

## VOLUME I, SECTION III. RECOMMENDATIONS

We respectfully submit the following recommendations<sup>1</sup> to Metropolitan Planning Organizations, the State Departments of Transportation, the State legislatures, the U.S. Department of Transportation, and the U.S. Congress. Each of these institutions plays an important role in, or significantly influences, the transportation planning and allocation process. Our recommendations are listed neither in terms of priority, nor are they of equal weight. Collectively, they are our best assessment of how to improve the metropolitan transportation planning process, as gleaned from the research we performed, as summarized in Volumes II and III of this Report.

### METROPOLITAN PLANNING ORGANIZATIONS<sup>2</sup>

- 1. Effective Leadership.** The most successful MPOs appear to have leaders with the ability to achieve progressive collaboration and build consensus between individuals with diverse interests, and to fashion regional solutions to common problems. An important component of effective collaborative leadership is to enhance the credibility of the process and the comfort level of the member governments with the MPO. The collaborative process of decision making, where neither the problems nor the solutions are clear, is difficult, and requires a special type of leadership. MPOs should:
  - Before selecting staff leaders, engage assessment centers to evaluate the leadership qualities of potential candidates.
  - Once staff leaders have been selected, encourage them to improve their leadership skills by pursuing professional educational opportunities.
  
- 2. Staff Competence & Credibility.** The most successful MPOs are characterized by staffs with high levels of technical competence and expertise, able to assist the State DOT and member governments in transportation data collection, modeling, planning and other technical assistance. Our research reveals the need of MPOs to nurture leadership and communications skills and credibility in a competent staff with highly developed technical expertise. MPOs should:

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<sup>1</sup> The Scope of Work commissioning this Study directs us to “Develop a detailed report, including documentation, analysis, and recommendations, for presentation to the parties and the House and Senate Committees on Appropriation of the U.S. Congress” and “Make appropriate recommendations and outline suggested course of action to address recommendations, based on the facts and information developed in this study, *with special attention to national applicability*” [emphasis supplied]. Several of these recommendations are supported by those adopted by the U.S. Advisory Commission on Intergovernmental Relations, in its study, *MPO Capacity: Improving the Capacity of Metropolitan Planning Organizations To Help Implement National Transportation Policies* (May 1995).

<sup>2</sup> Since the primary focus of this study is on the Denver Regional Council of Governments, each of these recommendations is directly applicable to DRCOG. Nonetheless, we believe most of these recommendations have national applicability to large MPOs. For example, our findings reveal that the most successful MPOs are characterized by effective leadership, a technically competent staff, a regional ethos among participants, public input and involvement, and a cooperative State DOT/MPO relationship.

- Encourage and assist their staff to engage in technical seminars and professional education to improve their skills in modeling, forecasting, and other transportation planning activities;
- Improve and, if necessary, expand their ITS technology staff and capabilities;
- As the MPO committees develop the TIP and LRP, encourage the MPO staff to present alternative choices, and identify the pros and cons, or costs and benefits, of each;
- Enter into formal memoranda of agreements with the State DOTs, regional transit providers, and local jurisdictions to share data, technical methods, and cooperatively provide technical assistance and training;
- Disseminate the assumptions and criteria it adopts for purposes of transportation air quality modeling;
- Eliminate inappropriate duplication of effort and clarify the respective staff technical responsibilities so that only the best decision support information is available to decision makers at all levels of government for all transportation related purposes (e.g., resource allocation, investment decision making, financial planning, management and operations); and
- Provide economic compensation adequate to retain not only competent, but also proficient, staff.

**3. Streamlined, Efficient Process.** Among the criticisms levied at the MPO planning and project selection process is that it is unduly cumbersome, time-consuming and laborious. In Denver, among the changes most frequently identified by respondents for implementation was that DRCOG should streamline its decisional process, to eradicate unnecessary complexity. DRCOG should:

- Work with Air Quality Agencies<sup>3</sup>, CDOT and the Regional Transportation District [RTD] to update its 1977 MOA so that the transportation planning and allocation process is reasonably refined, streamlined, and simplified to remove unnecessary complexity and redundancy;
- Consider eliminating at least one level of committees (such as consolidation of the Transportation Committee with the Transportation Policy Committee), reducing their size, instituting formalized freight planning, replacing the 49-member Board of Directors with a General Assembly of general membership, and an empowered, representative and reconstituted Executive Board,<sup>4</sup> clarifying their mission and

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<sup>3</sup> 23 CFR § 450.310 (d).

