead role are twofold: (1) it can make policy decisions from the perspective of extensive practical knowledge and experience, and (2) it receives the bulk of transit financial resources -- operating revenues. It would have to depend on the state for additional financing. Because of its single-purpose scope, it would not be able on its own to improve transit/highway and transportation/land use coordination, except perhaps in a limited way in the immediate vicinity of transit stations and corridors.

- Alternative 3: Strong State Role. In states with strong urban representation and a state department of transportation with genuinely multimodal structure, the state might assume the lead decisionmaker function. The traditional involvement of many states in regional highway planning and programming provides a precedent for expanding state participation in multimodal regional transportation planning and, in turn, transit programming. The access to state revenue sources would be another advantage. The state role, however, would not significantly improve land use,transportation coordination, because few states have assumed any responsibilities for local or regional land use.

- Alternative 4: Strong Metropolitan Planning Agency Role. Placing the metropolitan planning agency in the role of lead decisionmaker would offer the best opportunity for genuinely coordinating both transit/highway decisionmaking and transportation/land use decisionmaking. For years Federal policy has aimed at strengthening the role of metropolitan planning agencies, although with limited success, since only where metropolitan Planning agencies have been given additional responsibilities by state governments do they have sufficient local authority and credibility for leading transit decisionmakinq.

Whereas the lead agency in each model occupies a different tier of government, each approach requires more effective distribution and coordination of responsibilities among the various governmental levels. In each model, metropolitan planning agencies would ensure that transit plans are coordinated with areawide comprehensive planning and regional transportation planning. The state would become more actively involved by way of providing financial assistance and coordination with the highway program. Metropolitan transit authorities would ensure that proposed capital and operating projects are feasible and would coordinate them with current operations. Local governments would coordinate local land use programs and traffic management programs

with the planning process. Under each model, variations in the relative strengths of the three levels of government could occur.

Each of the models would clarify the respective decision-making responsibilities of the various organizations involved. Each thus would relieve the competition and conflict that were found to characterize transit decisionmaking in metropolitan areas and would allow the lead agency to set priorities among available funds and see that available funds are used most economically. However, the models differ in the extent to which they could improve coordination between highway and transit planning and implementation, on the one hand, and transportation and land use planning on the other hand.

Depending upon the type of agency that might assume the lead role, differing degrees of integration between highway and transit planning and implementation would be made possible. Joint administration of the Federal transit and highway programs would be required to permit a multimodal approach at every level of decisionmaking.

With respect to integration of transit and land use, fundamental changes in the powers of metropolitan planning agencies would be necessary before integrated regional land use/transit programs are likely to be implemented. More modest additions to the authorities and responsibilities (and financing resources of transit planning institutions could lead to joint transit/land use strategies in the immediate vicinity of transit stations and corridors.

The Federal Government cannot impose any one of these model structures for a transit decisionmaking forum on a metropolitan area in the absence of legal changes in the statutory authorities, responsibilities, and funding capabilities of the existing institutions that might be necessary at the state and local levels. To encourage evolution of the regional decisionmaking arrangements in the direction of one of the four models, the Federal Government alternatively could:

- Make establishing a lead agency with adequate statutory power, responsibility, and financing, a precondition for receiving Federal transit support; or devise financing incentives that provide additional assistance to regions with adequately structured decisionmaking forums;
- Develop a policy of providing greatly increased aid to transit in order to greatly increase transit use, and channel that aid directly to transit operators, who would be responsible for programming its use and thus would be more likely to take on lead decisionmaking responsibilities Use of transit funds could be broadened to include land in

vicinity of stations and corridors, and as long as they also had sufficient formal authority, transit agencies could have a greater impact on shaping future land use and development.

- Merge the Federal highway and transit programs at all levels of government. This could expand the involvement of the state in metropolitan transit planning and might encourage more states to take lead decisionmaking roles.

- Expand Federal support for regional land use and development, making the Federal transportation program a line item in a comprehensive community development program. This could provide metropolitan planning agencies with the financing necessary to implement plans; and if statutory authority were provided through state and local action, these planning agencies could assume the lead transit decisionmaking role.

These alternative potential Federal policy initiatives will be explored more fully in Chapter 7.

Accountability of Decisionmakers

Federal requirements have called for adequate representation of local governmental officials on the boards of agencies receiving transit planning funds, and recent regulations have extended this requirement to cover Metropolitan Planning Organizations. However, Federal policy has been ineffecitve in dealing with a range of limitations on accountability that have been experienced in metropolitan transit planning:

. Closed-door compromising between decisionmakers. Boards dominated by representatives of special-purpose agencies, rather than-delegates from **local governments,** tend to trade favors in exchange for support. When this negotiation process takes place out of public view, the decisionmakers cannot be held accountable.

- Domination by consultants. The planning of San Francisco's BART and more recent experiences in Other metropolitan areas raised questions about the appropriate role of consultants vis-a-vis transit planning agencies. If decisions are made by the consultant, while board members give rubber stamp approval, accountability is reduced. Experience in

the case cities indicates that engineering consultants (1) may be biased toward a particular technology because they are experienced in it, and (2) may have a vested interest in producing a plan they would be qualified to design and construct.

