

TO: Rob DeGraff, Doug Ficco
CC: Kris Strickler, Dean Lookingbill, Andy Cotugno, Richard Brandman
FROM: Mark Turpel
DATE: October 22, 2004

SUBJECT: WP 5.2 Toll Collection Options

Thank you for the opportunity to comment on the latest work product: " Toll Collection Options, Working Paper 5.2."

Following are comments or questions that I have regarding this product. I have not been able to discuss your work product or my comments with Richard Brandman or Andy Cotugno, so these comments should not be considered approved by our department or agency.

Page 1, first paragraph, first sentence - Tolling Policy. This sentence makes a reference to tolling policy that WP 5.2 and the two other work products on tolling address. While many tolling financial and operational issues are discussed in the three work products, the work products, to date, do not include consideration of the demand management aspects that tolling could address. That is, roads are a vital economic good that currently are used at the same cost to the driver regardless of congestion. Tolling, if designed to price the use of roads at peak times, could help efficiently manage a scarce resource. The Regional Transportation Plan encourages peak period pricing and calls for managing and optimizing the use of highways in the region to reduce congestion, improve mobility and maintain accessibility within limited financial resources. This broader vision could have implications for the highway crossing design and operation that may not be included in the work products produced to date.

We can address in the paper that tolling will have an impact on travel demand. However, the purpose of the tolling analysis is to first and foremost estimate the revenue potential for tolling so that the region has a reasonable understanding of how tolling might fit into the financing of a Columbia River Crossing Project. Our analysis will also seek to inform the region how other policy choices (i.e. the inclusion of HOV lanes in the project; tolling one bridge or two) may interact with revenue projections ultimately affecting not just the financing side of the project but its design and operation. At this point, we are recommending *assumptions* to facilitate estimating the revenue potential of tolling. The region may change those assumptions as it balances financing issues against other community priorities as it develops a consensus in the DEIS process about what will be proposed to be built.

Page 1, first paragraph, last sentence - Preparation for Future Environmental Documents. This sentence states that conclusions from the three working papers will be assembled to be used with future environmental documents. As noted below, there are several concerns with the conclusions of WP 5.2 and it is suggested that there are many interested parties, including the directly affected cities, the transit agencies, and the metropolitan planning organizations on both sides of the river who may be interested in

discussing assumptions and conclusions prior to public review. Further, public review with such entities as nearby neighborhoods, freight and other interested businesses, motor vehicle users and environmental organizations will likely further shape the Project. According, the documents released for public review to could differ from the conclusions in WP 5.1-5.3 based on these discussions and the environmental documents could very likely be further revised based on broader public review.

We agree with your assessment. Working papers will be reviewed by the RCC and comments noted. Recommendations will be used to complete the tolling analysis and the results can be used to help all of the impacted stakeholders reach decisions on what should or should not be included in the EIS.

Page 1, last two paragraphs - ETC market share/toll both plazas. The I-5 Columbia River Crossing Project needs to move forward as quickly as possible to address the transportation needs of the greater metropolitan area as well as the interstate and international travel and commerce needs. Nonetheless, the Project is a very large scale undertaking that will take great efforts to secure funding as well as the engineering and environmental work. Accordingly, it is not inconceivable that opening day could be as much as eight or tens years out. In that time, the development and acceptance of new technologies could provide the possibility of higher ETC market share than that found in the past. While it seems only prudent to assume that ETC market share might not be very high - as low as 25% - it also seems useful to pose the "what if" question - what if ETC market share were 100%? This provides an option that would not include toll plazas and provide a glimpse of a Project with a much smaller footprint. In this way, the tradeoffs between 100% ETC and at least some manual tolling could be compared for public review. Accordingly, it is suggested that the first conclusion be revised to provide a worst case (25% ETC market share or similar percentage) and a best case - 100% ETC.

