



TOWN OF WELLS

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May 2, 2017

Marybeth Richardson, Hearing Officer
Maine Department of Environmental Protection
312 Canco Road
Portland, ME 04103

Re: Maine Turnpike Authority NRPA Permit Application - York Tolling Plaza

Dear Ms. Richardson:

The Town of Wells Board of Selectmen has discussed the MTA application regarding the NRPA Permit for the new Open Road Tolling plaza in York. While the Town of Wells takes no formal position on the application, it does want to go on record with the concerns it has regarding possible future toll increases and diversion of traffic as the result of those possible increases from implementing new technology.

The Town warned the MTA back several years ago, when substantial toll increases were initiated at the York Toll, that traffic diversion caused by these toll increases would directly impact the Route One Corridor from York to Wells, including the Route 109/Exit 19 corridor in Wells and Routes 4 /236 in the Berwick's. We have seen that diversion occurring in a measurable manner since late 2012. The opportunity to deploy new technology (AET or ORT) has resulted in the MTA's analysis by CDM Smith in their April 14, 2014 Report – *Maine Turnpike ORT /AET Impact Analysis* to conclude in their Executive Summary (ES2-4) as follows:

Summary

Various impacts and implications of implementing either ORT or AET at the York and Gardiner Toll Plazas have been presented in this report. The study compared traffic, toll rates, operating costs, net revenue over a 10-year period, and capital costs to a hypothetical continuation of the current cash collection of tolls. The analysis was conducted over a 10-year interval for each condition.

Both AET and ORT can be financially feasible options at York and Gardiner. AET offers free flow travel for all motorists with lower overall capital costs, but requires substantial video surcharges and results in traffic diversion to alternative routes. Because AET requires license plate image capture and mailed invoices for non-E-ZPass motorists, it also involves substantially more risk associated with being able to bill and collect on a substantial portion of transactions.

Conversion to ORT preserves cash collection at a lower operating cost, creates less risk to the Turnpike and requires no change to present toll rates. Cash paying motorists, however, would still be required to stop and pay their toll. And while the 10-year net toll revenue impact is positive, ORT capital costs are substantially higher than those for either the existing condition or for AET.

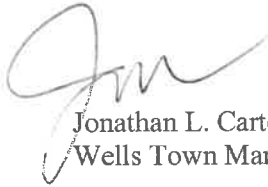
York Toll Plaza: (ES-2)

The analysis indicated that an unregistered video surcharge of about \$3.00 (passenger car) would be required to maintain net revenue neutrality under AET at York over a 10-year time horizon. This is in addition to the current \$3.00 cash toll at this location. The most recent toll increase at York took place on November 1, 2012 (from \$2.00 to \$3.00) and the Authority foresees that, under the existing condition, no further increases would be needed for 15-20 years. The imposition of the \$3.00 video surcharge is also estimated to result in diversion to US Route 1 ranging from 3,400 to 5,500 per day.

The Board of Selectmen is concerned that this new technology may be at the heart of the issues surrounding the controversy of the siting of the new Toll Plaza. The Town of Wells is only concerned that if the MTA raises its toll rates for whatever reason over the next ten years, additional traffic diversion and environmental harm will be seen in the already burdened Route One corridor (York to Wells), Route 109 / Exit 19 and the Route 4 /202 Berwick corridors.

The Board of Selectmen unanimously asks the DEP to seriously consider these impacts that may occur from their decisions on a larger geographic area other than just the York Gateway Plaza sites.

On behalf of the Board of Selectmen,



Jonathan L. Carter
Wells Town Manager

cc: Board of Selectmen