

VOLUME II, SECTION VIII.
MPO EFFECTIVENESS:
HOW MUCH DIFFERENCE DOES INSTITUTIONAL STRUCTURE MAKE?

INTRODUCTION

This section addresses the question: How much difference does the institutional structure of an MPO make to its effectiveness? While the Denver, Colorado metropolitan area is the focus of attention, this section also provides comparative information from other parts of the country.¹ Since rigorous comparative studies of the relationship between MPO structures and effectiveness have not been conducted, this section relies on anecdotal evidence and common sense to answer this central question.

The approach taken in this section is to:

- review the institutional requirements for MPOs in federal laws and guidelines outlined previously in this study
- reflect on the long struggle over MPO structures by contending parties
- consider some of the non-structural factors that affect the institutional performance of MPOs
- compare in greater detail the structures of a few specific MPOs in regions comparable to Denver

The principal conclusion based upon this approach, of this section is that establishing an institutional structure for the MPO that is responsive to the general guidelines of federal law, is a necessary but not controlling condition for the effective performance by an MPO. While the regional council model appears preferable in light of the many intergovernmental and non-transportation factors that MPOs must consider in accordance with federal law, other models may perform just as well in certain circumstances. The bottom line for what will work best in any given metropolitan area may well lie in the specifics of that area itself.

There is, however, a factor that appears essential to the effectiveness of an MPO, whatever its structure: the MPO's planning and decision-making process must be inclusive and collaborative. Although this twin factor may appear to make the MPO process complicated, time-consuming, inefficient, and cumbersome, failure to include and collaborate runs the risk that important interests in the region will feel left out, become alienated, and act in ways that will interfere with implementation of the plan. The single most important requirement to meet in establishing an effective and efficient MPO process is developing trust among the diverse partners; there must be a widespread level of trust among these parties to allow them to work together constructively, unhampered by suspicions and defensiveness. Inclusiveness and openness in the collaborative process go a long way toward meeting this requirement.

¹ Because ISTEA and TEA-21 do not require specific institutional structures for MPOs, many different models have sprung up.

FEDERAL REQUIREMENTS AND EXPECTED INSTITUTIONAL PERFORMANCE

When the *Intermodal Surface Transportation Efficiency Act (ISTEA)* was enacted in late 1991, it mandated two principal institutional changes for MPOs. First, it required these organizations, many of which had existed for years, to involve several new types of stakeholders in their planning processes. Second, it required expanding the boundaries of the planning area to include space for the next 20 years of expected urban growth, and to encompass the area in the air quality region (if the region experiences air quality problems).² These required changes in MPO boundaries, memberships, and committee structures have been occurring incrementally³ since the enactment of ISTEA.

In addition, the federal requirement for MPOs to involve local elected officials and officials of the state department of transportation (SDOT), in effect since the early 1960s, ISTEA included requirements to more directly involve transportation providers (other than the SDOT and local governments), and to vastly increase and improve the involvement of the public (as consumers of transportation services, taxpayers, and parties potentially impacted by transportation facilities). The additional transportation providers to be brought into the process, as appropriate to the area, included transit operators, airports, and the operators of freight transportation services, such as ports, railroads, truckers, shippers, and parcel delivery companies. Considerable flexibility was provided in determining the means of such involvement.⁴

ISTEA also allowed the grand fathering of existing MPO structures, and made it difficult to initiate a redesignation of the organization. Redesignation by virtue of ISTEA is a high profile political process requiring a consensus between local elected officials representing at least 75 percent of the region's population, including the central city, and the governor. Very few redesignations have occurred.

When ISTEA was reenacted in 1998, by the *Transportation Equity Act for the 21st Century (TEA-21)*, the new law retained the institutional provisions initiated by ISTEA and therefore, the evolution of MPO institutions can be expected to continue along the same lines.

With very few specific institutional requirements, ISTEA, TEA-21 and the regulations that implement these Acts, provide relatively little guidance for those who seek to restructure their MPO. The best source of guidance has evolved from the MPO certification process. Every three years, the federal government must certify that each MPO with a population of 200,000 people or more meets federal transportation planning

² Bruce D. McDowell, "Reinventing Planning Under ISTEA," *TR News*, 175, pp. 9-11. TEA-21, however, deleted the requirement for MPO regions to encompass the whole air quality region.

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

⁴ Membership on the policy board is one option, but various committee, task force, and other options may be used.

requirements.⁵ During the first round of certifications, completed in 1996, 129 MPOs were certified. The remainder of the nation's 340 MPOs self-certify that they meet these requirements.⁶

During certification, the federal government insures that the large MPOs meet federal requirements related to MPO structures. During the 1996 certifications, the federal review teams suggested to many MPOs how they could improve their structures and their relationships with other institutions in their regions. The teams also identified improvements already made by many of the MPOs. This informal federal guidance on institutional matters (one of five major topics addressed in these first-round certification reviews) was described as follows by the U.S. Advisory Commission on Intergovernmental Relations (ACIR):⁷

A LEVEL PLAYING FIELD

The concept of a "level playing field," on which all the transportation providers and affected parties can come together to plan the future and decide on the most appropriate present actions needed to achieve future goals, addresses three principal topics: (1) MPO boards and committees, (2) MOUs with partners, and (3) intergovernmental coordination. The following composite comments on these three topics were drawn from a universe of 70 certification reviews and enhanced planning reviews conducted by the federal government in a 1995-96 period.

MPO Boards and Committees

The certification and enhanced planning reviews commented on three main themes regarding MPO policy boards and committees: (1) their structure, makeup, and voting arrangements; (2) their roles and responsibilities; and (3) the need to periodically review and revise their makeup, responsibilities, and voting structures. The federal reviews stated the following expectations about boards and committees.

MPO Structure. *The MPO should seek representation of State DOTs, rail boards, turnpike commissions, transit authorities, and private transportation providers on the policy board and other technical and policy committees. Their input is vital to a thorough intermodal transportation planning process. Arrangements should be made for the state DOT district office to vote a proxy for headquarters staff who are unable to attend policy and technical advisory meetings. In addition, the voting structure should be reviewed, and if needed, changed to allow voting equity or population-weighted voting if requested.*

⁵ Bruce D. McDowell, *Improving Regional Decisions: MPOs and Certification* (Washington, DC: The Brookings Institution, September 1999).

⁶ Separate MPOs within a single contiguous urbanized area of 200,000 people or more must be federally certified even if the population within that MPO is less than 200,000.