<sup>4</sup> Though a 49-member Board assures all jurisdictions may participate, it creates a governing body that may simply be too large to be efficient. Moreover, as noted in Recommendation numbered 4 below, we believe that having seats representing clusters of similarly situated jurisdictions will enhance the goal of regionalism over parochialism. DRCOG could resolve this problem by amending its Articles of Association to create a General Assembly of universal membership, and a representative Executive Board. For example, Seattle's MPO has a General Assembly of general membership of all voting members, and a smaller (26-member) Executive Board comprised of representatives of counties, cities and towns, appointed by the local jurisdictions they represent, and whose seats and votes are reconsidered every three years based on current population data. The General Assembly meets at least annually to review and ratify key decisions of the Board. Similarly, the North Central Texas Council of Governments has a General Assembly comprised of all 220+ members, which elects an 11-member Executive Board (comprised of nine local elected officials

role, and instituting full-time population-based weighted voting (as in Dallas and Seattle);<sup>5</sup> and

- Simplify the basic transportation committee structure to facilitate the achievement of consensus on key policy and technical issues. There should be one committee making decisions regarding transportation plans and programs, and one committee providing technical advice to policy committee and providing oversight for technical activities of MPO staff. Other committees (e.g., citizen’s advisory, freight users/shippers) would be organized to report to either of these or both, and all committees and sub-committees should be structured to eliminate overlap as much as possible.

**4. Regional Ethos.** Our research reveals the importance of balancing parochial and regional concerns. One of the difficult objectives of MPOs is to create a regional ethos among their elected representatives. Our findings reveal that though most participants believe the elected officials in the MPO process reflect the needs of the metropolitan area as a whole, approximately 40% say the elected officials are more concerned with their individual needs.<sup>6</sup> Some participants in MPOs view the process as a means of enhancing their parochial interests. MPOs should consider several structural means of promoting a more regional approach among their members, including:

- Having each county represented on its Board and all key committees (it should be made clear that counties have a responsibility to represent the transportation interests of both unincorporated areas and incorporated municipalities within their boundaries);<sup>7</sup>
- Having at-large or regionally elected members of the public serve on their Board;<sup>8</sup>
- Having seats on its Executive Board and committees represented by members who represent clusters of similarly situated jurisdictions (e.g., small suburban towns,

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and two regional citizens), which endorses the transportation planning documents and policies approved by the 37-member Regional Transportation Council.

<sup>5</sup> Some MPOs, such as DRCOG, have “on demand” weighted voting. This places political strain upon any jurisdiction which might want to call for it. Full-time weighted voting would eliminate this stigma. Because it is more democratic, full-time weighted voting also may enhance the perception of fairness in the decisional process, and give it added legitimacy. To ensure the interests of the minority are protected, super-majority voting may be required for particularly important decisions. Our recommendation for full-time population-based weighted voting effectively resolves the issue of whether a joint city/county government should have one or two votes.

<sup>6</sup> In Denver, 49% of respondents indicated that participants in the MPO process put their local concerns ahead of regional needs. When asked to identify the one change they believed would improve the MPO process, the largest number identified adoption of a more cooperative, regional approach.

<sup>7</sup> Each county in the Dallas/Ft. Worth MPO region is represented on the Regional Transportation Council, with the number of seats varying by population; representatives on the Council are selected by county judges.

<sup>8</sup> As an example, up to three citizen representatives on the Dallas/Ft. Worth MPO Regional Transportation Council may be appointed by the Mayor of Dallas; one may be appointed by the Mayor of Ft. Worth.

counties, central city, inner suburbs, outer suburbs, transportation providers, environmental advocates, and the public at large);<sup>9</sup> and

- Staffing a modest inter-governmental affairs office to assist the MPO in improving communications and relations with local governments and the state.

**5. Public Involvement.** The most successful MPOs recognize the importance of, and are aggressive in pursuing, public involvement in shaping priorities of the region. Meaningful public participation in the MPO process enhances the acceptance and support of the transportation projects in the region, and enhances the ability of the region to compete successfully for state funds. Performance goals and funding priorities should result from an inclusive, open, transparent, and fair planning process. The aggressive position on public involvement goes beyond mandated public hearings, and encouraging citizens to express their concerns at committee meetings. To educate the public, elicit ideas, and improve understanding of the region's needs, MPOs should:

