MUNICIPAL DISTRICT
BONNYVILLE NO. 87

December 22, 2025

Dreeshen, Devin, Honourable
Minister of Transportation and Economic Corridors
Members of Executive Council
Executive Branch
127 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

via e-mail: minister.transportation@gov.ab.ca

Dear Minister:

RE: Request to remove the provincial bridge classification from 1500-3000mm diameter culverts and to allow the "as-built" replacement of non-conforming <3000mm diameter culverts as a maintenance activity on local roadways

On behalf of the Municipal District of Bonnyville (M.D.), we would like to request the province review and change its definition of a bridge to match national standards. This is specifically related to bridge sized culverts, which are currently defined under provincial standards as any culvert spanning 1500mm, when the threshold that most Canadian jurisdictions use to classify a culvert as a bridge structure is 3000mm. I would also like to request an exemption for rural municipalities that allows the "as-built" replacement of these kinds of structures as a road maintenance activity when the road itself is not being upgraded.

By treating existing non-conforming culverts as separate bridge assets, their replacement in Alberta triggers design upgrade requirements that are very costly, awkward, engineering intensive, and often require extensive road reconstruction work to accommodate. It is not uncommon that a culvert that would normally cost our internal maintenance crews $75K to replace "as-built" will cost $300K-$400K once the required engineering and upgrade costs of a bridge replacement are considered. It is also very common that the road itself needs to be humped over the upgraded culvert to accommodate its new geometry, with engineers speculating on the future geometry of a road upgrade that hasn't been scoped out yet (culverts are designed for a 50-year service life).

These required costs of upgrade are not sustainable and are putting Albertas municipalities at risk. The M.D. of Bonnyville has a population of approximately 12,900 and currently is responsible for inspecting and maintaining 120 local road bridge structures, many of which are approaching the end of their lifecycles. These structures are heavily used by industry, and the M.D. is being forced to consider closing roads because it cannot afford the required bridge culvert upgrade costs.

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Of the 120 local road structures that that the Province of Alberta currently classifies as bridge structures under the M.D.'s responsibility, 48 of them would not be classified as bridge structures elsewhere in Canada. This represents a bridge replacement/upgrade liability of approximately $40 million dollars.

Please find the attached regional differences in what is considered a bridge:

1. Alberta: Alberta Transportation and Economic Corridors - BIM Manual (>1.5m span)
2. Ontario: Ontario Ministry of Transportation – OSIM Manual (>3m span)

Should you have any questions or wish to discuss further please contact either myself or CAO Ben Berlinguette at 780.826.3171.

Yours truly,

Barry Kalinski
Reeve

Municipal District of Bonnyville No. 87

cc. MLA Scott Cyr, Bonnyville-Cold Lake- St. Paul
County of St. Paul
Lac La Biche County

Enclosure

1. Alberta Transportation and Economic Corridors - Technical Standards Branch - Bridge Inspection and Maintenance Manual - Bridge Structure Definition

Bridge Apron	An area of protective material laid down on a streambed (or canal bed) to control local scour around a feature requiring protection. Typically, riprap is used to provide this protection. See also Riprap.
Bridge Culvert	A structure that is a conduit located below the roadway surface facilitating passage of streams or other traffic through the roadway. Bridge size culverts have an equivalent diameter of at least 1500 mm. See also Beveled End, Concrete End Treatment, CSP, Culvert Barrel, Piping and SPCSP.
Bridgerail	A safety feature attached to a bridge structure to help prevent errant vehicles from going over the edge. See also Parapet.
Bridge Structure	Infrastructure grouping that includes bridges (single-span, continuous beam, single or multiple arch, suspension, frame type), bridge size culverts, watercourse training works and overhead sign structures. See also Major Bridge and Standard Bridge.
Camber	The difference in elevation of the midspan point and a straight line drawn between the two ends. When used in the context of culvert construction it is the adjustment required in the longitudinal profile of the bedding to compensate for post-construction settlement. For bridge structures it refers to upward curvature caused by prestressing or curvature added during fabrication to compensate for dead load deflection or long term creep.
Cap	A horizontal beam located below the abutment or pier bearings and spans between piles. The purpose of the cap is to distribute the dead and live loads from the superstructure. The term can also be used to describe the cover (metal or plastic) used to protect the exposed wood end grain from wetting.
Cathodic Protection	An electrical method of preventing corrosion of one steel component by the sacrificial corrosion of a second component. Operates by electrically connecting the two structures in the same electrolyte. For bridge applications, cathodic protection has been used to protect the soil side of metal culverts and on bridges to protect the steel reinforcement in concrete decks.

2. Ontario Ministry of Transportation - Ontario Structure Inspection Manual - Bridge Definition (Known users of OSIM are the maritime provinces, Ontario, Manitoba, Saskatchewan, most large Canadian cities including Calgary and Edmonton)

GENERAL DEFINITIONS

Abutment - A substructure unit which supports the end of the structure and retains the approach fill.

Auxiliary Components - Any component which does not share in the load carrying capacity of the structure.

Biennial Structure Inspection An inspection performed in every second calendar year to assess the condition of the structure, in accordance with the methodology described in OSIM.

Bridge - A structure which provides a roadway or walkway for the passage of vehicles, pedestrians or cyclists across an obstruction, gap or facility and is greater than or equal to 3 m in span.