⁷ U.S. Advisory Commission on Intergovernmental Relations, *Planning Progress: Addressing ISTEA Requirements in Metropolitan Planning Areas* (Washington, DC: ACIR, February 1997), pp. 42-45.

Roles and Responsibilities. *The MPO should clearly define and document the roles and responsibilities of various participating agencies and develop formal procedures to guide cooperation in the planning process. In addition, the MPO should document the governor's approval of the MPO's urban boundaries.*

The MPO should define the roles and responsibilities of the policy board and all technical committees. The duties that should be defined are those for the development of the TIP and Long Range Transportation Plan as well as project selection and evaluation activities.

The MPO should ensure that the policy board and all policy and technical committees meet on a regular basis and in an open forum. The public involvement process should be taken into consideration when planning meetings to ensure that public notification of such meetings is occurring. This will provide cooperative decision making and information exchange in the planning process.

Reevaluation. *In considering MPO redesignation, it is important to carefully evaluate the region's agencies and governments to determine whether others should be included or excluded. The MPO should review the existing MPO structure periodically and revise it to ensure that local officials have enhanced roles on the MPO policy board and in other decision-making activities.*

MOUs With Partners

This topic deals with: (1) negotiating and adopting agreements that formally specify the roles, relationships, and responsibilities of the organizations participating in the MPO process; (2) ensuring that the contents of agreements cover all the ISTEA requirements; and (3) keeping agreements up to date. The federal reviews stated the following expectations about MOUs with partners.

Adopted Agreements. *The MPO must have formal adopted agreements with the state DOT(s), transit organizations, air quality agencies, local governments, federally recognized Indian nations, the freight/goods movement industry, and any bi-state organizations and multiple MPOs within the region.*

Contents of Agreements. *The agreements must detail the roles and responsibilities of the various organizations as well as coordination procedures in the overall regional planning process.*

It is important for the MPO to clearly define the scope of planning procedures, including descriptions of areas of cooperative planning activities, financial forecasting, long range plan development, TIP development, and major metropolitan transportation investments. In addition, the agreements should address air quality conformity issues in those portions of the area that are classified as nonattainment.

Up-to-Date Agreements. *The MPO must update the agreements among MPO members and the outside agencies participating in the planning process to reflect current arrangements. It is also important that the MPO realize that the roles and responsibilities defined in the agreements should evolve over time, and the agreements should be reevaluated periodically. The MPO could describe the roles and responsibilities in a brochure-type format to support public understanding of the evolving planning process.*

Intergovernmental Coordination

This topic focuses on effective processes for coordination and cooperation among all affected organizations in the MPO's area and with adjoining MPOs, including those across state lines. The federal reviews stated the following expectations about intergovernmental coordination.

Within the MPO. *In this geographically and governmentally complex region, the MPO should work to "break down" polarization by creating communication and trust. The MPO should develop formal procedures to guide cooperation in the planning process. It would be advantageous for participating agencies to establish a cooperative process to coordinate land use and transportation plans and programs.*

Among MPOs. *The MPOs should continue to work together to eliminate problems with major investment studies and management systems, and to keep the lines of communication open between the entities involved in the transportation planning process.*

The MPO is encouraged to communicate and document efforts to coordinate with bi-state agencies, air quality agencies, federally recognized Indian nations, and other intergovernmental organizations to foster an atmosphere of regionalism and multimodalism. For the bi-state region, federal assistance is available for establishing activities across state lines.

In the only two cases where the federal government has held out for major changes before certifying the MPO, institutional issues have been the sticking point. Both cases involved state dominance and lack of significant involvement by local officials in the MPO process.

It is clear from this MPO certification experience that federal provisions require performance rather than any specific structure, and that the institutional performance criteria are:

- inclusiveness (both geographically and across the affected interests)
- equity of representation
- fairness and openness of the planning process

- clear and well documented roles and responsibilities shared among the partnering governments and agencies within the MPO process

Within these broad parameters, a metropolitan region has considerable latitude to establish an MPO structure that meets its own needs and conditions.

THE LONG STRUGGLE OVER MPO INSTITUTIONS

Metropolitan planning has a relatively long history in the United States. It has always included transportation as an important element, but transportation is now the dominant part because that is where most federal aid and requirements are focused. To understand the evolution of metropolitan institutions, this section of the paper reviews the sequence of reforms and examines the key issues that have been of concern along the way.

Major Eras of Metropolitan Reform⁸

Despite a great deal of interest in metropolitan government by reformers throughout most of the 20th Century, the number of city-county and multi-county consolidations has been very modest, and most of the consolidations that did take place have long since been overrun by the relentless outward growth of metropolitan development. Therefore, the mechanism of choice across most of the country has become some form of local federation or con-federation.

Regional Planning Commissions

From the 1920s through the 1950s, the “blue-ribbon” regional planning commission was the most common form of metropolitan institution. The commission members were usually prominent businessmen or other prominent citizens who wielded power in the community. They were appointed by local governments, or in some cases by the business community itself. The prominence of the personalities on the commission, their reputations for getting things done in an efficient businesslike fashion, and their region-spanning business interests, were thought to be the antidote needed to overcome the deficiencies of parochial local governments that had neither the power nor the geographic reach to cope with burgeoning urban growth.

These commissions drew up plans to help guide the overall physical development of the governmentally fragmented region, but frequently found no one who could receive their report and act on it. The commissions’ influence was limited to the power of persuasion, and usually was not compelling enough to get action. In a few cases, especially in the largest metropolitan areas where transportation, water, or sewer problems were at crisis levels, area wide special purpose districts were created to implement needed facilities on a single-function basis.

⁸ This section is drawn from: Bruce D. McDowell, “Chapter 6. Regional Planning Today,” in So, Hand, and McDowell, editors, *The Practice of State and Regional Planning* (Chicago: The American Planning Association, 1986), pp. 133-165.

Councils of Governments

In the 1960s, the philosophy of organizing regional planning bodies changed. Rather than commissions of prominent citizens insulated from government, the idea was to put local elected officials on the regional policy-making boards. These policy-makers, it was reasoned, could connect regional planning to local implementation of plans. “Think regionally, and act locally” was the hope. The local officials appointed to serve on the regional council of governments (COG) usually included both county and municipal policy-makers, with some variations to accommodate the particulars of local government structures among the states. In general, COGs were structured on a one government, one vote basis, and were designed to act by consensus, for the most part.

