REPORT TO THE CONGRESS

Progress And Problems Of Urban And Transportation Planning

Department of Housing and Urban Development
Department of Transportation

BY THE COMPTROLLER GENERAL OF THE UNITED STATES

092265
NOV. 19, 1971
To the President of the Senate and the
Speaker of the House of Representatives

This is our report on the progress and problems of urban and transportation planning. The activities discussed in the report are administered by the Department of Housing and Urban Development and the Department of Transportation.

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of this report are being sent to the Director, Office of Management and Budget; the Secretary of Housing and Urban Development; and the Secretary of Transportation.

Comptroller General
of the United States
WHO THE REVIEW WAS MADE

Urban and transportation planning is being carried on, with Federal support, in every major metropolitan area.

During fiscal year 1970 about $50 million was appropriated to the Department of Housing and Urban Development (HUD) for comprehensive areawide urban planning. During the same period, about $60 million was appropriated to the Department of Transportation (DOT) for comprehensive transportation planning.

Because of the legislative requirements, the significant Federal investment in urban and transportation planning, and the possible variations in types and quality of planning, the General Accounting Office (GAO) reviewed the effectiveness of such planning.

GAO concentrated its review on urban and transportation planning for the Detroit, Michigan, metropolitan area because of its size and advanced planning process. Because of its size the Detroit area could be expected to have complex urban problems common to other metropolitan areas.

To gain a broader perspective of urban planning, GAO also made limited inquiries into the planning structures of 15 other metropolitan areas. Further GAO considered the results of a current DOT evaluation of the effectiveness of urban transportation planning nationwide.

FINDINGS AND CONCLUSIONS

Detroit has a continuing planning process which has made, and should continue to make, some contribution to urban growth by developing plans for land use and for transportation systems.

Because of the difficulty in getting numerous independent governmental units to agree on a master plan, however, it appears that the planning process will not have a major impact in directing future area development toward the most desirable growth patterns. (See p. 8.)

Detroit's urban planning situation may be indicative of problems confronting many other major urban areas with similar complex governmental structures. (See p. 18.)
**Metropolitan Detroit situation**

Of the 220 independent units of government in the six-county Detroit metropolitan area, 76 are members of the Southeast Michigan Council of Governments. The council directs urban and transportation planning in the Detroit metropolitan area. From July 1965 to June 1970, the council and its predecessor directed projects costing $5.4 million, including $3.5 million in Federal funds. (See p. 11.)

The Detroit planning effort was aimed at producing a coordinated plan to guide future land use and to develop a balanced transportation system and at developing a planning process and structure to assist in the implementation of the plan. (See p. 9.)

In 1968 the council developed five alternative plans for the area, offering varying degrees of control over land use. The council, however, could not agree on any one plan because the members were concerned about the loss of local government authority. (See p. 12.)

In August 1969 the council's planners developed a compromise transportation and land-use plan. (See p. 15.)

As of October 1971 the compromise plan had not been approved as the official master plan and was being revised. The council has no authority to compel member communities to agree or to comply with the plan. In addition, not all the government units which would be affected by the planned urban development are members of the council. If the council members reach agreement on the plan, its implementation could be hampered or blocked by the views of, or lack of support by, the nonmember units. (See p. 16.)

Local government officials agree with GAO that, although the planning process has made, and will continue to make, some contribution to urban growth, it appears that the process will not have a major impact in directing future development toward the most desirable growth patterns. (See p. 17.)

**Urban planning nationwide**

GAO, in its limited review of the governmental structure of 15 other metropolitan areas, found that the situation in Detroit was similar to that of many other metropolitan areas.

Regional planners are confronted with many units of government sharing differing degrees of responsibility and authority for transportation and land use. From this structure arises the problem of getting many independent governmental units to agree on a master plan which may benefit the entire region but which may be detrimental to the individual government units. (See p. 18.)

DOT has conducted a nationwide study of urban transportation planning and has tentatively concluded that, although the planning process has produced
substantial benefits, it has not promoted the use of transportation sys-
tems as a means of improving the quality of urban life and that a new con-
cept of urban transportation planning, emphasizing transportation systems
as an urban development tool, is needed. (See p. 19.)

Congressional intent for urban planning

In December 1970 the Congress first spelled out its expectations for urban
development. It amended the Housing Act of 1954 to require that the Sec-
retary of Housing and Urban Development encourage the formulation of plans
and programs for effectively guiding and controlling major decisions as to
where urban growth should take place. (See p. 6.)

RECOMMENDATIONS OR SUGGESTIONS

GAO proposed that HUD and DOT revise their guidelines, to set forth more
clearly the urban planning objectives required by the 1970 legislation
and to assist planning agencies in devising methods to overcome local op-
position to areawide plans. (See p. 21.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

HUD agreed that improvements in the planning process and implementation of
urban development plans were desirable. Several policy changes were in-
cluded in the 1971 legislation proposed to the Congress.

DOT was revising its instructions for transportation planning to reflect
the objectives set forth in the 1970 Federal-Aid Highway Act. It was also
considering ways to help overcome local opposition to areawide plans.
(See p. 21.)

HUD stated that the planning efforts supported by DOT and HUD had a much
broader impact than that indicated by the report. DOT and HUD planning
assistance programs support the areawide efforts required under Federal
programs as prerequisites for Federal grants.

GAO recognizes that the awarding of Federal grants in consonance with, or
to help implement, areawide plans is better than the fragmented approach
of programs in prior years. The lack of an approved area plan, however,
tends to diminish the effectiveness of Federal grants for the area. Con-
versely an approved plan tends to increase the effectiveness of Federal
grants. (See p. 24.)

DOT stated that GAO's central point that urban planning had little impact
in directing areas toward the most desirable growth patterns was highly
controversial, considering the lack of consensus within a metropolitan
area of what desirable growth patterns really were. GAO recognizes this
controversy. Unless agreement can be reached by the people of an area on the most desirable growth trend, the work of areawide planning agencies will not have a major impact on the future development of the area. (See p. 25.)

Other issues on which HUD and DOT commented are discussed on pages 21 to 25.