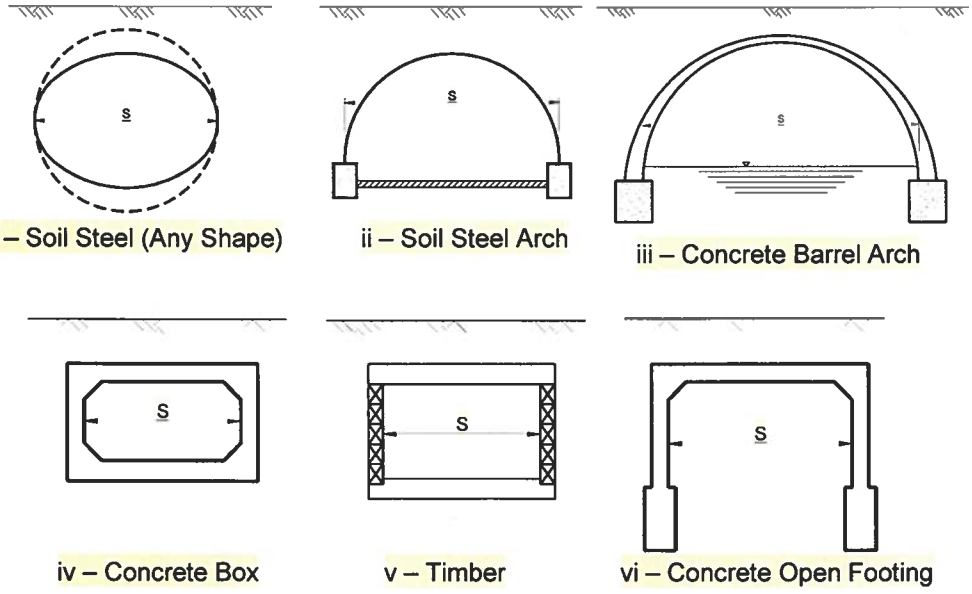
Chord - The upper and lower main longitudinal component in trusses or arches extending the full length of the structure.

Coating - The generic term for paint, lacquer, enamel, sealers, galvanizing, metallizing, etc.

Concrete Deck Condition Survey - A detailed inspection of a concrete deck in accordance with The Structure Rehabilitation Manual.

Culvert (Structural) - A Structure that forms an opening through soil and;

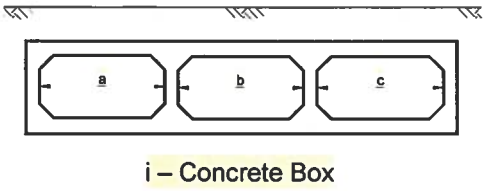
a) Has a span of 3 metres or more (e.g. *S* in the diagrams below), or



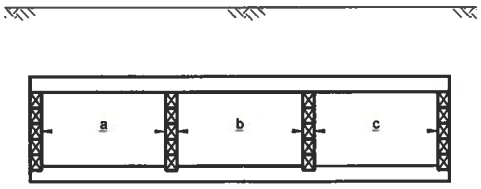
i – Soil Steel (Any Shape) ii – Soil Steel Arch iii – Concrete Barrel Arch

iv – Concrete Box v – Timber vi – Concrete Open Footing

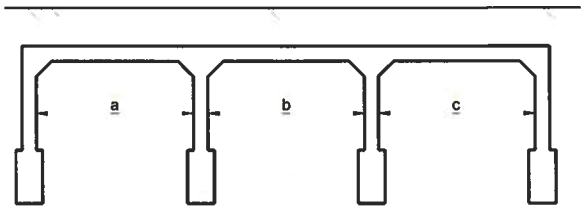
b) Has the sum of the individual spans of 3 metres or more, for adjacent multiple cell culverts (e.g. *a+b+c* in the diagrams below),or



i – Concrete Box

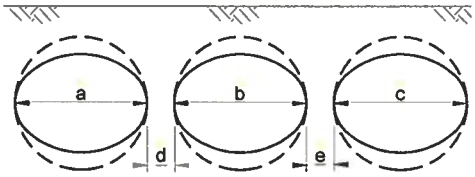


ii – Timber

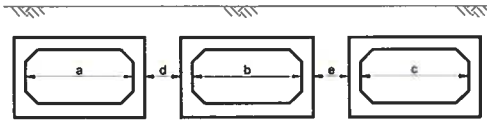


iii – Concrete Open Footing

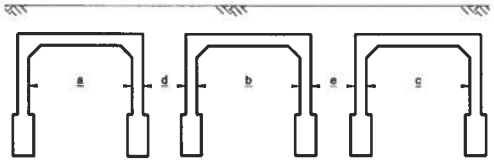
c) Has the sum of the individual spans of 3 metres or more, for multiple cell culverts (each with spans at least 2m) separated by soil (a width not more than the span of smallest individual cell) (e.g. *a*+*b*+*c* in the diagrams below, where *a*, *b*, and *c* are all ≥ 2.0m and *d* and *e* are both ≤ the minimum of *a*, *b*, and *c*), or



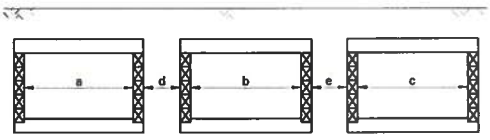
i – Multi-Cell Soil Steel



ii – Multi-Cell Concrete Box



iii – Multi-Cell Concrete Open Footing



iv – Multi-Cell Timber

d) Has been designated by the Owner as qualifying as a culvert.

Defect - An identifiable, unwanted condition that was not part of the original intent of design.

Detailed Visual Inspection - An element by element visual assessment of material defects, performance deficiencies and maintenance needs of a structure.

Deterioration - A defect that has occurred over a period of time.

Diagonals - Component which spans between the top and bottom chord of a truss or