- Imbalances in representation. The metropolitan experience shows there is public interest in structuring boards to be genuinely representative of their constituencies. One reflection of this interest is the demand in several regions to balance suburban and city representation on the board. In general, the case studies indicate that the most accountable decisionmakers are those who are closest to the elective review recess. The move to directly elect the board members of San Francisco's Bay Area Rapid Transit District was another kind of effort to create a more representative board. (However, although direct election may prove to increase the accountability of the BARTD board, in general there is a risk that directly elected board members will be responsive to special interests and not to their public constituencies.)

- Overly parochial concerns of decisionmakers. A problem related to the question of fair representation involves the difficulty of structuring a decisionmaking process to take a broad, regional perspective rather than pursue a variety of narrowly defined parochial interests. Negotiations between board members to make sure each gets his constituency's "fair share" of transit improvements can lead to extensive plans that serve everyone while perhaps failing to focus improvements where they are needed. This problem is directly related to the means used to finance transit plans, and resolving it is as much a question of financing policy as institutional policy.

- Need for legislative oversight at the state level. Experience shows establishment of legislative oversight committees at the state level can provide an important degree of accountability, but only a few state legislatures have taken this initiative. Legislative oversight is appropriate where states created or are helping finance the agency in question. (In cases where the state legislature is not actively involved in supporting a metropolitan transit program, transit opponents potentially could use the oversight function as a platform for obstructing progress in transit development; although the opposite situation is also possible, and the oversight committee might be used as a platform by reformers.)

Implications for public policy. Formal provisions to allow public accountability of decisionmakers are the result of statutory action at the state and local levels. A number of different means could be used, as long as the decisionmakers are close to the

elective review process. Given the complex character of the difficulties that- must be faced in structuring an accountable decisionmaking process, the main issue for Federal policy is that no information about the effects of different approaches has been available.

If key transit decisions are being made at the state level, the decisionmakers could be high-level gubernatorial appointees, and thus the governor could be held accountable in direct election. If local governments take on a key decisionmaking role, the tie to the electoral process could be equally direct, through the mayor or elected city or county council. If, on the other hand, the decisionmaking organization is a regional transit operator or planning agency, its policy board could be comprised of local elected or appointed officials whose term in public office is determined by a public vote.

Distributing the number of representatives on the one man, one vote principle would create a board that is more truly representative of-a region's interests than if each jurisdiction, regardless of population, were represented equally.

Transit agencies have sought planning assistance from consultants primarily due to the general lack of trained and experienced personnel that might be hired permanently. In recent years, however, planning and construction experience in San Francisco, Washington, D.C., and Atlanta have added somewhat to the nation's reservoir of transit planning professionals. Staffing transit planning agencies with sufficient independent technical expertise to review and direct consultant activity might be a step toward reducing opportunities for consultants to dominate. Similarly, transit agency personnel skilled in day-to-day transit operations should be encouraged to oversee consultants who are unlikely to be knowledgeable about critically important transit operations and management considerations. Where appropriate, state legislative review committees could provide an additional check on the decisionmaking process on behalf of the public.

In the end, the inability of Federal policy to lead an adequate decisionmaking forum is at the heart of the accountability issue. The key to an accountable decisionmaking process is for the decisionmaking agencies to have clear authority to carry out their responsibilities. The Federal Government could encourage accountability in the course of encouraging establishment of a more clearly defined forum for decisionmaking in the ways described earlier in this chapter.

By attempting to focus decisionmaking in the Metropolitan Planning organization and making certain that it has an accountable board, the Federal Government is not squarely addressing the accountability issues and, in fact, may be compounding them. If the public believes decisions are made in one forum when they really are reached outside that forum, the entire decisionmaking process tends to occur out of public view and thus is less accountable than it would be if the public at least knew where decisions were being reached.

Citizen Involvement

Since the mid-1960s, Federal requirements have called for giving the public the opportunity to be heard in the transit planning process. However, even though public officials increasingly have come to regard public participation as an integral part of the planning and design process, only a few programs -- such as Boston Transportation Planning Review, Denver's development of its transportation land use concept in 1972, and the BART extension studies -- have been structured to solicit citizen participation from the beginning. Several factors have helped keep planners from taking adequate approaches to citizen participation:

- preelection of transit technology. Metropolitan experience indicates that decisionmakers who favor a particular type of technology or transit system configuration from the beginning of planning are unlikely to design citizen participation programs that are successful in identifying and resolving disagreements and conflict among members of the affected community. If citizen participation programs are regarded as public relations campaigns, there is a danger that public commitment will be made to a particular technology without full consideration of all its potential impacts.

- Unawareness of potential ill-effects of transit. Experience shows a tendency for the public to assume, as transit planning begins, that transit systems , unlike proposed highways, pose no potential serious threats to their neighborhoods. The assumption can help keep down the level of participation and range of issues debated until late in the planning process, after construction has begun and more citizens become aware the project is real. Unless the public is given adequate information from the beginning about all the potentially positive and negative side effects associated with construction and operation of a transit system, planners increase the likelihood that opposition will be voiced later on in the process, when delay and restudy is more costly. Processes that consider issues on a subregional basis rather than systemwide are likely to attract a greater number of participants.

- Risks incumbent in citizen participation efforts. Planners may be reluctant to encourage citizen participation because the programs are time consuming and costly, and if the interests of a small group are allowed to dominate, they can bias decisionmaking.

Implications for public policy. Citizen participation programs are a means for collecting data about public values and needs that are essential for making sound transportation plans. The

main issue for Federal policy is that although Federal guidelines require citizen participation, they do not provide adequate guidance for how and when to conduct a-citizen participation program.

