

ITEM 13 - Information

March 19, 2008

Briefing on Final Report of the TPB Regional Value Pricing Study

Staff

Recommendation: Receive briefing on the final report for the study, which was reviewed by the TPB Value Pricing Task Force on February 27.

Issues: None

Background: The Regional Value Pricing Study, which is funded by a grant from the Federal Highway Administration (FHWA), has evaluated alternative scenarios for a regional network of variably-priced lanes combined with extensive express bus services.

National Capital Region Transportation Planning Board

777 North Capitol Street, N.E., Suite 300, Washington, D.C. 20002-4290 (202) 962-3310 Fax: (202) 962-3202 TDD: (202) 962-3213

M E M O R A N D U M

To: The National Capital Region Transportation Planning Board

From: Ronald F. Kirby, Director of Transportation Planning

Re: Briefing on the Final Report of the TPB Regional Value Pricing Study

Date: March 13, 2008

Background

The TPB has had an active interest in variably priced highway lanes since June of 2003 when the TPB, in conjunction with the Federal Highway Administration and the Maryland, Virginia, and District Departments of Transportation, sponsored a successful one-day conference on value pricing for the Washington region. Following the conference, the TPB created a Task Force on Value Pricing to examine how value pricing could benefit the region. The Task Force developed the attached set of regional goals for a system of variably priced lanes which were adopted by the TPB in April of 2005. The goals were designed to “help guide the regional development of variably-priced lanes that work together as a multi-modal system, while addressing the special policy and operational issues raised by the multi-jurisdictional nature of this region.”

The task force currently includes the following members:

Chair: Christopher Zimmerman – Arlington County
Lyn Erickson – Maryland Department of Transportation (MDOT)
Tom Harrington – Washington Metropolitan Area Transit Authority (WMATA)
Catherine Hudgins – Fairfax County Board of Supervisors
Michael Knapp – Montgomery County Council
Timothy Lovain – City of Alexandria Council
Phil Mendelson – District of Columbia Council
Rick Rybeck – District of Columbia Department of Transportation (DDOT)
JoAnne Sorenson – Virginia Department of Transportation (VDOT)

TPB Regional Value Pricing Study

TPB staff has undertaken an eighteen-month study to evaluate alternative scenarios for a network of variably priced highway lanes for the Metropolitan Washington Region. The study was conducted under a grant from the Federal Highway Administration’s Value Pricing Pilot

Program, and overseen by the TPB's Task Force on Value Pricing. The task force reviewed the final report at its February 27, 2008, meeting.

Attached to this memo are the following:

- *Final Report*: the first 10 pages of the final report are attached, including the report cover, acknowledgements, table of contents and executive summary.
- *Goals for a Regional System of Variably Priced Lanes*, adopted by the TPB on April 20, 2005
- *Two Letters*: The task force has received comments on the final report from Environmental Defense and the National Park Service.

The full final report can be accessed from the task force web site:

<http://www.mwcog.org/TPB/VPTF/docs>

Copies of the full report will be available at the March 19 TPB meeting.

National Capital Region Transportation Planning Board

**Evaluating Alternative Scenarios for a Network of
Variably Priced Highway Lanes in the Metropolitan
Washington Region**

Final Report

February, 2008

*FUNDED UNDER A GRANT FROM THE FEDERAL HIGHWAY ADMINISTRATION'S VALUE
PRICING PILOT PROGRAM*

Acknowledgements

Director, Department of Transportation Planning

Ronald F. Kirby

Report Authors

Michael D. Eichler
Gerald K. Miller
Jinchul Park

This study was funded under a grant from the Federal Highway Administration's Value Pricing Program through the Virginia Department of Transportation, and was overseen by the National Capital Regional Transportation Planning Board's Task Force on Value Pricing for Transportation.

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Preface

In this study of the potential for pricing highway use in the Washington region, several different scenarios for adding new priced highway lanes, pricing existing highways, and enhancing bus services are analyzed and discussed. Prior to reviewing this work, it is appropriate to recognize that the idea of variably priced road facilities with enhanced bus services for the Washington region is not new: in 1959, Professor William Vickrey of Columbia University presented a statement to the Joint Committee on Washington Metropolitan Problems of the US Congress which advocated just such a set of policies. Professor Vickrey's presentation was subsequently published in 1994 in two articles (one in the *Journal of Urban Economics*, and one in *Logistics and Transportation Review*) in order to "rescue it from obscurity" and recognize it to be of "considerable historical interest in the context of urban economic transport theory and policy." In 1996, Professor Vickrey received the Nobel Prize in Economics for this and other pioneering work on pricing.

