



Oregon

Tina Kotek, Governor

Oregon Transportation Commission

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DATE: August 31, 2023
TO: Oregon Transportation Commission

FROM: Kristopher W. Strickler
Director

SUBJECT: **Agenda Item J** – Tolling Implementation Update

Requested Action:

Receive an update on ODOT's work to implement tolling, focused on upcoming decisions related to the low-income toll program.

Background:

ODOT continues to make progress on a number of toll-related efforts.

- ODOT continues to work closely with its three toll-related advisory committees - the Regional Toll Advisory Committee, Statewide Toll Rule Advisory Committee (STRAC), and Equity and Mobility Advisory Committee - to develop and implement the toll program.
- After completing review of the rules around customer accounts and enforcement, the STRAC has begun work on the next section of the toll rules, focused on the rate framework—including how different vehicle types are treated, what discounts and exemptions are available, and how rates are set and adjusted.
- ODOT released the procurement to select a vendor to provide the back office and customer service center functions and will release the procurement for roadside systems (gantries and other related equipment) this fall.
- ODOT has continued consultation with tribal governments about how to apply tolls to tribal government vehicles and their members.

Over the coming months, the OTC will face important discussions and decisions about a number of important issues, including:

- Low-income toll program: How to structure a low-income toll program, including benefit levels, types, and qualifying income thresholds.
- Nexus projects and local investment: How to approach requests from local government to address the impacts of tolling on the Portland regional transportation system.
- Tribal tolls: Whether and how to exempt tribal government vehicles and their members.
- Toll discounts or exemptions: What vehicles will receive a discount or be exempt from tolls.
- Rates by vehicle type: What different vehicles (weight and size) will pay.
- I-205 Toll Project and Regional Mobility Pricing Program rate structures: Rates for toll facilities across the day.

These issues will be brought to the OTC for discussion and decision as part of the rulemaking and rate setting process.

Low Income Toll Program Development

Since 2020, when the OTC chartered an Equity and Mobility Advisory Committee (EMAC), work has been underway to understand and develop an approach to address impacts from tolling on people who are experiencing low income. In 2021, the Oregon Legislature adopted HB 3055, which directed ODOT to develop a report on the approach by the following year. This led to the [Low Income Toll Report](#), which was created with EMAC and adopted by the OTC in September 2022.

In developing the policies that will guide the program, we are building from the following actions:

- [Low Income Toll Report](#), which identified income thresholds for consideration and future evaluation with two tiers: a significant discount for those making 200% or below of the Federal Poverty Level (FPL), which is \$60,000 for a family of four in 2023, and some level of discount up to 400% of FPL, which is \$120,000 for a family of four. Also, there was a list of inclusive practices for enrollment, verification, and enforcement in the report.
- [Equity and Mobility Advisory Committee’s recommendations](#) on strategy for the low-income program investment and accountability.
- [Oregon Highway Plan Toll Amendment](#) Policy 6.10 and 6.7, which states:
 - “Road pricing should not contribute to furthering financial indebtedness for people experiencing low income. This should be considered in the establishment of rates, discounts, exemptions, payments, enrollment, penalties or free travel options available to avoid further burdening people experiencing low incomes who are struggling to meet basic needs (food, shelter, clothing, healthcare, etc.).
 - Evaluate and implement a low or no cost rate system for low-income users.”

Since the OTC’s approval of the Low Income Toll Report in September 2022, staff has been working to understand how ODOT can operate a low-income toll program on opening day. The goal is to have a program that is equity-informed, appropriately verifies eligibility, does not negatively impact financing options or congestion reduction goals, meets a defined schedule within estimated cost parameters, and limits the impact on toll rates for other toll payers.

Income-levels for these percentages are as follows:

Federal Poverty Level and Median Income by Household Size

Household Size	200% FPL (2023)	400% FPL (2023)	Portland Metro Region Median Household Income (2022)
1	\$29,160	\$58,320	\$74,550
2	\$39,440	\$78,880	\$85,200
3	\$49,720	\$99,440	\$95,850
4	\$60,000	\$120,000	\$106,500
5	\$70,280	\$140,560	\$115,020
6	\$80,560	\$161,120	\$123,540

Background

As ODOT explores a low-income toll program, we are examining potential income thresholds. In the [research review](#) of the few existing low-income toll programs, 200% of the FPL is a common income threshold for benefits. 200% of the FPL is also the approximate level for income-qualification for existing social services in Oregon. Similar to TriMet’s Low-Income Fare Program, this could allow ODOT to leverage other sources for income verification.

