



January 7, 2026

U.S. Department of Homeland Security
United States Coast Guard
Commander
Coast Guard District Northwest
915 Second Avenue, Rm 3510
Seattle, WA 98174-1067

Subject: Comments on Public Notice (04-25) – Interstate Bridge Replacement Navigation Clearance Determination

Dear Commander,

On behalf of Tidewater Transportation and Terminals, and Tidewater Environmental Services, we respectfully submit the following navigation-related comments in response to U.S. Coast Guard District Northwest Public Notice (04-25), dated December 12, 2025, regarding the request to reevaluate the Preliminary Navigation Clearance Determination (PNCD) for the Interstate Bridge Replacement (IBR) Program.

Tidewater is the largest inland marine transportation company west of the Mississippi River, headquartered in Vancouver, Washington, and operating extensively along the Columbia–Snake River System (Marine Highway 84). Our fleet transports millions of tons of essential commodities annually, including refined petroleum products, agricultural goods, fertilizer, containers, and project cargo, and our environmental business supports hazardous and non-hazardous waste transportation and industrial cleaning throughout the Pacific Northwest. Safe, reliable, and predictable navigation through and over the I-5 bridge corridor is critical to our ability to serve regional industries, rural communities, and energy supply chains.

Based on our operational profile and foreseeable navigation needs, Tidewater confirms that a fixed-span bridge providing 116 feet of vertical navigation clearance above zero Columbia River Datum (CRD) is sufficient to meet our navigation requirements, provided it is designed and constructed to support safe and predictable operations. Tidewater prefers a fixed-span configuration because it enhances navigation safety, operational certainty, and system reliability by eliminating lift-related delays, mechanical failure risks, vessel queuing, and the navigational complexity of coordinating bridge openings in a congested, high-consequence reach of the river. From a marine operations and dispatch perspective, fixed spans allow vessel movements to be planned and executed with greater certainty under variable river conditions, weather events, and traffic volumes, improving safety outcomes for both marine and surface transportation users.

The Pacific Northwest Waterways Association (PNWA), representing more than 150 navigation-dependent organizations, has confirmed that 116 feet of vertical clearance meets the navigation needs of its membership. PNWA has also confirmed that the U.S. Army Corps of Engineers’

“Connecting customers to local, regional, and global markets”

6305 NW Old Lower River Road, Vancouver, WA 98660 • 360.693.1491 • tidewater.com



Dredge *Yaquina* can safely operate under the proposed bridge configuration when combined with 400 feet of horizontal clearance (a 300-foot channel with 50 feet of clearance on each side), and that entities negatively impacted by the reduced clearance have received appropriate mitigation through formal agreements.

Communication and coordination will be paramount as the IBR advances into demolition of the existing bridge and construction of the replacement structure. Early and continuous engagement with navigation interests and the U.S. Army Corps of Engineers will be essential to ensure that construction phasing, channel modifications, and any temporary navigation impacts are clearly communicated well in advance. This coordination will allow operators to plan safely, minimize disruptions to freight and cruise schedules, and maintain channel maintenance activities within required fish windows.

We appreciate the Coast Guard's careful consideration of maritime stakeholder input and stand ready to provide additional operational details if helpful.

Thank you for the opportunity to comment on this important matter.

Respectfully submitted,

Johan Sperling
President and Chief Executive Officer
Tidewater Holdings, Inc.
Johan.Sperling@tidewater.com