There is no one way to conduct a successful citizen participation program, and Federal guidelines cannot be expected to spell out a magic formula for approaching citizen participation in a way that will either achieve a high level of participation or ensure that the resulting plan will be accepted by the public. However, Federal guidelines could be made more explicit with respect to the points during the planning process when citizens might most effectively participate. Planners could be required to provide the opportunity for input from citizens or to allow public review at these points in the process, which are discussed in the next section.

Federal guidelines also could clarify the purpose of citizen participation programs. Effective programs regard the information collected in the course of citizen participation efforts to be an essential aid for decisionmakers, but the participation program itself is not a substitute for decision-making.

TECHNICAL PLANNING PROCESS ISSUES

Since the UMTA program was begun following the Urban Mass Transportation Act of 1964, Federal requirements have attempted to guide the conduct of the technical planning process. Whereas early requirements were limited to identifying the products of the technical planning effort, Section 4f of the 1966 Department of Transportation Act, much augmented by the National Environmental Policy Act of 1969 and the Urban Mass Transportation Assistance Act amendments of 1970, led to requirement of more specific guidance for conduct of the planning work. They mandated consideration of a full range of alternatives in the course of technical planning, identification of the advantages and disadvantages of each, and provision of the opportunity for public involvement in the technical process.

The Federal-Aid Highway Act of 1973, followed by the National Mass Transportation Assistance Act of 1974, [1]/ laid the groundwork for integrating technical planning of highways and transit by placing the Federal programs for the two modes under the same statutory requirement for coordinated urban transportation planning. (This requirement had been articulated first for urban highway planning, back in the Federal-Aid Highway Act of 1962.)

The "Proposed Policy for Major Urban Mass Transportation Investments" published by UMTA in August 1975 (and incorporated in DOT Secretary Coleman's September 1975 "Statement of National

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1/ And set forth in the Septpmber 17, 1975, regulation, "Planning Assistance and Standards: Urban Transportation Planning," op. cit.

Transportation Policy") takes a step toward clarifying how alternatives analysis should be performed. Metropolitan experience demonstrates the need for such clarification and direction to resolve a number of issues impeding conduct of a sound transit planning process.

The national policy issues involving the technical planning process are grouped under four categories corresponding to those used for the guidelines for assessment: goals, development of alternatives, evaluation of alternatives, and implementation.

Goals

The growing popular concern for equal opportunity and environmental protection, combined with demand for public participation in planning, has influenced the technical planning process. The need for development of a broad range of goals that can be translated into criteria and used to evaluate alternatives is now widely recognized. This need is reflected (albeit not expressly) in Federal requirements for public involvement. However, two major factors have constrained the use of goals for this purpose:

- Lack of public involvement. As discussed in the previous section, experience shows that planning programs begun with a predetermined outcome tend to employ inadequate means for citizen participation. This situation rarely leads to an open, participatory transit planning process in which a broad range of alternatives is evaluated against criteria based on public goals.

- Difficulty of developing criteria from broadly formulated goals. Although it is now accepted practice to construct a broad set of goals to guide planning, planners do not agree on how to develop criteria based on these goals. Some goals easily lend themselves to qualification, but many social, environmental, and aesthetic objectives present difficulties. One aspect of the problem is that there is little definitive information about the relationship between transit and certain social objectives, such as land use.

The main issue for Federal policy concerns the need for more guidance on how to structure goal-setting and on the use of measurable criteria in evaluation. Federal requirements stop short of explaining how to go about developing specific objectives and measurable criteria, just as they fail to provide sufficient guidance for conduct of citizen participation programs as a whole. In fact, perhaps by oversight, the proposed UMTA policy for major urban mass transportation investments fails to say that the public should have the opportunity to participate in goal and criteria formulation or in reviewing the extent to which alternatives achieve these goals and criteria.

Development of Alternatives

Documentation of the advantages and disadvantages of a wide range of feasible options is essential to meet Federal requirements calling for-analysis of alternatives. In the metropolitan areas studied, four factors hindered adequate development of alternatives:

- Lack of broad experience with transit technologies. As many of the recent transit planning activities got underway, transit planning and development had been ignored for so many years that there was no body of technological information to draw on in doing the planning. planners in the United States were unaware of technological options that were being investigated and employed in Europe. As a result, much attention focused on conventional, heavy technology transit.

- Preconceived plans. Partly due to the lack of information noted above, and partly due to the difficulty of amassing the political support necessary to launch transit planning, many transit plans were begun with one system clearly the favorite. In these cases, the other alternatives developed tended to serve as straw men.

- Automobile orientation of the public. The rise in auto ownership, and the paralleling, rise in, trips in the suburbs -- where transit traditionally is lacking -- have increased public dependence on the automobile. Under these circumstances, little public support for using portions of the highway network for bus transit can be-expected. This has been one reason why transit alternatives that would operate on existing highways have not been fully considered. (However, growing interest in improving substandard air quality and, especially, the 1973-74 gasoline shortage recently have increased the political feasibility of such options.)

- Separate highway/transit programs. On the other hand, as discussed in the previous section, there is little incentive for developing the transit options that require management or joint use of highways in the absence of effective coordination between agencies with power to implement highway improvements and agencies with authority over transit.

