



January 7, 2026

Commander, U.S. Coast Guard District Northwest  
915 Second Avenue, Room 3510  
Seattle, WA 98174-1067

**RE: Comment: Interstate Bridge Replacement (IBR) Program Navigation Impact Report (NIR)**  
Submitted via email: [d13-smb-d13-bridges@uscg.mil](mailto:d13-smb-d13-bridges@uscg.mil)

Dear Commander:

On behalf of Ginn Group, a Clark County-based residential developer, I am submitting this letter to **affirm support** for the Interstate Bridge Replacement (IBR) Program's **fixed span bridge configuration** option over the Columbia River with 116' of vertical navigation clearance.

Ginn Group, like all companies and households in the Portland Metro Region, relies on I-5 as the essential artery that keeps the region mobile. Ginn Group's business relies on a wide range of materials that arrive after using the I-5 corridor, and Ginn Group's employees, trade partners and customers all rely on I-5 engage in daily commerce. Replacing a 100+ year-old lift span bridge with a new bridge that includes a lift span that can stop traffic and bring the entire region's traffic circulation to a halt, is, to be blunt, a colossally stupid idea. It may have been a good idea 100 years ago, but to design a bridge today for the next 100 years using the same logic that was applied in 1914 would be foolish. The new bridge cannot have a lift span.

We appreciate the diligence of the IBR Program in studying multiple options to address the project's purpose and need while balancing many priorities. We believe our region is best served by a fixed span option allowing for a safe, practical and more cost-effective bridge design. We understand that formal Agreements have granted adequate mitigation for those few companies who depend upon a higher clearance for a portion of their commerce. Further, we note there is minimal additional economic or development opportunity offered by a lift span because the dredged 43-foot shipping channel stops to the west of the current I-5 bridge and there is virtually no shoreline land available for development upriver.

With estimated construction costs rising by the day and congestion from the aging lift span continuing to impose real, escalating impacts on our economic viability, it is critical to our region, state and nation that replacement of the I-5 bridge begin as soon as possible. We appreciate the efforts of all involved in planning, design and funding of this critical transportation facility expected to last a century. Thank you for your time and consideration.

Sincerely,

Phil Wuest  
President  
Ginn Group LLC

cc: [info@interstatebridge.org](mailto:info@interstatebridge.org)  
[admin@iccbusiness.org](mailto:admin@iccbusiness.org)