Regional Mobility Authorities in Texas

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ABSTRACT

A regional mobility authority (RMA) is an innovative tool that brings transportation decisions to the local levels and provides local governments the opportunity to accelerate needed projects. An RMA improves mobility, enhances economic development, and provides potential revenue sources through designing, constructing, operating and maintaining tolled or non-tolled roadways, passenger and freight rail, airports, and pedestrian and bicycle facilities.

Although the idea of an RMA is not a new way to finance transportation in the United States, Texas House Bill 3588 and its predecessor, Senate Bill 342, have opened the door to debt financing in Texas. With this additional innovative tool to finance transportation projects in Texas, it is important to understand the functions of RMAs and draw conclusions about the effects they might have in the state.

To accomplish this task, literature on the subject was reviewed and input from professionals involved in transportation and the RMA process were obtained. Several questions targeted at addressing several key objectives were created. A call list was developed, and from that list eight interviews were conducted with professionals from state agencies, local organizations, and research institutions. Financial options before the introduction of RMAs were compared to current practices in the state, and conclusions were drawn about their effectiveness. Upon completing the interviews and literature review, conclusions about RMAs were drawn on the following topics:

- Short-term benefits
- Short-term problems
- Long-term benefits
- Long-term problems
- Barriers to forming an RMA
- Agency cooperation

Key words: innovative financing—mobility—toll roads
INTRODUCTION

In June 2003, Texas House Bill 3588 became law. House Bill 3588 amended the governing Regional Mobility Authority (RMA) legislation, Senate Bill 342. This gave the Texas Transportation Commission general oversight to create and dissolve an RMA as well as approve applications for federal funding (Russell and Saenz 2004). As RMAs are formed throughout Texas and become more common, the expected impact will influence the future of transportation financing in many of the following ways:

- Create revenue for transportation projects
- Give local governments more control in transportation planning
- Speed up project time lines, relieving congestion sooner
- Improve mobility and increase safety for motorists (Russell and Saenz 2004)

PROBLEM STATEMENT

Although the methodology of the RMA and its functional procedures of debt-financing transportation infrastructure is not a new way to implement projects in the United States, House Bill 3588 and its predecessor, Senate Bill 342, introduce debt financing into Texas as the solution to metropolitan congestion by expediting needed projects and increasing highway capacity. The addition of this innovative financing tool is a major departure from the pay-as-you-go philosophy of the past 88 years. Therefore, it is important to understand the way RMAs function and explore the expected effects on the transportation infrastructure in Texas.

RESEARCH OBJECTIVES

With Texas House Bill 3588 reaffirming its commitment to RMA formation, it is important to understand how RMAs are formed and how they will affect present and future transportation project financing. To better understand the affects of an RMA in Texas, the following objectives have been established:

- Determine the short-term effects of RMA formation and financing
- Determine the long-term effects of RMA formation and financing
- Investigate agency cooperation after the formation of an RMA
- Determine RMA’s improvement over the past system
- Describe experiences with the formation of an RMA

BACKGROUND OF TRANSPORTATION FINANCING IN TEXAS

The state of Texas obtains monies for transportation-related projects in many ways. Among the most common are motor fuel taxes, motor vehicle registration fees, and federal reimbursements. The distribution of fiscal year 2003 can be seen in Figure 1 (TxDOT Finance Division 2004).
When reviewing current fuel tax returns, Texas is a donor state. A donor state is a state that receives less money back than the amount it sent to the Highway Trust Fund. Currently, Texas only receives approximately 88 cents for every dollar that is sent to the fund. In fiscal year 2003, Texas utilized 72% or 2.1 billion dollars of the fuel taxes collected for transportation. The distribution of gas tax usage is shown in Figure 2 (TxDOT Finance Division 2004). The Texas Department of Transportation (TxDOT) is seeking a federal act guaranteeing a 95 cent return per dollar vested as a Texas transportation priority and is currently pursuing maximum returns from fuel taxes (Johnson 2003).
Vehicle registration fees collected in fiscal year 2003 amounted to over 1.2 billion dollars, establishing these fees as a significant source of money for transportation projects. Unlike fuel taxes, these monies go directly to the State of Texas for its use. According to Strayhorn (2004), “State law requires all vehicles, with few exceptions, that are operated on public roads to be titled and registered in Texas. TxDOT is the state agency responsible for this titling and registration, and state law designates county assessor-collectors as agents of the state.” The distribution of vehicle registration fees can be seen in Figure 3 (TxDOT Finance Division 2004).

