

Federal Regulations Impact Studies
SAN DIEGO TROLLEY
IMPLEMENTATION PROCESS EVALUATION
Working Paper Number 1

San Diego



ASSOCIATION OF
GOVERNMENTS



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January 1982

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**ASSOCIATION OF
GOVERNMENTS**

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FEDERAL REGULATIONS IMPACT STUDIES

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I. INTRODUCTION AND FINDINGS

At the beginning of the San Diego Trolley Implementation Process Evaluation, library research was undertaken to identify other studies which attempted to quantify the time and dollar costs of federal (or state) regulations. The purpose of this research was primarily focused on the methods used in other studies which might be of benefit. This work was largely completed before the work program was finalized.

The purpose of this study is to identify the difference between the MTDB procedures and those which would have been required if the system had been built using federal monies. The procedures which will be evaluated include those for planning and engineering, purchasing, contract administration, "buy America" requirements, construction standards, operating plans and labor contracts. For example, MTDB essentially omitted the preliminary engineering phase, going directly from feasibility studies to final design. Also, the light rail vehicles were purchased before final approvals were obtained for the project. Undoubtedly, other differences will be identified.

Six methodologies were identified which will be utilized in this "Implementation Process" study. Half of these methods are fairly routine; but the other half (B, D and E, below) were not originally included in the study work program.

- A. Liaison or Advisory Groups: Many studies use advisory groups which can be separated into two distinct types: policy and technical advisors. Because this study focuses on a fairly technical implementation process, the advisory group will be composed primarily of engineers and planners.
- B. Position Papers by Advisory Group Members: Specific issues within or about the study will often arise. Particularly when a technical committee is involved. One or more members of the advisory committee may have specific expertise on this issue, and could prepare a working paper addressing it. This work could be reimbursed by the study. No specific issues or contributors have been identified for the Implementation Process study.
- C. Questionnaires: Many different types of questionnaires can be used. For the Implementation Process study, the initial questionnaire requests information on specific problems with existing federal rules and regulations which have been experienced by engineers and planners who have planned and implemented rail systems in the United States. Other questionnaires may be used later in the study.

- D. Catalogue of Regulations: Federal regulations are quite lengthy, and are often published in different formats. A catalogue, which summarizes the most pertinent aspects of each regulation, will be prepared in the initial stages of the Implementation Process study.
- E. Functional Responsibility Matrix: In a manner similar to the catalogue, a responsibility matrix will be used to summarize the responsibility for enforcing federal transit regulations. Again, this is a tool to help in understanding the interrelationship of the regulations and to summarize the participation of various agencies and offices within UMTA in the federal implementation process.
- F. Base Case (Minimum Reasonable Cost): The San Diego Trolley will be used as a base case for this study. It represents the cost of implementing a rail transit system without federal regulatory control.

II. DESCRIPTION OF RELEVANT STUDIES

- A. A Comparative Analysis of Federal Port Policy in the United States and Canada, Geoffrey R. McIntyre, Ph.D., New York University, University Microfilms International, Ann Arbor, Michigan, 1978.

This study is a comparative investigation of U.S. and Canadian Federal government ocean port policies. In the U.S., the principle of interport competition and relative independence from federal government involvement reflects traditions of a decentralized local concern. In Canada, since 1936, ports have been organized as a national port system administered by the National Harbours Board. This report is an inquiry into the responsiveness of two different port systems to a common innovation made possible by the development of cargo containerization. The methodology behind the research involves:

1. The historical evolution of port policy in the U.S. and Canada as background.
2. The development of a Functional Responsibility Matrix (see Appendix A) showing U.S. Federal agencies involved in key port activities of planning and development; port promotion; and port operations.
3. The development of a mathematical trend line indicative of containerization growth, and evaluation of the impact of containerization.
4. The drawing of conclusions between the adoption of the two port systems to the intermodal freight transportation system (minibridge service).

