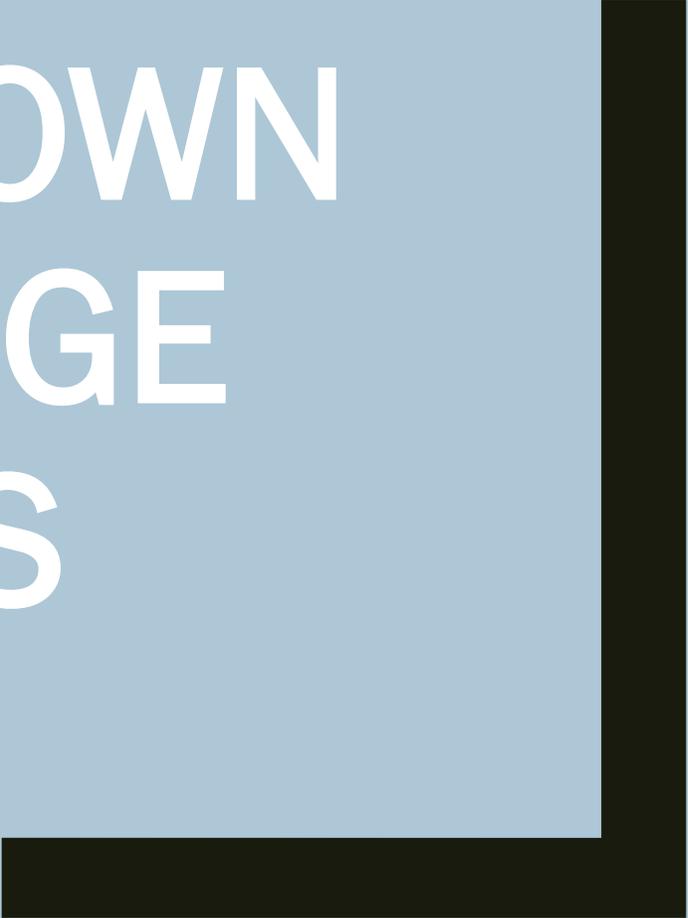




**2019 DRAFT TOWN
ROAD & BRIDGE
STANDARDS**



BACKGROUND ON ERAF

- The original purpose of the standards when they were first developed in 2001 was to ensure municipalities could be reimbursed by FEMA based on the cost to rebuild flood-damaged roads, bridges and culverts with designs that will better withstand future floods. The 2001 standards also included some safety and basic gravel road construction recommendations.
- Without adopted standards, FEMA's reimbursement will be based on the cost to replace infrastructure to its original condition before the disaster.

BACKGROUND ON ERAF

- Adoption of the State-approved Town Road and Bridge Standards is one of several programs or measures that municipalities must take to increase the state share of the non-federal match required for FEMA Public Assistance grants.
- Adoption of the State approved Town Road and Bridge Standards is one of the requirements to reduce the local match for the Town Structures and Class Two Town Highway Grants from the Agency of Transportation.

Changes from current Standards include:

- Enables municipalities to adopt the *Town Road and Bridge Standards* in its entirety or to only adopt specific sections;
- Makes the *Town Road and Bridge Standards* compatible with the Municipal Roads General Permit;
- Includes optional intermittent stream culvert standards;
- Includes optional Class 4 road standards *but still must compile with MRGP*;
- Removes training requirement for town highway maintenance crews on best road management practices; and
- Requires adoption of intermittent stream culvert standards and Class 4 road standards in order to be eligible for reduced local match from the Emergency Relief and Assistance Fund (ERAF).

COMMENTS

- It is unclear how the scope of adoption relative to hydrologic connectivity will impact cost-share under the Emergency Relief and Assistance Fund (ERAF) Rule.
- In the fifth paragraph on page 1, it states that towns must select “YES” for Section 1, 2, 3, 4 and 7 to qualify.
- Must a town select “YES” for both connected as well as non-connected road segments for both Sections 1 and 2 for this ERAF benefit to apply?

COMMENTS

- C. It says “roadway drainage shall be disconnected,” and “all drainage ditches shall be turned out.” There are many locations where this simply isn’t practical due to topography (it’s uphill on both sides of the road).
- Again, topography is not listed as one of the criteria which municipalities can consider, but should be. While “shall” is not “must,” it is often interpreted as such, and perhaps the term “should” is better.
- Feasibility. It mentions the implementation of a standard does not require the condemnation of private property. Could this be construed to mean that a standard does not need to be implemented if work (e.g. grading, removal of trees) or discharge of water, would take place outside the ROW?
- Historic is used frequently but is not defined. How old or large or significant does a tree need to be to be considered historic?

**Please provide comments to your
District by April 26, 2019**

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