Some selected quotations from Professor Vickrey's 1959 presentation to Congress provide an excellent starting point and context for the work reported in this study:

*"Under urban conditions we cannot have both free flowing rush hour traffic and the absence of user charges or other constraints on highway use. One or the other of these desiderata must yield."*¹

*"Recent technological developments in electronics have placed within reach and within reasonable cost the possibility of assessing against the users of metropolitan streets and highways a set of charges that can be tailored about as closely to the costs occasioned by the actual usage as these costs themselves can be estimated. This can be done without interrupting or even slowing the flow of traffic, and at a cost that will be minute compared to the savings produced in inducing a more economical and less congested pattern of traffic flow and a more economical apportionment of traffic between the various available modes of transportation. It would, moreover, go far toward solving the financial problems associated with the provision of the expensive facilities required to provide adequate transportation in a modern metropolis".*²

"Pricing of highway use will thus make it possible to provide at reasonable cost uncongested and speedy transportation anytime, anywhere, and for anyone for whom the occasion is sufficiently urgent to warrant the payment of the corresponding charge. Without pricing, it is

¹ Vickrey, William, "Reaching an Economic Balance Between Mass Transit and Provision for Individual Automobile Traffic (1959)", *Logistics and Transportation Review*, 1994

² Vickrey, William, "Statement to the Joint Committee on Washington, DC Metropolitan Problems (1959)", *Journal of Urban Economics* **36**, 42-65, 1994

very likely that during the rush hours this degree of freedom of movement would not be available to anyone at any price."³

*"It is accordingly of the utmost importance, in evaluating plans for traffic facilities, to consider the various ways by which their use may be suitably controlled."*⁴

Almost fifty years later, we now take up again the basic principles enunciated by Professor Vickrey and many other distinguished economists, planners and engineers, and present them for public consideration in a new context.

³ Vickrey, William, "Statement to the Joint Committee on Washington, DC Metropolitan Problems (1959)", Journal of Urban Economics **36**, 42-65, 1994

⁴ Ibid

I Executive Summary

The National Capital Region Transportation Planning Board (TPB), the Metropolitan Planning Organization (MPO) for the Metropolitan Washington Region, has undertaken an eighteen-month study to evaluate alternative scenarios for a network of variably priced highway lanes for the Metropolitan Washington Region. The study was conducted under a grant from the Federal Highway Administration's Value Pricing Pilot Program, and overseen by the TPB's Task Force on Value Pricing.

1.1 Study Background

The TPB has had an active interest in variably priced highway lanes since June of 2003 when the TPB, in conjunction with the Federal Highway Administration and the Maryland, Virginia, and District Departments of Transportation, sponsored a successful one-day conference on value pricing for the Washington region. Following the conference, the TPB created a Task Force on Value Pricing to examine how value pricing could benefit the region. The Task Force developed a set of regional goals for a system of variably priced lanes which were adopted by the TPB in April of 2005. The goals were designed to "help guide the regional development of variably-priced lanes that work together as a multi-modal system, while addressing the special policy and operational issues raised by the multi-jurisdictional nature of this region." As the framing of the regional goals proceeded at the TPB, three major variably-priced highway facilities were being developed through project planning studies for inclusion in the region's financially constrained Long Range Transportation Plan (CLRP): the Inter-County Connector in suburban Maryland, the Northern Virginia Capital Beltway HOT lanes project, and the I-95/395 HOT lanes project.

The Intercounty Connector is an 18-mile east-west highway in Montgomery and Prince George's counties in Maryland that will run between I-270 and I-95/US 1. The project will include six variably-priced lanes with express bus service connecting to Metrorail stations. This project was included in the CLRP in 2004, and construction is expected to begin in 2008 with an expected completion date of 2012.

The Northern Virginia Capital Beltway HOT lane project will add four new HOT lanes to a 14-mile segment of the Capital Beltway (I-495). Vehicles with three or more occupants, as well as transit buses and emergency response vehicles, will be able to use the lanes for free; all other vehicles will pay a toll that varies according to levels of congestion and the time of day. This project was added to the CLRP in 2005, and completion is expected by 2013.