This study is both descriptive and analytical, since the subject is not conducive to a solely quantitative approach. This comparative method goes beyond the question of what is, to the concern with why things are the way they are. It investigates the historical forces which have created this relationship — adaption/opposition to a new cargo distribution method. It examines the implications of divided administrative responsibility, considering the fragmentary nature of the U.S. Federal governmental port policy. Also examined is the impact of containerization. Emphases are on the evolution of the load center concept and the trend towards larger containerhips as indicated by the method of least squares. The adaption of longshore labor is dealt with in depth.

- B. Urban System Study, Report of the Secretary of Transportation to the United States Congress, Pursuant to Section 149, Public Law 94-280, Federal-Aid Highway Act of 1976, U.S. Government Printing Office, Washington, 1977.

Section 149 of the Federal-Aid Highway Act of 1976 directed the Secretary of Transportation to submit a report to the Congress within six months of enactment of the legislation, documenting findings of a study on the various factors involved in the planning, selection, programming and implementation of Federal-Aid Urban System routes. The objectives of the study may be summarized as follows:

1. To obtain information on the implementation and functioning of the Federal-Aid Urban System Program.
2. To analyze this information with regard to:
 - a. The various types of organizations which carry out the planning process required by Section 134 of Title 23, United States Code (U.S.C.).
 - b. The status of jurisdiction over roads on the Federal-Aid Urban System.
 - c. Programming responsibilities under local and state laws.
 - d. The authority for and capability of local units of government to carry out the necessary steps to process a highway project.

The study was carried out by staff of the Federal Highway Administration and Urban Mass Transportation Administration, in cooperation with state, county, city and other local organizations.

The study had been divided into four phases; Phase II is most relevant to the Guideway evaluation:

Phase II: Develop procedures and gather information.

Based upon review by the Liaison Group, developed the information needs required for this study. Categories of information:

- a. Complete national data based upon current information.
- b. Experience of the organizations represented by the Liaison Group with the Urban System Program.
- c. Information from a representative sample of urbanized areas. This information includes, for the various types of organizations that currently carry out the Section 134 planning process, the degree of representation of local governmental units, staffing, authority under law, and

relationship to the state transportation agency. Information for local and state agencies includes the legal and actual responsibilities for planning, selecting, programming, designing, and constructing Urban System projects.

C. Cost Impact of U.S. Government Regulations on U.S. Flag Ocean Carriers, John Cameron, Ernst and Whinney, U.S. Department of Commerce, Washington, D.C., December, 1979.

This report summarizes the findings of a project to identify the cost of U.S. government regulations which are incurred by U.S.-flag ocean carriers and which have a detrimental impact on U.S.-flag carriers in competition with foreign-flag carriers. Included is:

1. A discussion of the objectives of the project including a description of the tasks performed.
2. Highlights of the major findings of the project and a discussion of these findings.
3. Identification of the overall cost impact of U.S. government regulations on the U.S.-flag fleet operating in foreign trade.
4. Recommendations for future action by the government.

In addition to this overall purpose, there are several specific study objectives, as follows:

1. To prepare a comprehensive catalog of U.S. government regulations which deal with international marine transportation.
2. To determine and analyze the actual costs of selected U.S. government requirements.
3. To identify the nature and extent of U.S. regulations which impact adversely on U.S.-flag ocean carriers.
4. To access the competitive disadvantage suffered by U.S.-flag carriers.
5. To consider appropriate actions which can be taken by government and various affected parties for reducing the negative impacts of U.S. government regulation affecting the maritime industry.

It was recognized early in the project that the objectives could best be met through the active participation of the maritime industry. Industry participation was thus solicited in two principle areas: the creation of an Industry Advisory Committee for the duration of the project and the widespread use of companies to supply cost data and other information.

D. Impacts of Urban Mass Transportation Administration Capital Grant Programs, Dr. Leonard Merewitz National Transportation Policy Study Commission, Washington, D.C., 1979.

