



May 22, 2019

Andrew Gottlieb
Executive Director

RE: Culvert and Small Bridge Working Group Request for Input

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Dear Members of the Culvert and Small Bridge Working Group:

The Association to Preserve Cape Cod (APCC) writes in response to the request for stakeholder input to help inform the Culvert and Small Bridge Working Group in its final report to the State Legislature on recommendations regarding the repair or replacement of Massachusetts' culverts and small bridges, as directed by Amendment #1193 in the FY19 state budget.

Founded in 1968, APCC is the Cape Cod region's leading nonprofit environmental advocacy and education organization, working for the protection, preservation and restoration of the Cape's natural resources. For over a decade, APCC has been an active partner with Cape Cod municipalities and the state on numerous wetland restoration projects involving the replacement of undersized culverts that restricted tidal flow to coastal salt marshes and/or restricted access along migratory fish passages. In most cases, these projects involved the installation of modern wide box culverts over streams to replace culverts that were substandard or failing.

These culvert replacement projects have not only restored valuable natural habitat and the function of ecological systems, they have also provided significant improvements in the form of flood control and increasing a wetland's ability to absorb storm surge that otherwise could have threatened private property and public infrastructure. Well-designed culverts and small bridges are critical infrastructure that will be an increasingly important climate change resiliency tool as the effects of sea level rise become more apparent and violent coastal storms become more frequent. They must be built with the future in mind.

In addition, there is an opportunity for better coordination and efficiency of activities conducted by multiple state agencies on projects involving culvert and small bridge replacement. For example, priority environmental restoration

projects identified by the Division of Ecological Restoration frequently require the replacement of substandard culverts passing under roads. These culvert replacement projects, built to modern design standards to achieve the desired ecological restoration objectives, could be incorporated into planned MassDOT road improvement projects, thereby saving the Commonwealth and municipalities time and money through such coordinated efforts.

It is imperative that the Commonwealth not move backward by weakening effective culvert and small bridge engineering design standards in the name of short-term cost-savings. The investment made in upgrading failing infrastructure to the modern design standards adopted by Massachusetts will bring long-term benefits to a community that far outweigh a project's initial cost.

Thank you for the opportunity to provide these comments.

Sincerely,



Andrew Gottlieb
Executive Director