

**SUMMARY AND RECOMMENDATION FOR DETERMINING THE PORTION OF THE LOCAL STREET AND ROAD REHABILITATION NEED THAT IS “REGIONALLY SIGNIFICANT”**

The Local Streets and Roads Committee recommends that the portion of the City/County streets and roads system that should be used for the purpose of determining both Pavement and Non-Pavement regional maintenance and rehabilitation needs, and for determining eligibility for regional funding for this purpose shall be the portion deemed eligible by FHWA and Caltrans for Federal funding, inclusive of all streets and roads classified as rural major collector or higher and as shown on a current approved version of the map depicting streets and roads classified by the Federal Functional Classification System (FFCS).

It is further recommended that the portion of the City/County road system described above be included in its entirety in the Metropolitan Transportation System (“MTS”) of roadways, and that future additions/deletions of streets and roads to the MTS be processed in accordance with State and Federal standards for amending the FFCS.

**BACKGROUND**

The MTS was introduced in 1991. It included all interstate highways, state routes, and a portion of the street and road system operated and maintained by Cities and Counties. The stated purpose at the time was to set up a system of roadways recognized as “regionally significant” to be subsequently analyzed and potentially “managed” to help relieve congestion through the application of system management techniques like signal coordination, special lane designation, etc. At around the same time, state legislation and local sales tax measures were setting criteria for “regionally significant roadways” (Contra Costa Measure C) and the Congestion Management network for purposes of congestion measurement and evaluation, compliance reporting, and other purposes. Preceding this, there existed for many years a sub-set of local streets and roads designated as eligible for federal funding. This sub-set was the Federal Aid to Urban (FAU) and Secondary (FAS) system, and was used by Counties to allocate federal money to cities and to county road projects.

In ensuing years, the MTS was not utilized in the manner that it was originally intended, and eventually reverted to being a system whose meaning and purpose became increasingly identified with distribution of regional funding to Cities and Counties and not system management. The importance of other system designations also evolved into something other than what was originally intended, and at this time, most “congestion management” and “regionally significant” roadway system designations are incorporated into more global and all encompassing network analyses that recognize the interrelationship of freeways, all types of arterial and collector local streets and roads and other modes of transportation, such as transit, bicycles, pedestrian travel and ferries.

On the Federal side, the FAU/FAS system evolved into the Federal Functional Classification System, which classified all streets, roads and highways according to an

accepted system of classification that assigned levels of importance to each road segment based on a number of criteria. This functional classification was very similar to that used by cities and counties since the 1970's to classify their roadways within their respective General Plans Circulation Element. For the past several federal funding cycles, all roadways classified as urban collector and above have been deemed to be important enough to be eligible for federal funding. However, MTC has, for the most part, taken a more restrictive position by limiting needs assessment and eligibility to the streets and roads included in the MTS.

The implication that the MTS would be utilized in some way to “manage” the roadway system on a regional level, coupled with the growing identification of the MTS as the basis for regional fund allocation, has confused local jurisdictions and caused a certain amount of ambivalence regarding the designation and the process for including (or excluding) road segments in the MTS. This has been exacerbated by the fact that the original MTS was developed with minimal participation by local officials (MTC dealt with CMA's in establishing the MTS, not with the jurisdictions in charge of the local street and road system), and that the process for amending the MTS, which was intended to be flexible and to recognize changing times, priorities, etc. has become convoluted, increasingly subjective through modification and amendment of the criteria, and generally a mystery to the local jurisdictions most directly affected.

The ambiguity surrounding what should or should not be included on the current MTS, according to the specified criteria, results in an implied, if not real threat of loss of local control, and has resulted in local agencies seeking removal of streets from the MTS, thereby shooting themselves in the pocketbook, in a manner of speaking. Conversely, agencies seeking approval to add streets to the MTS have had their requests refused without gaining a clear understanding as to why the roadways being reviewed could not be considered “regionally significant”. This has raised the suspicion on the part of local agencies, warranted or not, that there is an effort to keep the MTS restricted in size so as to keep the local streets and roads rehabilitation need “manageable” within the context of limited regional funding.