The first federal requirement for transportation planning in all metropolitan areas was enacted at this time, and it followed the COG format, with the addition of appropriate state DOT representatives. At the same time, a number of other federal programs began to require regional approaches, some in metropolitan areas, others in non-metropolitan areas, and some in both types of areas. Examples included:

- comprehensive development and housing planning from HUD;
- water, sewer, solid waste, and air quality planning from EPA;
- coastal zone management from NOAA;
- economic development planning from EDA and the Appalachian Regional Commission;
- community action, health, and aging services from HHS;
- manpower training and employment services from Labor;
- criminal justice planning from Justice; and
- the area wide clearinghouse function from OMB (which still provides affected state and local governments opportunities to review and comment on a very wide range of proposed federal-aid projects and direct federal actions before the final federal decision is made on them).

By the 1970s, the federal government saw the potential benefits that could be derived by putting many of its regional initiatives together in the same regional planning body. To take advantage of this potential, OMB stated a preference for federal programs to use the multipurpose COGs to administer federal programs that required a regional approach. In addition, Vice President Spiro Agnew, who had been governor of Maryland, sought the assistance of the states in establishing statewide systems of COG-type regional organizations to be recipients of these multiple federal responsibilities, and to help coordinate them.

Most states cooperated. Over 500 of these regional organizations remain in operation today.⁹ In Colorado, 13 such regional councils serve all but two of the state’s

⁹ National Association of Regional Councils, *Building Regional Communities for the 21st Century: Directory of Regional Councils* (Washington, DC: NARC, July 1999).

counties (which are partly organized as an independent MPO). These regional councils are organized into a statewide association.

In the 1980s, the federal support for this multiple-program approach to regional planning was abandoned. Only two of the 39 federal programs that had teamed up in the effort remained committed to the concept by mid-decade. Metropolitan transportation planning (MPO) was one, and EDA's economic development district (EDD) program was the other. There are currently 340 MPOs and 320 EDDs, but there is organizational coincidence between the two programs in only 82 cases. Some regional councils also house additional federal programs--such as Area Agency on Aging (AAA), Community Action Agency (CAA), or Regional Clean Air Agency (RCAA)—but this is now a result of state or local initiatives rather than a federal preference.

Metropolitan Planning Organizations

The 340 metropolitan planning organizations recognized jointly by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) are known as MPOs.¹⁰ However, this common term hides the fact that the institutional structures of MPOs vary considerably from place to place and from time to time.¹¹ In the mid-1970s, about 75 percent of all MPOs were housed in COG-type regional councils—up from only 37 percent in 1972. However, by 1993 only 48 percent of MPOs were of this type, while 28 percent were housed in individual cities, counties, or joint city-county planning organizations, and 22 percent were independent single-function transportation planning organizations. Significantly, the transition from state-staffed MPOs to local ones was almost complete by 1993; only two percent remained within the state bureaucracy by that time, down from 42 percent in 1972.

A large part of the reason for the decline in using regional councils to house MPOs is the fact that many new, small MPOs were created following the 1980 and 1990 Censuses of Population. Each Census defines new “urbanized area” boundaries, based on the density of contiguous urban settlements. These definitions are determined without regard to local or state political boundaries, and any such area aggregating a population of 50,000 or more triggers the federal requirement for an MPO to address its transportation problems. Existing urbanized areas can grow and change their shape enough to require existing MPO boundaries and member governments to change. Other urbanized areas reaching the 50,000 population threshold for the first time might be close enough to an existing MPO to be incorporated into it. However, the overall impact of the 1980 Census was to create 70 new MPOs, and the 1990 Census caused another 11 MPOs to be created. These new MPOs are mostly quite small in relation to the size of regional councils (which are usually multi-county), and are more likely, therefore, to be housed within an individual city or county government.

¹⁰ Association of Metropolitan Planning Organizations, *1999 Profiles of Metropolitan Planning Organizations* (Washington, DC: NARC, March 1999).

¹¹ U.S. Advisory Commission on Intergovernmental Relations, *MPO Capacity: Improving the Capacity of Metropolitan Planning Organizations to Help Implement National Transportation Policies* (Washington, DC: ACIR, May 1995), p. 35.

The other reason for increased numbers of MPOs is that the federal insistence on a single MPO for each contiguous urbanized area was relaxed in 1983. This relaxation has allowed some existing MPOs to split along state or county lines. When such splits occur, memorandums of understanding (MOUs) must be signed to establish coordination with the adjoining MPOs that share the same area.

Key Institutional Issues

As these changes in MPO structures have occurred, a number of significant policy issues have emerged. These issues, which are summarized below, tend to be resolved only temporarily; they continue to lie just below the surface ready to reemerge when a controversy comes along to challenge the status quo.

The Fourth Level of Government

Regional planning always seems to make many people and officials apprehensive about losing control of their local communities. Generally, the way to avoid these fears is to limit the scope of planning and to make sure that it is advisory only. In most states, this means that such “powers” as the MPOs have come mainly from federal laws and regulations that are accepted “voluntarily” as conditions for the acceptance of federal highway and transit money. Seldom does state law go as far in giving regional organizations real authority over spending decisions as ISTEA and TEA-21 have gone with the large MPOs.¹² The principal exceptions are single-purpose special districts and the handful of “growth management” states that empower regional councils to help state agencies cope with rapid and environmentally risky development pressures.

A Framework for Coordination

Some states consciously use regional councils as a major tool for coordinating state and federal aid to local governments. The regional planning framework provided by the regional councils across the state provides technical studies and consensus-building processes among local officials that build support for using state and federal funds from a variety of programs, along with local funds, to achieve broad community goals. Kentucky is a good example of a state that uses regional councils this way.

This arrangement allows regional councils to help make connections between transportation and land use, land use and economic development, economic development and welfare reform, welfare reform and social services, social services and community development, community development and livable communities. Such linkages are impossible to make among federal agencies and committees of Congress; they also are very difficult to make within state governments; and they frequently go beyond the reach

¹² California is one exception where it is arguable that there would be little, if any, effect on the MPO process and environmental protection if the federal surface transportation legislation were repealed. See, for example, Bruce D. McDowell, *Environmental Consequences of a Reduced Federal Role in Transportation* (Lansdowne, VA: Eno Transportation Foundation, Inc., 1997).

of individual local governments, because the needs they address span area-wide job markets, housing markets, and service areas of major facilities such as hospitals. But regional organizations can span both geography and diverse programs, unhindered by the limiting demands of operational responsibilities.