- Influence of self-interested consultants, One limitation on the range of alternatives developed in some cities may have been exerted by the engineering consultants hired to do the planning work. Their mission

and approach was more to design a given system than to develop and evaluate alternatives. Engineering consultants who were hired to do transit system planning could look forward to being hired for larger, more lucrative engineering design contracts, particularly if the system selected were one in which they had extensive previous experience.

Implications for public policy. Most of these problems can be and have already been influenced by Federal policy. Federal research and development programs, as well as private research, have resulted in a relatively comprehensive body of information documenting the performance of alternative technologies. In addition, the proposed UMTA policy specifically calls for greater attention to low-capital alternatives, making this a prerequisite for receiving Federal aid. Finally, the proposed policy's requirement for analysis of the appropriateness of different technologies to serve the varying needs in each part of the region in effect rules out the possibility of beginning the planning process with a preconceived solution.

The proposed policy may not be able to achieve these purposes, however, for several reasons. First, its success is dependent to a large extent on the ability of. UMTA's small, centralized staff to review the local planning process to determine whether adequate consideration has been given to a full range of feasible alternatives. The staff may not have sufficient manpower and technological expertise to carry out these responsibilities without causing harmful delays. (These problems are discussed in the following section on financing issues.)

Second, many of the factors leading to development of preconceived, single-technology plans involve the kind of financing available to transit decisionmakers, and the proposed policy does not affect financing policy. (The specific issues are discussed in the next section.)

Finally, in calling for improved management of existing systems, although the proposed new policy places much higher priority on using existing highways and streets for bus service, it is not backed by promises of Federal support. The provisions of the proposed new policy do not provide the necessary financial incentives for improving coordination between transit and state or local highway programs. Unless Federal transit and highway programs are integrated, it will be difficult and perhaps impossible to put highway-oriented solutions into operation widely.

Evaluation of Alternatives

The purpose of the evaluation process is to give decisionmakers sufficient information about the advantages and disadvantages of options so that selection can be made in full awareness of the consequences of the decision. Several issues have arisen regarding the effectiveness of alternatives analysis in achieving that objective:

* Reliability of forecasts of transit ridership. In transit planning, the data and methodologies used to forecast future transit ridership should provide accurate, reliable information about the circumstances under which travelers will choose transit instead of the automobile, and one type of transit service instead of another. Generally speaking, the ability to measure the relationship between the respective travel times, costs, and use of automobiles and transit has improved since the 1960s, but there is relatively little evidence concerning the long term stability of these relationships. Moreover, the effect of the attractiveness and comfort of new transit technology on patronage is not adequately taken into account in conventional patronage models, which give primary consideration to relative savings in travel time. (Indeed, there are as yet no established methodologies for measuring the influence of such amenity factors.)

* Range of factors to be used in evaluation. To meet a broad range of local and national goals, an equally broad range of factors must be used in the evaluation process. As described under the discussion of 'goals" issues above, some goals are more difficult to frame in a way that is meaningful for use in evaluating alternatives. In this regard, the proposed UMTA policy is ambiguous.

- Need for analysis of local options in addition to regional options. Experience in Boston, San Francisco, and other metropolitan areas indicates the advantages of approaching alternatives analysis on a subregional basis. The findings of the assessment show that metropolitan areas have concentrated on long-range plans too exclusively, and thus often tended to (a) ignore community level or neighborhood needs and (b) ignore demographic trends of the past 20 years in which the greatest growth in travel occurred in suburb-to-suburb trips.

- Need for programming a period for resolution of conflict. The metropolitan experience shows the desirability of including sufficient time, technical staff, and other resources into the planning process in anticipation of the conflicts of opinion that inevitably occur in a complex planning process, and the need to resolve these conflicts. The most effective alternatives evaluation process is iterative: public reviews are scheduled periodically over the course of the analysis, and if more investigation of a particular alternative is desired, or if a new alternative is suggested, the evaluation process is recycled.

Implications for public policy. The main shortcoming of Federal policy to date with respect to alternatives analysis has been its failure to give specific guidance for how to conduct the evaluation. The proposed UMTA policy answers this deficiency by calling for application of cost-effectiveness criteria to alternatives and by requiring analysis of subregional components of transit Systems. Thus, the new policy offers a potential remedy for the issues that have been cited involving evaluation criteria and balance between local and regional options. However, the effectiveness of the policy in alleviating these problems is not assured.

The proposed UMTA policy calls for analysis of the relative cost-effectiveness of transit alternatives, and UMTA proposes to limit the extent of Federal aid to 80% of the most cost-effective alternative. The results of a cost-effectiveness analysis provide useful information about the relative costs of alternative ways to meet the same objectives. Depending upon the way it is defined and administered, however, the UMTA policy may have two undesirable consequences.

Both potential dangers stem from the failure of the policy to define the factors to be built into the cost-effectiveness analysis. First, because the policy does not clearly state whether local social and environmental goals are to be included in the cost-effectiveness evaluation or merely "taken into account," the policy may lead to excessive focus on low-cost improvements to be implemented in the short range, to the detriment of longer range goals. In addition, because the policy does not explicitly recognize the importance of operating costs in the evaluation of alternatives, the true cost-effectiveness of the various alternatives may not be determined.

The policy's emphasis on subregional analysis is potentially an important step toward structuring a planning process that will be able to meet community-level needs as well as the needs of the region as a whole. However, to be most effective, it would have to be coupled with initiatives to clarify decision-making responsibilities and alter the mechanisms for raising the local share of transit financing.