- Work aggressively to form partnerships with citizen groups;
- Encourage stakeholder groups who are concerned about transportation issues (e.g., chambers of commerce, land use organizations) to become involved in advocating their transportation priorities;
- Provide informational briefings and dialogues with transportation committees of their State legislatures, State DOT transportation commissions, local transit providers, municipal leagues, and county organizations, for purposes of informing them of, and building consensus on, needs and priorities;
- Reassess their committee structures to ensure that all leaders, staff and stakeholders required to be included by TEA-21 are adequately represented in the transportation planning process. In particular, the interests of passenger transportation may be dominating decision making over the interests of freight transportation. The interest of common carriers should be accommodated in a more formalistic and structured way, such as creation of an intermodal roundtable (as in Seattle), or having formal representation of common carriers on its transportation policy committee (as in Denver);
- Publicize the work they do in addressing transportation and air quality problems;
- Organize periodic symposia and publicize information on the long-term economic and social needs of the region;
- Provide timely information on their web pages; and
- Respond promptly to inquiries and complaints.

**6. Cooperative Relationship With the State DOT.** The most successful MPOs engage their State DOTs in a cooperative and collaborative decisional process. It is, so to speak, a two-way street. Both must strive to achieve greater cooperation and collaboration.

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<sup>9</sup> For example, the Dallas/Ft. Worth MPO Regional Transportation Council has a number of seats dedicated to clusters of cities, with mayors of the cities collectively designating their representative to the Council.

- As part of improved outreach efforts, the MPO, the State DOT, and the State Transportation Commission should better coordinate the long-range transportation plan for the region with the long-range transportation plan for the state, particularly regarding mobility and system preservation needs.
- MPOs should develop the TIP and long-range plan criteria in a comprehensive format to accommodate, not only projects proposed by local governments, but to assess State-proposed projects fairly as well. Thus, transportation projects in the metropolitan region proposed by State DOTs and local governments should be assessed by the same criteria in both the TIP and the long-range plan.
- To facilitate the state’s need to advocate its interest in statewide accessibility, and to facilitate consideration of transit issues, the State DOT and local transit provider should have a seat on all key MPO transportation committees, and a non-voting seat on the Executive Board.
- The MPO and State DOT should consider exchanges or assignments of staff to be housed in the other agency, and also a regular, substantive meeting schedule among the principals.
- In Colorado, until the State DOT re-draws its engineering districts so that one is coterminous with the boundaries of DRCOG, that MPO should attempt to coordinate transportation planning with the three districts, in which it operates together – to attempt to treat them as a single unit in the regional planning process.<sup>10</sup>

**7. Land Use.** Our research reveals the importance of integrating land use, air quality, and transportation planning. Because transportation issues are inextricably intertwined with land use issues, MPOs should strive to develop a cooperative process with the state and local jurisdictions to coordinate transportation and land use plans and programs.

- The MPO should serve as a forum for the planning directors of the region to coordinate their land use and transportation plans. Such coordination would not only enhance mobility and result in a superior allocation of the public’s resources, it would improve the quality of life in metropolitan areas.
- Transportation projects proposed by jurisdictions which honor the growth boundary, as defined in the regional growth plan, should receive higher priority in the LRP and the TIP than those proposed by jurisdictions which ignore the growth boundary.<sup>11</sup>
- In developing TIP criteria, special attention should be given to the needs of rapidly growing regions, to accommodate population and demand trends in each succeeding planning cycle.

**8. Accountability.** The most successful MPOs are noteworthy in hiring and retaining staff members that have the confidence of their membership. Such staff must be

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<sup>10</sup> Though we ascribe no blame, 79% of respondents describe the DRCOG/CDOT relationship as merely “fair” or “poor.”

<sup>11</sup> The Denver MPO (DRCOG) offers additional points to projects submitted for selection under the TIP by communities that have adopted the urban growth boundary defined in the *Metro Vision 2020 Plan*.

accountable to the elected officials and public members who comprise the MPO. MPOs consist of elected and appointed officials, as designated by the governor and local officials. The MPO as a policy/decision making body is served by a staff. The MPO staff is not the decision making body. The staff provides the information the MPO itself needs to make decisions on federally required plans and programs. Real decision-making power in an MPO must rest with its officers and committee members, for the MPO exists to serve the regional needs of its constituents – the state and local governmental institutions, and the public. Ultimately, it is facilitation of the public’s need for passenger and freight mobility in an environmentally benign way that is the primary goal of regional transportation planning.