MATTERS FOR CONSIDERATION BY THE CONGRESS

The Congress has under consideration several legislative proposals relating to urban and transportation planning. In view of the character and magnitude of urban planning problems—and their solutions—this report contains information which may be useful to the Congress.
# Contents

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>DIGEST</td>
<td></td>
<td>1</td>
</tr>
<tr>
<td>CHAPTER</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>FEDERAL ROLE IN URBAN PLANNING</td>
<td>5</td>
</tr>
<tr>
<td>2</td>
<td>URBAN AND TRANSPORTATION PLANNING IN DETROIT METROPOLITAN AREA</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>Urban planning has little impact in directing area development toward most desirable growth patterns</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>Development and refinement of numerous plans for land use and for transportation systems</td>
<td>12</td>
</tr>
<tr>
<td></td>
<td>Difficulties encountered in obtaining agreement on a single plan for urban development</td>
<td>16</td>
</tr>
<tr>
<td></td>
<td>Views of local officials on impact of urban planning</td>
<td>16</td>
</tr>
<tr>
<td>3</td>
<td>URBAN AND TRANSPORTATION PLANNING NATIONWIDE</td>
<td>18</td>
</tr>
<tr>
<td></td>
<td>Inquiries into governmental structures in other metropolitan areas</td>
<td>18</td>
</tr>
<tr>
<td></td>
<td>Evaluations of urban planning</td>
<td>19</td>
</tr>
<tr>
<td>4</td>
<td>AGENCY COMMENTS</td>
<td>21</td>
</tr>
<tr>
<td>5</td>
<td>CONCLUSIONS</td>
<td>26</td>
</tr>
<tr>
<td>6</td>
<td>SCOPE OF REVIEW</td>
<td>28</td>
</tr>
<tr>
<td>APPENDIX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>I</td>
<td>Letter dated June 21, 1971, from the Department of Transportation to the General Accounting Office</td>
<td>31</td>
</tr>
<tr>
<td>II</td>
<td>Letter dated May 27, 1971, from the Department of Housing and Urban Development to the General Accounting Office</td>
<td>33</td>
</tr>
</tbody>
</table>
APPENDIX

III Principal officials responsible for Administration of activities discussed in this report 36

ABBREVIATIONS

DOT Department of Transportation

GAO General Accounting Office

HUD Department of Housing and Urban Development

SEMCOG Southeast Michigan Council of Governments
DIGEST

WHY THE REVIEW WAS MADE

Urban and transportation planning is being carried on, with Federal support, in every major metropolitan area.

During fiscal year 1970 about $50 million was appropriated to the Department of Housing and Urban Development (HUD) for comprehensive areawide urban planning. During the same period, about $60 million was appropriated to the Department of Transportation (DOT) for comprehensive transportation planning.

Because of the legislative requirements, the significant Federal investment in urban and transportation planning, and the possible variations in types and quality of planning, the General Accounting Office (GAO) reviewed the effectiveness of such planning.

GAO concentrated its review on urban and transportation planning for the Detroit, Michigan, metropolitan area because of its size and advanced planning process. Because of its size the Detroit area could be expected to have complex urban problems common to other metropolitan areas.

To gain a broader perspective of urban planning, GAO also made limited inquiries into the planning structures of 15 other metropolitan areas. Further GAO considered the results of a current DOT evaluation of the effectiveness of urban transportation planning nationwide.

FINDINGS AND CONCLUSIONS

Detroit has a continuing planning process which has made, and should continue to make, some contribution to urban growth by developing plans for land use and for transportation systems.

Because of the difficulty in getting numerous independent governmental units to agree on a master plan, however, it appears that the planning process will not have a major impact in directing future area development toward the most desirable growth patterns. (See p. 8.)

Detroit's urban planning situation may be indicative of problems confronting many other major urban areas with similar complex governmental structures. (See p. 18.)
Metropolitan Detroit situation

Of the 220 independent units of government in the six-county Detroit metropolitan area, 76 are members of the Southeast Michigan Council of Governments. The council directs urban and transportation planning in the Detroit metropolitan area. From July 1965 to June 1970, the council and its predecessor directed projects costing $5.4 million, including $3.5 million in Federal funds. (See p. 11.)

The Detroit planning effort was aimed at producing a coordinated plan to guide future land use and to develop a balanced transportation system and at developing a planning process and structure to assist in the implementation of the plan. (See p. 9.)

In 1968 the council developed five alternative plans for the area, offering varying degrees of control over land use. The council, however, could not agree on any one plan because the members were concerned about the loss of local government authority. (See p. 12.)

In August 1969 the council's planners developed a compromise transportation and land-use plan. (See p. 15.)

As of October 1971 the compromise plan had not been approved as the official master plan and was being revised. The council has no authority to compel member communities to agree or to comply with the plan. In addition, not all the government units which would be affected by the planned urban development are members of the council. If the council members reach agreement on the plan, its implementation could be hampered or blocked by the views of, or lack of support by, the nonmember units. (See p. 16.)

Local government officials agree with GAO that, although the planning process has made, and will continue to make, some contribution to urban growth, it appears that the process will not have a major impact in directing future development toward the most desirable growth patterns. (See p. 17.)

Urban planning nationwide

GAO, in its limited review of the governmental structure of 15 other metropolitan areas, found that the situation in Detroit was similar to that of many other metropolitan areas.

Regional planners are confronted with many units of government sharing differing degrees of responsibility and authority for transportation and land use. From this structure arises the problem of getting many independent governmental units to agree on a master plan which may benefit the entire region but which may be detrimental to the individual government units. (See p. 18.)

DOT has conducted a nationwide study of urban transportation planning and has tentatively concluded that, although the planning process has produced
substantial benefits, it has not promoted the use of transportation sys-
tems as a means of improving the quality of urban life and that a new con-
cept of urban transportation planning, emphasizing transportation systems
as an urban development tool, is needed. (See p. 19.)

Congressional intent for urban planning

In December 1970 the Congress first spelled out its expectations for urban
development. It amended the Housing Act of 1954 to require that the Sec-
retary of Housing and Urban Development encourage the formulation of plans
and programs for effectively guiding and controlling major decisions as to
where urban growth should take place. (See p. 6.)

RECOMMENDATIONS OR SUGGESTIONS

GAO proposed that HUD and DOT revise their guidelines, to set forth more
clearly the urban planning objectives required by the 1970 legislation
and to assist planning agencies in devising methods to overcome local op-
position to areawide plans. (See p. 21.)

AGENCY ACTIONS AND UNRESOLVED ISSUES

HUD agreed that improvements in the planning process and implementation of
urban development plans were desirable. Several policy changes were in-
cluded in the 1971 legislation proposed to the Congress.

DOT was revising its instructions for transportation planning to reflect
the objectives set forth in the 1970 Federal-Aid Highway Act. It was also
considering ways to help overcome local opposition to areawide plans.
(See p. 21.)

HUD stated that the planning efforts supported by DOT and HUD had a much
broader impact than that indicated by the report. DOT and HUD planning
assistance programs support the areawide efforts required under Federal
programs as prerequisites for Federal grants.