For context, the following are the income eligibility thresholds for a sample of other benefit programs.

- Supplemental Nutrition Assistance Program (“food stamps”): 200% of FPL
- Oregon Health Plan: 138% of FPL
- Women, Infants, and Children: 200% of FPL
- TriMet Low-Income Fare Program: 200% of FPL
- Department of Environmental Quality Charge Ahead Rebate Program for electric vehicles: 400% of FPL

Rationale for an Additional Benefit for Up to 400% of the FPL

As noted in the [Low Income Toll Report](#), the direction to consider an additional smaller discount for households with incomes up to 400%, stemmed from the following:

- Avoid a single-tier of benefits that has a drop off. People in this income bracket may experience income that fluctuates throughout the year or varies year to year; therefore, this benefit would offer some reassurance of continued benefits despite that fluctuation.
- Equity and Mobility Advisory Committee members have strongly supported a benefit tier up to 400% of the FPL.
- Reach customers making the minimum wage, which is \$15.45 for the Portland region. This would equate to a \$32,136 annual gross salary, which is approximately 210% FPL for an individual. Professions in this income bracket (200% to 400% FPL) include: Preschool teachers, home health care aids, cooks and food servers, farm workers, school janitors and bus drivers, and cashiers.
- When looking at other assessments of income, such as [Asset Limited, Income Constrained, Employed](#) or the Self-Sufficiency Standard, higher than 200% FPL would be recommended to not further add to the transportation cost burden. The following chart provides this analysis:

Portland Metro Self-Sufficiency Standard (SSS)¹ Compared to the Federal Poverty Guidelines (2021)

Household Size	1	2	3	4	5
Clackamas County	\$36,249	\$57,349	\$71,700	\$95,112	\$144,944
%FPL	281%	329%	327%	359%	467%
Multnomah County	\$31,801	\$54,173	\$70,300	\$95,727	\$154,422
%FPL	247%	311%	320%	361%	497%

¹ The [Oregon SSS](#) (Self-Sufficiency Standard for Oregon) calculates how much income a family must earn to meet basic needs and is derived from the costs of housing, childcare, food, healthcare, and transportation, plus the cost of taxes and impacts of 2021 tax credits.

Washington County	\$36,155	\$57,191	\$71,403	\$94,806	\$144,473
%FPL	281%	328%	325%	358%	465%
Clark County	\$30,756	\$48,584	\$60,219	\$79,647	\$120,376
%FPL	239%	279%	274%	301%	388%

OTC Action Needed by December 2023

Based on feedback from the Commission to date, ODOT is committed to a program that, at a minimum, provides benefits for drivers with a household income equal to or below 200% of the Federal Poverty Level (FPL). ODOT is working to incorporate as many of the inclusive practices for enrollment, verification, and enforcement as possible that were identified in the Low Income Toll Report. As noted in the report, a cumbersome verification processes in other low-income toll programs were a major factor in why other programs have low enrollment.

Governor Kotek has directed ODOT to report on the agency's plans to address equity concerns related to tolling by December 15, 2023. ODOT plans to bring key policy issues to the Commission prior to submission of this report. In particular, ODOT will bring forward two specific policy decisions for the Commission to provide direction to include in this report.

- **The scope of a low-income toll program for drivers at or below 200% of FPL.** Initial analysis indicates a program providing a significant discount for those at or below 200% of FPL can be structured in a way that will likely not have significant impact on traffic or toll revenue. Based on additional analysis, ODOT will bring the Commission options for the benefit level for those at or below 200% of FPL, with the intent to implement this benefit on opening day. If approved by the Commission, this option will be modeled in the I-205 Level 3 traffic and revenue analysis and the Regional Mobility Pricing Project traffic and revenue analyses and incorporated into toll rules. Based on the final outcomes of these rigorous analyses, modifications may be made to the program prior to implementing tolling.
- **Options for a 200-400% of FPL program to analyze in greater depth.** ODOT believes additional analysis will be necessary for committing to a program for 200-400% of FPL, as few if any toll agencies have implemented such a program and the potential for traffic and revenue impacts could be significant. ODOT will bring forward options and ask the Commission to provide direction on whether to consider such a program and if so what options to analyze in future toll traffic and revenue analyses in order to provide full information for the Commission to make a decision in 2025 prior to implementation of tolling.