The I-95/395 HOT lane project in Virginia was included in the CLRP in 2007. This project will reconfigure the existing HOV facility between Eads Street in Arlington County and just south of the Town of Dumfries from 2 to 3 lanes, and convert those lanes to HOT lanes. The project has an overall length of 36 miles, and includes a nine-mile taper lane near Dumfries to ease congestion as the HOT lane traffic merges back into the general purpose lanes. Completion of this project is expected by 2010.

1.2 Scenario Development

In order to place these three new projects into a regional context and to assess the potential for a more extensive network of variably priced lanes, the TPB developed and analyzed several different scenarios of variably priced lane networks. Three basic highway networks were defined;

- A. A “Maximum Capacity” scenario in which two variably priced lanes (VPLs) were added to each direction of the region’s freeways; one VPL was added to each direction of major arterials outside the Capital Beltway; existing High-Occupancy vehicle (HOV) lanes were converted to VPLs, and direct access/egress ramps were added at key interchanges in the VPL network.
- B. A “DC Restrained” scenario in which the new capacity from the “Maximum Capacity” scenario was removed from all of the bridges and other facilities in the District of Columbia, and replaced by variable pricing applied to existing freeway and selected arterial lanes.
- C. A “DC and Parkways Restrained” scenario in which the “DC Restrained” scenario was further restrained by applying variable pricing to the existing capacity on the region’s parkways (Baltimore Washington, George Washington Memorial, Rock Creek, Clara Barton, and Suitland).

The TPB’s regional travel demand model was utilized to forecast the demand and performance characteristics of these scenarios for the year 2030. Starting with base toll rates of \$0.20 per mile, a toll update algorithm was applied to gradually raise the tolls on those VPLs that were congested, until a “free flowing” volume to capacity ratio was achieved. The three networks were then “prioritized” by removing VPLs with low demand (as indicated by low toll rates). Finally, significantly enhanced bus transit services were added to each of the three “prioritized” VPL networks by shortening run times and headways of existing bus services, and adding new routes to sections of the VPL network that had neither current nor planned bus transit routes. In Virginia, vehicles with three or more occupants (HOV 3+) were allowed to use the VPLs free of charge; in the District and Maryland only buses were allowed to use the VPLs free of charge.

1.3 Scenario Analysis

The results of the analysis demonstrated that toll rates on the VPL network would have to vary significantly by segment, direction and time-of-day in order to maintain free-flowing conditions. Toll rates ranged from a low of \$0.20 per mile to over \$2.00 per mile on the “Maximum Capacity” scenario, where all of the VPLs were either newly added lanes or conversions of existing HOV lanes. In the “DC Restrained” and “DC and Parkways Restrained” scenarios, where 43-percent and 56-percent respectively of the variably priced lane miles were existing as opposed to newly added lanes, toll rates were significantly higher on some segments. Where variable pricing was applied to existing capacity on DC bridges, for example, tolls of between \$2.00 and \$5.00 per one way crossing were required to maintain free-flowing conditions, corresponding to toll rates of between \$3.00 and \$10.00 per mile.

Compared to the “Maximum Capacity” scenario, the “DC Restrained” scenario had lower system-wide vehicle miles of travel (VMT) and some 37 percent higher system-wide toll revenue. Moving from the “DC Restrained” to the “DC and Parkway Restrained” scenario produced a further reduction in system-wide VMT, and a further 32 percent increase in system-wide revenue.

In terms of financial feasibility, a comparison of the forecasted revenues versus costs for each of these scenarios found that because of the high costs of building new interchanges and new lane miles for newly added VPLs, only the “DC and Parkways Restrained” scenarios generated revenues close to covering costs. As would be expected, applying variable pricing to existing HOV or general purpose lanes generated revenues significantly in excess of costs. Where new VPLs are added to the network, revenues might equal or exceed costs on some segments with favorable demand, toll levels and construction costs. In many segments of the system, however, it appeared that revenues would not be sufficient to offset capital and operating costs.

The addition of extensive transit service to the VPL networks resulted in system-wide increases in transit use of around 4 percent; decreases in HOV use of between 4 and 15 percent; small decreases in regional VMT; and decreases in total system revenue. In a few “high transit demand” corridors, high quality transit could have a significant impact on transit use, HOV use and total system revenue.

1.4 Impacts of the Scenarios on Land Use and Population Groups

An effort was made in this study to assess the impacts of these VPL scenarios on land use patterns and different population groups in the region by looking at changes to accessibility to jobs and households effected by the scenarios. Very few zones experienced significant changes in accessibility to jobs by highways: some zones in Loudoun, Fairfax and Montgomery counties experienced increases, while some losses were experienced in the regional core in scenarios with high tolls on DC bridges. Accessibility to jobs by transit improved in all three scenarios, particularly in zones around the Beltway and in other major radial and circumferential corridors.