- MPOs should engage in a periodic<sup>12</sup> self-assessment process that involves their leaders, staff, and stakeholders in evaluating how well they are performing, how they might improve their process in the future, and how they might improve their relationships with constituents and other organizations, particularly State DOTs.
- Working cooperatively in a non-partisan way, all the actors in the MPO transportation planning process (state and local officials) should establish objective criteria, which should be used periodically (e.g., every three years at the time of a federal planning certification review) to conduct an objective performance evaluation.
- MPOs should invite objective and candid peer or other outside review of their procedures, processes and work products.
- MPOs should hold retreats headed by competent outside facilitators who bring in experts to elucidate “best practices” in MPO organization and performance.
- The MPO Executive Board should monitor the performance of the Executive Director in an annual performance-based salary process. In turn, the Executive Director should establish an internal review process to evaluate the performance of the MPO staff, in an annual performance-based salary review, for example.
- Orientation and training programs should also be developed for elected officials, particularly those new to the MPO, to educate them as to the process and procedures of MPO transportation planning and allocation.
- A formal grievance procedure should be created which would allow any MPO member to petition the Executive Board with respect to any of the issues identified in this recommendation. The board should engage in a public report of any grievance filed.

## **STATE DEPARTMENTS OF TRANSPORTATION<sup>13</sup>**

- 1. Cooperative Transportation Planning.** The objective of State DOTs and MPOs should be to create a cooperative and coordinated multi-modal transportation

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<sup>12</sup> Since each federal transportation funding bill includes new policy and procedural mandates, we believe periodic analysis should be performed not less than once every such funding cycle.

<sup>13</sup> This study did not survey officials outside large metropolitan areas. We recognize that perceptions and priorities in small towns and rural areas, and for intercity mobility, may warrant different considerations than those expressed here.

planning process which satisfies the public's need for mobility while ensuring efficient expenditure of the public's resources.

- States and MPOs should fulfill their statutory mandate to develop a more cooperative transportation planning process by coordinating project selection.<sup>14</sup> For selection of projects in MPO regions, there should be collaboration between the State DOTs and MPOs; such collaboration should include consultation, discussion and agreement between them on project selection, prioritization and timing.
- The State DOTs and MPOs should attempt to become partners in the process of jointly promulgating guidelines and LRP and TIP criteria, with early interaction between their respective staffs in the development of priorities.<sup>15</sup> Eventually, joint recommendations might become a regular occurrence.
- State DOTs should develop an open and objective selection process for selecting, prioritizing and timing their projects. The state process should include input from local jurisdictions, stakeholders, and the public.
- The project prioritization and planning process should be formalized in rules and regulations, rather than pursued on an *ad hoc* basis.
- The State DOT and MPO should also consider exchanges or assignments of staff to be housed in the other agency, and regular, substantive meetings among principals.

**2. Fiscal Responsibility.** Cost overruns on transportation infrastructure projects too often deprive or delay other worthy projects of funding. State and local governments should make better efforts to properly scope and cost their projects at the outset.

- State DOT officials should collaborate with local transportation planners at the outset to ensure proposed projects are properly scoped and costed.
- State DOTs should establish firm project budgets and maintain fiscal discipline throughout the project implementation.

**3. Equity Assessment.** State DOTs should periodically evaluate the needs and equity of economic resource distribution between regions, using criteria such as population, vehicle miles traveled, lane miles, pollution, and perhaps performance-based measures, such as mobility and congestion. They should also engage in donor/donee analysis (how much money regions are contributing, versus how much they are receiving).<sup>16</sup> Such evaluations should be made public.<sup>17</sup>

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<sup>14</sup> Among the most important criteria identified in our surveys and in the literature which distinguish successful MPOs is an effective and positive cooperative relationship with their State DOTs. AASHTO and AMPO are to be commended for the work they have done in promoting cooperative transportation planning between State DOTs, MPOs and local jurisdictions.

<sup>15</sup> A solid majority of respondents across the four MPOs we studied (i.e., Dallas/Ft. Worth, Denver, Phoenix and Seattle) found the MPO process for selecting transportation projects superior to the State DOT's process. Those four State DOTs, and perhaps others as well, should formalize the process by which their projects are selected so that the criteria by which projects are selected are consistent with the criteria for selection embraced in the long-range plan and the TIP.

