Tolling and Mobility Pricing

This is an outline and starting point for Clark County Council discussion on October 26th, 2022 regarding a Resolution in opposition to tolling. Ultimately the Resolution was approved on November 1st, 2022.

Proposed Tolling and Mobility Pricing for I-5 and I-205

The recently approved Modified Locally Preferred Alternative (Modified LPA) for the I-5 Interstate Bridge replacement includes an assumption that a variable rate toll[1] will be implemented. The Interstate Bridge Replacement Program (IBRP) further includes a recommendation for "the Oregon and Washington State Transportation Commission to consider a low-income toll program[2], including exemptions and discounts." In addition to tolling proposed on the I-5 Bridge replacement, ODOT, at the direction of the Oregon Legislature, is proposing to toll I-205 and to initiate Mobility Pricing on both corridors.

Concerns with tolling

There are many reasons given nationwide to support tolls for construction of new roads and bridges. In each, there are fundamental fallacies as to the appropriateness of applying these reasons to the tolling not just the I-5 Bridge, but also, I-5 through Portland and I-205. To support tolling, several points must stand:

- **Toll roads save travel time:** Despite making this claim that toll roads save travel time, there is no demonstrative evidence that tolling will save time for travelers on the I-5 Bridge replacement or within the I-5 and I-205 corridors in the Portland metropolitan area. In fact, one study[3] showed that travel times actually increase: "travel times will DOUBLE by 2045. Going from Salmon Creek to the Fremont Bridge takes 29 minutes today and will take 60 minutes in 2045 according to the IBR team." Variable pricing assumes that, particularly during peak rush hour periods in which tolls are the highest, that some drivers will be deterred by the higher tolls, and will choose alternative travel times or will choose to use transit or carpool.[4] The FHWA Federal Highway Administration WA "expects" that "some employers would respond to congestion pricing by offering employees more work-schedule options."[5] These assumptions and expectations have not been verified in the context of the I-5 Bridge. People would be paying substantial tolls with little-to-no reduction in their travel time or congestion. IBR 2045 projections show two confirmations of no benefit. One – morning travel times would double (Salmon Creek to the Fremont Bridge). Two – the percentage of rush hour vehicles traveling zero to 20 mph would double.
- **Tolls fund critical maintenance and improvement**: Washington and Oregon already have some of the highest state gas taxes in the nation[6], with Washington's "carbon tax" adding another 46 cents per gallon[12] beginning January 2023. While road maintenance and improvement costs are increasing, residents want to see that any additional taxes they pay will provide additional services and value. As the Regional Transportation Commission RTC wrote to the Oregon Transportation Commission in 2018,

[1] https://www.interstatebridge.org/media/xxufktqx/ibr_modified_lpa-recommendation_factsheet_5-24-2022_remediated.pdf
[2] *Id.*
[3] Interstate 5 bridge replacement concept approved by committee | The Reflector
[4] https://ops.fhwa.dot.gov/publications/fhwahop08039/cp_prim1_08.htm
[5] *Id.*
[6] https://igentax.com/gas-tax-state-2/

it is imperative that any new value pricing tolling in the region have identifiable "specific planned regional system improvements."[7] The Modified LPA and tolling for the I-5 and I-205 corridors do not describe in detail how the tolling revenue will be used to fund specific maintenance and improvement projects within the I-5 Bridge corridor and I-205 areas. We know that some of the tolls, even those paid by Washington residents, will be funneled to the Oregon Department of Transportation, but we do not have assurances of how those funds will be spent. In some states including Washington, where tolls have been instituted, over 40% of funds collected as tolls had to be used to pay for tolling collection.

- **Tolling will be an economic growth engine:** This argument relies on the assumption that tolling will result in increased traffic flows and therefore more free movement of goods across the I-5 Bridge and through both the I-5 and I-205 corridors. Currently over 143,000 vehicles cross the I-5 Bridge each weekday, with 7 to 10 hours of congestion during peak travel times.[8] With population growth, the number of vehicle crossings is anticipated to increase significantly. Yet the IBR program intends to toll without increasing through-lane capacity. The Modified LPA maintain the three existing through traffic lanes and add auxiliary lanes to increase capacity and safety for freight mobility. Tolling as argued will "help improve travel reliability" by generating more predictable travel times. This assumes that many people will be able to change their travel times away from rush-hour resulting in fewer cars traveling at peak toll periods.[9] The IBR is already "predicting" travel times will DOUBLE by 2045 – "predictably slower" travel. Travel times will remain long and unpredictable with the only outcome being increased costs to the vehicle users. Furthermore, freight often must travel immediately from port to destination and cannot wait for more favorable variably priced tolls or more favorable traffic conditions leading to higher good costs. Lastly, money that travelers must spend on tolls is less money to spend elsewhere in the economy.
- **Tolling is beneficial to the environment:** Supporters of tolls argue that tolls reduce congestion, which in turn has environmental benefits. However, when drivers merely divert onto the side streets, this results in more congestion on the side streets, more accidents and more pollution. Rather than helping the environment, the environmental problem is merely being moved closer to pedestrians, bicyclists, businesses, and homes on the side streets. There are negative environmental justice impacts, as well, as the neighborhoods in N and NE Portland near the I-5 corridor which are some of the areas of Portland with the lowest income, most racial diversity, and some of our most vulnerable populations. ODOT's "Value Pricing" PAC predicted 130,000 total vehicle diversions on to side streets once tolling was fully implemented, an 80,000 vehicle increase above the 50,000 presently diverting due to congestion.
- **Double tolling on I-5.** There would be "double tolls" to use Interstate 5 – one for the bridge and a second toll to drive on I-5 in Oregon. This "double toll" would likely cause many Vancouver residents to divert to I-205 which would only have a single toll. The likely impact would add to traffic congestion with all its negative impacts on I-205 as well as SR-14 and other arterials that connect the two freeways.