The clearinghouse role of regional councils gives them access to most of the federal and federally supported activities that are going on in the region. In addition, state policies designed to make full use of the regional councils can provide a similar overview of state activities. From this vantage point, regional councils can bring local officials into a process of commenting, molding outside resources to local goals, and achieving the kind of communities their constituents desire.

Weighted Voting

As regional council roles have begun to pass from strictly advisory to significant policy and financial influence when they wield MPO responsibilities, the one government, one vote structure that most of them inherited has been challenged. Although some have had population-weighted voting since the 1960s, it is not a common practice.¹³ Large central cities with only one vote among a sea of suburban votes, have been especially concerned in the 1990s as they have competed for transit investments downtown against seemingly insatiable needs for new freeways and other roads at the urbanizing fringe. As consensus-building organizations, many regional councils emphasize the importance of not using such a divisive mechanism as tightly contested votes. However, the possibility of weighted voting may provide added incentive to achieve consensus.

Regional Council Membership

Most state legislation makes the membership of local governments in regional councils voluntary. Despite significant amounts of federal funding in most regional councils, and considerable state funding in some, local dues are crucial to the survival of most such organizations. Regional councils need local funds to match federal and state grants, as well as to pursue their own goals. Therefore, threats to walk out are taken seriously, and have been used in several regions to draw attention to critical issues. In counterbalance, requiring local membership in an MPO as a pre-condition to releasing federal highway and transit funds makes it very difficult for local governments to elect not to belong.

With each additional federal program for which a regional council takes responsibility, it must involve additional stakeholders particular to the needs of the program. For MPO responsibilities, these added stakeholders are state DOT officials, transit officials, freight providers, and so on. For economic development, the added players are business people of various types. For air quality, they are technical experts of various sorts. And on it goes.

¹³ Seth B. Benjamin, John Kincaid, and Bruce D. McDowell, "MPOs and Weighted Voting, *Intergovernmental Perspective*, 20 (Spring 1994), pp. 31-36.

The need to involve these diverse “members” has sometimes led to establishing separate regional planning bodies, each with a membership tailored to a single federal program. However, other regional councils have been able to craft a series of policy boards, technical committees, and advisory committees addressing the specific needs of each program, while keeping them all within the umbrella of the local-official led regional council. In this arrangement, a single integrated staff can serve the whole organization, coordinate related programs, and provide beneficial synergies by combining planning funds from multiple federal, state, and local sources.

There may be subtle differences between the various types of participants in this multiple-policy process. However, the important point remains that they are all involved legitimately in the part of the process where their contribution is needed, and in a way that counts. These relationships need to be negotiated specifically for each region, and set forth both clearly and publicly in formal agreements, so that citizens and local officials alike can understand and learn to trust the process. For MPOs, such an arrangement can provide the best means of “taking into consideration” the numerous non-transportation factors required by ISTEA and TEA-21—including land use and economic development.

Networking the MPO

As a planning and coordination organization, an MPO is seldom a “doer”. Yet, it should be as achievement-oriented as any transportation provider. It cannot afford to simply prepare plans and walk away. It needs to keep after the providers, monitor the progress of their implementation efforts, and report to the region on progress toward reaching the goals adopted for such things as reducing congestion, supporting economic development, improving safety, and making communities more livable.

The required connections with other planning bodies, implementing agencies, and affected parties are many and complex. They should be recognized, planned, negotiated, and formalized so that there is no misunderstanding about them. This goes well beyond mere membership on a policy board, a technical committee, or an advisory committee: MOUs are needed for meeting action targets and customer-oriented outcome goals. (Commitments to act are important elements of the process.)

Consultations with Non-Metropolitan Local Officials

ISTEA and TEA-21 both require the state DOTs to consult with local officials in areas outside the MPOs as the states develop their long-range state transportation plans and short-range funding programs (known as state transportation improvement programs, or STIPs). In TEA-21, Congress called for a study of the state processes being used to accomplish these consultations. Work now under way at the National Academy of Public Administration has identified several means being used for this purpose. Most are carried out by the state DOT itself, but in about a dozen states, non-metropolitan regional councils are being used for this purpose.

Colorado is one of the states taking the regional council approach to local-official consultation. It funds these councils (known as regional planning organizations, or RPOs) to prepare transportation plans with involvement of the local officials in their regions. Then, the state incorporates the project-funding priorities of these regions into the STIP, along with the priorities of the five MPOs and two Tribal governments. This amalgamation of regional funding priorities is accomplished using a statewide transportation advisory committee composed of the chairperson (or the chairperson's designee) of RPOs, MPOs, and Tribes.

Where MPOs are housed in regional councils that have larger geographic territories than the federal government recognizes for MPO planning, there is a remainder non-metropolitan area that is represented by local officials on the regional council governing board, but may not be represented in the MPO plan. When that is the case, the state DOT must find another way to consult with those local officials about its plan and STIP. Ideally, however, such a regional council would prepare a transportation plan for its whole territory and present it to the state DOT on behalf of all its metropolitan and non-metropolitan officials.

Needed Research

As noted previously there has been no rigorous research completed concerning the relative effectiveness of MPOs having the various types of institutional structures described above. Thus, it is difficult to comment on the effects of housing an MPO in a regional council, a city or county government, a joint city-county planning commission, an independent transportation-only MPO, or a state DOT. About all that can be done, given this lack of research, is to hypothesize that:

- The regional council and independent MPOs may have the greatest latitude to change their boundaries when necessary.
- The regional council may be better able than the transportation-only MPO to link-up with economic development and land use planning.
- The city, county, and joint city-county MPOs may have the tightest connections with land use, but may not have adequate geographic reach.
- An MPO staffed by the state DOT may have greater difficulty building the trust of local governments in the MPO region.
- Coordinating transportation plans and systems within a region may be more difficult when the region is served by multiple MPOs, than when it is served by a single one.

NON-STRUCTURAL FACTORS THAT AFFECT INSTITUTIONAL PERFORMANCE

It may be that the institutional structure of an MPO is not the most influential factor in determining the organization's performance or effectiveness. It clearly is not the only significant factor.