## ANALYSIS

When it comes to using the MTS as the criteria for both establishing regional rehabilitation funding need as well as regional rehabilitation and system preservation funding eligibility, the picture is even more muddled. First of all, the relationship between a roadways structural condition and its “regional importance” is tenuous at best. While it is true that greater traffic (especially truck traffic) means greater wear and tear, it is not true that less traffic means that the road will be in better structural shape, or that a deteriorated road will become less congested because it is maintained to a higher standard. While to a degree, driving habits are dictated by road conditions, unless the condition is extremely poor, this influence is relatively minor when compared to other factors. As a result, restricting regional funding to MTS rehab will not solve the regional congestion problem, but could result in poor rehab strategy decisions by local jurisdictions, as described below.

The most rationale approach to maintenance of the roadway system is a scientifically based pavement management system, like the MTC PMS, which recognizes the relative traffic impacts on, as well as the importance of various road classifications, and integrates that information with road history, condition, prior maintenance record, etc., into a logical, systematic set of priorities and funding recommendations. Superimposing on such a system another system like the MTS, defined entirely on the basis of “regional importance” and not structural condition or rehabilitation needs, to define need and priorities, runs counter to the logic inherent in the PMS and can force local jurisdictions into making poor decisions regarding rehab strategy based on what is eligible and not what is needed. The FFCS, by broadly defining rehabilitation funding eligibility as encompassing all arterials and collectors, provides far greater flexibility and consistency with the MTC PMS (and other PMS systems) logical approach to system rehabilitation and preservation.

The bottom line is, there is not now, nor will there ever be in the foreseeable future enough regional funding to meet the regional need. In addition, this need will grow due to diminishing size of the local road rehabilitation funding pie and the accumulated effect of deferred maintenance that results from inadequate funding. However, the argument over what should be the size of the regional system for purposes of establishing need and funding priority is more than academic – it’s practical in the sense that it is used to arrive at a formula to divide up what limited amount of regional funding is available, and it is also used to dictate to local jurisdictions how the funding, once allocated, should be spent.

In summary, the use of the MTS, or any other system designation for determining a fair split of regional funding need between competing interests as well as funding eligibility should be predicated on:

- being fair and comparable to how other systems, notably transit, are treated
- consistent with how the federal government allocates funding
- reasonably tied to regional importance according to as objective a set of criteria as possible
- objective in its construct and participatory as to the process by which the designation is assigned.
- Broad enough in scope to allow local jurisdictions maximum flexibility to apply both local and regional funds toward system management in a rationale, scientifically based manner.

In the opinion of the LS&R Committee, the current MTS fails to fulfill any of these objectives.

To aid in the process of analyzing the current MTS system and developing a recommendation on how that system might be revised, a sub-committee of the Local Streets and Roads Committee was formed. The sub-committee developed a matrix in order to compare various alternatives—for defining a system of regionally significant roadways—against the criteria generally described in bullet points above. The matrix

attached to this recommendation is an abbreviated version of what the sub-committee used in the process of developing its recommendation.

### **Arguments Against the Current MTS:**

- While comparing transit and streets and roads brings to mind “apples and oranges” the outcome of the current approach is that 30% of the transit shortfall is recognized as “regional” while only 13% of the streets and roads shortfall is represented by the MTS.
- The MTS has no direct relationship to the FFCS or to federal funding eligibility standards. Some streets on the MTS are not eligible for federal funding and many that are not on the MTS are.
- Current MTS criteria is largely subjective and not related to existing road system designations such as those included in local jurisdictions’ General Plans, Federal classification system, sub-regional congestion management plan designations, or other established standards. As the criteria and its application has evolved, the MTS has become a stand alone system unique (probably in all of the US) in its construction and application to determining how much federal funding goes to local streets and roads.
- from the local jurisdiction perspective, the process for adding/deleting streets from the MTS is mysterious, non participatory, and perceived as threatening to local control.
- It is not coordinated with the FFCS, and as a result, streets that are eligible for federal funding but not on the MTS are excluded from funding consideration and streets that are on the MTS but not classified as arterials or collectors on the FFCS are counted towards the “need” but ineligible to receive any federal monies.
- There is no built in “hierarchy” within the MTS, so if a decision needs to be made on prioritizing limited funds, its either all or nothing.
- Because the MTS is an artificially constructed subset of arterials and collectors it narrows local jurisdictions’ options in applying sound principles of pavement management to prioritize limited available funding. As a result, an MTS street may get paved when it doesn’t need to be, just because it can – a bad reason for deciding to do something.