This paper attempts to analyze the impacts of UMTA capital grants in terms of eleven national transportation goals: adequate service; appropriate rates and prices; economic efficiency; energy conservation; environmental protection; safety; employment generation; industry promotion and protection; regional and urban development; equity; and national defense. Where they are quantifiable, benefits and costs of grant programs are estimated for each goal. In general, grants for buses are found to be more cost effective than grants for urban rail.

This paper focuses on the impacts of the following programs on urban mass transportation:

- a. Capital assistance grants.
- b. Federal-Aid Urban Systems grants.
- c. Interstate transfers.
- d. The capital assistance portions of formula grants.

The paper discusses the purpose and background of each program. The report attempts to estimate the effect of the absence of grant funds on transit systems. Several questions are raised pertaining to the UMTA capital grants, including:

- a. How many millions of transit passenger-miles per year were affected by UMTA capital grants?
- b. Would commerce and industry have decentralized further in the absence of good commuter service?
- c. Would cities have paid for new buses themselves?
- d. Would fares have increased?
- e. Would block grants or other funds have been available for transportation projects?

In this analysis, it is assumed that general state and local support would remain as it has been and that level of service would also remain the same. Without UMTA grants, it is assumed that fares would have been raised to make up for the shortfall in revenues. Passenger response to such fare increases are estimated, and the amounts by which these estimates differ from actual ridership could be considered to be the number of passenger-miles induced by UMTA capital assistance.

E. Review of Possible Effects of Some Selected Federal Actions on New Transit Product Introduction, David Chin, UMTA, Washington, D.C., July 1979.

Federally funded research and development (R&D) programs sponsored by various agencies have shown that merely spending money on R&D does not automatically guarantee innovation. Innovation must be viewed as a process occurring over time and it will not be realized until there is development of the new technology into the marketplace. The main concept of this study is to evaluate the feasibility and effectiveness of new concepts and modification of existing concepts by which the federal government can encourage the deployment of the most appropriate innovation in urban mass transit.

In order to perform this study, information was gathered on the problems facing the innovation process and possible methods that could alleviate these problems. Fifteen concepts were examined by which UMTA could strengthen its role in the technology deployment phase of the innovation process. From the in-depth discussions based on a questionnaire with nine members of the transit industry, the transit operators identified uncertainty over future federal design and performance guidelines as the single major barrier to new product introduction.

The transit suppliers cited uncertainties over the stability and volume of annual product sales, opportunity costs of foregone investments, and lowest-bid procurement as their barriers. Of the fifteen concepts, six were ranked as highly feasible and effective: (1) standard set of performance guidelines; (2) lowest life-cycle cost procurements; (3) federal grants for the purchase and test of limited production quantities; (4) coordination of transit products orders by UMTA; (5) use of federal capital incentives to influence local authorities to adopt regulations to encourage transit use; and (6) formation of a transit operators and suppliers committee to facilitate greater cooperation in the development cycle. In-depth analysis was performed on the six selected concepts, and examples of UMTA programs incorporating recommended concepts were discussed.

The methodology of the study is centered on a series of interviews based upon a questionnaire, and then analyzing the responses to the questionnaire and interviews. The participants included selected representatives of the railcar building industry, bus manufacturing industry, component supply companies, and transit authorities.

The questionnaire is organized into four sections:

1. Developments in transit technology that are seen as being useful to suppliers and operators over the next 10 years.
2. Barriers to the successful development and delivery of the types of technology identified in Section 1.
3. Current UMTA programs designed to assist in the technology delivery areas.
4. New programs, or modifications of existing ones, that could be used by the federal government combatting the technological delivery barriers.

The initial section of the questionnaire presents two major groups of questions. The first group requests that the participants identify the types of technology that are of interest to them either as a transit supplier or operator. The second group addresses the need for innovations over the next 10 years for those categories of technology that are of interest. The participants are asked to rank the areas of technological interest and need for innovation according to the following key: high, medium, low and none.