![Figure 3. Distribution of Texas motor vehicle registration fees for fiscal year 2003](image)

Another funding option exercised in Texas is Federal Highway Administration (FHWA) reimbursement. The FHWA reimburses 80% of the total cost of a project each month. There are five steps to the reimbursement process, which can be seen in Figure 4 (TxDOT 2004).

![Figure 4. Process for FHWA reimbursement for TxDOT projects](image)
State Infrastructure Bank

State infrastructure banks (SIB), authorized in 1995 by Public Law 104-59 as a part of the National Highway Designation Act, provides an innovative way to finance transportation projects. Part of a federal pilot program, SIBs provide loans at below-market interests rates for infrastructure projects (TxDOT 2004). States that have SIBs are allowed to transfer up to 10% of total federal dollars received, match that amount with state funds, and deposit everything into the SIB, thus creating a self sustaining, growing revolving loan fund (Bass 2001). The map of the United States in Figure 5 shows SIB participation levels (Innovative Finance 2003).

![State Infrastructure Banks: Pilot Program Participation](image)

**Figure 5. SIB participation**

The Transportation Infrastructure Finance and Innovation Act (TIFIA) was developed as part of the Transportation Equity Act for the 21st Century (TEA-21). Under the establishment of this new federal program, the U.S. Department of Transportation (USDOT) provides credit assistance to states for major surface transportation projects of national or regional significance. During fiscal years 1999–2003, TEA-21 authorized up to $10.6 billion in revenue assistance. The TIFIA program’s objective is to leverage limited federal resources. The strategic goal of TIFIA is to stimulate capital investments in transportation infrastructure by providing credit rather than grants to projects of importance (Sullivan and Callender 2003).

Toll roads are another way of financing transportation in Texas. In 1953, the Texas Turnpike Act became law, and in 1957 the first toll road in Texas was built, the Dallas-Fort Worth Turnpike (Turnbull 2003 ). The general timeline for toll authorities and related activities is as follows:

- 1953: Texas Turnpike Act became Law
- 1957: Dallas-Fort Worth Turnpike opened
- 1983: Harris County Toll Road Authority created
- 1997: North Texas Tollway Authority was created by Senate Bill 370
- 2001: Senate Bill 342 created RMAs
- 2003: House Bill 3588 “provided additional authority and created new opportunities for toll facilities” (Turnbull 2003)
Defining RMAs

According to the Texas Tollways website, an RMA is “a local transportation authority that can build, operate, and maintain toll roads.” Alamo RMA in Bexar County describes an RMA as able to “provide the San Antonio area with an opportunity to significantly accelerate needed transportation projects and have a local entity in place that will make its own mobility decisions for the community, while enhancing the economic vitality and quality of life in the San Antonio metropolitan area” (AlamoRMA 2004). Diana Vargas lists acceleration of projects, improvement of mobility, enhancement of economic development, and provision of potential revenue sources as reasons why RMAs continue to form in Texas. TxDOT’s RMA manual defines an RMA as “a political subdivision formed by one or more counties to finance, acquire, design, construct, operate, maintain, and expand transportation projects” (Russell and Saenz 2004).

An RMA is an innovative tool that brings transportation decisions to the local levels and provides local governments the opportunity to accelerate needed projects, improving mobility, enhancing economic development, and providing potential revenue sources through designing, constructing, operating, and maintaining tolled or non-tolled roadways, passenger and freight rail, airports, and pedestrian and bicycle facilities.

Once established, an RMA can generate revenue for additional transportation related projects. The primary purpose of an RMA is to give more control to local governments to accelerate needed projects that may take otherwise longer, in comparison with the previous process. With accelerated projects, congestion relief and increased mobility will be brought to the traveling public faster, increasing safety on Texas roadways (Russell and Saenz 2004).

The creation of an RMA begins at the request of one or more counties. Any county, including one that is part of an existing tollway authority, may form a RMA. The County Commissioners Court, the local governing body, must first authorize the creation of an RMA. The commissioners must recognize that the existence and purpose of the RMA will be for the planning, constructing, maintaining, and operating of transportation projects in their regional area of the state (Texas Statutes 2004).