Regardless of where MPOs are housed, ACIR found that MPOs consistently incorporate the following four basic components:

1. A policymaking board that involves elected officials from the local governments in the metropolitan area and others;
2. A technical committee that brings together staff representatives of the federal, state, and local transportation and transportation-related agencies that have a role in ISTEA planning;
3. A staffing arrangement able to maintain the process and ensure that required plans and programs are produced; and
4. A public involvement mechanism.¹⁴

How well these four components are put together and used may make a great difference in how successful the MPO will be. This may depend on factors such as the following:

- **The political culture and intergovernmental traditions of the region.** Is cooperation a habit? Is collaborative planning accepted as the way to operate?
- **The strengths of current leaders, other personalities, and their styles of operating.** Is dependable and steady leadership available? Do the key players get along with each other? Do they let others into the decision making process?
- **Staff competence, objectivity, openness, and fairness.** Can the staff facilitate creative problem-solving among diverse players, win their trust, and maintain credibility even in contentious situations?
- **The nature of current regional issues.** How controversial and stressful are they? How deep are race and class divisions? How strong, divided, and unyielding are the key interest groups? How intense is the competition among power centers? To what extent are issues taken to court instead of being mediated in good faith?
- **Are outcomes of the planning process fair, and perceived as being fair?** Does everyone get something from the process? Does everyone understand how results are arrived at? Is the allocation of funds perceived as being fair, at least over a multi-year period of time?

Some metropolitan areas have more difficult problems to solve than others do, and fewer resources with which to solve them. The MPO structure may be part of the problem, but not necessarily the biggest part. Frequently, the right leadership and staff

¹⁴ ACIR, *MPO Capacity*, p. 34.

can make do with a less than perfect organizational structure, but it seldom works the other way around.

Perhaps the most important characteristic of an MPO is its willingness to be inclusive, open, inquisitive, and exploratory. In short, is it a “learning” organization, or, is it set in its ways, impervious to change, and resistant to new players and new ideas?

One of the few doctoral dissertations on regional councils, painstakingly classified the existing regional councils in the early 80’s into the following types, according to the results they were achieving with largely the same organizational structures:

- **In name only.** Barely functions.
- **Tourist board.** Promotes development of the region with an “advertising” approach.
- **Stalemate.** Unsuccessfully attempts to resolve major interjurisdictional policy issues.
- **Regional broker.** Provides the policy forum within which major interjurisdictional issues are resolved.
- **Local entrepreneur.** Constantly invents and pursues new ways to serve the region’s local governments and area wide interests.
- **National emphasis.** Pursues policy objectives of various federal-aid programs.
- **State extension.** Carries out state policies autonomously within the region.
- **State agent.** Acts within the region on behalf of state government.
- **Regional provider.** Provides agreed-upon regional public services.
- **Regionweal.** Authoritatively governs area wide policies and programs.¹⁵

Many regional councils, of course, exhibit characteristics of more than one type. Each one tends to be a unique blend of circumstances.

ACIR’s preliminary assessment of the capacity of MPOs to meet ISTEA requirements, half way through the ISTEA experience, documented the great need for MPOs to be open to change. It recommended, in part, that MPOs:

- Take time out to think about what they are doing;
- Train their staffs, elected officials, and other stakeholders to understand the new concepts and methods of ISTEA planning;
- Go through some self-evaluation exercises; and
- Develop a program of continuous improvement.¹⁶

The ISTEA model of region-building is one of the best available. It has been proposed as the basis for improving the effectiveness of other programs that require a regional approach.¹⁷

¹⁵ So, Hand, and McDowell, editors, *The Practice of State and Regional Planning* (Chicago: The American Planning Association, 1986), p. 156.

¹⁶ ACIR, *MPO Capacity*, p. 14.

SOME MPO STRUCTURES COMPARED

This Study compares the Denver situation with the MPO processes in Phoenix, Dallas-Ft.Worth, and Seattle, the institutional structures of which are examined here in greater detail. In addition, in this section we consider the four separate MPOs in the Tampa Bay area since one of the current issues in Denver is whether to have a separate MPO for one of the counties that is now a member of the Denver Regional Council of Governments.

Size of MPO

These five metropolitan areas are all middle sized, ranging from 2.3 million people to 4.8 million. Denver is the smallest in this group, with Phoenix, Seattle, and Tampa similar in size. Dallas is considerably larger than the other four.

In square miles, Denver is also relatively small, along with Tampa. Seattle is considerably larger (6,400 square miles compared to 4,000 for Denver), and Phoenix and Dallas are even larger (9,000 and 12,000 square miles, respectively).

Dallas includes almost all of its population in its MPO area, even though the square miles within the MPO boundaries cover less than half the total region. For the other regions in this comparison, the MPO area is about the same as the whole region defined for other purposes.

Number of Governments

In numbers of governments within the regions, Phoenix has the fewest (27), located all in one county. (The other MPOs in this comparison are all multi-county.) Tampa, Denver, and Seattle are in the middle with 43, 54, and 86 (cities & counties) local governments, respectively. Dallas is way out front with 231 governments in its region.

Year Established

All of these MPOs have been in business for many years. Phoenix and Dallas are the oldest, having been designated in 1974. Denver was recognized for transportation planning in 1977, at the same time as the oldest of Tampa's four MPOs. Two other Tampa MPOs were designated in 1978, and the fourth was recognized in 1982. The newest, because it was reorganized in 1991, is Seattle which existed much earlier in other forms.

¹⁷ Bruce D. McDowell, "The ISTEA Model of Region Building," *The Regionalist*, Volume 3, Numbers 1-2 (Fall 1998), pp. 55-63.

Air Quality

In air quality status, Denver and Dallas are non-attainment, resulting in the imposition of additional burdens on their planning processes. Seattle and one of the Tampa MPOs are “maintenance,” meaning that they have emerged from non-attainment, but still have to continue heavy-duty air quality planning to ensure that they do not slip back into non-attainment status. Phoenix and the other three Tampa MPOs are in compliance with federal air quality standards, making their planning processes simpler.

Air quality status and MPO staff size appear to be correlated. The two non-attainment MPOs (Denver and Dallas) have staffs of 38.7 and 33.3 per million population, respectively. Seattle, an air quality maintenance area, has a staff of 15.8 per million population, and Phoenix (which does not have an air quality problem) has a staff of 17.9 per million. (Comparable data was not readily available for the Tampa MPOs.) These staff-size comparisons, however, are complicated by other factors, including responsibilities for other programs.