Additional Federal activities might be taken to address the other issues affecting the conduct of the analysis of alternatives. For example, planning guidelines could describe the need to program time and resources for conflict resolution into the process, or a fixed percentage of planning grants

could be earmarked for this purpose. Finally, Federally sponsored research into the question of improving the reliability of patronage forecasts, and specifically the effect of amenity factors, could benefit transit planning.

Implementation

In addition to generating information to guide decision-making, planners must create a program and schedule for putting a plan into effect. Most transit planning examined in the assessment has had the goal of producing a single, regionwide, long-range plan. Little or no attention was paid to several important program planning questions.

planners have done little analysis of the optimal schedule for staging of construction: which parts of the plan to implement first, and how to coordinate with existing transportation systems. Their plans have tended to be inflexible instead of preserving options both to respond to potential future problems and to take advantage of future technological developments.

Another shortcoming of many plans has been their inability to direct and control transit-related effects, particularly land development impacts. The emphasis on fixed, long-range plans has tended to minimize attention to short-range improvements, despite evidence that such short-term plans are popular. Instead of constructing systems in small, independent increments, planners have conceived of plans as requiring one long-term construction effect.

Failure to stage construction in increments also creates the possibility that constructed fragments of the system will be left isolated if steep cost escalation or other factors force a halt to construction. Constraints that have hindered development of optionally effective and flexible programs for implementation include:

- Inadequacies of financing mechanisms. As will be discussed in the next section, financing mechanisms have tended to encourage packaging of transit proposals into extensive, one-time construction projects rather than subdividing them into increments,

- Inadequate decisionmaking forum. As was discussed in the institutional section, the fragmentation of the decisionmaking forum and the absence of a single lead agency with appropriate authority and responsibility has discouraged the setting of priorities for implementing proposed transit improvements.

- Political pressures. In the context of the constraints imposed by financing mechanisms and the weakness of decisionmaking agencies, political pressures for giving equal service to everyone in the region have encouraged simultaneous construction of as much of the proposed plan as possible.

Implications for public policy. Federal policy has influenced the development of flexible implementation schedules by allowing these constraints to remain in effect. Ultimately, to allow successful staging of construction, they would need to be removed.

The proposed UMTA policy attempts to address the issues by requiring development of plans that can be implemented in stages. Although metropolitan experience bears out the need for incremental staging, the policy could have the undesirable effect of focusing too much on the near-term, thus eliminating opportunities for making investments that will pay off only in the long run. In addition, it runs the risk of encouraging metropolitan areas to concentrate the area's requests for transit improvement in too narrow an area.

TRANSIT FINANCING ISSUES

Issues involving transit financing policy are closely interconnected with issues that have arisen within both the other two categories of investigation. Institutions must have access to sources of financing to be effective in implementing plans, while the technical planning process must Produce plans that are financially feasible. The sources of funds and the conditions under which they are made available have created significant problems for metropolitan transit planners and decisionmakers.

The current Federal program for transit support has evolved over a period of nearly 15 years, expanding from a limited capital loan program begun in 1961. The present program makes $11 billion available over a six-year period to support a range of research, planning, capital improvement, and operating activities. About $8 billion of that sum is administered on a discretionary basis, while a $4 million sum is allocated on a formula basis for optional capital or operating purposes.

A wide variety of mechanisms for financing is used on the local level. Bond issues supported by locally levied taxes have been perhaps the most common method of local transit support for large new systems. Some states have earmarked state tax receipts for transit in urban areas.

Characteristics of the Federal and local financing programs have limited the transit planning and decisionmaking process in a number of ways. The issues raised by the assessment of politian experience are grouped in categories corresponding to four basic guidelines for assessment: ability of the financing devices to achieve national, regional, and local goals; to provide stable and predictable sources of funding; to encourage a balance between long-range, regional, single-technology planning and short-term responsiveness to local needs; and to avoid unnecessary administrative delays at the Federal level.

Achieving National, Regional, and Local Goals

The basic purpose for public programs of transit support, as will be discussed in the concluding portion of this chapter, is to meet the various goals of public policy. Whereas in a general sense transit financing has been successful in meeting a range of national and local goals, four issues have arisen:

- Insufficiency of current funding levels. The national goal of increasing transit ridership has led to an increase in transit service and, in turn, to soaring operating costs. The National Mass Transportation Assistance Act of 1974 (section 5) provided-funds for operating support, but the effects of inflation, combined with the escalating rate of growth in operating costs, have left many transit operators with greater deficits now than before the operating assistance was made available. These increases in operating deficits, as well as the costs of proposed improvements, have created new pressure for expanding the amount of Federal support for transit, and for increasing the flexibility in the uses to which the funds can be put.

- Lack of financing incentives. No financing incentives are provided for achieving certain national goals such as the goal of optimizing the use of highway and street space for transit.

- Narrow-purpose funding. Some goals, particularly local and regional goals involving coordinated development of transit systems and surrounding land uses, cannot be met because transit systems are narrowly defined. In part to keep the price tag low, estimates presented to voters in regional referenda do not provide for many of the costs of infrastructure necessary to achieve optimal land use in the vicinity of transit stations and corridors.

- Separate funding of highways and transit. Separate funding and administration of transit and highway programs at all levels of government has tended to prevent (and will continue to prevent) use of highways to provide transit capacity, even though this is an objective of national policy.

Implications for public policy. Several kinds of policy initiatives would be able to address these issues.