### **Arguments Supporting Using the FFCS to Determine Regional Significance:**

- Is comparable to transit in that both result in roughly 30% of the overall system shortfall being deemed “regional” in nature.
- It is the basis for federal funding eligibility
- The designation of “arterial” or “collector” is assigned to a road segment on the basis of a process that involves local, regional, state and federal concurrence, is closely linked to typical General Plan designations, and is generally more objective, consistent and understandable than the MTS designation process.
- Broadens local jurisdictions’ discretion on how to use regional funding in a prudent manner consistent with the PMS.

- Provides an objective basis, if needed, to determine priority for use of limited funding, either by use of the PMS or by assigning higher priority to arterials over collectors.

## CONCLUSION

How the use of the MTS to determine the local streets and roads share of the funding pie is perceived by local city/county jurisdictions can be illustrated by the following analogy:

Most parents have heard of the age-old strategy for dividing a pie fairly between two of their kids - one gets to cut the pie and the other gets to pick the piece they want. Rightly or not, use of the MTS to determine the streets and roads share of the funding “pie” is perceived as the same kid cutting the pie and picking the piece they want.

Until the MTS is replaced with a more rational and objective means by which local streets and roads funding need and eligibility is determined, the results of the funding pie cutting, from the local jurisdiction perspective, will always be perceived as less than satisfactory, and MTC, like the hapless parent cutting the pie, blamed by one of the “kids” for giving the other preferential treatment. Substituting the FFCS for the MTS in this context won’t make everyone happy, but it will increase MTC’s credibility with local jurisdictions by making an important part of the “pie” cutting process separated from the politics of who gets what share.

For the reasons outlined in the paragraphs above, it is the recommendation of the Local Streets and Roads Committee, that the system of roadways deemed “regionally significant” for the purposes of determining the regional local street and road “need” for pavements and non-pavement rehabilitation, consist of all streets and roads with a Federal Functional Classification of Rural Major Collector and above.

**ATTACHMENT -- MTS ALTERNATIVES COMPARISON MATRIX**

**10/25/2004**

	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
	<b>Current MTS</b>	<b>Arterials</b>	<b>Arterials &amp; Some Collectors (Transit)</b>	<b>Federal System (Arterials &amp; eligible Collectors)</b>
Meets Criteria for Federal Funds?	Yes	Yes	Yes	Yes
Objective	No—Based on subjective criteria.	Based on FFC <sup>1</sup>	Based on FFC plus + required data from local agencies regarding eligibility of collectors	Based on FFC
Consistent & Comparable	Current MTS is not consistent with other established route systems; i.e., FAU, Functional Class, CMP, etc...	Consistent with current FFC classifications. Does not change frequently. Comparable with major Transit routes.	Consistency would depend on the definition of eligible collectors. <u>Example:</u> All arterials and those collectors that carry Transit vehicles.	Consistent with current FFC. Does not change frequently. Covers more LS&R mileage than used by Transit vehicles; however, comparable in percentage of total shortfall represented by top Transit score
Simplifies	Most cities/counties do not currently track MTS routes (condition, traffic, etc...) There are no special management requirements for the MTS.	Already Defined – No subjective criteria	Would need to define the collectors that were eligible in a consistent manner. Some monitoring (ADT/ Transit route/ etc.) may be required	Already Defined – No subjective criteria
Defensible	Many major roadways are not included in the MTS. Difficult to understand application of criteria in determining “regional significance” of a roadway.	Only slightly greater than the current MTS. Arterials carry the most traffic (people/goods), therefore, it is easy to justify the definition of “regional significance”.	If the route is utilized by Transit, it should be considered “regional” since all of Transit is considered regional.	Score 16+ for Transit also equates to roughly 30% of the total Transit shortfall
Participatory	Not currently. Procedure for determining eligibility <i>could</i> be changed to allow more participation from public works representatives.	Requires minimal participation since it is based on the FFC	Would require input from local jurisdictions on eligibility criteria for collector routes	Requires minimal participation since it is based on the FFC
Shortfall Comparison (Approx.)	\$990,500,000 (13% of total)	\$1,357,000,000 (18% of total)	\$1,717,000,000 (23% of total)	\$2,287,000,000 (30% of total)
% Total Mileage	8%	14%	19%	28%

<sup>1</sup> *Federal Functional Classification (FFC) refers to the functional class of the roadway – Arterial, Collector, or Residential/Local. This classification is used in the Federal System to determine eligibility for the use of federal funds.*