



January 9, 2026

Brendan J. Harris  
Chief, Waterways Management Branch  
U.S. Coast Guard District NW  
915 Second Avenue, Room 3510  
Seattle WA 98174-1067  
Via Email: d13-smb-d13-bridges@uscg.mil

Dear Chief Harris:

***Re: Comments on Public Notice 04-25***

Oregon Business & Industry (OBI) is a statewide association representing businesses from a wide variety of industries and from each of Oregon's 36 counties. In addition to being the statewide chamber of commerce, OBI is the state affiliate for the National Association of Manufacturers and the National Retail Federation. Our 1,600 member companies, over 75% of which are small businesses, employ more than 250,000 Oregonians. Oregon's private sector businesses help drive a healthy, prosperous economy for the benefit of everyone.

OBI appreciates the opportunity to provide comment on the proposed bridge height for the Interstate Bridge Replacement Project (IBRP). As noted above, OBI represents businesses in every segment of the state economy and a bridge that moves people and freight safely and efficiently is essential to the regional economy.

Any project, but particularly a project of this complexity and importance, involves competing priorities and ultimately, tradeoffs. Not all things can be accomplished, not every interest can be served, and choices must be made that achieve the best possible outcome for the greatest number of individuals and interests.

OBI appreciates the efforts of the IBRP to reach mitigation agreements with four significant users of the river. This represents smart policy and addresses the tradeoffs required in a massive, complex, and nationally important project.

The Coast Guard cites 54 vessels over a period of two years requiring elevation greater than 116 feet, or the proposed height of a non-movable, single span IBR replacement (exclusive of the four users that have reached agreement with the IBRP).

Fifty-four vessels over a span of two years should not dictate the height – and therefore the design, construction cost, and ongoing operational costs – on a crucial interstate freeway connection. The tradeoffs here are clear. The overwhelming majority of river traffic, both commercial and recreational, will be sufficiently served by a 116-foot bridge height.

Dictating a movable span to accommodate relatively few episodic, unpredictable, and avoidable uses is an unreasonable tradeoff for the costs imposed on all users of the facility and the American taxpayer. A lifting span requires constant, permanent onsite staffing and enormous ongoing maintenance and repair costs. Moreover, the costs imposed by creating an unpredictable point of complete stoppage of all through bound traffic on an interstate freeway will ripple across every user, impacting interstate commerce and local residents. These costs – direct and indirect – will exist and compound for the entirety of the lifespan of this new bridge. Increasing the cost and complexity of the new bridge, while decreasing its functionality and utility, is a poor tradeoff for accommodating what are relatively few, avoidable conflicting river uses.

OBI appreciates the Coast Guard's dedication to rigorously considering all aspects of the IBR use cases, and particularly the ongoing safety of the structure and its users.

In this case, it isn't possible to achieve every possible objective. There are a variety of elements of this project that are constrained and require choices, accommodations, and compromise. While 116 feet may not be ideal in every circumstance, it is the most practicable, rational, and responsible decision given myriad considerations including the critical need to replace the bridge and finite resources with which to fund the project.

Sincerely,

A handwritten signature in black ink, appearing to read "Duke Shepard", written in a cursive style.

Duke Shepard  
Senior Policy Director