GAO recognizes that the awarding of Federal grants in consonance with, or
to help implement, areawide plans is better than the fragmented approach
of programs in prior years. The lack of an approved area plan, however,
tends to diminish the effectiveness of Federal grants for the area. Con-
versely an approved plan tends to increase the effectiveness of Federal
grants. (See p. 24.)

DOT stated that GAO's central point that urban planning had little impact
in directing areas toward the most desirable growth patterns was highly
controversial, considering the lack of consensus within a metropolitan
area of what desirable growth patterns really were. GAO recognizes this
controversy. Unless agreement can be reached by the people of an area on the most desirable growth trend, the work of areawide planning agencies will not have a major impact on the future development of the area. (See p. 25.)

Other issues on which HUD and DOT commented are discussed on pages 21 to 25.

MATTERS FOR CONSIDERATION BY THE CONGRESS

The Congress has under consideration several legislative proposals relating to urban and transportation planning. In view of the character and magnitude of urban planning problems—and their solutions—this report contains information which may be useful to the Congress.
CHAPTER 1

FEDERAL ROLE IN URBAN PLANNING

Planning of Federal programs is of vital concern to the Congress. Of particular significance—because of the impact on the quality of urban life—is the need for planning of urban growth and development, including transportation systems. Underscoring its awareness of the need for urban and transportation planning, the Congress, in fiscal year 1970, authorized $110 million to be made available in the form of grants by the Department of Housing and Urban Development and the Department of Transportation for this purpose.

Urban planning involves the process of studying practically all aspects of where and how people live and work—community attitudes, travel habits, desires for the future, and the use of land in achieving individual and community goals. This planning, with a projected time frame of about 20 years, includes the preparation of master plans or general development plans on the

--pattern and intensity of land use,

--effective development and utilization of human and natural resources, and

--development of transportation systems that will serve the needs of the people.

With Federal support urban planning, including areawide land-use and transportation planning, is being carried on in every major metropolitan area. Planning agencies, usually referred to as metropolitan or regional planning commissions, have been established in most metropolitan areas to carry out this planning. Local communities within the metropolitan areas also make plans to be carried out within their own boundaries. This type of planning, however, was not included as part of our review and is not discussed in this report.
The Housing Act of 1954 (40 U.S.C. 461) and the Federal-Aid Highway Act of 1962 (23 U.S.C. 134) have provided impetus and significant funds for metropolitan planning.

The Housing Act of 1954 is administered by HUD. The act authorizes planning grants--$50 million appropriated for planning in fiscal year 1970--to State and local governments to (1) assist in solving planning problems, including those resulting from the increasing concentration of population in urban areas, (2) facilitate comprehensive planning for urban and rural development, including coordinated transportation systems, on a continuing basis, and (3) encourage such governments to establish and improve planning staffs and techniques on an areawide basis. Of this $50 million, about $20 million is for metropolitan planning and the remainder is for a variety of State, local, and special area planning.

The Federal-Aid Highway Act of 1962 is administered by DOT. The act authorizes planning grants--for which $60 million was appropriated in fiscal year 1970--for the development of long-range highway plans and programs. These are coordinated with plans for other forms of transportation and give consideration to probable effects on the future development of urban areas of more than 50,000 population. The act provides that, after July 1, 1965, no highway projects for such urban areas can be approved unless the projects are based on a continuing comprehensive transportation planning process carried on cooperatively by States and local communities.

Before December 1970 the expected results of urban planning had not been explicitly defined in congressional legislation or in HUD and DOT guidelines. Without specific planning objectives, urban planners have been free to develop plans ranging from probable growth trends in the event present trends continue to probable growth trends in the event a controlled growth pattern is followed.

In December 1970 the Congress amended the Housing Act of 1954 and more explicitly defined what was to be achieved through urban planning. In addition to continuing the existing planning requirements, the act, as amended, states that the Secretary, HUD:
"*** shall encourage the formulation of plans and programs which will include the studies, criteria, standards, and implementing procedures necessary for effectively guiding and controlling major decisions as to where growth should take place ***.

(Underscoring supplied.)

At the same time the Congress amended the Federal-Aid Highway Act of 1962 by requiring that local views on transportation projects in urban areas be considered. The act, as amended, states that:

"No highway project may be constructed in any urban area of fifty thousand population or more unless the responsible public officials of such urban area(s) *** have been consulted and their views considered with respect to the corridor, the location and the design of the project."

To gain insight into, and make observations on, the effectiveness of urban planning in improving the quality of urban life, we reviewed the planning activities—land-use and transportation planning—in the Detroit metropolitan area. We selected Detroit because (1) it has an advanced planning process, (2) it is one of the largest metropolitan areas in the Nation, ranking fifth in population in the 1970 census, and (3) it can be expected, because of its size, to have the complex urban problems (urban sprawl and inadequate transportation systems) common to other major metropolitan areas.
CHAPTER 2

URBAN AND TRANSPORTATION PLANNING

IN DETROIT METROPOLITAN AREA

The Detroit metropolitan area has a continuing planning process which has made, and should continue to make, some contribution to urban growth--development of plans for land use and for transportation systems. It appears, however, that the process will not have a major impact in directing future area development toward what areawide planners believe to be the most desirable growth patterns necessary for significantly improving the overall quality of urban life. The primary cause of this situation is the inherent difficulty in getting numerous independent political units to agree on a plan of action which, although beneficial to the area as a whole, may be detrimental to the aims of some individual units.

This situation is contrary to the recently stated intent of the Congress for the future role of urban planning--effectively guiding and controlling major decisions as to where growth should take place.

The benefits of areawide planning and the need for transportation and land-use plans have long been recognized in the Detroit metropolitan area. Since 1947 a regional planning commission--financed principally by voluntary contributions from the counties in the region and by Federal funds--has carried on a continuing planning program in the Detroit area. Examples of the commission's efforts are:

--Development in June 1957 of a regional land-use plan showing what the region would look like by 1970.

--Development in April 1958 of a regional highway plan to meet expected needs through 1980.

On July 1, 1965, prompted by the requirements in the Federal-Aid Highway Act of 1962, the regional planning commission started a transportation and land-use study encompassing the southeastern Michigan counties of Wayne, Oakland,
The study was designed to

-- produce a coordinated plan to guide future land use and the development of a balanced transportation system to serve the needs of the metropolitan region in 1990, and

-- develop a planning process and structure to assist in implementation of the plan and continue to make the evaluations, refinements, adjustments, and projections necessary to keep the plan current.