The increasing need for operating assistance could be addressed if a greater portion of the Federal transit program were made available for operating assistance as well as capital aid. If the current funding levels are insufficient to continue

improving the nation's urban transit, or even to keep current levels of service in operation, the Federal Government should consider increasing the amount that is available, while assuring that funds are used most efficiently. If UMTA's new requirement for determining the cost-effectiveness of alternative proposed transit improvements is administered appropriately, as was discussed in the previous section, it should encourage identification of the most cost-efficient way to meet particular combinations of transit goals. To raise the level of total available funds, a policy decision could be made to (1) increase the levels of authorization in the transit program, (2) increase the amount of Federal highway money that is made available for transit, or (3) put the highway and transit programs on a jointly funded basis.

The latter approach would allow the most effective planning and implementation of transit improvements that use highways. Expanding the existing transfer provisions for using Federal highway money to support transit may have undesirable consequences. Currently, metropolitan areas may use funds from the Federal-Aid Urban Systems (FAUS) portion of the highway program for either transit or highway projects. Also, under the interstate transfer provisions, they have the option to exchange funds earmarked for certain interstate highway segments for transit funds. Generally speaking, there is evidence that the decision to use the interstate transfer provision results not only from lack of adequate transit funds, but also from the desire to retain the large sums of Federal aid involved even when it becomes obvious that a interstate segment should not be built. This kind of pressure has provided the incentive for hasty decisionmaking based on inadequate technical planning support.

If the highway and transit programs were put on a joint funding basis, complementary highway and transit programs could be undertaken, thereby reducing inefficiencies in the overall urban transportation system and resulting in more transit service per dollar spent. The need for this kind of economy is becoming increasingly necessary inasmuch as in recent years the total amount of financing available for urban transportation as a whole has been decreasing in real dollar terms.

The issues related to goals also point to the fact that the Federal Government has not successfully taken advantage of the opportunity to use financial aid to achieve specific national purposes. The significance of this opportunity is discussed in the concluding section of this chapter.

Stability and Predictability of Funding

The 1974 National Mass Transportation Assistance Act

permitted local decisionmakers to program section 5 funds over a three-year period with reasonable assurance that they would receive the authorized amounts because they are based on a statutory formula. Because most Federal transit funds are administered on a discretionary project-by-project basis, however, there is no assurance of the amount a local area will receive year by year. (The recent UMTA pledge of $600 million to Atlanta over the duration of the currently authorized program is one of the few exceptions to this situation.)

The short term of the Federal financial commitment to individual metropolitan areas has combined with changes in UMTA policy and the lack of secure financing on the local level to keep local decisionmakers from being able to determine in advance the amount of funding support that will be available to them. This problem has led to:

- Loss of local support. Lack of firm Federal commitment to a specific level of funding has undermined popular support for transit in several metropolitan areas, particularly at the time of referenda on raising the local share of the costs of implementing a plan.

- Repetitions and delays in planning. Several metropolitan transit officials have complained that UMTA unfairly imposed new planning requirements late in the planning process, causing (or threatening to cause) delays.

- Pressure for state aid. Stability of funds required to plan and program effectively has been best achieved when localities do not have to rely primarily on local taxing powers and particularly on the property tax. In general, only states have the power to levy taxes that can provide stable, reliable funding for the local share of transit improvements over time, and in recent years some states have acted to provide that aid.

Implications for public policy. The need to remove uncertainties about future funding availability suggests consideration of a more systematic, rational basis for distributing Federal transit funds among metropolitan areas. The two alternative courses are to continue to use the discretionary grant approach and tie the award of these grants to achievement of specific program objectives, or to allocate most or all of the funds by formula.

The alternative of having UMTA distribute funds by carefully formulated criteria has been the subject of a year-long investigation by UMTA staff for a set of criteria to guide investment decisions. Such criteria would differ from the proposed policy by allowing UMTA to judge directly whether a transit proposal is justified. To date, no conclusions have been reached. Each urban area has such highly individualized characteristics that it is difficult to devise general criteria that adequately take these differences into account.

Alternatively, a large portion of the funds could be allocated by formula, while some funds could be retained for discretionary distribution by the Secretary. Experience in the metropolitan areas indicates this would be a highly satisfactory approach. If most funds were allocated by formula, year-to-year funding levels would be stable, and decisionmakers would have sufficient advanced notice of future funding levels to allow sound planning and programming.

There are difficulties involved in devising and administering an equitable allocation formula. However, a more equitable formula could be devised if highway and transit funds are combined and distributed under one formula. This approach would allow larger metropolitan areas with relatively greater transit needs and relatively fewer highway needs to direct most of their allocated funds to the transit program, while smaller metropolitan areas, whose highway needs (and needs for transit that uses highways) are likely to be greater, could devote proportionally more of their allocated resources to highway purposes.

The portion of the funds that remain in the discretionary program could be distributed according to criteria for achieving Congressionally formulated goals and objectives. Keeping some kind of discretionary grant program is important to allow giving support to cities beginning major transit development programs. Under most formulas, especially if they are based on measures of existing transit service, cities like Atlanta would not receive the large amounts of capital assistance they would need to undertake major new construction efforts.