Petitions for the creation of an RMA are then submitted to the chairman of the transportation commission and reviewed by TxDOT to ensure the application is complete. A detailed listing of the requirements can be found in the TxDOT publication, Regional Mobility Authorities Manual (Russell and Saenz 2004). This process is divided into three basic steps. For the purposes of this paper, a short description of each step is given in Table 1 (Russell and Saenz 2004).
Table 1. Three-step process for petition and approval of an RMA

<table>
<thead>
<tr>
<th>Step 1: Submit petition to Texas Transportation Commission</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Resolution from commissioners court of each county</td>
</tr>
<tr>
<td>• Identification of proposed transportation project</td>
</tr>
<tr>
<td>• Description of impact on regional mobility</td>
</tr>
<tr>
<td>• Appointment process of board members (i.e., involvement of city, county, or other local government entities in selecting board members)</td>
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</tbody>
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<tr>
<th>Step 2: Review petition and schedule public hearing</th>
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<tbody>
<tr>
<td>• TxDOT will review petition to ensure all requirements have been met before a public hearing date can be set</td>
</tr>
<tr>
<td>• County will advertise the hearing in accordance with a public outreach plan developed with TxDOT</td>
</tr>
<tr>
<td>• Legal notice will be posted in classified section of area newspapers</td>
</tr>
<tr>
<td>• Hearing information and petition will be posted on county website</td>
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<tr>
<td>• Other innovative outreach activities targeting the general public will occur</td>
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<tr>
<th>Step 3: Decision by Texas Transportation Commission</th>
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<tr>
<td>• Sufficient public support based on information for public outreach activities must be present</td>
</tr>
<tr>
<td>• Benefit to traveling public must be evident</td>
</tr>
<tr>
<td>• Project must be consistent with local and state transportation plans</td>
</tr>
<tr>
<td>• Local and statewide mobility must be improved</td>
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The transportation commission may deny a petition if it determines the geographic representation and appointment process of the proposed RMA board will not fairly represent political subdivisions affected by its creation (Russell and Saenz 2004).

Each county that is a member of an RMA will appoint an equal number of members to serve on the board of directors, with a minimum of two members. The governor will then appoint an additional member, and this member shall be the presiding officer. Each board member will serve staggered six-year terms ending February 1 of odd numbered years. Members may be reappointed at the discretion of the appointing entity. The terms of no more than one-third of the board members may expire at once.

Other requirements that must be met in order to form an RMA are outlined in the Manual on Regional Mobility Authorities (Russell and Saenz 2004), and detailed in the Texas Transportation Code (Texas Statutes 2004).

Once the RMA is approved, the entity will take on many of the characteristics and authorities of its parent agency, TxDOT. The RMA has been described as an arm of TxDOT for the local area. Some of the authorities that exercised by the RMA are the following:

- Develop transportation projects
- Acquire or condemn property for transportation projects
- Enter into comprehensive development agreements
- Apply for loans from the SIB
- Establish tolls
- Use surplus revenue to finance other local transportation projects, either tolled or non-tolled
RMA Funding Sources

*TIFIA and SIBs*

In Texas, the Central Texas Regional Mobility Authority (CTRMA) used the TIFIA program to advance the US 183-A corridor, a large capital-intensive project in northern Travis County that otherwise might be delayed or not built at all. CTRMA received $66 million (one-third of the estimated project cost of $200 million) as a direct TIFIA loan (Innovative Finance 2003). Figure 6 indicates the states with current TIFIA and SIB loans for transportation infrastructure projects (Innovative Finance 2003).

![Figure 6. TIFIA loan activities in the United States](image)

**Federal Aid**

Another source of funding for the RMA that can help finance transportation projects is federal aid provided by Section 129 of Title 23 U.S. Code. This amendment legislated by the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA), allows federal participation in a state loan for a toll project. Section 129 loans allow states flexibility to negotiate interest rates and other terms of the loan (Innovative Finance 2003).