As a result of implementation issues identified (noted below in the background section), ODOT recommends taking a more deliberative approach to consideration of any benefits above 200% FPL that will require additional analysis prior to the Commission making a decision.

Implementation Analysis Needed for an Additional Benefit at 400% of the FPL

During ODOT's investigation of what is needed to deliver the I-205 Toll Project and a low-income toll program timely and efficiently, we encountered issues that need to be worked through before committing to an additional tier of benefits above 200% of the FPL. These include:

- **Revenue impact:** Based on preliminary analysis, ODOT believes providing a discount to households earning less than 200% of FPL is unlikely to result in significant revenue loss because few people at this income level would pay a toll without a discount. However, revenue loss from a benefit that extends above 200% may be more significant, depending on the size and type of benefit. ODOT is conducting further analysis of low-income program options to better understand impacts to revenue and congestion.
- **Financing:** Because Oregon does not currently operate a toll program, and therefore does not have a track record of operating a toll program, net toll revenues are unknown and entail some level of risk against which to bond. Nationally, low-income toll programs do not offer benefits up to 400% of FPL, therefore there is little or no precedent and potential participation is unknown. Because the risk for potential investors is also unknown, the Traffic and Revenue analysis, which is typically designed to be conservative, may discount revenue expectations. The more uncertainty there is, the less attractive the debt offering, jeopardizing ODOT's toll credit rating, increasing the cost of bonding, and potentially requiring further credit support from the State Highway Fund.
- **Traffic impact:** Reduced tolls for people making up to 400% of FPL will increase traffic on tolled facilities, obviating some of the congestion relief from the project and implementation of tolls. Additional analysis is needed to determine impacts.
- **Eligibility verification:** In order to ensure that people accurately access benefits, ODOT will need to have a system to verify eligibility. ODOT is planning to use existing benefits programs to verify income up to 200% of FPL. However, few if any benefit programs extend to 400% FPL, so eligibility verification will be challenging. This may require creating an income verification system with the Oregon Department of Revenue or other state agencies that will take time to put in place. The geographic extent of the program will also have to be determined. Processing income requests from outside of Oregon and without interoperability agreements will add complexity and cost.
- **Cost of implementation and operations:** Adding complexity to the toll operations system will come with increased costs to implement and operate, including the potential for significant additional staffing.
- **Schedule:** An extensive toll relief program with different benefit levels and eligibility and income verification requirements will require customization because this is not part of most toll programs. The more unique our desires, the more difficult it will be for vendors to identify solutions, and this will in turn increase the cost of implementation and time to complete.

New Analysis of Low-Income Toll Program Options for I-205 Toll Project

ODOT has engaged a consultant to complete a preliminary traffic and revenue analysis of a variety of options. As shown in the table below, most options other than a 100% discount have relatively small revenue and traffic impacts for I-205. The full analysis is included in the attachment.

Preliminary Traffic and Revenue Analysis for I-205 Toll Project

		Value	Enrollment*	Revenue*	Traffic*
<200% Options					
1	100% discount	\$115	23.0%	-6.9%	+5.0%
2	50% discount	\$45	6.0%	-0.6%	+0.7%
3	Credit (\$45 monthly)	\$45	6.0%	-1.0%	+0.7%
200-400% Options					
9	Credit (small)	\$5	0.5%	0.0%	0.0%
10	Credit (larger)	\$20	0.5%	-0.1%	0.0%
11	25% discount	\$25	1.1%	-0.2%	+0.1%

Feedback Requested:

1. Does the Commission agree with the proposed approach to commit to providing a specified benefit to households earning at or below 200% of Federal Poverty Level by the end of 2023?
2. Does the Commission agree with ODOT’s recommendation to conduct further analysis of options for reduced tolls for people earning up to 400% of Federal Poverty Level before making a commitment to such a benefit in 2025?
3. What level of traffic and revenue impact is acceptable for the low-income toll program?
4. What information will the Commission need in order to make decisions on both points by the end of 2023?