In January 1968, before the completion of the study, a newly formed Southeast Michigan Council of Governments (SEMCOG) took over the activities and projects of the regional planning commission. SEMCOG is a voluntary association of local governments, covering a six-county area in southeast Michigan, concerned with fostering a cooperative effort in resolving problems, policies, and plans that are common and regional in nature.

In addition to areawide transportation and land-use planning, SEMCOG is involved in planning for other areawide activities, such as health, education, and safety. It also is responsible for reviewing and commenting on local community requests for Federal grants to ensure that they are in consonance with the areawide planning process, and it works closely with the local member agencies to help implement such plans.

Although there were 220 local governmental units in the SEMCOG area, as of March 1971 only 76 had chosen to become members and to provide financial contributions. Included in the 76 were all county governments, some of the largest city governments--including the city of Detroit--and some of the local governmental agencies having authority to implement certain aspects of areawide planning. For example, an areawide recreational authority is a member and works closely with SEMCOG in helping to attain long-range recreation needs of the area. In addition, 31 school districts are members and provide financial support.
Area covered by transportation and land use study

Map provided by Southeast Michigan Council of Governments
The transportation and land-use study was officially completed in June 1970 at a cost of $5.4 million--shared as follows:

<table>
<thead>
<tr>
<th>Source of funds</th>
<th>Amount (millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department of Transportation</td>
<td>$2.1</td>
</tr>
<tr>
<td>Department of Housing and Urban Development</td>
<td>1.4</td>
</tr>
<tr>
<td>Local units of government</td>
<td>1.2</td>
</tr>
<tr>
<td>Michigan Department of State Highways</td>
<td>.6</td>
</tr>
<tr>
<td>Private agencies</td>
<td>.1</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$5.4</strong></td>
</tr>
</tbody>
</table>

The transportation elements of the study considered only highway and mass-transit systems. In the continuing phase of the planning process, however, area plans will be developed for consideration of harbors, airports, and railroad facilities. The objectives of the continuing phase also will be to refine the basic study data, develop financial transportation and land-use plans for the area, and make additional studies to keep the plans up to date.
URBAN PLANNING HAS LITTLE IMPACT IN
DIRECTING AREA DEVELOPMENT TOWARD
MOST DESIRABLE GROWTH PATTERNS

SEMCOG's long-range objective was the preparation of a plan that would guide future development of the Detroit metropolitan area toward the best use of land from an economic, environmental, and personal-choice standpoint and that would include the consideration of transportation systems.

This objective has not been achieved even though considerable time and significant amounts of funds have been used to gather and evaluate much information in the development of numerous plans for land use and for transportation systems. Because of the numerous types and levels of governmental entities in the Detroit metropolitan area, each having its own interests and objectives in developing the area, SEMCOG's planners could not persuade the local governments to agree on a single plan of action for the entire area.

**Development and refinement of numerous plans for land use and for transportation systems**

After gathering and studying extensive data on the region, SEMCOG's planners set out to develop a master plan projecting where people would—and should—live and work by 1990 and the transportation systems that would be needed to serve them. Initially they established 50 concepts for alternative growth patterns of the region. In 1968, after considerable refinement, they chose five alternatives to present to local government units and to area citizens.

SEMCOG's planners presented the alternatives as representing what the area could look like with varying degrees of control over land use. They depicted the projected growth of the area if local communities (1) exercised only minimal land-use controls, thereby continuing present growth trends, (2) instituted new controls that would help to achieve what SEMCOG's planners believed to be the most desirable uses of the land, and (3) accepted various combinations of these two growth patterns. The five alternative plans were described by SEMCOG as follows:
"TREND--*** would allow a continuation of sprawl with low population densities in outlying areas. Improvement in public transportation would be difficult and unlikely. The gobbling up of open space and potential recreation land would continue. Numerous small centers (shopping centers, office complexes, community colleges) of specialized activity would spring up helter-skelter. Detroit and other older cities would decline as centers of activity, hindering urban renewal.

"MODIFIED TREND--*** somewhat similar to TREND, would mean slightly higher population densities in outlying areas. Not quite as much open space and potential recreation area would become urbanized. Improvements in public transportation would be limited almost entirely to increased bus service. Larger multi-purpose areas would replace many small activity centers. A somewhat higher pace or urban renewal activity in the older cities is implied.

"CENTERS--*** would result in a substantial departure from TREND. Most of the new urbanization would occur in new towns or in multi-purpose centers, many formed around existing small clusters of urbanization. Most of the prime open space and recreation lands would be preserved for regional breathing space and for use by the people. Because of the higher population densities, cost per mile for sewer, water, and transportation services would be somewhat less. Transportation improvements would include a more extensive system with some rail transit. The rate of central city renewal activity would be more rapid. There would be fewer, larger, and more varied activity centers recentralizing some activity and jobs in Detroit and other central cities in the region.
"CORRIDORS--*** would be similar in some effects to the CENTERS alternative, but would concentrate new urbanization in corridors providing more opportunities for better sewer and water and transportation services. This structural difference would support a more extensive public transportation system, including a much more extensive rail transit network. Since Detroit would be at the center and other older cities along the spokes of the transportation hub, a much more rapid rate of renewal and a greater degree of recentralization of activity would take place in the older centers of the region.

"NEW DIRECTIONS--*** would represent an almost complete reversal from TREND. It calls for much higher residential densities and only about half of the households in the region living in single-family homes compared with 75 percent at present. In addition to the preservation of outlying open space and recreational lands, NEW DIRECTIONS would recapture Detroit's river-front acreage from obsolete industrial uses to provide recreation opportunities closer to the center and permit some industrial renewal. An extensive public transportation system, much of it by rail, would provide increased mobility and aid in recentralizing activities in Detroit and older centers. Relatively few new activity centers would be built. Revitalized older downtowns would be more varied in activity and more accessible by public transportation as well as by automobile."

In developing the land-use alternatives, the SEMCOG planners did not develop separate transportation plans for each of the growth patterns. Instead only two alternative transportation plans (combinations of differing highway and mass-transit systems) were considered.
Difficulties encountered in obtaining agreement on a single plan for urban development

SEMCOG's planners had extensive discussions and public meetings on the alternative plans with various groups--local government officials, city and county planners, and general citizens groups. SEMCOG's planners, however, could not persuade local governments to agree on any one plan. Disagreement seemed to center on one basic issue--diminishment of local government authority in the interest of areawide development. The following examples illustrate this problem.

