



December 12, 2025

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)

Dear Commander,

On behalf of the Pacific Northwest Waterways Association (PNWA), I write to provide comments to consider for the General Bridge Permit and reevaluation of the Preliminary Navigation Clearance Determination (PNCD) for the Interstate-5 Bridge Replacement (IBR) project and to confirm the navigation needs of PNWA's membership are met with 116' of vertical navigation clearance. We have also confirmed the U.S. Army Corps of Engineers *Dredge Yaquina* is capable of clearing the new bridge configuration as long as 116' of vertical navigation clearance is maintained along with a 400' wide horizontal clearance (300' wide channel with 50' of clearance on both sides). This is necessary to address side slope sloughing and ensure the full width of the navigation channel remains clear. We also understand that 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.

PNWA has over 150 members, including ports, barge companies, steamship operators, grain elevator operators, agricultural producers, electric utilities, irrigation districts, and union labor throughout Washington, Oregon, and Idaho. Our association supports projects to advance and protect the region's navigation infrastructure, freight mobility, economic health, and the environment. We support the region's multi-modal transportation system, which provides safe, efficient, and reliable links to competitive domestic and world markets.

It is critical to our region, state, and nation to replace the Interstate 5 Bridge as soon as possible. The impacts of congestion, due in part to the existing moveable span, cause frequent delay leading to real and exponentially more costly impact our regional economic viability. Safety and multimodal enhancements to meet the needs of all transportation modes as defined in the IBR Program's Supplemental Draft Environmental Impact Statement will undoubtedly result in a positive return on investment.

In addition to commerce passing over the bridge via trucking, there is a major export gateway passing under the bridge via marine vessels. In 2023, the Columbia River System exported approximately 51.1 million tons of cargo valued at approximately \$25.3 billion. In 2023, fifty-six percent of U.S. wheat exports transited the Columbia Snake River System to global markets. In addition, in 2024, over 21,000 cruise passengers and crew visited contributing over \$21 million to communities along the Columbia and Snake Rivers. Ensuring this navigation pathway remains open and is not impeded by future bridge operations is critical. PNWA members have confirmed that 116' of vertical clearance will not impact current operations for shipping or cruising.

The IBR Program's extensive public process to develop bridge configuration alternatives provided ample opportunity for technical review and engagement by stakeholders. The IBR Program has put forth an inclusive and transparent process to engage as many stakeholders as possible in the process and to select a bridge configuration for our future that balances the purpose and needs of the project while mitigating for impacts. It is vital to ensure the multi-modal transportation system is integrated to keep supply chains moving as expeditiously and safely as possible.

It is our understanding that the IBR Program has worked closely with the U.S. Army Corps of Engineers to understand and model anticipated changes in water levels that affect the river level over time including climate change, atmospheric rivers, severe seasonal weather, and changes to the water flow regime that could result if the U.S. and Canada are not able to negotiate a new Columbia River Treaty and the flood risk management of the system. Both higher high flows and lower low flows can affect the river level and the ability to safely maneuver vessels. In addition to cargo, cruise boat demand has steadily increased over the last ten years and represents a growing market in the region. Stable and predictable flows help ensure the safety of the cruise vessels, crews, and passengers.

We understand there will be changes to the channel alignment and ensuring communication with all navigation interests will be essential as those changes are implemented. As we understand it, the IBR configuration will allow for the tug and barge vessels to use the primary channel under the new IBR rather than the barge channel. The use of the primary channel will increase safety as the operators maneuver the vessels without having to make a sharp turn to clear the railroad bridge and then immediately line up to use the barge channel.

Communication and coordination are paramount. In the future, as the IBR proceeds to demolition of the old bridge and construction of the new bridge, it will be very important to engage navigation interests and the U.S. Army Corps of Engineers to ensure that information about the phases of construction and any potential impacts to river traffic are clearly communicated far in advance. This information is critical to the maritime industry for planning and staging of products to occur to meet supply demands safely and impacts to cruise schedules can be avoided or minimized in advance. This communication and coordination will also be helpful in ensuring that Columbia River Channel maintenance can safely occur during the appropriate fish windows while bridge work may also need to be occurring at the same time.

We appreciate your consideration of our comments on the Interstate Bridge Replacement Program General Bridge Permit and confirm the navigation needs of PNWA's membership are met with 116' of vertical navigation clearance.

Respectfully,



Neil Maunu
Executive Director
Pacific Northwest Waterways Association

CC: Interstate Bridge Replacement Program (IBR)