In the next section, 20 potential barriers are identified. The purpose of this section is to identify the barriers that are perceived as directly impeding the effective delivery of the needed technology identified in the previous section.

The third section of the questionnaire relates to the current UMTA programs for stimulating the technology delivery mechanism. The specific purpose of this section is to learn from both suppliers and operators the extent to which these current UMTA programs have been successful in countering the barriers identified in Section 2.

Finally, the last section lists 15 new types of incentive programs, or modifications to the existing programs, that could be undertaken by the federal government in reducing or removing the barriers. In this section, the participants are asked to rank the feasibility of using and the resulting effectiveness of each of these new concepts.

F. Urban Mass Transportation, A Dozen Years of Federal Policy, George M. Smerk, Indiana University Press, Bloomington and London, 1974.

The objective of this book is to recount what has happened over a little more than a decade of federal participation in urban mass transportation. The book is a narrative version of a survey course in federal urban mass transportation policy. The book reviews the development of federal policy and goes on to discuss some of the pros and cons regarding transit. There is a brief examination of the transit industry and the federal agency responsible for the execution of the federal transit policy. The third objective of the author is to review the findings, successes, and failures of federal policy, including examination of some of the very basic causes behind the failures. Finally, suggestions for long-run and short-run policy and procedural changes that might lend to improvement in urban mass transportation are made.

III. APPLICABLE PROCEDURES AND METHODOLOGY

The major focus of this review of previous regulation studies was to determine study methodologies which may be of use in the evaluation of the MTDB implementation process. Seven potentially useful methodologies are described below.

A. Liaison or Advisory Groups

The use of advisory groups drawn from concerned agencies was one of the most common methods used. To obtain information on the implementation and functioning of the Federal-Aid Urban System Program, the Secretary of Transportation established a Liaison Group for the Urban Systems Study. The 12-member Liaison Group was composed of the following organizations:

- The Advisory Commission on Intergovernmental Relations
- The American Association of State Highway & Transportation Officials
- The American Public Transit Association
- The American Public Works Association
- The Council of State Governments
- The International City Management Association
- The National Association of Counties
- The National Association of Regional Councils
- The National Conference of State Legislatures
- The National Governor's Conference
- The National League of Cities
- The U.S. Conference of Mayors

This Liaison Group provided local, state and a broad national policy perspective.

In the study, Cost Impact of U.S. Government Regulations on U.S. Flag Ocean Carriers, John Cameron also used an Industry Advisory Committee to help identify the cost of U.S. government regulations which are incurred by U.S.-flag ocean carriers and which have a detrimental impact on U.S.-flag carriers than on foreign-flag carriers. The Committee met several times to provide guidance and feedback on both the study approach and the conclusions and recommendations. The Committee members included:

- The President of the American Institute of Merchant Shipping
- The Vice President of the Moore-McCormack Lines, Inc.
- The Director of Mobil Shipping and Transportation Company
- The Director of Sea-Land Service, Inc.
- The Vice President of the Shipbuilders Council of America
- The Vice President of Ogden Transportation Corporation
- The Vice President of the Council of American-Flag Ship Operators
- The Marketing Manager of the Bath Iron Works Corporation
- The Vice President of Zapata Bulk Transport, Inc.

Three major industry associations represented on the Committee also provided support, consultation, and access to their member companies at numerous times throughout the study. They significantly aided in helping to gain credibility for the research effort within the maritime industry.

The study team was assisted by various offices and individuals of the Maritime Administration, U.S. Department of Commerce (MARAD), as well as other federal agencies. This was particularly the case for reviewing interim products such as the cost impact work manuals and the catalog of regulations. Numerous companies participated in the assimilation of cost estimates according to the format supplied by the study team.

An advisory group made up of planners and engineers will be used in this current study to identify problems with the existing federal regulations and comment on study findings and recommendations. These professionals will be drawn from agencies planning or implementing guideway transit systems.