Other Programs

Seattle’s regional council has only one function other than MPO (namely, growth management), whereas Denver has ten other functions, Dallas has eight, and Phoenix has 14. These other program responsibilities, however, are not clearly distinguishable from available staffing data. The Denver, Dallas, and Phoenix regional councils, according to the latest directory of the National Association of Regional Councils, have program responsibilities that span land use, human services, environmental protection, the federal review and comment clearinghouse, and others. Seattle’s much more restricted list of responsibilities—MPO and state-designated growth management roles—nevertheless, includes one that is uniquely tailored (within this group) to complement MPO effectiveness. The four MPOs in Tampa are separate single-purpose MPOs at the single county level, although they are in a region with a highly regarded award winning regional council. (The four-county MPO is Tampa Bay Regional Planning Council (TBRPC). TBRPC carries out responsibilities for area wide aging programs, state-designated growth management, federal program clearing-house, and other programs.)

All five states in this comparison are fairly strong regional council states. All except the state of Washington, have wall-to-wall regional councils, and the pattern in Washington is nearly as complete. Colorado, Texas, Florida, and Washington all have state associations of regional councils that help to reinforce the effectiveness of their members. Arizona is the only one of these states that does not have such a state association.

Policy Boards and Committees

Organizationally, Denver’s policy board is the largest with 49 local officials. It accommodates transportation officials on its Transportation Committee (which has final approval authority for transportation matters), regional review team, and transportation

advisory committee. The TC has ten members: four officials from the COG, and three each from the state DOT, and the regional transit authority.

The Dallas-Ft. Worth MPO includes five staff officials (representing the two state highway districts, two transportation authorities, and one toll-road authority in the region) in addition to the 32 local, elected officials on the TC.¹⁸

Although this Transportation Council has final authority over MPO decisions under federal law, it is embedded within the North Central Texas Council of Governments, and seeks endorsement of its decisions by the 13 member Board of Directors of that organization as well. The 26-member Executive Board in Seattle consists mostly of local, elected officials, in addition to state DOT and port representatives representing 150 votes out of a total of 1150.¹⁹ The 1000 local-official votes are population-weighted. (The other MPOs in this comparison have policy boards of 15, 14, 12, 9, and 9.)

The committee structures of these MPOs differ considerably from one another. They range in number from two to six committees.

The most extensive set of transportation committees is in Seattle, where a separate transportation policy board works in tandem with a growth management policy board to funnel recommendations to the 26 member Executive Board. This Board is the predominantly local official body that recommends final policy action to the General Assembly, which consists of all the local elected officials in the four-county region. All major plans and programs must be approved by a two-thirds vote of the General Assembly, with the votes apportioned by county population and cast one-half by county officials and one-half by municipal officials. Seattle has an annual General Assembly where all members meet to make decisions about leadership, the operating budget and matters of regional significance. The transportation policy board in Seattle combines representatives of local governments, transit agencies, citizens, and organized interest groups. Seattle also uses three technical committees: a regional policy level staff committee, a working level regional technical committee, and a regional project evaluation committee. Two specialized committees round out the committee structure: a transportation operations committee, and a citizen advisory committee for transportation enhancements.

The Tampa MPOs all have technical coordinating committees and citizen advisory committees. Two also have Local Transportation Disadvantaged Coordinating Boards and Bicycle/Pedestrian Advisory Committees. In addition, two have an MPO Chairman's Coordinating Committee.

Phoenix has just a technical coordinating committee and a citizen advisory committee, similar to Denver. Dallas uses a general technical coordinating committee,

¹⁸ Author's interview with Michael Morris, Director of Transportation Planning, NCTCOG, November 16, 1999.

¹⁹ Author's interview with Mary McCumber, Executive Director, PSRC, November 15, 1999.

plus two specialized technical committees: the Travel Demand Management/Congestion Management System Committee, and the Intermodal Freight Task Force.

This brief survey of committee structures seems to indicate that there may be an emerging need for some specialized committees to help MPOs give greater attention to new policy concerns and to involve greater numbers of special interest parties in certain aspects of regional transportation planning.

With respect to weighted voting on the policy boards, Denver, Phoenix, Seattle, and one of the four MPOs in Tampa have it in some form. In Seattle, the Executive Board and General Assembly always vote on a population-weighted basis to avoid the stigma of calling for a weighted vote. In Dallas, the elected official seats on the Transportation Committee are apportioned by population, with Dallas having six, Ft. Worth having three, and other jurisdictions having a single seat or sharing a seat with other small jurisdictions. The cities of Dallas and Ft. Worth, only, may appoint up to one-third of their seats from non-elected officials, to help ensure better attendance and relieve the busy schedules of their city council members. These non-elected officials are usually former elected officials who have had experience on the Transportation Committee.

Outside Assessments

Phoenix and Seattle have active metropolitan citizens' leagues that tend to act as a counterweight to the regional councils. Dallas has the Dallas Regional Mobility Coalition, organized by the Dallas County Judge,²⁰ to advocate transportation solutions for the eastern part of the region. The Dallas region also has the independent Partners in Mobility coalition led by the chambers of commerce in the whole region.²¹ The MPO provides technical support to Partners in Mobility to enable it to represent the whole region with one voice before the Texas Transportation Commission (the body that allocates most of the federal and state transportation funds for the region). Partners in Mobility typically sends a delegation of 150 people to the Commission's hearings, and uses the region's four county judges and the mayors of Dallas and Ft. Worth as its spokespersons. This has proven very successful.

Furthermore, Dallas, Phoenix, and Seattle have all had "Peirce Reports" prepared for them. These are reports prepared by syndicated reporter, Neal Peirce, one of the few well-known national reporters specializing in urban affairs. He prepares reports upon invitation from the regions themselves, following a detailed self-study of regional issues and institutions, and a several-day visit by Peirce and his partner who work with the key parties to find solutions to pressing problems. The resulting report is published in a local newspaper in an attempt to develop interest in new initiatives for regional problem solving. The existence of these reports indicates that there are influential elements in the subject regions that are receptive to regional innovations.

²⁰ In Texas and some other southern states, county judges are the chief political officials in the county, not judicial officials.

²¹ Author's interview with Dan Kessler, Assistant Director of Transportation Planning, NCTCOG, November 17, 1999.

When Peirce prepared his reports for Phoenix (1987), Seattle (1989), and Dallas (1991), the structure of their regional organizations was at issue. But he found very different situations in each region,²² resulting in three very different recommendations. For Phoenix, he recommended county home rule, since the whole region is in a single county. For Seattle, a four-county region, he recommended strengthening the regional council. For Dallas, he recommended a new, broad-based citizens' league to help prepare the region for governmental reforms it was not yet ready for. Subsequently, some progress has been made in all three regions, although not always in precisely the way that was recommended. The most important effect was to mobilize regional leadership for thoughtful innovation.