--Alternative plans that provided for changes in the current growth trend were rejected because, in some cases, they conflicted with the plans and desires of the individual local units of government. For example, proposed use of land for recreation purposes might be beneficial to the area as a whole but not be consistent with the plans of the local governments.

--Alternative plans that provided for extensive rebuilding and renewal of the central city were generally opposed by the suburbs, which favored alternatives that continued existing growth trends.

Concluding that there was no prospect of agreement on any one of the five alternative plans, SEMCOG's planners, in August 1969 (about one year after the five alternatives were proposed), developed a compromise transportation and land-use plan for the year 1990. From each of the five alternatives, SEMCOG's planners adapted elements they considered beneficial and capable of being achieved. Emerging from this adaptation was a tentative and preliminary plan generally reflecting the desires of each local unit of government and some of the concepts of SEMCOG's planners on what would be best for the entire area.

As an integral part of this compromise plan for urban development, SEMCOG's planners set out in considerable detail their recommendations for a balanced transportation system for the area. The proposed system included extensions of already planned highways and mass transit. It was based primarily on current and projected transportation needs in
accordance with existing growth trends rather than on consideration of how transportation could be used to influence the most desirable urban growth.

As of February 1971, however, the compromise plan had not been approved as the official master plan for the area and was being further revised. SEMCOG's planning director said that, hopefully, by mid-1971 SEMCOG's members would adopt the plan as a guideline for urban growth in southeast Michigan. He acknowledged, however, that even if the plan was adopted, SEMCOG had no authority to force individual communities to comply. As of October 1971 the plan had not been approved by SEMCOG's members.

The planning director's views highlight significant problems confronting any council of governments--the voluntary nature of membership and the lack of authority to require individual communities to comply with the plan. For example, 144 of the 220 governmental units in the SEMCOG area are not members. Consequently SEMCOG's goals for achieving urban growth could be hampered, if not completely blocked, by the views of, or lack of support by, these nonmember governmental units.

The reasons why the remaining 144 government units have not joined SEMCOG seem to be as varied as the number of units involved. In general, however, some units oppose SEMCOG because they fear that it is the forerunner to a metropolitan government which will smother the autonomy of local governments and others are critical because it is not a metropolitan government which they believe to be necessary for the region.

Views of local officials on impact of urban planning

The tentative transportation and land-use plan for the Detroit metropolitan area--the compromise approach developed in August 1969--is a sophisticated, intricate proposal for integrating land-use and transportation-system concepts. Some of the more significant highlights of the plan are:

--Development of totally planned new towns, concentrations of urban activity in certain centers and along corridors, designation of recreation spaces and open
spaces in both developed and undeveloped areas, and extensive rehabilitation and redevelopment of older areas.

--A net increase of 348 miles of freeways and 230 miles of major arteries; together with a 113-mile rapid-transit system, supplemented by and coordinated with an extensive unified regional bus system.

To gain insight into the impact of this plan on improving urban life in the Detroit metropolitan area, we solicited the opinions of various local government officials including local and SEMCOG planners. Their opinions, as expressed to us, confirm our observations that, although the planning process has made, and may continue to make, some contribution to urban growth, it will not have a major impact in directing future area development toward what SEMCOG's planners believe are the most desirable growth patterns for significantly improving the quality of urban life.

Several of the local government officials seemed to sum up the problems with the following comments.

"The compromise plan has not and probably will not achieve the objective of guiding future land use. The best land use pattern for the Detroit region includes accomplishment of social goals not acceptable to all the region's citizens."

"Local government units have opposed acceptance of area-wide land use plans primarily because they have historically controlled land use and are unwilling to give up this right."

"The plan does not represent much of a change from previous transportation plans or ideas. Many of the regional freeways proposed have been on the State Highway Department planning boards for many years and are well known by local officials."

"The highway network in the plan will probably get implemented because most of it has been proposed or committed for many years. The land use proposals will not be as fortunate."
CHAPTER 3

URBAN AND TRANSPORTATION PLANNING NATIONWIDE

Detroit's urban planning situation may be indicative of problems confronting many other major urban areas. Our limited inquiries into the governmental structure of other metropolitan areas and a recent DOT nationwide evaluation of transportation planning seems to confirm this observation.

INQUIRIES INTO GOVERNMENTAL STRUCTURES
IN OTHER METROPOLITAN AREAS

Governmental structures in major metropolitan areas typically consist of numerous independent political units, each having control over land use, and, in some cases, transportation systems, within its boundaries. Our inquiries into 15 urban areas, in addition to the Detroit area, have shown that each area has a complex system of many autonomous governmental units sharing authority and responsibility for area growth.

Although all 15 metropolitan areas have councils of governments or other forms of regional planning agencies, memberships are voluntary and, in most instances, only limited numbers of the independent political units are members. In each of the 15 areas, regional planners are confronted with the significant political complexities of getting agreement on areawide plans from numerous governmental units.

Information provided to us in February 1971 by the regional planning commissions of the 15 metropolitan areas is presented below.

<table>
<thead>
<tr>
<th>Metropolitan area</th>
<th>Total units</th>
<th>Members of council of government (note a)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Atlanta, Georgia</td>
<td>48</td>
<td>6</td>
</tr>
<tr>
<td>Baltimore, Maryland</td>
<td>20</td>
<td>6</td>
</tr>
<tr>
<td>Boston, Massachusetts</td>
<td>100</td>
<td>76</td>
</tr>
<tr>
<td>Cincinnati, Ohio</td>
<td>273</td>
<td>100</td>
</tr>
<tr>
<td>Cleveland, Ohio</td>
<td>233</td>
<td>141</td>
</tr>
<tr>
<td>Dallas-Fort Worth, Texas</td>
<td>142</td>
<td>107</td>
</tr>
<tr>
<td>Denver, Colorado</td>
<td>46</td>
<td>30</td>
</tr>
<tr>
<td>Houston, Texas</td>
<td>101</td>
<td>62</td>
</tr>
<tr>
<td>Kansas City, Missouri</td>
<td>108</td>
<td>12</td>
</tr>
<tr>
<td>Philadelphia, Pennsylvania</td>
<td>362</td>
<td>12</td>
</tr>
<tr>
<td>Portland, Oregon</td>
<td>42</td>
<td>27</td>
</tr>
<tr>
<td>San Francisco, California</td>
<td>100</td>
<td>93</td>
</tr>
<tr>
<td>Seattle, Washington</td>
<td>72</td>
<td>22</td>
</tr>
<tr>
<td>St. Louis, Missouri</td>
<td>481</td>
<td>117</td>
</tr>
<tr>
<td>Washington, D.C.</td>
<td>66</td>
<td>15</td>
</tr>
</tbody>
</table>

*Or regional planning agency or commission.*
We believe that, because of the numerous political units in the metropolitan areas and the voluntary nature of the councils of government, the major problem observed in the Detroit area--getting numerous independent political units to agree to a plan of action which may be beneficial to the area as a whole but which may be detrimental to the individual units--may also exist in other metropolitan areas.