Changes in accessibility to households by highways were minimal. Gains in accessibility to households by transit were found near major interchanges in the VPL network particularly around the Capital Beltway. These results suggest that a VPL network may encourage employers to locate at key VPL interchanges where they can enjoy significant increases in accessibility to the region’s workforce, and that over time the VPL network could have measurable impacts on employer location decisions.

The accessibility changes noted for different population groups were fairly evenly distributed across the various groups, based on their current and projected residential locations. Since the VPL networks were all quite comprehensive in their coverage of the region, this result was to be expected.

Two of the three scenarios analyzed in this study include the application of variable pricing to a substantial number of segments of existing general purpose lanes. As might be expected, in addition to improved traffic management and travel reliability, these applications would generally have highly favorable financial results, generating revenues

well in excess of costs and providing opportunities for significant investments in expanded transit services. However, the benefits of improved traffic management on these general purpose lanes must be weighed against potential disbenefits for three distinct groups: *the tolled* (drivers using the newly tolled road who choose to pay the toll); *the tolled-off* (former users of the newly tolled road who have switched routes, modes or times for their trip, or are no longer making their trip altogether); and the *un-tolled* (drivers on other routes who are impacted by the drivers diverted by the tolls). A key factor with respect to addressing potential disbenefits will be the availability of high-quality transit and other alternatives to all of those who are impacted by the new tolls.

1.5 Topics for Further Consideration

The three variably priced lanes scenarios analyzed in this study have suggested some key topics for further consideration with respect to expanding the region's VPL network:

- Because in many locations it may not be financially feasible to add new VPLs, future work activities should assess the impacts of tolling more existing lanes.
- More detailed “drilling down” to specific segments is needed to assess the relative benefits and costs of adding new VPLs to the regional network..
- More attention should be devoted to detailed specification of bus rapid transit (BRT) and other high quality transit services.
- More explicit consideration should be given to the impacts of VPL facilities on trucks, recognizing that new HOT lanes typically do not provide access to trucks.
- Geometrics of parkways and overpasses need to be examined in detail to assess the feasibility of applying variable pricing and increased bus transit to the region's parkways.
- The availability of right-of-way and other location-specific factors may effectively preclude the addition of new VPLs on certain portions of the regional network.
- Potential chokepoints within the VPL network and at access and egress points need in-depth analysis to ensure that delays and back-ups do not occur.
- The results of this study should be incorporated into several ongoing corridor studies that may be considering variably priced lanes, including the Southern and Western Mobility Studies, the 14th Street Bridge EIS and the I-66 Corridor Study.
- Extensive public education and outreach about the potential benefits and impacts of variable pricing to manage highway congestion will be essential because of the limited experience with such strategies in the Washington region. Experience in cities like Stockholm and London could be very valuable in this regard.

Ongoing work under the TPB's Scenario Study provides an excellent opportunity to pursue these considerations. During the next phase of the Scenario Study, specific segments of these three VPL networks could be identified as high priorities for expanding the VPL network beyond the three facilities currently included in the region's Constrained Long Range Plan (CLRP).

Goals for a Regional System of Variably Priced Lanes
Adopted by the TPB
April 20, 2005

As the Washington region moves forward with plans to develop variably-priced lanes, it is anticipated that a system of variably-priced lanes will be implemented in phases, likely with one corridor or segment at a time. The following goals can help guide the regional development of variably-priced lanes that work together as a multi-modal system, while addressing the special policy and operational issues raised by the multi-jurisdictional nature of this area.