In the current study of the Denver area by the University of Denver, interviews of key players in Dallas, Phoenix, and Seattle indicate that the Dallas and Seattle regions are perceived as having more effective regional councils/MPOs than Denver and Phoenix, despite the similarity of their regional council structures. The most significant variation, perhaps, is in the MPO committee structures. The two allegedly more effective MPOs have more innovative committees than Denver and Phoenix.

By comparison, size of the regional council policy board does not appear to be a determining factor. Denver and Phoenix have the largest and smallest boards (49 and 9), while Dallas-Ft.Worth and Seattle have transportation decision making boards with intermediate sizes (37 and 26). Denver's decision-making board for transportation matters (the ten-member Transportation Committee) is significantly smaller with a smaller local elected official contingent than in Dallas and Seattle.²³

As noted previously both of the "more effective" MPOs have weighted voting (as does Denver), but it seems to be a full-time part of the operation more than in Denver. (Weighted voting has seldom, if ever, been used in Denver.)

This analysis suggests that these and other factors may play roles in the effectiveness of these MPOs.

THE MULTIPLE-MPO CASE

The Tampa case was selected to illustrate the multiple-MPO option because it is about the same overall size as Denver in population (2.4 million people versus 2.3 million), land area (3,635 versus 4,000 square miles), and number of local governments (54 versus 43). Also, the whole metropolitan area is in a single state in both cases. MPO planning has been going on in both areas since 1977.

²² Neal R. Peirce, with Curtis W. Johnson and John Stuart Hall, *Citistates: How Urban America Can Prosper in a Competitive World* (Washington, DC: Seven Locks Press, 1993).

²³ While policy board size may play a role in effectiveness, with one of intermediate size being preferable, the evidence is not conclusive at this point.

However, the Tampa region has clearly separate urban centers that have developed at different rates and been designated for MPO planning at different times (Tampa in 1977, Clearwater in 1978, Sarasota in 1978, and New Port Richey in 1982). It is more a case of these four separate urbanized areas growing together over time, compared to Denver growing out from a single dominant center.

Florida also exercises a considerable amount of state coordination over development as well as transportation systems. It is one of the foremost states in growth management and its statewide land use plan is adopted by the legislature. It also requires all cities and counties to prepare and adopt comprehensive development plans that are consistent with the state plan. The regional councils, as well as the state Department of Community Affairs, review the local plans for consistency with state and regional policies, and the local plans must manage the pace of development consistent with the provision of adequate public facilities and services. The legislature has provided for state take-over of local planning in cases where the local planning is inadequate. In the Tampa Bay region, the Florida DOT ensures that the transportation simulation models for all four MPOs are integrated.

If a portion of the Denver Region were to become a separate MPO, consideration would have to be given to how its work would be reintegrated into plans for the rest of the region. Formal coordination agreements would be required. Areas like Tampa Bay should be studied to see how this coordination could work. The statewide process for establishing STIP priorities in Colorado also would have to be adjusted to recognize the existence of another MPO on the statewide STIP prioritization committee—which consists of the chairpersons (or designees) of all the MPOs, RPOs, and Tribal governments.

These questions would have to be answered during the arduous redesignation process provided in TEA-21. As noted herein before, under that process, local governments representing at least 75 percent of the region's population, including the central city, would have to agree with the governor on the boundaries of the multiple MPOs and the arrangements for coordinating them.

CONCLUSIONS

As indicated at the beginning of this section, the principal conclusion of this review of institutional factors is that a structure that meets federal guidelines is essential, but hardly a guarantee of MPO effectiveness. The regional council type of MPO, which Denver has, offers advantages in connecting with non-transportation factors that TEA-21 requires to be considered. Denver also is fortunate to have the whole region served by a single MPO; that eliminates the need for a multiple-MPO coordination agreement and an added responsibility for the state DOT to ensure modeling consistency between the MPOs. It also eliminates the need for restructuring the statewide STIP prioritization committee.

Despite an apparently adequate basic institutional structure, this analysis suggests that the Denver MPO may be well advised to take some new steps to update its institutions. For example, it probably should reassess its transportation committee structure to ensure that it provides adequate opportunities for involving all the new interests that now need to be involved in the TEA-21 process. It may also want to undertake a self-assessment that involves its leaders, staff, and stakeholders in thinking through how well it has been performing, and how it might improve its process in the future. The University of Denver study could be a stimulus for that self-assessment, but an outside study is not a substitute for self-assessment. The central question to be examined in the self-assessment is whether the Denver MPO process is adequately inclusive and collaborative. An efficient and effective committee structure may hold answers to that question.

This section simply attempts to bring some outside perspective to these issues. It is not based on a study of the Denver MPO, and it does not address the non-institutional factors listed earlier. Other sections consider those factors. Nevertheless, these outside perspectives and a review of other materials prepared for this study, suggest the following tentative recommendations.

RECOMMENDATIONS

1. Improve the comfort level of local governments in the MPO. Compared to the Dallas and Seattle MPOs, the one in Denver is less “democratic.” It focuses a great deal of authority in the Transportation Committee (TC). TC has only ten members, of which only four represent DRCOG, and only two of DRCOG’s representatives must be elected officials. The other six members of the TC are divided equally between CDOT and RTD. This is an older, more elitist structure compared with the 32 elected officials on the primary transportation policy group in Dallas, and over 20 in Seattle.

In addition, weighted voting is full-time in Dallas and Seattle, but only on-call in Denver. All votes in Seattle’s regional council are population-proportioned and cast equally by county and municipal officials, with the proportions adjusted every three years. In Dallas, the Regional Transportation Council seats themselves are population-weighted.

These two structural features can have a significant effect on how fair the local governments perceive the MPO’s decisions to be. As illustrated by the differences in Dallas and Seattle, there is no “right” way. Each area has to negotiate a solution its elected officials are most comfortable with. However, Dallas and Seattle provide two options worth considering in Denver.