EVALUATIONS OF URBAN PLANNING

DOT began a study early in 1970 of the effectiveness of the transportation planning process under the Federal-Aid Highway Act of 1962. The objective of this study was to determine ways and means of improving the effectiveness of such planning. As of October 1971 the results of the study were being reviewed within DOT.

DOT obtained detailed information on urban planning by sending questionnaires to 40 mayors, 25 councils of government, 50 State highway departments, and 211 urban transportation planning agencies. On the basis of responses to the questionnaires (96 percent) and of visits by DOT officials to selected urban areas, the DOT study group has tentatively concluded that:

--Although the planning process has produced substantial benefits, it has not promoted the use of transportation systems as a means of achieving desirable urban goals for land use, growth patterns, and lifestyles (improving the quality of urban life).

--A new concept of urban transportation planning, emphasizing transportation systems as an urban development tool, is badly needed.

The DOT study group plans to use the information obtained during its studies to recommend that DOT develop a concept for the ideal urban transportation planning process at the metropolitan level, taking into consideration all modes of transportation--air, water, mass transit, highways, and railroads. The study group plans also to recommend the consolidation of the transportation planning functions within DOT to develop a national urban transportation planning assistance program.
HUD has not made an evaluation of the total urban planning assistance program authorized by the Housing Act of 1954. It has, however, had studies made on the effectiveness of urban planning activities in cities with less than 50,000 population.

It appears that the conclusions drawn from these studies are equally applicable to major metropolitan areas of more than 50,000 population. In a report on the studies, dated October 1969, the consultants who made the studies for HUD pointed out that the HUD planning grants had stimulated planning in many small communities throughout the Nation but had been only moderately effective as a tool for guiding and implementing public policies in small communities.

The consultants pointed out also that one of the factors contributing to the ineffectiveness of the planning activities sponsored by HUD was the inherent difficulty in coordinating the actions of a variety of National, State, and local agencies having distinct and often conflicting interests. Other problems which contributed to this situation were associated with the state of the art in urban planning, the leadership at the local level, and the capacity of local administrators to deal with complex and crucial urban issues.

The consultants made several recommendations for improving the effectiveness of the planning programs in small cities. Some of these recommendations were adopted by HUD and others were being evaluated for later implementation. These recommendations were concerned primarily with (1) providing greater emphasis on the social, economic, and administrative problems of communities, (2) handling urgent, short-range issues, (3) increasing the roles of the States in the administration of urban planning programs, and (4) streamlining administrative procedures at Federal and State levels.
CHAPTER 4

AGENCY COMMENTS

In a draft report submitted to the Secretaries of Transportation and Housing and Urban Development for comment, we proposed that DOT and HUD revise their urban planning guidelines, to more clearly set forth the planning objectives required in the 1970 legislation and to assist planning agencies in devising methods that will help overcome local opposition to areawide plans.

The Assistant Secretary for Administration, DOT, and the Assistant Secretary for Community Planning and Management, HUD, commented on the draft report by letters dated June 21 and May 27, 1971, respectively. These letters are included in this report as appendixes I and II.

In commenting on our proposal, DOT stated that the Federal Highway Administration was revising its Policy and Procedures Memorandum to include the planning objectives set forth in the Federal-Aid Highway Act of 1970. This act states that no highway project may be constructed in any urban area with a population of 50,000 or more unless the views of the public officials of these areas have been considered with respect to the corridor, location, and design of the project.

DOT stated also that the Federal Aviation Administration and the Urban Mass Transportation Administration were preparing planning assistance guidelines to reflect 1970 legislation requiring that the two agencies conduct public hearings to obtain the views of public officials and of the public before any project could be approved. DOT stated further that various methods were being considered to help overcome local opposition to areawide plans.

HUD agreed that improvements in the process of planning and the implementation of urban development plans were desirable and stated that, for this and related reasons, several HUD policy changes were contained in legislation proposed to the Congress in 1971. Several other legislative proposals dealing with land-use and areawide planning were
also being considered by the Congress. These legislative proposals place emphasis on (1) making planning an integral part of the management process, (2) focusing planning authority on elected officials, and (3) emphasizing the importance of the State as a coordinative agency.

These legislative proposals generally will provide a stimulus for more effective urban planning at the State, local, and area levels. Certain of the proposals provide for (1) State-wide development plans, seeking to integrate all-important elements of community development including designations of potential growth areas and new community development sites, and (2) standards for determining communities, or groups of communities, to be considered together as single localities for purposes of establishing and carrying out local and areawide programs.

Each of the proposals would provide Federal funds for activities that will aid in the attainment of specified State and local objectives relating to governmental operation, land use, housing, and areawide and intergovernmental coordination.

In commenting on our draft report, DOT stated that there were examples of metropolitan planning agencies in other metropolitan areas which contrasted with the situation in Detroit, and it cited the metropolitan council of the Twin Cities area (Minneapolis-St. Paul, Minnesota) as such an example. HUD referred to this council as an example of a more effective planning agency.

The Twin Cities Metropolitan Council has planning and implementing authority over areawide sewer and solid-waste-disposal needs and over open-space land acquisition. The plans of several independent commissions, boards, or agencies--such as transportation (other than highways and airports), mosquito control, conservation, and watersheds--must be approved by the council before they can be put into effect.

If the plans of these agencies do not fit within the council's metropolitan development guide for the area, it has the authority to veto the plans. In addition, the council has authority to establish zoning criteria in the
vicinity of airports which the individual communities must adhere to, and thus the council controls the type of development which can take place.

The council received its planning and implementing authority from the Minnesota Legislature over a period of years. According to a DOT official, the council's authority is unique among regional planning agencies throughout the Nation. Members of the council represent each of 14 equal population districts and are appointed by the Governor of the State. Thus the council represents the people of the area, not individual political subdivisions, as is the case with SEMCOG in the Detroit metropolitan area.

Granting implementing authority to the metropolitan council apparently resulted from recognition by the people of the Twin Cities metropolitan area that certain problems areawide or metropolitan in scope, could not be handled efficiently or effectively on an individual community basis by the more than 300 independent communities in the metropolitan area.

