

January 11, 2026

Mr. Steven M. Fischer
Bridge Administrator
USCG Northwest District
915 Second Avenue
Seattle, WA 98174
via Email d13-smb-d13-bridges@uscg.mil

Re: Navigation Impact Report (NIR) Comments – Interstate Bridge Replacement (IBR) Program General Bridge Permit Application

Dear Mr. Fischer,

The Columbia River Steamship Operators' Association, Inc. (CRSOA) and the Columbia River Pilots (COLRIP) are writing to provide comments on the Interstate Bridge Replacement (IBR) Program's General Bridge Permit application. Together, our organizations represent the commercial maritime industry and the state-licensed pilots responsible for ensuring the safe, efficient movement of vessels on the Columbia River System.

Established in 1922, the Columbia River Steamship Operators' Association, Inc. (CRSOA) consists of members representing ship owners, operators, agents, launch services, ship assist, towing, and bunkering, as well as facilities and ports along the Columbia, Willamette, Snake River and Oregon Coast River Systems. The mission of the CRSOA is to facilitate trade, provide business leadership, exercise principles of environmental stewardship, serve as an industry focal point, and promote operating policies and procedures that are safe, reliable, efficient, and cost effective.

Columbia River Pilots are an association of 45+ professional mariners licensed by the State of Oregon to provide maritime pilotage services to all ports on the lower Columbia and Willamette Rivers. Our pilots possess extensive navigational experience, local knowledge and ship-handling skills and are charged with safely and efficiently piloting vessels in all weather conditions, at all hours of the day and night, 365 days a year.

We recognize the need to replace the Interstate 5 Bridge to improve regional transportation reliability and address the long-standing delays associated with the moveable span, and we support continued advancement of this project through the federal permitting process.

We collectively support safe, reliable commerce throughout the Columbia, Willamette, and Snake River Systems, moving millions of tons of cargo annually and ensuring the safe transit of deep-draft, tug and barge, and passenger vessels. Reliable navigation is central to that work. Together, we have reviewed the IBR Program's proposed 116-foot vertical navigation clearance and confirm that existing vessel traffic operating on the Columbia River can be accommodated at this height. We understand that the IBR Program's formal Agreements with entities determined to be negatively impacted by a 116' vertical navigation clearance for a fixed-span option have been granted adequate mitigation.

That said, we must also acknowledge the long-term implications of a fixed-span design. Since the original bridge opened in 1917, vessel technology, river operations, cargo profiles, and transportation demands have all evolved significantly. The authorized navigation channel is –27 feet, and a fixed span at 116 feet **will permanently limit the potential for future growth** resulting from vessel diversity, advancements in vessel design, and operational flexibility on this federally recognized deep-draft system. Furthermore, the river system is recognized as Marine Highway M-84 as part of the United States Marine Highway Program (USMHP), an initiative managed by the Maritime Administration (MARAD) under the US Department of Transportation designed to alleviate landside congestion and generate other public benefits by increasing the efficiency of the surface transportation system. While we remain disappointed that the current design does not anticipate or preserve opportunities for future maritime expansion, or full use as a marine highway, we will continue to support the project's forward progress in the interest of overall system reliability.

We appreciate the IBR Program's coordination with the U.S. Army Corps of Engineers to ensure the Dredge Yaquina can safely clear the proposed configuration and to evaluate water-level trends that may affect vessel transits. Predictable flows, adequate maneuvering room, and attention to changes over time are essential for the safe operation of vessel traffic. We encourage continued engagement with maritime industry experts to ensure that vessel safety and maneuverability remain central to decision-making throughout construction.

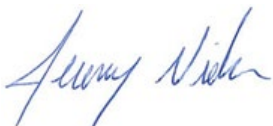
Clear communication will be particularly important as the project advances into demolition of the existing structure and phased construction of the new bridge. Timely notice of in-water work, temporary restrictions, and any anticipated impacts to navigation should be closely coordinated with COLRIP and CRSOA—as the pilotage and industry representatives most directly affected—and with the Corps of Engineers well in advance to avoid unnecessary delays or safety risks.

We understand the project's design will allow tug and barge operators to utilize the primary navigation channel rather than the more constrained barge channel. This adjustment should improve operational safety by reducing the need for sharp maneuvering between the railroad bridge and the crossing alignment. We encourage ongoing collaboration with COLRIP, CRSOA members, vessel operators, and other maritime stakeholders to ensure final channel geometry and aids-to-navigation placement fully support safe and efficient transits.

We appreciate the Coast Guard's review of the Navigation Impact Report and the opportunity to comment. While we continue to emphasize the importance of preserving long-term navigational flexibility on this critical federal waterway, we confirm that the proposed 116-foot vertical navigation clearance meets the needs of current operations. We look forward to continued coordination as the project moves into construction and throughout the life of this investment in our transportation system.

Please do not hesitate to reach out to Captain Jeremy Nielsen at the Columbia River Pilots at 503.289.9924, or Kate Mickelson at the CRSOA at 503.505.3008, for any additional information or to coordinate a follow-up discussion.

Respectfully,



Captain Jeremy Nielsen
President
Columbia River Pilots



Kate Mickelson
Executive Director
Columbia River Steamship Operators' Association