Seattle provides still another option that might be considered in Denver to provide a greater level of comfort to the counties. In Seattle, half of the funding for which the regional council has responsibility is programmed by regional committees, while the other half is apportioned to and prioritized by the individual counties. This might be unduly complicated in the Denver region because of the split between three CDOT

engineering regions that already causes state and federal funds to be sub-allocated within the region. Still, it may be worth thinking about in lieu of splitting the MPO. It would be one way of giving local elected officials a more direct say in the use of some state and federal transportation funds. Although the practice of sub-allocating federal surface transportation funds within the MPO, by formula, is inconsistent with federal guidelines, it may be allowed under certain conditions that support system wide goals consistent with the adopted area wide transportation plan (23 CFR 450.321 (l)).

2. Improve relations with the Colorado Department of Transportation. As noted previously, the relationship between DRCOG and CDOT is complicated by having three CDOT engineering districts to deal with. This makes it more difficult to estimate the funds available in the future, and constrains how they can be used within the region. It also increases the number of CDOT officials who must be dealt with.

These disadvantages may be offset, at least in part, by the state's use of a STIP-prioritization committee consisting of the MPOs, RPOs, and Indian Tribes. However, the three CDOT district engineers are not members of the Transportation Committee, as they are in Dallas (two districts involved). And, Denver has neither the consensus-building discipline enforced in Seattle by the need to win a two-thirds weighted vote of all the region's local elected officials, nor Dallas' Partners in Mobility to help demonstrate metropolitan unity when dealing with the state.

A statewide realignment of engineering, planning, and commission member districts in CDOT, rather than a partial adjustment for just the Denver region might be worth considering, along with the Dallas and Seattle approaches. In considering a realignment of the CDOT engineering, planning, and commission districts, contracting for the performance of highway maintenance (perhaps to counties, as in Wisconsin) might provide needed flexibility.

3. The Multiple-MPO Option. If consideration is given to splitting the DRCOG region for transportation planning (which is now appropriately defined for this purpose), the means for dealing with two extra burdens should be thought through thoroughly. One is the need for a new memorandum of agreement providing for the multiple MPOs to meet together periodically, share data and plans, and coordinate work plans. (This new arrangement probably also would have to establish a single air-quality conformity analysis mechanism—to be provided by CDOT, DRCOG, or a mutually agreeable contractor.)

The second additional burden would be on CDOT to ensure that coordination between these multiple MPOs is adequately maintained. The Florida experience should be explored to get a better sense of how this could work.

4. The MPO Memorandum of Agreement should be periodically reviewed and updated. This MOA is very badly out of date. Federal certification review teams in other areas have called for updates of many MOAs that are not nearly as far out of date as this one.

Actual practice in the Denver region has moved far beyond the terminology and procedures in this MOA. It does not recognize that the state has changed its highway department into a department of transportation, nor does it recognize the changes made by ISTEA and TEA-21. Federal public involvement requirements are now much different than those reflected in the MOA; UMTA has become FTA; and freight planning is now a major emphasis that is totally unrecognized. For the future, Broomfield is about to become a city-county, and will need to be recognized as such in the MOA. Since changes such as these occur frequently, the MOA should reflect them in a timely way so that it remains an accurate guide to the Denver region's MPO process. Several of the improvements recommended by this study would require additional changes in the MOA.²⁴

5. Expand the transportation planning committee structure. There appears to be too little recognition in DRCOG's structure of the growing importance of freight planning. The Dallas and Seattle MPOs, among others, have created freight planning committees or task forces to fill this gap and respond to the new priority on this subject created by ISTEA and TEA-21. A regional planning directors' committee, such as the one in metropolitan Washington, also could be very useful in helping to make the land use-transportation connection. An economic development task force, with both local and state representatives, could help to make more solid connections with the "economic vitality" requirements of TEA-21.

Regardless of the specifics, DRCOG's committee structure should be under review constantly in relation to the region's needs and evolving federal requirements. Transportation planning is a collaborative process, and effective mechanisms for wider and more inclusive involvement are important for success.

Although unnecessary committees should be avoided, inclusive committees in priority issue areas, that have focused agendas designed to produce reliable understandings of real challenges and practical responses to them, help to facilitate rather than delay needed action. It is often better to have a separate committee with balanced representation of interests in a major transportation sector, such as the diverse goods-movement industry, to develop that part of the plan. This would avoid limiting representation to a small number of such parties on a larger committee or board where other interests would be likely to swamp those of the sector needing special attention. Rather than waste the time of the more general group with specialized tasks, the additional committee can develop its portions of the plan to the point where the broader group can review them and integrate them into the overall plan.

6. Remain sensitive to the region's geographic issues. DRCOG is fortunate to have a geographic region that is larger than required to meet federal transportation planning requirements at present and in the foreseeable future. The region currently

²⁴ Many of the details in this MOA may be unnecessary in this kind of formal document. Detailed procedural steps may need to change frequently, and should not require the arduous ratification steps that MOAs do.

includes two non-metropolitan counties and parts of two other counties that are not currently subject to air quality and transportation requirements. A growing issue across the country concerns the role of regional councils in helping their local government members outside the MPO boundaries to consult effectively with the state DOT. Such consultation is federally required, but the states are free to decide how it will be accomplished. Colorado is one of about a dozen states that have decided to use non-metropolitan regional councils for this purpose. However, the rural remainder of DRCOG is not now served in this manner. This is a service enhancement that DRCOG should consider providing.

7. Apply the federal-aid review process. Metropolitan clearinghouse review opportunities have been available since the 1960s to ensure that all proposed actions requiring federal agency approvals be submitted to affected local governments and state agencies for review and comment before final federal decisions are made. Although this process is not as frequently used as it was in earlier years, the Dallas region reported using it as a regular part of its MPO process. In the event DRCOG is no longer actively integrating its MPO and clearinghouse functions, it might consider reinstating the integration, using this opportunity to strengthen its relationship with affected parties that are not directly involved in the transportation planning process—especially land use, economic development, and environmental agencies.

8. Institute periodic self-studies. The Denver region has not been as prone as many others across the country to reassess its goals, processes, and structures. Transportation planning has been a highly dynamic activity in recent years, and there is much to learn from others. Keeping up with the literature and regularly attending conferences is necessary; however, it is not the same as a formal self-evaluation process that involves staff, policy members, interest groups, and citizens in self-study. Such a process usually includes peer review, working retreats that explore ideas and build personal relationships, and development of a conscious program to improve the regional planning process. Although such a process may introduce uncertainties, it also opens opportunities. An open process is likely to be constructive because it educates larger groups of officials and citizens about regional affairs, and helps to broaden support for regional organizations. DRCOG should consider instituting a regular self-evaluation process.