<sup>16</sup> For states which impose a fuel tax at the wholesale level (such as Colorado) this may require changing and monitoring how transportation taxes are collected in jurisdictions, or finding an appropriate surrogate

- 4. Updated MOA.** In Colorado, the Memorandum of Agreement [MOA] designating DRCOG as the MPO for the Denver region was signed in 1977. But the State of Colorado of 1977 was a different environment than the Colorado of 2000. The Colorado of two decades past was one in which transportation development was dominated by a State Department of Highways, in a different economy, with a smaller population, less onerous transportation needs, and a differing federal legislative mandate. In the past two decades, major changes in metropolitan transportation planning have occurred, including promulgation of ISTEA and TEA-21, which should be incorporated into a new and updated MOA. Given the changes in the nature of federal transportation legislation and programs, changes in the transportation system in terms of capacity, performance and condition, changes in the size and complexity of the metropolitan area and the inter-related transportation and quality of life issues it faces, the basic dimensions of the Denver Metropolitan Transportation Planning Process should be revisited.
- The update of the MOA governing the transportation planning process should be carried out as a cooperative, non-partisan effort.
  - Among the most frequent changes sought by our survey of Denver participants was that DRCOG should streamline its process, and remove unnecessary complexity. The process specified in that 1977 MOA should be reasonably refined, streamlined, and simplified to remove unnecessary complexity and redundancy.
  - Among items to be considered should be consolidation of the Transportation Committee with the Transportation Policy Committee, instituting formalized freight planning, and instituting proportional representation and/or weighted voting (as in Dallas and Seattle).<sup>18</sup>
  - The MOA should be redrafted not less than once every ten years, or more often if significant changes have been made in federal legislation.
- 5. Engineering Regions.** In Colorado, certain economic resources are distributed to, and transportation projects are designated by six engineering regions. The engineering regions are the geographic units where project selection and resource allocation are focused. One of these regions is situated wholly within the area encompassed by the Denver Regional Council of Governments [DRCOG], while two others spill over, partially within and partially outside of DRCOG's boundaries. The boundaries of the engineering regions have not been redrawn to reflect the federal emphasis on regional transportation planning mandated by ISTEA. Depending on the issue and one's perspective, this either gives the Denver Metropolitan Area undue

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for the tax, such as vehicle miles traveled, adjusted for the relative efficiencies of open highway versus city driving.

<sup>17</sup> Given the local interest in resource allocation equity issues, measures of resource allocation equity should be included among the evaluation criteria; however, additional research beyond the work undertaken by the University of Denver should be done with regard to equity measurement. There are no clear, universally accepted measures of equity that cover both the resources provided by the citizens of each respective jurisdiction and the transportation needs of those citizens, both within their home jurisdiction and beyond.

<sup>18</sup> DRCOG has had weighted voting available as an option since 1972. To our knowledge, weighted voting has never been requested.

influence on resource allocation decisions at the statewide level, or not enough. By constituting the Denver Region as a single district, it would allow more democratic, objective representation for that area in the context of statewide resource allocation, and streamline decision making. It would also lead to better articulation of the needs of the non-metropolitan areas in the commission districts of which the Denver Region is currently part.

- To facilitate more efficient transportation and cooperative planning, the Colorado Department of Transportation should consider re-drawing its regions, so that a single engineering region is coterminous either with the boundaries of the 8-county DRCOG region or the 6-county Denver Transportation Management Area.
- At the same time, Colorado should also re-draw the jurisdictional lines of its planning and commission member districts.

## STATE LEGISLATURES<sup>19</sup>

**1. Flexible Funding.** Our surveys revealed widespread concern about the inadequacy of economic resources to satiate transportation needs at all levels – federal, state, and local. An overriding concern of many respondents was that there were insufficient dollars to meet the needs. Many states are faced with an environment in which transportation needs outweigh available resources. Such states should consider creating additional flexible funding revenue streams to support transportation projects. Such revenue should not be restricted to *highway* operations, maintenance and capital projects, but should be available for all modes of transportation.

**2. Land Use.** In large, fast-growing regions, transportation infrastructure is often unable to keep pace with growth. In such areas, state legislatures should consider developing methods for implementing regional land use plans so that development and transportation are better coordinated. The state transportation investment should support the regional land use plan; the land use plan should be supportive of transportation. Such coordination would maximize the impact of transportation dollars, and enhance mobility.<sup>20</sup> States should also consider passing Growth Management Acts similar to that enacted in the State of Washington, or some of the more enlightened “Smart Growth” plans that have been proposed in a number of states.<sup>21</sup>

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<sup>19</sup> The Metropolitan Planning Organization functions specified in federal legislation and regulations require that MPOs “serve as a forum for cooperative decision-making on metropolitan area transportation plans and programs.” Federal legislation does not require or enable MPO’s to raise money, operate, maintain or manage a metropolitan transportation system or any of its parts, control land-use or in any way act as a surrogate regional government. These functions can only be added to an MPO’s portfolio by specific state legislation.

