

Greetings,

Thank you for this opportunity to provide written comments to the Joint Interim Committee on the Interstate 5 Bridge. These comments expand the oral comments I provided during the live meeting.

My name is Dean Suhr and I live in West Linn, Oregon, near the south end of I-205. I am a 37 year Oregon resident (and significantly older than that) In the early 2000's I commuted from West Linn to a job in the Vancouver, WA area using the Glenn Jackson (I-205) bridge. Since, for the most part, I was driving counter to the primary congestion – my drive was efficient and normally at full highway speeds. With that said, I was also a frequent I-5 driver in the North Portland area and had numerous opportunities to cross the I-5 bridge.

First off, I applaud and thank you for the persistence and hard work you and the various project teams are putting into this project. It is very complicated with many competing interests, requirements, and historical baggage.

While the entire bridge project is of interest to me, my focus in these comments is on tolling, which is a critical piece of the project's four legged financing including OR & WA state commitments and Federal grants.

I am founder and President of the Vote Before Tolls Committee, and am the author and co-petitioner for IP-4, the Oregon Vote Before Tolls initiative (see item #5, below). The grassroots effort supporting this initiative is called the No Toll Army, however please note I am not personally opposed to tolls, rather if we in Oregon are to initiate a new tax via tolling we need to have much more public/private communication, transparency, and trust before we take this irreversible step. As such, these issues cannot be resolved later. We in Oregon, where there are no mainline tolls, have this one opportunity to impact tolling philosophies and programs before they start. Details and <https://VoteBeforeTolls.org> ... more on this initiative follows later in these comments.

I have learned a lot the past 10 months about Oregon tolling including the tremendous number of processes, committees, agencies, and requirements – local, state and federal – to implement tolling.

I suggest the Joint Committee take note that it is taking longer to plan and implement tolling on southern I-205 absent of any connected highway construction and the I-5 Rose quarter region than was presented yesterday if the I-5 bridge project construction starts in 2025 or 2026.

I encourage the committee to take a more aggressive and earlier interest in the details of the tolling aspects of the project as it is so critical to the project funding.

Comments/Questions.

1) Who will be doing the tolling

- OR, WA or a new joint entity? How is the tolling aspect of funding being financed? How will the interstate payments be made? What is the technology planned for the tolling (not just e-tag and phot ... peel this onion)? What is the interoperability (See below)?

2) Diversion

- **Diversion** is a key issue when implementing tolling. It would be a shame to improve the I-5 bridge and have people not take advantage of the improved transportation efficiencies by diverting to other routes. Further, diversion will offset the anticipated environmental benefits, give a false sense of congestion relief on new bridge, and will push congestion, pollution, and reduce safety on alternative routes.
- **I-205** is obvious and easy to access diversion route. I suspect many travelers will get used to I-205 as an alternative route during the multi-year I-5 bridge construction project so continuing to travel on an un-tolled I-205 bridge will be natural to continue.
- It would be appropriate to start tolling on I-205 at the same time as I-5 to minimize this diversion.
- **The Lewis & Clark Bridge** in Longview (OR/WA Hwy 433 and OR Hwy 30) is the other obvious diversion route. The environmental, traffic, and safety impacts of diversion on these highways and in the towns of Kelso, Longview, Rainier, St. Helens, Scappoose, and other smaller towns on this route need to be actively and aggressively studied as tolling decisions are being made.
- While probably not as significant, the impact of diversion on bridges between I-84 and WA Hwy 14 east of the Portland/Vancouver metro area should also be studied ... Bridge of the Gods/Cascade Locks, Hood River Bridge, and the Dalles Bridge.
- Please be studying and thinking about diversion impacts well in advance.

3) Toll collection overhead

- Nationally in FY2018, there was over \$15 billion in national toll revenue collected. \$2.3 billion, or 16% was dedicated to collection costs. We'd like to see the I-5 Bridge tolling program lead that national average down.

- We realize there is overhead to collecting tolls, however, this project will be all-electronic toll-tag and photo tolling only (no staffed tolling gantries) so we have an opportunity to implement an efficient state of the art tolling collection system.
- Traditionally, electronic toll-tag users get a discount on the published tolls (as an incentive to get and use an electronic tag), while pay later online and photo tolling is at the published toll rate, and for photo tolling, perhaps an additional service fee is charged.
- I'd encourage the Joint Committee to formally define and establish a toll collection overhead target ... and recommend you target under 10%. Every dollar saved by efficiencies here goes directly to the bottom line of funding the project and paying off its obligations. Use of a private contractor to manage toll collection should be considered, but the overhead must be guaranteed by contract, low, and contain escape/take over provisions when contract renewal periods occur.