B. Position Papers by Advisory Group Members

System Study Liaison Groups contributed position papers outlining the issues affecting the Urban System Program. The views of the Liaison Group, where relevant to a specific issue, are reflected in the Urban System Study. The Liaison Group papers dealt with the following issues:

1. The various types of organizations carrying out the planning process (23 U.S.C. 124).
2. The status of jurisdictions over roads on the Federal-Aid Urban System.
3. Programming responsibilities under local and state laws with respect to the Federal-Aid Urban System.
4. The authority for and capability of local units of government to process highway projects.

The Liaison Group made recommendations in a separate study document entitled Toward More Balanced Transportation: New Intergovernmental Proposals.

As major issues are identified in this implementation evaluation, it may be appropriate to have advisory group members with specific expertise prepare working papers.

C. Questionnaires

The methodology of David Chin's study of new transit products is centered on a series of interviews based upon a questionnaire, and then analyzing the responses to the questionnaire and interviews. The recipients of the questionnaire included selected representatives of the railcar building industry, bus manufacturing industry, component

supply companies, and transit authorities. The questionnaire was organized into four sections:

- I. Categories of Technology
- II. Barriers to the Needed Types of Technology Advances
- III. Current UMTA Programs
- IV. Suggestions for New or Modified UMTA Programs

An abbreviated sample of the questionnaire is shown in Appendix B.

One of the initial tasks of the implementation evaluation will be the distribution of a questionnaire to implementing agencies. This questionnaire requests information on specific problems with existing federal regulations.

D. Catalogue of Regulations

In the study of cost impacts of regulations on ocean carriers, Cameron's first major technical task was the identification and recording of all regulations, legislation, and administrative orders of the U.S. government which are related to the business of international marine transportation. The regulations were identified initially on an agency basis, using two principal sources; The Code of Federal Regulations, and a Congressional publication entitled The Merchant Marine Act, 1936, The Shipping Act, 1916, and Related Acts, As Amended Through the 94th Congress. Maritime industry regulations of the following agencies are promulgated by 19 federal departments and commissions.

The maritime-related regulations of each agency were catalogued according to two categories: (1) Operational, Engineering, and Technical Requirements; and (2) Economic, Administrative, and Federal Assistance Requirements.

For the ultimate purpose of determining the costs of the regulations, it was necessary to detail the specific requirement placed on the maritime industry by a given regulation or set of regulations. Regulations were summarized on a standard recording form, a portion of which was dedicated to the specific requirements imposed. Typically, the single page form, as shown in Appendix B, covers a regulation or set of regulations digested at the sub-part level of the Code of Federal Regulations (CFR). Some contain several related sub-parts or even entire parts of the CFR.

The resulting catalogue in two volumes (602 pages) serves as a condensed and usable summary of what is contained in thousands of complex sections, paragraphs, and sub-parts of legal and technical terminology in various administrative and general orders, regulations, and federal legislation. The catalogue was carefully reviewed for completeness and accuracy by the federal agencies which promulgate the subject regulations. It thus represents a single source of information in summary form for all the U.S. government regulations pertaining to the business of international maritime transportation.

With a nominal amount of effort, the catalogue may be indexed and then annotated annually.

Once all the requirements were identified and catalogued by agency, it was then necessary to select those regulations which seemed to have the most adverse cost impacts on the industry. This was done through discussions with the Advisory Committee.

While the regulations affecting the implementation of rail transit are far less complex, a catalogue will be prepared for review by UMTA and the Advisory Group.

E. Functional Responsibility Matrix

Geoffrey McIntyre's study is a comparative investigation of U.S. and Canadian Federal government ocean port policies. U.S. ports are characterized by a competitive system under local governmental control. Federal inputs relating to ports are fragmented among several organizations, each guarding its own interest. The issue of divided administrative responsibility at the federal level is represented by a Functional Responsibility Matrix.