**Test and Evaluation Project 045 (TE-045)**

Although the North Texas Turnpike Authority is not a RMA, it has taken advantage of another source of funding that could eventually be used to assist in financing future RMA projects. The FHWA uses Test and Evaluation Project 045 (TE-045) to expand transportation infrastructure investments. The program evaluates proposals from states for unique and innovative financing ideas that can be tested for implementation. The President George Bush Turnpike is the first project in the United States to benefit from TE-045 innovative finance provisions (Innovative Finance 2003).
Other funding resources, including bonds and other monies, will continue to play an important role in financing future transportation infrastructure projects in Texas. Their main purpose is to get the highway projects built as soon as possible so they may begin to serve the traveling public. However, issuing revenue bonds and establishing toll rates on these projects is expected to be used more frequently. Project selection will be the most important aspect of the RMA. If RMAs are conservative in their selection of highways to construct, revenues and funding for future projects will be secured (Innovative Finance 2003).

Current Status of RMAs in Texas

According to Behren, “The state’s regional mobility authorities are picking up steam with transportation projects planned for their areas. We are glad to see that happening and we want to support the efforts they put forth in bringing transportation solutions to the state” (quoted in Cross 2004). There are five currently established RMAs, and a future RMA in Webb County is being review by TxDOT and could be established by the end of the year. The existing RMAs are as follows:

- Travis/Williamson Counties, CTRMA
- Bexar County, Alamo Regional Mobility Authority (AlamoRMA)
- Grayson County
- Cameron County
- Smith/Gregg Counties, North East Texas Regional Mobility Authority (NETRMA)

The following section provides descriptions or lists of projects that were obtained from various RMAs.

Travis and Williamson Counties (CTRMA)

US 138A will be built by the new CTRMA and will bypass Cedar Park and Leander to the east, before rejoining US 183 near Seward Junction (Hurt 2004). Seventy miles of tolled lanes are planned in Central Texas. According to CTRMA (2004), “The approval means the Central Texas Mobility Authority can begin the task of investing more than $2.2 billion in mobility infrastructure and improvements for 13 projects in Williamson and Travis Counties. These improvements will help increase mobility, easing congestion and gridlock on our roads, and can be done more quickly than by using traditional methods.”

Bexar County (AlamoRMA)

In planning are “a new interchange with direct connectors at US 281/Loop 1604, an upgrade of the interchange at Loop 1604/IH 10, two new lanes in each direction on loop 1604 from IH 10 to IH 35, and an expansion of US 281 from Loop 1604 to Stone Oak Parkway” (Rios 2004).

Grayson County

An extension of State Highway 289 in Pottsboro is planned. A pass-through toll will be used, which is a “fee the state pays on behalf of individual motorists to public or private entities that have taken on the burden of financing road improvements” (Vaughan 2004).
Cameron County

The West Loop project is planned for Brownsville. Approximately seven miles, it would extend from U.S. 77/U.S. 83 to Palm Boulevard (Rodriguez 2004).

Smith and Gregg Counties (NETRMA)

Loop 49 is planned to be placed around the city of Tyler.

STUDY APPROACH

With the creation of RMAs through Senate Bill 342 in 2001 and additional powers added in 2003 with House Bill 3588, it is important to explore their immediate effectiveness and the RMAs’ involvement in future transportation decisions. Feedback from transportation professionals possessing informed opinions and knowledge concerning the RMAs’ functional processes is critical to achieving the study objectives. To gain professional feedback on the current status of RMAs in Texas, phone interviews were conducted. The questions were designed to get input from transportation professionals concerning the short- and long-term benefits and problems associated with RMAs; barriers to forming RMAs; the relationship between TxDOT, metropolitan planning organizations (MPOs), and RMAs; and the improvement of current TxDOT practices.

KEY FINDINGS

Twenty-nine professionals were initially contacted for interviewing. Of those contacted, nine responded and eight interviews were conducted. The eight interviews included professionals from TxDOT, MPO offices, RMA boards, and transportation research. The survey responses from the interview questions were then assimilated with information from current literature. Observations were made about each survey question. The following observations are based on the authors’ understanding of each survey question.