In our opinion the Twin Cities Metropolitan Council does offer a distinct contrast to the situation in Detroit. As stated earlier, the council is unique in its makeup and authority and is not representative of the planning activities in other metropolitan areas. Therefore we believe that the situation in Detroit is more representative of metropolitan planning agencies and indicates a need for both DOT and HUD to revise their planning guidelines.

Both DOT and HUD, in commenting on our report, pointed out that, although only 76 of the 200 local units of government in the SEMCOG area were members, such a statement was misleading in that it implied a more significant lack of local support than actually existed. DOT stated that the 76 units of government included all the counties and the largest cities. Also HUD stated that 100 percent of the area's population is represented because some of the villages and townships which are not members of SEMCOG are represented through their county government.

We recognize that 100 percent of the people in the Detroit metropolitan area may be represented in SEMCOG.
through one unit of government or another. The fact re-
mains, however, that the 144 units of government that do
not belong control land use and transportation within their
boundaries. Their agreement on an areawide master plan is
necessary before such a plan can be meaningful. Without
such agreement these units of government can use land under
their jurisdiction in a manner that may not be consistent
with the overall master plan.

HUD commented that our draft report placed much empha-
sis on the control over land use to implement planning ob-
jectives, as a measure of success in areawide planning. It
stated that, if an areawide strategy were agreed upon, the
control over land use would be only one means to secure its
implementation. It stated also that other means for secur-
ing the implementation of a plan included control over area-
wide facilities, such as transportation, power supplies,
and sewer and water facilities.

We agreed that other means are available to help
achieve a desired growth pattern besides the control over
land use. A major problem with urban and related trans-
portation planning noted in this report, however, centers
on getting the numerous independent units of government to
agree on an areawide strategy or a master plan for future
growth. Once this obstacle is overcome, several means can
be adopted to help ensure its implementation.

We are not suggesting the adoption of any particular
method. This is the responsibility of State and local gov-
ernments and is dependent upon the circumstances in each
metropolitan area. We believe that, until agreement can be
reached on the master plans for metropolitan areas, debates
on the methods of implementation are academic.

HUD also pointed out that HUD- and DOT-supported plan-
ning activities had a much broader impact than that indi-
cated by our draft report. HUD stated that the planning
assistance programs in HUD and DOT are supportive of area-
wide planning efforts required under several Federal pro-
grams as prerequisites for Federal grants. HUD stated also
that, in addition to statutory planning requirements for
specific implementation programs (grants for highways;
mass-transit systems; water, sewer, and waste treatment
facilities; and open-space land), the Intergovernmental Co-
operation Act of 1968 and the Office of Management and Bud-
get Circular No. A-95 extended the influence of the area-
wide planning agencies to a large array of Federal assis-
tance programs.

We agreed that areawide planning is a prerequisite for
Federal grants under many programs and thus would have a
broad impact on the metropolitan areas. The awarding of
Federal program grants in consonance with, or to help imple-
ment, areawide plans is surely better than the fragmented
approach of programs in prior years.

We believe, however, that the lack of an approved
area plan--as in Detroit--tends to diminish the effective-
ness of Federal grants for an area. Conversely, an ap-
proved plan tends to increase the effectiveness of Federal
grants. A good example of this was cited by HUD in its
May 27, 1971, letter, in which it pointed out that the
Worcester, Massachusetts, metropolitan area would apparently
save $10 million by installing an areawide sewer system
rather than each municipality installing its own.

DOT stated that the conclusion in our draft report
that urban planning had little impact in directing areas
toward the most desirable growth patterns was a highly con-
troversial point, considering the general lack of consensus
on what desirable growth patterns really were. We recognize
that there is considerable controversy over the definition
of desirable growth patterns. As HUD points out in its
comments, a desired growth pattern in some communities may
be what the community wants to happen, even if it amounts
to no more than a continuation and affirmation of existing
trends.

In our view desired growth trends involve alterations
of existing trends to provide for a more orderly and inte-
grated growth of the community. This lack of consensus on
future growth within a metropolitan area is the central
point of our report. Unless agreement on the most desirable
growth trend can be reached by the people of a metropolitan
area, the development of plans by planning agencies will not
have a major impact on the future development of the area.
CHAPTER 5

CONCLUSIONS

There is considerable debate--both in and out of Government--as to whether urban growth should be controlled and directed and, if so, to what extent. The control of land use is one of the main methods for directing growth and altering existing trends which have caused urban sprawl. Transportation systems, as well as water and sewer systems and utilities, can also be used as tools to help shape desired growth patterns.

We believe that the urban planning situation in Detroit--and possibly in urban areas nationwide--indicates that such planning may not be having a major impact in directing future area development toward what areawide planners believe are the most desirable growth patterns for significantly improving the quality of urban life. The primary reason for this situation is the inherent difficulty in getting numerous independent political units to agree on a plan of action which, although beneficial to the area as a whole, may be detrimental to the aims of some individual units.

Also contributing to problems in urban planning has been a lack of specifics in both legislation and agency guidelines as to what is desired from urban planning. Before December 1970 legislation and guidelines from both DOT and HUD allowed planning agencies to develop alternative area plans, ranging from probable growth trends in the event present trends continue to probable growth trends in the event controls were instituted to direct growth in the interests of the area as a whole. In amending the Housing Act in December 1970, we believe that the Congress specifically set out what it intends to achieve through urban planning--development of plans for guiding and controlling major decisions as to where growth should take place.

Both HUD and DOT recognized that improvements were needed in urban and transportation planning activities. In this regard HUD policy changes were included in the 1971 legislation before the Congress and DOT was revising its implementing instructions concerning planning grants. DOT
was also considering various methods to help overcome local opposition to areawide plans.

In certain respects the various legislative proposals now being considered by the Congress should help solve the problems noted during our review and help accomplish the planning objectives required under the 1970 legislation. Continuous efforts, by both HUD and DOT however, will be required to help overcome local opposition to the areawide plans.
CHAPTER 6

SCOPE OF REVIEW

Our review was directed toward determining what progress had been made in urban and transportation planning, the extent to which such planning had been used to help achieve future desired growth and development, and what problems hampered the effectiveness of the planning process.

We examined into the roles that HUD and DOT played in the planning process, and we reviewed the legislation, policies, and procedures guiding the planning activities. We examined also into the planning activities as they were being carried out at the State level in Michigan and at the local level in the Detroit metropolitan area.

We interviewed Federal officials in Washington, D.C., and Chicago, Illinois, who were responsible for planning activities in Michigan; State officials responsible for State-wide urban and transportation planning; and urban planners, mayors, city managers, and planning consultants in the Detroit metropolitan area.