Outcomes:

Based on Commission feedback, ODOT will finalize analysis of low-income toll program options and bring those to the Commission for feedback and decisions in November.

Attachments:

- Attachment 01 – Low Income Toll Program: Technical Analysis



Low-Income Toll Program Development: Technical Analysis

Recap of key takeaways from previous analysis conducted for the [Low Income Toll Report \(2022\)](#)

- 0-200% Federal Poverty Level (FPL) 50% discount showed almost no impact (around 1%) to traffic and revenue. The offering of some discount at this level actually attracts the lowest income drivers back to the tollway.
- 200-400% FPL 50% discount had a larger possible impact to traffic and revenue (10-15% estimate). The Low Income Toll Report's recommendation was to further investigate a smaller benefit for 200-400% FPL, than 0-200% FPL.
100% enrollment of potential users was assumed in the modeling. Achieving 100% enrollment would be unparalleled in the industry. Of the 17 other programs we have been tracking, achieving 10% enrollment would place us as a national leader. Lower this assumption for future studies.

Methodology for the new low-income options traffic and revenue analysis (2023)

Note: This research has primarily been developed by the Gabor Debreczeni, WSP, who is a consultant to ODOT on the toll project.

Borrowing from the methodology conducted in the Washington Department of Transportation's [Low-Income Toll Program Study I-405 and SR 167 Express Toll Lanes](#) (see pages 26 – 38), we plan on using a similar approach that includes:

- (1) For the income-threshold of 200% of the Federal Poverty Level, conduct the analysis for a program that would offer monthly credits, free trips, or a discount. The level of discount for the free trips and toll credits options would be set to 100% of the average monthly usage¹. The average monthly usage will be estimated at a high level based on the team's current understanding of corridor usage based on existing data and observations; the result will be a fixed dollar amount and a fixed number of trips, and most steps of the analysis will move forward with those fixed amounts as the inputs.
- (2) For the income threshold of 400% of the Federal Poverty Level, conduct the analysis for a program that would offer an annual credit or number of free trips. The level of discount for the free trips and toll credits options would be set to 10% of the annual average usage. The average annual usage will be estimated at a high level based on the team's current understanding of corridor usage based on existing data and observations; the result will be a fixed dollar amount and a fixed number of trips, and most steps of the analysis will move forward with those fixed amounts as the inputs.
- (3) Conduct analysis assuming enrollment rates that are based off knowledge of current enrollment levels of low-income toll programs nationally and past analysis conducted. For example, the Washington Department of Transportation [study](#) assumed enrollment levels of 10%, 25%, and 50% of eligible users.

¹ That is, as compared to an average user of the toll corridor – so, for example, if the average user of the corridor would be expected to cross an I-205 toll point ten times a month, the benefit would for those with incomes below 200% FPL would be “ten free trips per month”.

(4) Produce analysis results using spreadsheet methodology in combination with regional travel demand model results to estimate the impact of a program at 200% and 400% of the FPL and by discount type. This analysis will consist of three steps:

- a) A pre-processing step will be used to estimate the overall scale of potential trips benefiting from the LITP. This step will consider the number of people eligible for the program and their potential vehicle trips. This estimation applies assumptions for discount program eligibility, enrollment percentage, and the discount program type to estimate the number of potential vehicle trips that could utilize the benefits from the LITP.² The pre-processing spreadsheet translates these discount program assumptions into the input needed for the travel demand model: what percentage of vehicle trips³ need to be moved into new trip tables signifying LITP enrollees, and whether those trips are free, discounted or unaffected.⁴ The pre-processing will also consider how different discount options will impact certain times of day differently (for example, with the credits option incentivizing more off-peak travel, and the free trips options incentivizing more peak travel).⁵
- b) The second step consists of regional travel demand model runs.⁶ The model runs will be used to assess how toll highway usage could change in response to the LITP alternatives⁷. A baseline run will be conducted without the LITP being represented in the model, to serve as the basis of comparison for the runs with various LITP assumptions. Then, the new trip tables representing LITP participant trips will be created, based on the shares of trip tables estimated during the pre-processing step. The model results will be summarized to show the relative difference in gross revenue potential, as well as the toll highway volume/speed differential, for each of I-205 and RMPP.
- c) The third step is a post-processing step to adjust regional travel demand model outputs to account for any effects observed that the regional travel demand model is not fully