McIntyre uses the Functional Responsibility Matrix to demonstrate the degree of government involvement in the port policy. The matrix shows the 14 federal agencies and their level of responsibility in three key port activities:

<u>Port Activity</u>	<u>Level of Responsibility</u>
1) Port Planning & Development	G) General Responsibility
2) Port Promotion	A) Approval Required
3) Port Development	P) Primary Responsibility
	S) Specific Inputs
	L) Local Concern
	F) Funds Project

Many jurisdictional problems arose because U.S. regulatory agencies are concerned with single modes of transportation. Not only were there numerous conflicting policies, there were differences of approach and competition for funds. In Henry Marcus' Federal Port Policy in the United States, some 45 federal agencies involved in port and harbor development are identified and arranged in a classification scheme:

High Involvement, Low Impact	High Involvement, High Impact
Low Involvement, High Impact	Low Involvement, Low Impact

While responsibilities for rail implementation lie primarily within UMTA, a responsibility matrix for the various regulations will be drafted as part of the implementation evaluation.

F. Base Case (Minimum Reasonable Cost)

To determine the cost of ocean freight service without government regulations, a "base case" was developed by Cameron. Because the study objectives call for the determination of "incremental costs, i.e., the additional costs incurred as a direct result of the government mandated

requirement," the base case was established as follows: the cost of complying with union contract provisions, certain internationally recognized standards, or the minimum requirements of a prudent operator, in those cases where quantification was difficult. In other words, the establishment of baseline standards means that there would be a cost reduction if a requirement were eliminated and if the vessel operator and/or builder were free to design specifications based solely on international standards or on good judgment, whichever is less. Only requirements that are above these standards actually have a cost impact imposed by U.S. government regulations.

In this implementation evaluation study, the MTDB process is essentially being used as a base case from which incremental time and cost increases required by federal regulations.

IV. OTHER REPORTS REVIEWED

- . "How UMTA Makes a Grant," Thomas R. Crosby.
- . "Major Urban Mass Transportation Investments: Statement of Policy", Federal Register, Volume 41, No. 185, pp. 41511-41514, September 22, 1976.
- . Federal-Aid Highway Program Manual, Volume 6, Chapter 3, Section 2, Subsection 2, FHWA, November 14, 1975.
- . "Major Urban Transportation Investments: Statement of Policy," Federal Register, Volume 43, No. 236, December 7, 1978.
- . "Reducing the Paperwork Burden on Transit Operators," Federal Register, Volume 45, No. 53, March 17, 1980.
- . The Impact of Section 13(c) of the Urban Mass Transportation Act on Labor Management Relations at BART, John Kilgour, 1978.
- . Analysis of BARTS Operational Problems and Fiscal Deficits with Recommendations for Corrective Action, California Legislative Analysis, 1974.
- . Denver-Background and Implementation of Light Rail Transit, Deleuw-Cather, 1979.
- . An Analysis of the Financial and Institutional Framework for Urban Transportation Planning and Investment, Wells-Asher-Brennan, 1970.
- . Transportation Systems Evaluation, Peter Stopher and Arnim Mayburg, 1976.
- . Optimal Pricing and Investment Policies for Airport Landing Areas, Steven Morrison, 1979.
- . MARTA Phasing Study: Analysis of Priorities for the Completion of the Rapid Transit System, MARTA, 1977.
- . Interrelationship Between Planning and Funding, Mark Goode, 1977.
- . Urban Mass Transportation Industry Uniform System of Accounts and Records and Reporting System, UMTA, 1977.
- . Transportation and Substate Regionalism, Peter Lima, 1978.

- . Transit Regulation: Improve It, Decrease It, or Eliminate It,
Vukan Vuchic, 1976.
- . Toward Unification of National and State Policy on the Transportation Disadvantaged, Florida State University, Department of Urban and Regional Planning, 1975.
- . Scope and State Role in California Passenger Railroad Development, California State Assembly, Committee on Mass Transit, 1980.
- . Regulatory Change: Experimentation in Motor Carrier Entry Control, Robert Merrill and Thomas Coral, May 1979.
- . Incentives and Penalties in California Transportation Policy: The Impact on Three Programs on How People Travel, Don Brown, 1979.

