



495/METROWEST

PARTNERSHIP

Leaders for Regional Prosperity

September 28, 2016

Secretary & CEO Stephanie Pollack
Massachusetts Department of Transportation
10 Park Plaza, Suite 4160
Boston, MA 02116

RE: Massachusetts Department of Transportation's (MassDOT) All Electronic Tolling (AET) on I-90

Dear Secretary Pollack:

On behalf of the 495/MetroWest Partnership, we would like to commend MassDOT for modernizing I-90 with the move to All Electronic Tolling (AET), a long overdue reform that we advocated for as far back as 2008. We appreciate the efficiencies and traffic mitigation that will be achieved through AET. However, we remain concerned about toll equity issues for MassDOT's customers in the 495/MetroWest region.

The Partnership was pleased to learn of MassDOT's appointment of Leonard Fournier as the first Tollpayer Advocate, a long outstanding item on the punch list of reforms from the 2009 Transportation Reform Act. The Partnership advocated for the creation of this position during the debates on transportation reform and we welcomed its inclusion in the law; we truly appreciate MassDOT recognizing the importance of this role for the only interstate drivers in the Commonwealth who bear the burden of tolling.

The issues of transportation reform and investment have been priorities of the 495/MetroWest Partnership since our founding as a non-profit regional advocacy organization over a decade ago. As a public/private organization focused on economic development, the Partnership serves thirty-five communities, over half a million residents, and an employment base of over \$22.5 billion per year. The Partnership focuses on helping to alleviate regional constraints and limitations, and conducts numerous initiatives on transportation, workforce housing, brownfields, and water resources.

The Partnership has long advocated for a variety of transportation and transit infrastructure needs on behalf of the 495/MetroWest region, as well as calling for additional revenue and resources for MassDOT. Another consistent theme in our transportation advocacy work has been the challenges related to toll equity. As an organization, we have maintained strong opposition to the current inequities of tolling only one major interstate in the entire Commonwealth. Our residents, commuters, and employers have been burdened with this additional cost for far too long. Nevertheless, we understand the need for transportation revenue is real and we further recognize that tolling is likely to stay in place given the investment made by MassDOT into the All Electronic Tolling System (AETS).

While the Partnership encouraged and now applauds the move to AET as a more innovative, cost effective revenue collection option, the Partnership's 2013 *Fairly Funding Transportation* position paper, endorsed by our diverse Board of Directors, explicitly states that the Partnership will continue to strongly oppose the current turnpike toll system unless similar and equivalent tolling systems are put in place along the other major highways throughout the state. This

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position has not wavered and in fact, the introduction of AET presents an opportunity to address this inequity by tolling other roadways. And while we oppose continued tolling of only one interstate in the Commonwealth, we do appreciate the MassDOT commitment to an overall revenue neutral program.

However, while the revenue may remain neutral overall, the cost to the average 495/MetroWest driver is not neutral or even fair relative to other I-90 drivers. Based on the current gantry locations and rate structure, drivers entering I-90 at I-495 will see an increase at exits 13 in Natick, 14 in Weston, as well as various Boston exits while drivers entering at Route 146 in Worcester will experience a decrease in cost over several subsequent exits. We feel it is more important to ensure cost neutrality to the driver rather than bottom line neutrality to MassDOT. As such, we strongly encourage MassDOT to reconsider the proposed tolls at each gantry. We understand that the gantries are fixed but feel it is reasonable and feasible to adjust the toll rate schedule to reach a more balanced cost burden to all I-90 customers. As a result, your comments at the MetroWest Chamber of Commerce event today that MassDOT is looking at the implications for our regional drivers - particularly the proposed increase for commuters to I-95/128 - was welcome, and we look forward to a more equitable toll structure that addresses these concerns.

Beyond the topic of rate structures, an expected benefit of AET is reduced operations and maintenance costs. Given the fact that drivers on the Turnpike are tolled, they have a reasonable expectation for a very well maintained roadway. Since the transition from the Turnpike Authority to MassDOT, we have noted a deterioration in the maintenance of the Interstate. Once considered the best plowed road in the state during a snowstorm, I-90 can no longer hold this title and yet, drivers are still paying the same level of tolls and may possibly pay more based on proposed rate structures for a decreased level of service. We understand that the amount of personnel dedicated to the Interstate's maintenance has been reduced since the Turnpike Authority's control and would therefore suggest providing additional resources to ensure the proper maintenance of the roadway particularly in light of the operations and maintenance savings achieved through AET.

The Partnership recognizes and appreciates the commitment and investment MassDOT is making to the I-90/I-495 Interchange Project as indicated in the FY17-21 CIP. In the Triennial Review of the Western Turnpike, we were extremely pleased to see the I-90/I-495 Interchange mentioned as "the most significant" of the major capital projects in need of attention on the Western Turnpike. For many years, we have urged MassDOT to address this Interchange and the move to AET only accelerated the need for long term solutions. While we know the project is still a few years out, the demolition project is fast approaching. We urge MassDOT to minimize the impact and inevitable confusion of drivers as the demolition project proceeds at the I-90/I-495 Interchange. We would also note the importance of two additional exits within our region from I-90, Exits 12 and 13 in Framingham and Natick given their connection to major Massachusetts employers such as TJX, Mathworks, Staples, Bose Corporation and Sanofi Genzyme. We urge appropriate attention and consideration be given to these ramps and tollbooths in the transition to AET, and additional outreach to affected municipalities and drivers would be helpful in mitigating the inevitable confusion during this transition.

In addition to highlighting the need for a major capital project at I-90/I-495, the Triennial Review of the Western Turnpike presented a clear picture of the expenses related to maintaining a roadway, which highlights the need for similar toll revenue on the other major

interstates in the Commonwealth. Tolling other roadways is not simply about additional resources but is also about toll equity. As noted earlier, the Partnership has a history of demanding a more equitable means of securing transportation revenue and we understand that while the technology of AET makes tolling other roadways easier, it does not eliminate federal hurdles and barriers to such tolling. Therefore, the Partnership asks MassDOT to take two steps:

1. Update the *Comprehensive Tolling Plan for Additional Interstate and Controlled Access State Highways in the Commonwealth of Massachusetts*, with a particular focus on commuting data from the US Census Bureau Local Employment Dynamics (LED) and Local Employment Household Dynamics (LEHD) data.
2. Work with the MetroWest Caucus and our federal delegation in exploring the necessary steps to participate in a federal pilot program for expanded tolling.

The Partnership would like to thank MassDOT for the work that has gone into the AET project as well as the public outreach, meetings and extended comment period. Having testified at the Worcester and Framingham hearings, it is particularly notable that MassDOT Highway Administrator Tinlin participated in these briefings, and we would also like to extend our appreciation for MassDOT District 3's prior work with the Partnership in conducting regional briefings in past years as AET was in development.

Nevertheless, our concerns related to toll equity remain. We feel the proposed rate structure at the existing gantries needs to be reconsidered and rebalanced to hold the I-90 drivers with E-ZPass to their current tolling rates. Additionally, the Partnership strongly encourages MassDOT to reevaluate the opportunities available to tolling additional roadways in the Commonwealth.

We appreciate your consideration of our comments and welcome any questions related to this letter, which should be directed to the Partnership's Deputy Director, Jessica Strunkin at 774-760-0495 x101 or jessica@495partnership.org.

Sincerely,



Paul F. Matthews
Executive Director



Jessica Strunkin
Deputy Director

Cc: MassDOT Highway Administrator Thomas Tinlin
495/MetroWest Delegation