Long-range, Regional, Single-technology Planning Versus Short-term Responsiveness to Local Needs

Several aspects of Federal and local financing mechanisms have encouraged emphasis on planning to serve the long-range needs of an entire region, usually with a single technology, rather than specific, often more short-term needs of subareas of the region. This problem has been discussed in the previous two sections; the discussion here focuses on ways in which financing policy contributes to the imbalance:

- Competition for limited Federal funds. The national program's discretionary grant approval process has been one of the factors encouraging many metropolitan areas to compete with each other in preparing and submitting plans for larger fixed-guideway systems in order to obtain "their share" of the funds. This tends to build a metropolitan commitment to a very expensive and fixed long term plan. The 1973 increase in the Federal share from 66-2/3% to 80% increased the incentive for large systems because of lower local share requirements.

- Availability of financing for capital improvements only. There can be little doubt that the availability of Federal funds for capital improvements only has created a bias in local decisionmaking in favor of heavy rail

rapid transit systems or other fully grade-separated fixed-guideway systems. Such systems can only be justified if they attract high patronage. Since commuters provide the bulk of transit patronage, planners tend to extend heavy, fixed-guideway systems into the suburbs to maximize service to commuters (and thus maximize patronage).

- Need for regionwide voter support for local share. At the regional level, the need to gain approval in referenda for transit financing bonds or taxes also has led to fixed long-range plans for overly extensive, single-technology systems serving the entire region. A specific technological concept with broad voter recognition and appeal often was required in order for metropolitan leadership to generate sufficient interest to raise the necessary local and state funds to initiate a transit planning program, even with Federal funding. (Ironically, the decision to present an extensive regional system to voters in several cases resulted in defeat of the proposal because it was considered too expensive.)

Implications for public policy. Recent Federal policy initiatives have taken steps to deal with aspects of these issues. The earmarking of a portion of the UMTA program for operating assistance, at local option, removes some of the incentive to invest in capital-intensive systems, at least for smaller metropolitan areas, The fact that these funds are available on a formula distribution basis reduces somewhat the incentive to compete for a discretionary grant in those areas.

Increasing the portion of the Federal aid to be allocated by formula in the manner discussed in the previous section could extend these advantages to larger metropolitan-areas. There would be less of a Federal-level incentive to bypass local needs in order to develop a regionwide plan that might gain more total Federal aid.

Avoidance of Unnecessary Administrative Delays

Many transit planning and operating agencies have complained about the amount of time that it takes UMTA to approve grant contracts or amendments. Several aspects of the UMTA program contribute to this situation:

- Small, centralized UMTA staff. The staff is small in relation to the size of the program, a problem that is exacerbated by the fact that field officials must seek central office approval for most decisions.

- Project-by-project approach. The discretionary grant program has put UMTA in the position of having to judge which types of technology are "best" in metropolitan areas, which is a time-consuming responsibility.

- Equal level of attention to major and minor decisions. Complaints have been made that UMTA follows an equally rigorous process for routine bus purchases as for major new systems, although the availability of Section 5 formula grant money may be relieving this problem in some areas. UMTA has urged localities to use the formula money for routine purchases. In large metropolitan areas where most of the formula funds will be needed to support operations, however, the problem described will persist.

Implications for public policy. Placing a portion of the funds into the formula grant category has allowed UMTA to reduce the likelihood of creating unnecessary administrative delays. By calling for cost-effectiveness analysis on the local level, the proposed investment policy attempts to reduce the time and effort required for UMTA to review grant applications, but unless agreement is reached on explicitly defined cost-effectiveness criteria, the kind of analysis will vary from city to city, and UMTA still will be required to assess the technical aspects of local planning.

Two approaches might be taken to reduce delays in the grant review process. One alternative is to increase the size of the staff, both in the central office and in the field, and to delegate additional responsibilities to the field offices.

The more effective approach might be to put a greater portion of the UMTA program on a formula allocation basis. Funding would be continuous and there would be less need for time-consuming technological judgments in order to decide among grant applications.

THE ROLE OF NATIONAL GOALS

The previous sections of this chapter described a number of issues concerning the structure of the institutions involved in transit planning, the content of the technical planning process, and the mechanisms used to finance mass transit systems. These issues take on special importance today because of the growing support the Federal Government has given public transportation, and the ongoing debate about where to go from here.

At the root of any effort to resolve these problems is a broader issue involving the question of establishing national goals for public transportation. The purpose of such goals should be to provide specific direction for Federal financing policy, for regulations governing the responsibilities of decisionmaking institutions, and for requirements affecting the technical planning process. Although numerous statements of goals are contained in Federal legislation and administrative guidelines, critics of the current situation argue that these goals often are formulated in a way that is too general and broad to be useful.

In other words, existing goals offer no concrete answers to the central questions of how much public transportation the nation wants to buy, what purpose it should serve, and who should pay for it. These questions underlie a national debate over how we might go about a rational, systematic process of setting specific objectives and developing criteria to determine whether national policies and programs are accomplishing what they set out to do.

The participants in the debate do not contend that Federal policy for public transportation has not addressed itself to any goals, or that it has failed to recognize the broad array of purposes related to social and environmental concerns that public transportation can serve. In general, the Federal role in transportation has broadened from one that placed primary emphasis on the economic regulation of transportation activities to one that both promotes the development and improvement of the nation's transportation system and seeks to protect society against the potentially adverse impacts of transportation development.

Statements of current policy are found in several acts of Congress. The Declaration of Purpose (Sec. 2 (a)) of the Department of Transportation Act of 1966 states that national transportation programs should provide fast, safe, efficient, and convenient transportation at the lowest cost -- as long as they are not detrimental to the general welfare, the economic growth and stability of the nation and its security, and other national objectives, including those governing the utilization and conservation of the nation's resources.