Short-Term Benefits

For the purposes of this report, the authors are in agreement that the definition of short-term would not exceed five years. This time frame commences whenever the Texas Transportation Commission approves the petition to form an RMA and its board of directors is selected. Many respondents stated that the immediate benefit realized from an RMA comes from the representation of local people on its board of directors. The feeling is that the RMA brings their region one step closer in the transportation decision-making process. TxDOT will continue to address the state’s transportation needs within the jurisdictional area of the RMA. The short term-benefit of the RMA is that it can now begin to concentrate on transportation issues that will benefit and possibly stimulate economic growth in the area, rather that just sustain a minimum performance level of the system. Once they are formed, the RMAs’ impact on moving projects closer to construction is evident, as shown by CTRMA and AlamoRMA. The CTRMA, with the help of TxDOT, has developed a unified transportation system plan for the region. Included are 10 projects in various stages of development. Currently under construction is US 183A, CTRMA’s first entirely new project. Other projects currently under construction by TxDOT will add capacity to some of Austin’s better-known highways. After construction is complete, the toll lanes will be managed by CTRMA. The short-term benefits of having numerous projects that will ultimately have the effect of relieving congestion in this region are not typical of the other four Texas RMAs. While the other RMAs in the state all have potential projects to develop, these projects are realistically one to four years away.
An unexpected short-term benefit has occurred between two competitive counties in northeastern Texas. Historically, political cooperation between Smith and Gregg Counties has been a rare occurrence. It is not unusual for counties to work independently to improve their economic futures and thus improve the quality of life of all concerned. Tyler and Marshall, two major cities that operate as the county seats, are approximately 30 miles apart and have been competing with each other since their establishment. The two local governments have joined together to form the North East Texas Regional Mobility Authority (NETRMA) in an effort to capitalize on the opportunity to control future transportation development in the region. These two rivals have found common ground in forming the RMA and have worked together under the guidance of TxDOT to developed a proposed toll project, Loop 49.

**Short-Term Problems**

The respondents have identified one major problem that presents a short-term obstacle for RMAs. Start-up funding, also know as seed money, has been mentioned as an obvious and substantial problem for RMAs in general, but the magnitude of the problem seems to vary between each RMA. Upon review of responses to this question, it is apparent that rural RMAs view start-up funding as a substantial problem for them in the short term. One respondent described in her response that there were no initial funding sources inside the county. This fact presents a problem for rural counties who want to form an RMA, because the seed money is almost nonexistent. A different example would be the CTRMA and the AlamoRMA. These RMAs are located in counties were there is a larger, more affluent population, potentially giving them the advantage in the amount of available start-up funds. The answer to this short-term problem comes from TxDOT. One TxDOT respondent made the statement that the Texas Transportation Commission is committed to the success of the RMAs to the extent that it will assist as much as possible in the formation of any viable RMA.

**Long-Term Benefits**

The respondents agree that the long-term benefits revolve around the generation of surplus revenue from toll projects. With this additional revenue, the RMAs will have a separate pot of money to finance other transportation projects specifically developed to address the transportation needs of the region. The long-term benefits begin to emerge as the RMA exercises its authority to develop a wide range of transportation projects. The revenue supplied by successful toll projects and the resulting flexibility to consider a broad range of projects provide local governments greater control in planning for the needs of the transportation system. The relationship between the RMA and TxDOT should resemble the relationship between TxDOT and the FHWA. The RMA, operating within the policies of TxDOT, will handle the daily operation of the highways under their authority. TxDOT will oversee responsibilities, but stay out of the daily operations. As all these elements work together, the mobility of the area improves congestion relief and increases motorist safety.

**Long-Term Problems**

If projects are not conservatively chosen and estimated with the highest degree of accuracy, they may not be successful and will result in lost revenues. As previously stated, revenues from toll projects are critical to the future of the RMA. If surplus revenues do not reach their estimated potential, then the RMA will lack the revenue to service the bond debt. Should this occur, then TxDOT will be forced to service the
bond debt with funds that otherwise would be dedicated to different projects. Such an event will result in negative financial consequences for both transportation agencies and possibly jeopardize future projects.

**Barriers to Forming an RMA**

At the local level, the first and most important barrier to forming an RMA is local support. Since the RMA will be established for an indefinite time period to manage transportation, the region must be solidly in favor of its formation. There should be lengthy discussion that addresses all concerns before submitting the petition to the Transportation Commission for approval. With the resources that TxDOT can provide in encouraging and fostering any regions that can support a project, there are few or no barriers to forming an RMA. The process is simple and straightforward. With few or no barriers at the state level, this leaves initial funding or seed money as the only potential barrier to forming an RMA.