<sup>20</sup> For example, the success of transit is enhanced where transit stops are located in high-density residential areas or in park-and-ride lots adjacent to major highway arteries.

<sup>21</sup> Participants in the Seattle-Tacoma MPO process identified the State Growth Management legislation as an important element in creating a successful transportation planning process. Our Review Panel also identified growth management as an essential component of transportation planning.

**3. Transportation Commissions.** When the year 2000 census results are released, state legislatures should reassess the size and composition of their state transportation commissions to determine whether they equitably afford representation to those regions of their states with greatest transportation needs. At that time, the Colorado legislature should reassess whether only four of the State's 11 commissioners should represent the geographic region embraced by the Denver Regional Council of Governments. Such commissions should also be clearly subject to state "government in the sunshine" requirements of adequate notice, public hearings, and an open decisional process.

**4. Updated Enabling Legislation.** Nearly a decade has passed since the Colorado Department of Transportation [CDOT] was created. Given the intervening passage of TEA-21, it may be timely for the Colorado legislature to update CDOT's enabling legislation commensurate with the policies favoring openness of process, enhanced public participation, and seamless intermodalism, and re-emphasize the desirability of continuing, cooperative and comprehensive planning, so as to prepare it for the next century.

## **U.S. DEPARTMENT OF TRANSPORTATION**

**1. Updated Regulations.** The Federal Highway Administration [FHWA] and the Federal Transit Administration [FTA] should make an effort to promulgate rules implementing major federal transportation legislation within one year of its promulgation. For example, at this writing, the FHWA and FTA regulations still embrace the 15 transportation planning criteria enumerated in ISTEA, and have not been re-crafted to embrace the seven criteria of TEA-21. Regulations implementing the National Environmental Policy Act have not been updated since 1991. This creates incongruity in the legal process, and confusion among those who must comply with it. To reduce inconsistency, these agencies should coordinate their guidelines, and issue joint regulations for project development and implementation.<sup>22</sup> To the extent the underlying statute permits, the regulations should attempt to simplify, rather than complicate, the transportation planning process.

**2. Certification Reviews.** Though federal certification reviews of MPOs evaluate their compliance with federal mandates, no effort has been made by FHWA and FTA to collect, assess and analyze these certification reviews. The identification of strengths and weaknesses, and best and worst practices, across all MPOs would be useful information to which MPOs could look to improve their processes. FHWA and FTA should collect, assess and analyze these reviews. Moreover, comprehensive Enhanced Planning Reviews of major MPOs by outside reviewers or peers should be continued, and updated at least once during every transportation authorization cycle. FHWA and FTA should focus more carefully on whether the States and the local transit providers are fulfilling their long-standing statutory mandate to engage in cooperative transportation planning with local jurisdictions and MPOs.

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<sup>22</sup> The incongruity arising from the TEA-21 statutory structure, and an ISTEA regulatory structure, is a disconnect in manifest need of repair.

## U.S. CONGRESS

**1. The Role of MPOs.** Congress has recognized that problems such as transportation congestion, air pollution, and sprawl are interrelated issues, which should be addressed at a regional level, for such problems defy jurisdictional boundaries. Our surveys reveal that the MPOs, as a group, are seen as functioning moderately well to very well in meeting regional transportation needs. The Metropolitan Planning Organizations should continue to serve as an important forum for the state and local jurisdictions to resolve these problems.

**2. Central City Approval of MPO Redesignation.** Currently, the statutory requirements for MPO designation and redesignation require approval of (1) officials representing 75% of the affected population, (2) the central city, and (3) the Governor. Our research results emphasize the importance of equitable, collaborative transportation planning and allocation processes. According to any single jurisdiction disproportionate say in the MPO designation or redesignation process may create the appearance of inequity. Though our research does not support the creation of multiple MPOs, and it is manifest that central city participation is critical to effective regional transportation planning, we believe the credibility and legitimacy of an MPO, its ability to foster a regional ethos, and the appearance of fairness in the process will be enhanced if no single jurisdiction enjoys disproportional decisional weight in MPO formation or reformation based on criteria unrelated to population. We therefore recommend that Congress should consider, in conjunction with additional study, removing the requirement of approval of the central city for MPO designation or redesignation from the statutory criteria.