



January 8, 2026

Rear Admiral Alex Avanni
Commander, U.S. Coast Guard District Northwest
915 Second Avenue, Rm 3510
Seattle, WA 98174-1067

Submitted via: d13-smb-d13-bridges@uscg.mil

Re: Navigation Impact Report (NIR) comments related to the Interstate Bridge Replacement (IBR) Program General Bridge Permit Application and Reevaluation of the Preliminary Navigation Clearance Determination (PNCD)

Rear Admiral Avanni:

I am writing to express the Washington Public Ports Association's firm belief that the urgent completion of the Interstate 5 Bridge Replacement is a regional freight mobility and trade competitiveness imperative.

On behalf of WPPA, please consider the following comments, intended to confirm our perspective that the navigation needs of our heavily maritime-dependent region are met with a vertical navigation clearance of 116 feet. Congestion associated with the existing moveable bridge span regularly causes delays that impose real and escalating costs on regional mobility and economic vitality. Replacing the existing moveable bridge with a fixed-span structure providing 116 feet of vertical navigation clearance would significantly improve reliability for all transportation modes. A fixed span would reduce congestion, support efficient freight and passenger movement, and help ensure this critical multimodal transportation hub continues to function effectively for our region and for the broader western United States.

The IBR Program's extensive public process to develop and evaluate bridge configuration alternatives provided substantial opportunities for technical review and stakeholder engagement. This process appropriately balanced the project's purpose and need while identifying and mitigating potential impacts.

Washington Public Ports Association
A Trade Association Representing the 75 Public Port Districts of Washington State
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We understand that the IBR Program has coordinated closely with the U.S. Army Corps of Engineers to confirm that the Corps' Dredge *Yaquina* can safely clear a bridge configuration with 116 feet of vertical navigation clearance and continue maintaining the federal navigation channel. We also understand that the IBR Program has modeled anticipated changes in river levels over time and has entered into formal agreements providing adequate mitigation for entities determined to be adversely affected by a fixed-span option with 116 feet of clearance.

The safety, seismic resilience, and multimodal improvements identified in the IBR Program's Supplemental Draft Environmental Impact Statement are expected to deliver a strong and lasting return on investment for the region.

Thank you for the opportunity to provide comments on the Interstate Bridge Replacement Program's General Bridge Permit.

Sincerely,

A handwritten signature in brown ink, appearing to read "Eric Ffitch".

Eric Ffitch
Executive Director
Washington Public Ports Association

Cc: Interstate Bridge Replacement Program