**Agency Cooperation**

MPOs are formed in cities with 50,000 or more in population by a federal mandate, ISTEA. The MPO’s primary function is the planning of multimodal transportation within the city limits. MPOs directly control category 2 projects, where federal funds are involved, within their jurisdictional limits. Given this, RMAs will partner with MPOs, providing additional funding that will be used to advance MPO projects that are listed in their long-range plan. If long-range benefits are realized within the RMAs, then MPOs will benefit through the collaboration with RMAs and their funding sources, resulting in faster completion for some MPO projects. This is one of the reasons the state legislators gave the authority for the formation of RMAs. RMAs will be an arm of TxDOT focusing on regional transportation issues. MPOs will not have to plead for funding, but instead can work directly with local officials to solve their transportation issues. This process is the primary relationship between TxDOT and RMAs, relieving TxDOT of the burden of making decisions about regional transportation issues.

**Circumventing the MPO Process with RMAs**

According to TEA-21 legislation, if a project is built utilizing federal funds, it must be in the local MPO’s long-term plan. But on a technicality, if an RMA can fund and successfully build a transportation facility without using federal funds, the MPO process could be ignored. This technicality has some MPO officials worried, leaving them scrambling to see that agreements be in place so that no such thing could occur. The majority of the respondents believe that excluding the MPO process would be detrimental to the success of an RMA. RMAs can benefit from the planning work already completed by the MPOs, which should foster a working relationship rather than an antagonistic one. Although there is potential for bypassing the MPO process with the establishment of surplus toll revenue, the projects that will be undertaken are of such magnitude that the MPO will most likely need to be involved in the process.

**Redundancy of RMAs**

Although at first one might think that toll authorities and RMAs are redundant, they are very different in two very important aspects: flexibility of projects and the use of surplus toll revenue. For example, the Harris County Toll Road Authority can only develop toll roads and spend excess toll revenues on the highway that generated that revenue. On the other hand, RMAs not only have the authority to construct and fund roadways, but can also authorize projects such as passenger and freight rail, airports, and pedestrian and bicycle facilities. The future of toll authorities, provided that they are managed correctly, will change little and no new authorities will form. It is quite obvious that RMAs will be more attractive.
to those thinking about forming a mobility agency due to their flexibility in transportation projects and use of generated toll revenues.

**Improvement over TxDOT**

The most significant improvement over the past system is that regional personnel are making decisions about regional transportation issues. As far as planning, designing, and constructing, there will be little change from the capabilities that TxDOT already possesses. It is also apparent that TxDOT, in the short term, will be providing much needed support to start RMA projects. For example, CTRMA’s SH 183A was partially funded by TxDOT. If the current development trend continues with the formation of RMAs throughout Texas, the main purpose of an RMA’s existence will be a managerial effort to obtain funding and relieve TxDOT of planning, designing, and maintaining locally desired projects. This should not only relieve TxDOT of the responsibility of addressing local transportation concerns, but give TxDOT more freedom to focus on the much needed infrastructure and maintenance problems facing the state. The new rising concern is the possibility of an RMA folding or no longer being able to sustain an undertaken project. What becomes of that roadway? One assumption is that the state will obtain the folded project at a bargain price. This, however, will return the responsibility to the state. The focus of RMAs should not be to improve TxDOT capabilities, but feel competent in meeting, developing, managing, and maintaining local transportation needs independent of state budgets and decision making.

**The Success and Usefulness of RMAs in the Future**

Several respondents felt that if RMAs are utilized wisely, they will be a useful tool in solving transportation problems in Texas. Others are not certain at this point. RMAs, theoretically, will allow local projects to be funded, developed, and built faster than possible in the current pay-as-you-go system. The measure of success will ultimately be the relief of TxDOT’s responsibility of regional decision making. Only time will tell how effective RMAs will truly be.

**CONCLUSIONS**

An RMA has two primary functions: to plan, design, construct, and operate toll highways initially and to function as an extension of TxDOT within their respective region, funding and managing many transportation-related facilities. In order for an RMA to be a successful entity, projects must be chosen through careful thought and planning. Research is needed to accurately establish motorists’ values of time and willingness to pay in Texas, and currently feasibility tools are being developed to help with RMA planning, but are not yet proven. As to the future of transportation financing in Texas, it is still not certain the contribution RMAs will make.
REFERENCES