² As is typical for regional travel demand models, the Metro model is a trip-based model that considers aggregate travel behavior. It does not carry forward individual user demographics to vehicle trip routing choices. As such, the pre-processing step is necessary to define the “population” of trips that are potentially affected by different LITP scenarios to be evaluated.

³ Vehicle trip tables are further segmented within the regional travel demand model with different Value-of-Time (VOT) assumptions. The VOTs may be classified as low, medium, or high to represent a range of user willingness to pay tolls. The pre-processing step will acknowledge that while LITP participants generally behave with a lower VOT, for some trip types and circumstances their decision-making may exhibit higher VOTs.

⁴ Since the regional travel demand model is set up for an average weekday, program options for monthly credits or a fixed number of free trips (per month) will be translated to a fixed percentage of eligible trips being free and a fixed percentage being full toll.

⁵ During the pre-processing step, a plan will be developed to significantly limit how many unique travel demand model runs are needed to understand the effect of the listed benefit types, income thresholds, and enrollment rates, especially when assessing fairly small differences in scale of benefits or program population.

⁶ All regional model runs will be performed for future year demand in 2045 to best incorporate the long-term impacts of the LITP and align with the adopted Regional Transportation Plan.

⁷ Each model run consists of only the traffic assignment phase (i.e., where users decide their vehicle travel route including selecting toll or non-tolled roadways). Earlier trip demand estimation and mode choice phases of the regional models are omitted in these sensitivity tests, as they are resource intensive and are not expected to significantly impact the results considering the wide bands on variance/uncertainty included in assumptions for LITP enrollment. The post-processing step will take into account a high-level estimate of any expected mode shift as a result of the LITP.

representing or meaningfully differentiating (including adjustments to the revenue and operational impact estimates for any mode shift expected and not modeled in the second step). This will consider ways to estimate impacts without needing further model runs.⁸

- (5) Include the most recent assumptions available for toll rates schedules from the I-205 Toll Project and the Regional Mobility Pricing Project for regional travel demand modeling purposes.⁹ Conduct this analysis primarily for the I-205 Toll Project but identify impacts to system performance and revenue for the overall ODOT Toll Program in the region.
- (6) Combine this analysis with information from the following efforts to understand the full extent of impacts and benefits for Low Income Toll Program options:
 - a) NEPA analysis (e.g., travel costs as a part of household income and other economic assessment measures)
 - b) Traffic and revenue analysis
 - c) Public engagement
 - d) Further knowledge of operational costs to administer the program

Findings of traffic and revenue impacts to I-205 Toll Project and Regional Mobility Pricing Project (RMPP) are identified in Figure 3 and 4.

Explanation of benefit types: free trips, credits, and discounts

All of the benefit types described would be distributed on a **monthly basis**. It would be assumed that amounts would not carry over from one month to the next. For credits and free trips, the benefit amount would be reset to the amount provided at the beginning of the month. For discounts, the benefit would be applied soon after the toll transaction would occur. A monthly reset would not be needed.

For modeling purposes, the free trips benefit was assumed to have the same dollar value as the credit benefit. Where there would be a difference between the two in terms of revenue/transaction impacts is in usage by time of day – we’d expect more usage of the free trips at peak times as compared to credits.

Average usage refers to the expected value of how much the average program user would value the discount they’re receiving, per month.

Enrollment rate research and assumptions

An estimate of how many people are expected to enroll in a tolling equity program is important for financial and operational forecasting, and in understanding whether an individual program is successful in meeting its equity goals and the equity needs of the project. In general, enrollment in benefit programs is not universal – even for the largest and most well-publicized benefit programs like Medicaid or SNAP – and is much lower for tolling equity programs, where enrollment from those eligible is observed to be in

⁸ A return to steps (a) or (b) will be considered if more has been learned or updated on the assumptions of the analysis, the benefit levels, or the income thresholds. The analysis can be iterated if the results cause stakeholders to require adjustments to program parameters.