1. Operations, enforcement, reciprocity, technology, and toll-setting policies should be coordinated to ensure seamless connections between jurisdictional boundaries. The region should explore options for accommodating different eligibility requirements in different parts of the system of variably-priced lanes without inconvenience to the users.
2. The variably-priced lanes should be managed so that reasonably free-flowing conditions are maintained.
3. Electronic toll collection devices should be integrated and interoperable among the District of Columbia, Maryland and Virginia, and should work with other multi-state electronic toll collection systems, such as E-Z PassSM.
4. To ensure safety and to maintain speeds of variably-priced lanes on high-speed facilities, one lane with a wide shoulder consistent with applicable Federal Highway Administration (FHWA) guidelines should be provided at a minimum. Optimally, two lanes should be provided in each direction (or two lanes in the peak direction by means of reversible lanes) where possible.
5. Given the significant peak-hour congestion in the Washington area, transit bus service should be an integral part of a system of variably-priced lanes, beginning with project planning and design, in order to move the maximum number of people, not just the maximum number of vehicles.
6. Transit buses should have reasonably free-flowing and direct access to variably-priced lanes from major activity centers, key rail stations, and park-and-ride lots, so that transit buses do not have to cross several congested general purpose lanes.
7. Transit buses using the variably-priced lanes should have clearly designated and accessible stops at activity centers or park-and-ride lots, and signal priority or dedicated bus lanes to ensure efficient access to and from activity centers.
8. The region urges that the Congress and the Federal Transit Administration (FTA) recognize variably-priced lanes as fixed guideway miles so that federal transit funding does not decrease as a result of implementing variably-priced lanes.
9. The Washington region currently has approximately 200 miles of HOV lanes and a significant number of carpoolers, vanpoolers and other HOV-eligible vehicles. If the introduction of variably-priced lanes changes the eligibility policies for use of existing HOV facilities, transitional policies and sunset provisions should be set and clearly stated for all the users.
10. As individual phases of a system of variably-priced lanes are implemented, users of the lanes should be able to make connections throughout the region with minimal inconvenience or disruption.
11. Toll revenues from variably-priced lane projects may finance construction, service debt, and pay for operation and maintenance of the priced lanes. Should toll lanes operate at a revenue surplus, consideration should be given to enhancing transit services.



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1875 Connecticut Avenue NW Suite 600
Washington, DC 20009 USA

February 26, 2008

The Honorable Chris Zimmerman
Chair, Transportation Planning Board Task Force on Value Pricing
777 N. Capitol Street NW
Washington, DC

Dear Chairman Zimmerman:

Regarding: February 27, 2008, draft report, *Evaluating a Network of Variably Priced Lanes for the Washington Metropolitan Region*

In 2003, Environmental Defense supported the application of the Transportation Planning Board to the Federal Highway Administration for a study of variably priced lanes in the Washington Region, hoping that this study would consider a reasonable array of alternatives for congestion pricing in the region. We are disappointed at the narrow scope and slow pace of this initiative but want to express our support for several recommendations for further work that are discussed in the draft report.

Washington, DC regional transportation planning efforts need to adapt more from the visions that are being advanced in cities like New York, London, and Singapore if we are to address successfully the mobility, finance, equity, and environmental challenges of the 21st century. Unfortunately, such thinking is not evident in the range of alternatives considered for the Variably Priced Lanes Study, which has focused on adding new road capacity that will generate more traffic and greenhouse gas pollution, while leaving a majority of the region's drivers stuck in congested unmanaged lanes. The Variably Priced Lanes Study's alternatives would increase the region's high-speed motorway system by no less than 636 new lane miles, at a cost of \$50 billion, above what is now planned, with some alternatives expanding road capacity by a third more than that, at a cost of \$65 billion. Each and every alternative considered increases regional vehicle miles of traveled in defiance of the TPB's own adopted goal of reducing per capita motor vehicle travel. This is not a sound direction for progress.

The Variably Priced Lanes Study did not consider any scenarios that would apply toll management to all existing regional motorway lanes, allowing registered HOV-3 carpools to travel free or at a sharp discount. Yet past research by the Federal Highway Administration and experience across the world suggests such an approach might:

- Be accomplished at a cost of several billion dollars, including in-advance provision of new bus rapid transit and shared ride van and ridesharing services throughout the region,

- Eliminate the need for complex and costly interchanges and lane separations for tolled vs. unmanaged lanes,
- Allow toll rates to be set at far lower rates while providing congestion relief to all motorists, including trucks, not just light duty motor vehicles using special toll lanes,
- Enable toll revenues to be dedicated to supporting substantially better transit and new mobility services instead of costly, ineffective traffic-generating new road capacity.

Such a scenario analysis has been requested by the TPB's Citizen's Advisory Committee, Environmental Defense, and others in recent years, as noted on page 53 of the report.

We support the recommendations of the report on page 54 to "build on this study's findings and assess the impacts of tolling more existing lanes," with such a scenario being "presented to the new TPB Scenario Study Task Force and performed in the next phase of the TPB scenario study." We support recommended evaluation of Bus Rapid Transit options and truck traffic options as part of next step congestion pricing studies for the metro area. We urge attention to the recommendations on page 56 to consider congestion pricing approaches in ongoing regional corridor studies. And we look forward to working with the TPB in educating the public on the impacts of and rationale for congestion pricing on existing lanes.