The successive acts of Congress creating Federal support for mass transportation --- the Housing Act of 1961, the Mass Transportation Acts of 1964 and 1970, and the National Mass Transportation Assistance Act of 1974 -- in combination call for preserving and revitalizing existing mass transportation systems, increasing

mobility to lower-income people and transit dependents (including the handicapped) , attracting new riders, and using mass transit to influence and support desired development patterns and improved environmental conditions.

Current national transportation policy, as set forth most recently and comprehensively by the Secretary of Transportation in "A Statement of National Transportation Policy," incorporates these legislative goals:

> Federal policy for urban transportation should at once respond to locally determined transportation goals and serve such national objectives as the enhancement of our cities as vital commercial and cultural centers, control of air pollution, conservation of energy, access to transportation for all citizens and particularly the disadvantaged, facilitation of full employment and more rational use of land. [1]/

Recognizing that goals exist, the record of the debate suggests that they must be more sharply defined if policymakers are to be able to determine whether the aims of national policy are being achieved. Both the record of Congressional hearings on transportation policy and evidence gathered in the metropolitan areas examined by this study point to the need to clarify the goals, objectives, and criteria that are applied to public transportation.

During 1974, the Appropriation Committee's Subcommittee on Transportation of the U.S. House of Representatives held hearings on national transportation policy. [2]/ Other hearings, devoted to different transportation-related purposes, also aired discussion about national transportation policy, as did studies and publications outside the Federal Government. Although the various statements do not reflect agreement about the substance of particular goals and objectives that should be established, they do show the major concern that the nation should formulate more specific goals and objectives for what it wishes to achieve. The problem is not that no general goals exist, but that Congress has not directed UMTA to use goals and objectives as a firm basis for mobilizing, dispensing, and evaluating the use of Federal funds. Financial incentives could be offered for achieving specific objectives.

1/ A Statement of National Transportation Policy by the Secretary of Transportation, September 17, 1975.

2/ Department of Transportation and Related Agencies Appropriations for 1975, Hearings before a Subcommittee of the Committee on Appropriations, 93rd Congress, Second Session, 1975.

The problem is also reflected to varying degrees in the metropolitan areas examined by this study. While the general goals of increasing mobility, enhancing environmental quality, and shaping the pattern of land use remain overriding concerns of metropolitan transit planners, more questions have arisen regarding the best types of transit systems to reach these goals. Alternatives such as light rail or trolleys, PRT, busways, forms of paratransit, and conventional buses are being explored and more information sought on the relative merits of each.

For some, this questioning has -been spurred by UMTA's shifting policies. The main impact on metropolitan transit planning of the lack of clearly defined goals has been the difficulty of determining in advance how much Federal assistance will be provided, and what it will pay for. The problems related to this instability of funding were described in the financing section of this chapter.

As yet neither UMTA nor the several cities that are planning rapid transit systems have developed any one means for weighing the advantages and disadvantages of alternatives in order to come us with the one most suitable for their particular purposes. One reason this is so, and for why the local as well as the national debate runs on, is that it is difficult to reach agreement on specific criteria that can measure when goals for public transportation have been achieved. Each urban area has such highly individualized characteristics that it is difficult to devise general criteria that take these differences into account. Until such agreement is reached, it will be difficult indeed to pin down what UMTA's investment should achieve, and how, in turn, the local planning institutions and technical process should be structured.

Considerations for public policy. The practical issue in the debate about goals for public transportation may have less to do with whether goals and objectives can be set-and more to do with who should set them and who should have the power to carry out the programs to achieve them.

Setting specific national goals and objectives is not without precedent. Although they are simplistic examples, the interstate highway program and the space program are both cases in which Congress has set specific goals and established the institutional and financial means to achieve them. More

appropriate examples are the goals Congress has established for clean air and water. These have specific objectives for limiting pollution content in maximum amounts during specified periods and by certain dates. Criteria are being developed to measure effectiveness.

The purposes of public transportation may not be so susceptible to specification. But there are examples to be found. For instance, in the short term criteria could be based on increased accessibility of the population to transit. In the long term, criteria might be derived to build links between transit and patterns of urban growth. For example, urban areas could be required to prepare urban growth plans, backed by incentives and growth contours, in which transit service was provided to concentrations of housing and employment. Formulation of such criteria merits careful study because of the complexity of the relationships between land use and urban development.

The task of exploring whether goals and objectives should be set and, if so, what they might be, can be approached on either the national level or the local metropolitan level.

On the national level, a number of approaches might be taken. DOT and UMTA could be mandated to examine the question of goals, objectives, and criteria, and report to Congress by a certain date; a national commission could be established with the same mandate; or alternatively, a legislative commission could be empowered to explore the matter and, if required, prepare legislation for consideration by Congress. In any one of these cases the important task will-be to bring the matter to a legislative forum where the issues can be fully debated and decisions, made on the appropriate course of action. Responsibility for the task might also be left to local authorities. . In this case, the Federal government would have to make the requisite powers and funding available to the localities to carry out their programs.

Regardless of the approach taken, reaching an agreement on precise national or local goals and objectives poses difficult questions. But the kind of goals that are set will underlie whether more specific policies to shape transit institutions, planning, and financing will achieve their intended effects.