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[7] RTC letter to Oregon Transportation Commission, June 13, 2018

[8] https://www.interstatebridge.org/media/rldbywjg/ibr_aux_lanes_factsheet_remediated.pdf

[9] *Id.*

[6] https://www.oregon.gov/odot/tolling/Documents/RMPP_Draft_PN_Aug_2022_508.pdf

Concerns with Mobility Pricing

In addition to proposing tolling of both I-5 and I-205 from the Washington/Oregon borders through Portland to the Wilsonville area, ODOT proposes to introduce Mobility Pricing. What is Mobility Pricing and why would it be used? ODOT has produced a report.[6]

In their report they interchange the use of "Mobility Pricing" and "congestion pricing" as being equivalent. They note "The term congestion pricing describes a type of tolling where drivers are charged a higher price during peak traffic periods. The higher fee encourages some drivers to consider using other travel options such as carpools or transit, or change their travel time to other, less congested times of the day, or not make the trip at all."[10] Two graphics provided by the bridge replacement committee (Appendix A) show that they anticipate major diversion to side streets and communities with the resulting impacts.

Mobility Pricing is the equivalent of an additional "toll" on top of the established toll. Given that definition the issues cited earlier in this report regarding reasons to toll apply. Without repeating each of the points made above the same issues and concerns exist.

Cost of Collection

1. Tolling is an inefficient means of raising taxpayer money for transportation. Prior to the pandemic, WSDOT reported the "cost of collection" on Seattle's I-405 to be 43 percent of tolling revenues. The cost of collection for the gas tax is less than 1 percent. During the 3 years of the pandemic, the Washington legislature has had to bail out the entire WSDOT tolling program with revenues from the General Fund. Tolling revenues did not cover the cost of collection.
2. WSDOT is now reporting the SR-99 tunnel in Seattle (Big Bertha) is under water (pun intended!) and will remain in the red for the next 30 years. In addition, the legislature just allocated significant general fund dollars to reduce the price of tolls on the Tacoma Narrows Bridge due to local backlash. Up to 68% of revenue is being consumed by tolling costs (see Appendix A).

Summary

1. The tolling system, as proposed, places unreasonable and inappropriate burden on Washington residents, low-income residents, those who cannot modify their work schedule, and overall those who can least afford the toll. This will cause significant financial harm. In a July 2020 report, an estimated 75,000 Clark County area residents worked in Oregon paying an estimated $325 million in Oregon state income tax.[11] This is on top of the proposed tolls and mobility pricing.
2. The implementation of a tolling system will not achieve the purported beneficial outcomes, and there are no assurances that funds generated will be used for improvements within the I-5 and I-205 corridors in the Portland metro area. Indeed, there is ongoing discussion about using over $1 billion[12] to build a cover over a section of I-5 to "rejoin" the Albina district that was split in the mid-20th century. That will bring no relief to transportation issues but will spend money partially generated by Washington State

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[10] Page 1: Purpose and Need Statement - Regional Mobility Pricing Project (oregon.gov)

[12] https://www.washingtonpolicy.org/publications/detail/states-new-tax-on-co2-emissions-projected-to-add-46-cents-per-gallon-to-the-cost-of-gas#:~:text=Washington%20state's%20new%20tax%20on,state%20Department%20of%20Ecology%20reports.

[11] https://www.clarkcountytoday.com/news/washington-residents-can-save-oregon-income-taxes/

[12] http://www.wweek.com/news/state/2022/02/10/gov-kate-brown-wins-agreement-from-local-elected-officials-for-rose-quarter-project-with-highway-caps/

residents. Without guarantees that tolls are directed to improving transportation that benefits all users it makes no sense to proceed with tolling programs.

Conclusion

For the reasons noted above, the Clark County Council is opposed to tolling the I-5 corridor and the I-205 corridor as proposed. The Council understands that tolls may be necessary to build large infrastructure projects like the I-5 Bridge. If specific tolls related to the initial construction of the I-5 Bridge project only, that sunset after a predetermined period of time, can be proposed, they should be considered.

Appendix A

Note: The "green" shows diversion expectations

3.1.1 Change in VMT

As shown in Table 5, all of the alternatives slightly reduce regional VMT, with the greatest decline occurring in Alternative 4 followed by Alternative 3. All alternatives also result in a shift in vehicle travel demand away from freeways to non-freeway routes. Overall, Alternative 5 results in the smallest shift in vehicle demand from freeways to non-freeways and has the lowest overall VMT reduction.

Table 5: Change in Regional Daily VMT (2027)

[illegible]	Alt 1	Alt 3	Alt 4	Alt 5
Freeway	-228,000	-413,000	-463,000	-213,000
Non-Freeway	+117,000	+179,000	+185,000	+94,000
Total	-221,000	-234,000	-278,000	-119,000

SR 167 AND I-405 REVENUE VS OPERATIONS AND MAINTENANCE
FY 2021