For the purposes of evaluating tolling scenarios for the I-5 Columbia River Crossing project, we assume that 100% electronic toll collection will not be feasible in the near future. At this point, we are trying to make a realistic assumption of the impact of ETC on revenues. The DEIS may evaluate 100% ETC.

Page 2, first sentence - Toll Plaza Design Workshop. To my knowledge, no representatives of the City of Vancouver and City of Portland, CTRAN, TriMet or the two MPOs participated in the August 25, 2004 design workshop. Conclusions reached in this workshop may be valid, but the workshop materials and discussion were not made available to these organizations and there may be differing conclusions or revised assumptions which may need to be factored into any final conclusions released for public comment.

We agree. The purpose of the workshop was to make an initial assessment of site issues and to better understand the impacts of siting a toll plaza. A great deal of additional work will be needed in the DEIS phase that will allow all impacted agencies the opportunity to evaluate the options and help shape recommendations.

Page 3, first section - Tolling I-5 Bridge Only: Two Way Tolling Recommended.

While the consequences of tolling one-way may not be acceptable, it seems premature to recommend two way tolling without some analysis of the likely outcome of one-way and two way tolling. I-5 appears to be the preferred corridor and I-205 has some additional capacity. There are no local streets or arterial options like the New York City example cited in the work product, only I-205. Would peak flow tolling on I-5 alone be a better use of facility investment dollars and personnel? It is suggested that this recommendation be deferred until a tolling analysis of the I-5 Crossing area is completed.

As mentioned earlier, our scope does not provide for peak period pricing as a separate strategy. Our analysis will take into account the traffic impacts of various tolling scenarios.

Page 4 - first bullet - tolling goals. This assumption does not include consideration of the potential benefits of tolling for transportation demand management. Efficient use of scarce transportation facilities with capacity may be improved with tolling if so designed.

Same comment as above. Toll rates will not be set for the purposes of reducing travel demand in this study since our primary goal is to assess the revenue potential of tolling. Consideration of other community goals or priorities such as TDM can, and likely will, take place in the DEIS process where those other priorities can be weighed in the context of their impacts on revenues and other issues.

Page 4 - second bullet - guideline acceptability. I think this assumption refers to deviations from safety and design guidelines. Engineers with the cities may have suggestions or comments that could influence these design decisions, as could other considerations voiced by other interested parties.

We agree, and designers will welcome suggestions from the cities and others for innovative solutions. Also, the cities will want to approve connections to, and review traffic impacts on, their local arterials. However, on the interstate system, FHWA has the final approval authority on design exceptions/deviations. They are not deviations from safety, they are deviations from guidelines. Also, FHWA will look to ODOT and WSDOT to approve any design deviations prior to submittal to FHWA for review.

Page 4 - fifth bullet - two way tolls. One option not explicitly mentioned could be to toll in the direction of peak flows with reversible lanes than allow one set of toll plazas, if needed, to reduce costs and still provide function.

We did a quick feasibility review of reversible plaza lanes. One of the complicating factors is that ETC lanes and HOV lanes are typically located on the inside (median side) which complicates operations. We did not review a peak period reversible plaza because again, it is a peak period pricing mechanism that was not part of the project scope but can be an issue considered in the DEIS.

Page 4 - eighth bullet - ETC market share. As noted above, it is suggested that a range of ETC market share be included - not ruling out 100 % ETC at this time.

[See earlier comments.](#)

Page 5 - first bullet - Acceptable Toll Plaza Sites. The options discussed in the workshop were not provided to the cities, transit agencies or MPOs. Further, there is great interest on the part of the business community, adjacent neighborhoods and other organizations and individuals about this Project, including toll plaza sites. Accordingly, conclusions about the acceptability or unacceptability of toll plaza sites seems premature.

[We agree on the issue of others having input on the location of toll plazas. The workshop evaluation was cursory, merely to determine if there are apparently feasible locations for toll plazas for the purpose of this threshold financial analysis. Actual siting of toll plazas will require extensive work in the DEIS process prior to reaching any final conclusions.](#)