APPENDICES

- A. Functional Responsibility Matrix
- B. Example Regulation Catalogued
According to Standard Format

APPENDIX A

FUNCTIONAL RESPONSIBILITY MATRIX

	<u>Port Planning & Development</u>	<u>Port Promotion</u>	<u>Port Operation</u>
Local Concern	P,F	P,L,F	L
Dept. of Agriculture			S
U.S. Customs			S
Office of Management & Budget	A		
Interstate Commerce Commission			A
Water Resources Council	S		
Office of Coastal Zone Mgmt.	G		
Federal Maritime Commission			A
Environmental Protection Agency	G,S		G,S
Dept. of Interior	G		G
Dept. of Transportation	S		S
Council on Environmental Quality	G,S		G,S
U.S. Coast Guard	G		P,A,S
U.S. Army Corps of Engineers	P,A,S,F		G,S
Maritime Administration	A,S,F		S

LEGEND: G = General Responsibility
 A = Approval Required
 P = Primary Responsibility
 S = Specific Plan
 L = Local Concern
 F = Funds Project

The matrix is used to identify the level of involvement/impact each agency has on each category. For example:

High Involvement/Low Impact
 Low Involvement/Low Impact
 High Involvement/High Impact
 Low Involvement/High Impact

APPENDIX B

EXAMPLE REGULATION CATALOGUED ACCORDING TO STANDARD FORMAT

SUBJECT: Specifications - Lifesaving equipment and proposed rules

CITATION: 46 CFR 160.01160.64 EFFECTIVE DATE(s): 1/23/46 generally
with amendments

ENABLING STATUTE(S): 46 U.S.C. 391a, 404, 481, 489, 395, 367, 1333,
3906; 50 U.S.C. 198

PRINCIPAL AGENCY: Commandant, V.S.C.G. COORDINATING AGENCY(IES): Many

ABSTRACT: Contains specifications for life preservers, life rings, buoys, gas masks, breathing apparatus, respirators, self-igniting water lights, hatches, lifeboat winches, safety flame lamps, embarkation ladders, life-crafts, flares and distress signals of various types, emergency drinking water, lifefloats, signal pistols, line throwing appliances, davits and other lifeboat disengagement machinery, lifeboats, wood floats, first-aid kits, skids, jackknives, pumps and bilges on lifeboats, vests, buoyant cushions, inflatable liferafts, work vests, rescue boats, desalter kits, fishing tackle kits, and other lifesaving equipment.

Note proposed rule at 43 FR (6/8/78) which would add new sub-part 160.0716 specify construction and performance of exposure suits (see also 43 CFR 33).

REQUIREMENTS/FORM/FEEs: Requirements for each type of equipment in most (usually all) of the following areas:

- . Specifications and plans to be filed with government and/or retained by manufacturer
- . Approved types and models
- . Design and construction
- . Materials
- . Markings
- . Storage
- . Inspection and testing
- . Servicing and maintenance
- . Procedures for approval

Note proposed rule at 43 FR 49445 (10/23/78) which would implement a new test, new marking, and labeling rules, new specifications, etc., and would amend sub-parts 164.021, .022, .234, .024, .028, .031, .036, .040, and .057.

RELATIONSHIPS AMONG REQUIREMENTS: Some equipment must meet the standards of other agencies. For example, gas masks must meet Bureau of Mines standards; and canned emergency drinking water must meet Public Health

Service standards. Specifications for most other approved equipment can be obtained from the Commandant at Coast Guard headquarters or the Business Service Center, General Services Administration.

RELATED REGULATIONS/STATUTES: 46 CFR 94 - Lifesaving equipment - installation and numerical requirements.

PENALTIES/APPEALS: None provided.

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