It is time for our nation and region to take action on climate change. Vehicle technology and fuel strategies will not be sufficient to deal with transportation greenhouse gas emissions. Reducing traffic growth must be a key part of the Washington region's climate action plan.

Congestion pricing will be vital to making progress in managing traffic growth and congestion. But if road pricing is applied only to new lanes, it will exacerbate greenhouse gas emissions, rather than being part of the solution. Experience from London and Stockholm show that the public will support congestion pricing on existing free lanes if it gets substantially better travel choices from the get go as well as improved transportation system performance.

It is time for the TPB to fully evaluate how such options might apply to the Washington metropolitan area to provide improved mobility while reducing transportation's environmental footprint.

Sincerely,



Michael Replogle
Transportation Director

cc: Metropolitan Washington Transportation Planning Board
Nancy Floreen, Chair, COG Climate Change Task Force



United States Department of the Interior

NATIONAL PARK SERVICE
National Capital Region
1100 Ohio Drive, S.W.
Washington, D.C. 20242

IN REPLY REFER TO:

L2431 (NCR-LRP)

MAR 7 2008

Ronald F. Kirby, Director
Department of Transportation Planning
Metropolitan Washington Council of Governments
777 North Capitol Street, N.E., Suite 300
Washington, D.C. 20002-4239

Dear Mr. Kirby:

We would like to offer comments to the Transportation Planning Board (TPB) regarding the report entitled Evaluating a Network of Variably Priced Lanes in the Washington metropolitan area, which is a product of your staff and the TPB Value Pricing Task Force. This report, which is included as an information item at the March 19, 2008 TPB meeting, creates and analyzes several versions of Scenarios B and C that convert existing lanes of National Park Service roads, bridges and parkways into toll-only facilities. That is, to say that these scenarios propose to eliminate free visitor access to the Baltimore Washington Parkway, the Clara Barton Parkway, the George Washington Memorial Parkway, the Suitland Parkway, the Rock Creek and Potomac Parkway, Arlington Memorial Bridge and part of Independence Avenue located in Potomac Park.

We believe the inclusion of the National Park Service roads, bridges and parkways within any regional proposal for Value Pricing is misguided. With high volumes of commuter traffic using these routes daily, it is easy to forget that the primary purpose of these parkways is to provide a natural, scenic travel route into the Nation's Capital. These roads are nationally-significant historic cultural resources, listed on the National Register of Historic places, and designated as scenic parkways, where the character, landscape setting, and views and vistas are paramount. Any conversion to tolled facilities could be inconsistent with long-held management policies because it could require infrastructure that may detract from the scenic landscape setting of the parkways, Arlington Memorial Bridge, and Independence Avenue. Furthermore, charging park visitors a daily fee to visit any national park in the District of Columbia is prohibited by Sec. 803(d)(3)(B), The Federal Lands Recreation Enhancement Act, Title VIII, Division J, of the "Consolidated Appropriations Act of 2005" (118 Stat. 3380, Public Law 108-447, Dec. 8, 2004). If toll collection were authorized, additional Legislative changes would be needed to use the toll revenue to support regional transportation needs.

Unlike these units of the National Park System, highways and major arterials in the Washington metropolitan area operated by Maryland, Virginia and the District of Columbia are managed, at least in part, to provide sufficient capacity for uncongested travel, making the concept of Value Pricing more applicable. Value Pricing is an initiative of the Federal-aid Highway Program and according to

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Federal Highway Administration's Office of Operations, the tolling and pricing provisions within this program can be applied to state roads, local roads, and to the Interstate Highway System. There is no provision for applying Value Pricing to roads within the National Park System, as they are not part of the Federal-aid Highway Program.

We also note that Scenario A proposes the construction of additional lanes on highways, freeways, and major arterials throughout the region. In some locations, this added capacity would cut across lands of the National Park System. If this scenario is studied further, each project would have to be examined in detail to reduce or eliminate impacts to park resources, as is required by Section 4(f) of the National Transportation Act of 1966, as amended.

Sincerely,

A handwritten signature in cursive script, reading "Joseph M. Jawley". The signature is written in dark ink and is positioned above the typed name.

Regional Director, National Capital Region