4) Tolling interoperability

- Interoperability should be a key component of the tolling plan
- Trucking/freight efficiency has been identified as a key focus and target of the I-5 bridge project – and hopefully this user segment will be a key beneficiary as well. Trucking efficiency is not just the speed and predictability at which a truck travels, it includes the business overhead of managing, tracking, and paying for multiple non-interoperable toll-tag systems. The I-5 bridge tolling should not add to this burden.
- Federal legislation 23 CFR 950 and MAP-21, passed in 2012, require national compatibility and interoperability of tolling systems. This legislation has been widely ignored, including by the states of Washington and California. EZ-Pass, GoodToGo (WA) and FasTrak (CA) are not compatible. Nevertheless, interoperability is the law of the land.
- EZ-Pass has become the US interoperable standard by focusing on serving their customers – both by public agencies and by the traveling public.
 - 19 of 29 states are currently EZ-Pass interoperable, the other 10 states with highway tolls have their own standalone tolling systems. Three near Texas, are interoperable across the three, but not with EZ-Pass.
 - EZ-Pass has over 32 million accounts, with 49 million tags in use.
- The I-5 bridge project might be (and perhaps should be) the kick in the pants to cause Washington to implement EZ-Pass interoperability. And then, hopefully, California will join their northern neighbors in moving toward EZ-Pass compatibility as well.
- Ignoring this opportunity to comply with national interoperability will be a huge missed opportunity, and deficiency. FWIW, we feel the same about interoperability for Oregon's I-205 and I-5 tolling programs, i.e., Oregon tolling overall.

5) Risks of depending on tolling ... Oregon's IP-4 Vote Before Tolls initiative

- Key impacts of IP-4

- IP-4 is a Constitutional amendment, and not subject to legislative or public agency override
 - Retroactive to 2018 so covers current tolling proposals in the Portland metro area as well as the proposed I-5 Bridge tolls
 - Requires a regional vote of residents in counties within 15 miles of any tolled segment of highway (includes bridges). Specific to the I-5 Bridge project, residents of Clackamas, Washington, Multnomah, and Columbia counties will vote before new tolls can be implemented.
 - “Tolled section of highway” is carefully and deliberately defined so that placing the toll stations over the Washington line will not avoid its impact as the tolled actions of highway extend into Oregon to the first highway exit (southbound) or the last highway exit (northbound) before the respective tolling gantry.
 - The initiative covers a “public bodies”.
- IP-4 does not stop tolls (in spite of the No Toll Army grassroots branding), rather it requires a regional vote before new tolls.
- We suspect voter approval of tolls under IP-4 will require extensive transparency and clarity ... toll amounts, toll revenue usage, variable toll algorithms, tolling overheads, tolling sunseting or increase limitations and processes, impact of performance or lack of performance to goals (congestion reduction, environmental), interoperability, etc..
- We will make interoperability a key issue when voting to approve a new toll – so please act aggressively on this regard and act soon. “It’s too late”, or “the Oregon legislature said in 2017 OR/WA interoperability is the law” will likely not fly with the general public when voting on an I-5 bridge toll. Taking the easy path rather than doing what is right and best for the long term will likely not be tolerated by the voters. As a joint committee we expect you to rise above single state politics.
- IP-4, the Oregon Vote Before Tolls Initiative, is being submitted next week in Salem for a formal ballot title and Attorney general approval. It is targeted for the November 2024 ballot, and as mentioned above, is retroactive to all new tolls since 2018.
- We have found very broad support of the Vote Before tolls initiative across the general public, and across the state. Awareness of forthcoming I-205 and I-5 (non-bridge) tolls is our key focus – once made aware the support for the initiative is extremely high, perhaps over 80%. I caution you to not hope you can fly under the radar on tolling decisions because of the current low general public awareness of tolling in Oregon. Because of the Oregon initiative petition process we are intentionally being low key about increasing awareness until after we have permission to gather the 150k+ signatures required to place the initiative on the ballot.
- We are preparing to make IP-4 a key issue and public-rallying factor for public office campaigns in the upcoming November 2022 elections as well as the 2023 Oregon legislative session.
- If (when) IP-4 passes I would suspect I-5 bridge tolling might have a much higher chance of passage than the current I-205 and I-5 (non-bridge) tolling proposals. But, as mentioned above, the public will likely need extensive information and clarity about all aspects of I-5 bridge tolling.
- The initiative can be viewed here: <https://VoteBeforeTolls.org/Initiative/>

I would be happy to provide more information on tolling as well as IP-4 if so requested.

Dean

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Dean Suhr

President, Vote Before Tolls Committee

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Take the survey to be kept up to date: <https://VoteBeforeTolls.org>

FaceBook group: <https://www.facebook.com/groups/notollarmy>

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