Limited inquiries for specific information were made regarding other selected major metropolitan areas throughout the Nation. We examined into a study made for HUD on the effectiveness of urban planning activities in cities with less than 50,000 population and into the results of a nationwide evaluation of the planning process carried out by DOT.
June 21, 1971

Mr. Richard W. Kelley
Assistant Director
Civil Division
U.S. General Accounting Office
Washington, D.C. 20545

Dear Mr. Kelley:

This is in response to your request for comments on the General Accounting Office draft report to the Congress on "Progress and Problems of Urban and Transportation Planning."

Your report recommends that the Department of Transportation (DOT) (1) revise its urban planning guidelines to more clearly set forth the planning objectives required under the 1970 legislation and (2) assist planning agencies in devising methods that will help overcome local opposition to area-wide plans.

The Federal Highway Administration is revising its planning guidelines and will issue a revised Policy and Procedures Memorandum 50-9, Urban Transportation Planning, that will include the planning objectives set forth in the Federal Highway Act of 1970. The Federal Aviation and Urban Mass Transportation Administrations of DOT are also preparing planning assistance guidelines to reflect 1970 legislation. We are also considering various methods to help overcome local opposition to area-wide plans.

It should be noted that there are other metropolitan planning agencies, such as in the Twin Cities of Minnesota that offer direct contrast to the Detroit situation, highlighted in your report. The Twin Cities Metropolitan Council created by the Minnesota legislature and given broad mandatory review powers is designed to be a metropolitan agency equipped with both planning and implementation power.

The statement that only 76 of 220 local units of government have chosen to become members of South East Michigan Council of Government (SEMCOG) implies a more significant lack of local
support than actually exists. It would be fair to point out that these 76 units of government include all the counties and the largest cities. Those agencies that have implementing authority for capital improvement of regional significance are also included.

The conclusion that urban planning has little impact in directing area development toward the most desirable growth patterns is a highly controversial point, given the general lack of consensus on what "desirable growth patterns" really are.

We appreciate the opportunity to comment on this report.

Sincerely,

William S. Heffelfinger
Mr. Baltas E. Birkle
Assistant Director
U. S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Birkle:

Thank you for your letter to Secretary Romney providing us with the opportunity to review the March 1971 draft General Accounting Office report on "Progress and Problems of Urban and Transportation Planning." We have reviewed the draft in detail and appreciate the difficulty encountered in evaluating the impact of urban and transportation planning. Planning involves relationships between various land uses and facilities as well as relationships among agencies of government, private interests and the public. As such, there are various levels and functions of planning and implementation responsibilities, but the GAO draft report focuses almost exclusively on one scale of planning, that of metropolitan or areawide.

The draft report does not appear to recognize adequately the complexities of conflicting objectives, pluralistic interests, as well as the fragmentation of planning and governmental processes at the areawide scale. Three major aspects of the draft report concern us:

1. Method of Measuring Planning Success

The report places much emphasis on the control over land use to implement planning objectives as a measure of success of areawide planning. Control over land use is an important element in achieving a desired land use strategy; equally important, if not more so, are the supporting plans and implementing processes for regional shaping facilities, such as transportation, power supplies, sewer and water facilities. If an areawide strategy were agreed upon, the control over land use would be only one means to securing its implementation. Land use controls are particularly fragmented in metropolitan areas, and there are only a few examples where regional
agencies exercise limited degrees of land use control. The Metropolitan Council on the Twin Cities area, for example, has control over development in the environs of new airports.

There are other ways to evaluate planning "successes." Even in the Detroit example, further exploration of the agency's activities would indicate its role and influence in implementing plans by other regional agencies, such as the Huron-Clinton Metropolitan Authority.

2. Planning Assistance - Planning Requirement Relationships

The planning assistance programs in HUD and DOT are supportive of areawide planning efforts required under several Federal programs as a prerequisite for a Federal grant. Prior to a DOT Highway or Mass Transit grant, HUD water, sewer or open space grant or an EPA Waste Treatment Construction grant, planning has to be underway or completed, and the Federally-assisted project must be found to be consistent with the planning. The appropriate Federally-assisted projects therefore contribute to the implementation of the required planning prepared at the local or state level. Both Federal and local expenditures are more effectively used when made in accordance with such planning. In the Worcester, Massachusetts metropolitan area, for example, a saving of $10 million would result by using an areawide approach in the installation of its sewerage system instead of the $34 million individual municipality approach.

In addition to the statutory planning requirements for these specific implementation programs, the Intergovernmental Cooperation Act of 1968 as administered via OMB Circular A-95, extends the influence of the areawide planning agencies to a much larger array of Federal assistance programs. In most instances, the HUD and DOT supported areawide planning agencies are also the designated clearinghouses under A-95, and the HUD-DOT supported planning activities therefore have a much broader impact than would otherwise be indicated by the draft report.

3. Use of a Single Planning Example

Most of the draft report focuses on the urban and transportation planning process under the Transportation and Land Use Study, established by the Detroit Metropolitan Area Regional Planning Commission, now organized as the Southeast Michigan Council of Governments (SEMCOG). We believe that any attempted evaluation of the progress and problems of urban and transportation planning should be more substantive and include a sample of areas, or have some rational basis for the selection of a single area. Since the emphasis is on the
Detroit experience in obtaining an agreement, or lack of it, on a single land use alternative, it would also be advisable to investigate the other numerous products and results from the planning process.

Despite our reservations about the kind of analysis presented in the draft report, we would agree that improvements in the process of planning and its implementation are desirable. For this and related reasons, a number of policy changes are proposed in HUD's 1971 legislation. Title II, for example, places emphasis on: a) making planning an integral part of the management process; b) focusing planning authority on elected officials; and c) emphasizing the importance of the State as a coordinative agency.

We have detailed comments on specific portions of the report; they are listed by page on the enclosure. If we can provide you with additional information, please let me know.

Sincerely,

[Signature]

Samuel C. Jackson

Enclosures [See GAO note]

GAO note: These enclosures are not included in this report.
APPENDIX III

PRINCIPAL OFFICIALS RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES DISCUSSED IN THIS REPORT

<table>
<thead>
<tr>
<th>Tenure of office</th>
<th>From</th>
<th>To</th>
</tr>
</thead>
</table>

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

SECRETARY OF HOUSING AND URBAN DEVELOPMENT:
- George W. Romney: Jan. 1969 - Present

DEPARTMENT OF TRANSPORTATION

SECRETARY OF TRANSPORTATION:
- John A. Volpe: Jan. 1969 - Present