⁹ The travel demand model runs will assume the LITP applies to both I-205 and RMPP but not the IBR Program. Analysis of impacts/changes to IBR Program are not covered in this analysis although the project is assumed to be in place in future years, consistent with the adopted Regional Transportation Plan.

the low single-digit percentages (Figure 1). This effect creates large errors in estimating future usage and financial impacts, since the uncertainty in eventual enrollment can be orders of magnitude. Furthermore, if a study assumes universal enrollment, it will greatly overestimate the impacts of a tolling equity program.

In terms of benefits' impact on enrollment, the analysis (Figure 1) shows that for each increase of \$10 in monthly benefits, the enrollment rate tends to increase between 0.7% and 3.4%, depending on the other variables included in the model. The analysis assumes an annual eligibility reverification process and a minimum enrollment of 0.5% of those eligible.

We observe a significant negative impact on enrollment rates if the benefit program is a tolling equity program. This is not surprising given the relatively optional nature of tolling – toll-free options are nearly always available, whereas with benefit programs for food or electricity, no alternatives exist for consumption.

The role of eligibility reverification frequency was also analyzed in some of the models. The results indicate an increase in the enrollment rate of approximately 4.9% when reverification is required every two years, as compared to annual reverification. An additional increase of 4.9% in enrollment is projected if eligibility is not reverified beyond the initial verification process.

Lastly, some of the models consider the median household income in the program's geographic area, and they show an increase in enrollment of 2.3% to 3.4% for each \$10,000 increase in median household income in the project area. It seems possible that this effect is because wealthier areas have greater resources to devote to advertising the benefit programs and making them broadly accessible to those who are eligible.

Figure 1. Enrollment Research

Benefit Program	Program Name	Area	State	Monthly Benefit (2023\$)	Enrollment Rate
Tolling	VDOT Toll Relief [Old]	Hampton Roads	VA	\$24	2.8%
	Low-Income Assistance Plan (Metro ExpressLanes)	Los Angeles County	CA	\$3	2.4%
	VDOT Toll Relief [New]	Hampton Roads	VA	\$28	1.2%
	San Mateo 101 Express Lanes Community Transportation Benefits	San Mateo County	CA	\$9	0.7%
Transit	ORCA LIFT	Puget Sound	WA	\$23	50%
	SFMTA Lifeline Pass	San Francisco Area	CA	\$40	45%
	Fair Fares NYC	New York City	NY	\$34	30%
	Low-Income Fare is Easy (LIFE)	Los Angeles County	CA	\$24	13%
	TriMet Honored Citizen Hop Fast Pass	Portland Metro Area	OR	\$36	10%
	LIVE RTD	Denver	CO	\$55	8%
	Metro Transit Transit Assistance Program (TAP)	Minneapolis	MN	\$25	1%
Other	Earned Income Tax Credit	National	All	\$180	79%
	SNAP	National	All	\$152	74%
	Medicaid	National	All	\$585	56%
	Low-Income Home Energy Assistance Program	State of Washington	WA	\$23	36%
	FCC Affordable Connectivity Program	National	All	\$15	25%
	FCC Lifeline	National	All	\$5	19%
	Pacific Power Oregon Low-Income Discount Program	Oregon	OR	\$8	15%

Figure 2. Percentage of Eligible People Enrolling in a Tolling Equity Program Based on Benefit Level

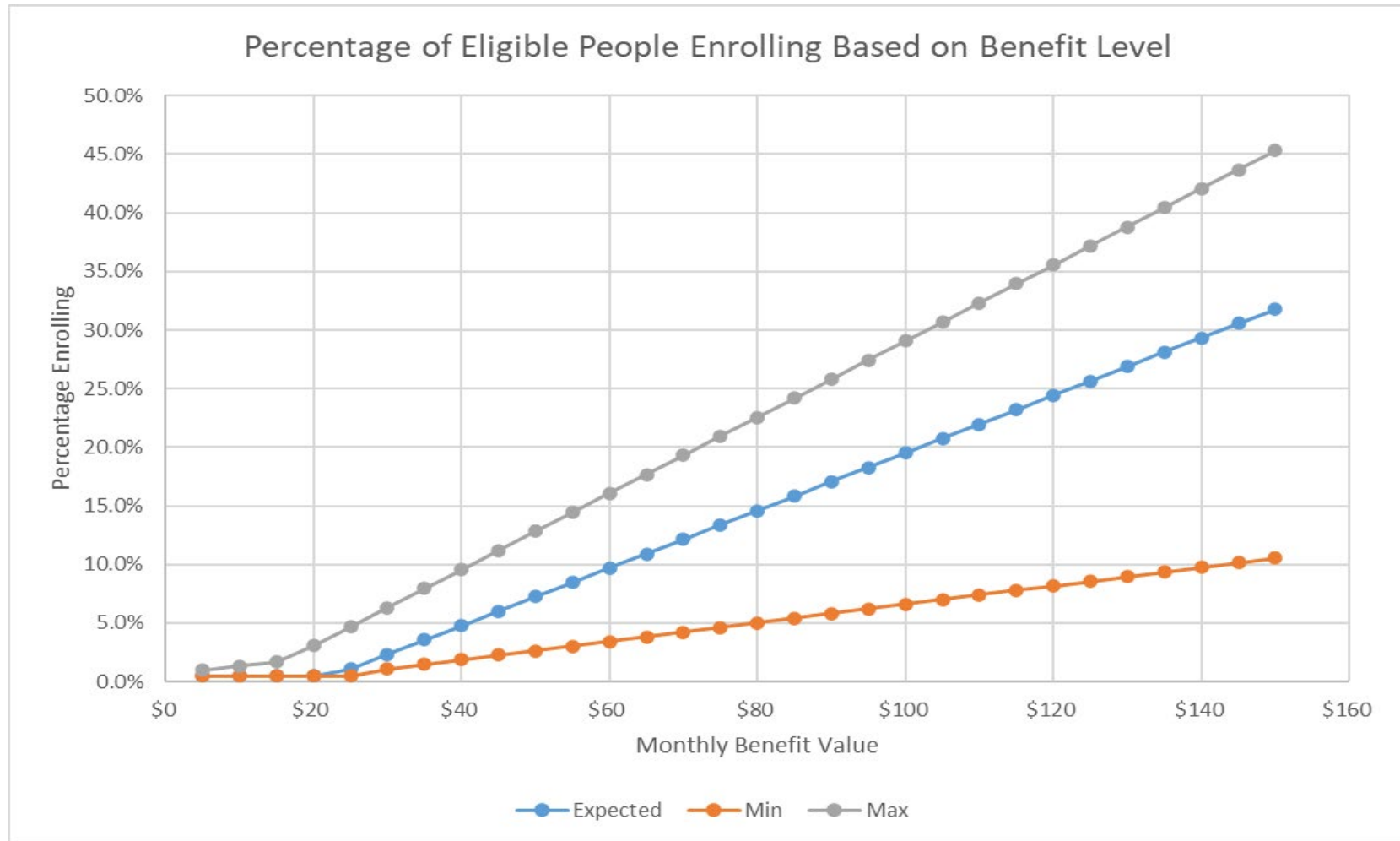


Figure 3. Low-Income Toll Options Analysis: Enrollment Assumptions

LITP Option				Enrollment (People)			Enrollment (Trips)		
#	Facility	Benefit	Amount	Low	Medium	High	Low	Medium	High
1	I-205 only	100% discount, <200% FPL	\$115	8%	23%	34%	19%	42%	54%
2	I-205 only	50% discount, <200% FPL	\$45	2%	6%	11%	6%	15%	25%
3	I-205 only	Average usage \$ credit, <200% FPL	\$45	2%	6%	11%	2%	6%	11%
4	I-205 only	Average usage free trips, <200% FPL	\$45	2%	6%	11%	2%	6%	11%
5	I-205 & RMPP	100% discount, <200% FPL	\$145	10%	31%	44%	23%	49%	62%
6	I-205 & RMPP	50% discount, <200% FPL	\$55	3%	8%	14%	8%	20%	30%
7	I-205 & RMPP	Average usage \$ credit, <200% FPL	\$55	3%	8%	14%	3%	8%	14%
8	I-205 & RMPP	Average usage free trips, <200% FPL	\$55	3%	8%	14%	3%	8%	14%
9	I-205 only	10% average usage \$ credit, <400% FPL	\$5	0.5%	0.5%	1.0%	0.1%	0.1%	0.1%
10	I-205 only	50% average usage \$ credit, <400% FPL	\$20	0.5%	0.5%	3.1%	0.2%	0.2%	1.4%
11	I-205 only	25% discount, <400% FPL	\$25	0.5%	1.1%	4.7%	1.5%	3.4%	12.1%
12	I-205 & RMPP	10% average usage \$ credit, <400% FPL	\$5	0.5%	0.5%	1.0%	0.0%	0.0%	0.1%
13	I-205 & RMPP	50% average usage \$ credit, <400% FPL	\$30	1.1%	2.3%	6.3%	0.6%	1.2%	3.4%
14	I-205 & RMPP	25% discount, <400% FPL	\$30	1.1%	2.3%	6.3%	3.4%	6.7%	15.6%

Figure 4. Low-Income Toll Options Analysis: Revenue and Transaction Impacts

LITP Option				Gross Revenue Impact			Transactions Impact		
#	Facility	Benefit	Amount	Low	Medium	High	Low	Medium	High
1	I-205 only	100% discount, <200% FPL	\$115	-3.1%	-6.9%	-8.9%	2.3%	5.0%	6.4%
2	I-205 only	50% discount, <200% FPL	\$45	-0.2%	-0.6%	-0.9%	0.3%	0.7%	1.2%
3	I-205 only	Average usage \$ credit, <200% FPL	\$45	-0.4%	-1.0%	-1.9%	0.3%	0.7%	1.4%
4	I-205 only	Average usage free trips, <200% FPL	\$45	-0.4%	-1.0%	-1.9%	0.3%	0.7%	1.4%
5	I-205 & RMPP	100% discount, <200% FPL	\$145	-4.2%	-9.0%	-11.3%	2.9%	6.1%	7.6%
6	I-205 & RMPP	50% discount, <200% FPL	\$55	-0.4%	-1.0%	-1.5%	0.3%	0.6%	0.9%
7	I-205 & RMPP	Average usage \$ credit, <200% FPL	\$55	-0.6%	-1.5%	-2.6%	0.4%	1.1%	1.8%
8	I-205 & RMPP	Average usage free trips, <200% FPL	\$55	-0.6%	-1.5%	-2.6%	0.4%	1.1%	1.8%
9	I-205 only	10% average usage \$ credit, <400% FPL	\$5	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
10	I-205 only	50% average usage \$ credit, <400% FPL	\$20	-0.1%	-0.1%	-0.5%	0.0%	0.0%	0.2%
11	I-205 only	25% discount, <400% FPL	\$25	-0.1%	-0.2%	-0.5%	0.0%	0.1%	0.3%
12	I-205 & RMPP	10% average usage \$ credit, <400% FPL	\$5	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
13	I-205 & RMPP	50% average usage \$ credit, <400% FPL	\$30	-0.2%	-0.4%	-1.0%	0.1%	0.2%	0.5%
14	I-205 & RMPP	25% discount, <400% FPL	\$30	-0.1%	-0.3%	-0.7%	0.1%	0.1%	0.3%

Research on Existing Low-Income Toll Programs

Research on [existing low-income toll programs](#) were reviewed and discussed with the Statewide Toll Rules Advisory Committee and Equity and Mobility Advisory Committee at a July 2023 meeting. Takeaways from the research included:

- Low-income toll programs are relatively new to the industry.
- 200% of the Federal Poverty Level, or an income-threshold that allows for existing service providers to verify income is a common practice.
- Enrollment in programs is historically and currently very low.

Geographic extent of existing low-income toll programs

Facility	Geographic extent of program
San Mateo 101 Express (San Francisco, CA)	San Mateo County residents
Elizabeth River Bridge Crossings (Hampton Roads, VA)	Hampton Roads region residents (recently expanded, previously limited to a few local cities)
I-10/I-110 Express Lanes (Los Angeles, CA)	Los Angeles County resident
Central 70 Express Lane (Denver, CO)	Globeville and Elyria-Swansea neighborhood residents