



Rear Admiral Arex B. Avanni
Commander
U.S. Coast Guard Northwest District
915 2nd Avenue, Room 3510
Seattle, WA 98174

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Dear Rear Admiral Avanni,

On behalf of Columbia River Towboat Association, we submit the following comments in response to the Coast Guard Public Notice DNW-PN-01-26 – Application Received for the Replacement of the I-5 Twin Bridges.

The Columbia River Towboat Association represents commercial navigation interests throughout the Columbia-Snake River System, including operators of towboats, barges, terminals, and other maritime transportation services that support agriculture, energy distribution, manufacturing, construction, and regional commerce across the Pacific Northwest.

After reviewing Public Notice 01-26, CRTA offers the following operational and navigational concerns for the Coast Guard's consideration:

1. There is a noted period of time (17 months) where the only allowable passage for all navigation users, including commercial traffic, sail boats, recreational vessels, and motorboats will be the primary navigation channel. Currently, these river users are able to share safe passage across (3) different lanes of traffic, as well as unmarked channels for small recreational vessels. Limiting passage to a single lane, at the primary channel, will create a significant bottleneck and increase the potential for congestion and vessel conflicts.
2. CRTA requests additional information regarding how vessel movements will be coordinated during this period. Specifically, industry seeks clarification regarding:
 - Whether a temporary vessel traffic management system will be implemented.
 - Which agency or entity will administer traffic coordination.
 - Expected commercial vessel delays.
 - Procedures for safely managing interactions between commercial vessels and recreational traffic within the shared navigation channel.

3. CRTA requests clarification regarding whether bridge lift restrictions (0630-0900 and 1430-1800 on weekdays) will remain in effect during construction. If these restrictions continue while all navigation is consolidated into a single channel, additional delays to commercial navigation should be anticipated and evaluated.
4. During this 17-month period, every commercial vessel requiring more than thirty-nine feet of vertical clearance will require a bridge lift. This represents a substantial increase in lift frequency. Given the age of the existing bridge's mechanical and electrical systems, combined with documented lift-span malfunctions in recent years, CRTA requests information regarding contingency plans in the event of bridge mechanical failures or prolonged outages.
5. Throughout the construction phase, industry anticipates varying pieces of equipment in the water, located within proximity to designated channels and bridge piers. Appropriate lighting of all in-water fixtures, equipment, and work barges as well as boundary protection, will be necessary for safe passage.
6. During the 2023 IBR navigation simulation study, stake holders discussed the need for an onsite tug escort to support commercial barge tows transiting between construction piers in designated channels. Inclement weather, high river flows, reduced visibility, and periods that require bare-steerage operations may necessitate tug assistance. Should such mitigation be implemented, CRTA recommends that the assist vessel possess adequate horsepower and maneuvering capability and be operated by appropriately qualified personnel to safely support commercial navigation throughout construction.

CRTA recognizes the importance of replacing the Interstate Bridge and supports investments that improve the region's transportation infrastructure. At the same time, the Columbia River is a federally designated navigation corridor supporting billions of dollars in annual commerce. It is essential that marine transportation continue to operate safely, efficiently, and with minimal disruption throughout construction.

CRTA respectfully requests continued engagement with the Coast Guard, the Interstate Bridge Replacement Program, and other appropriate agencies to collaboratively develop operational procedures, mitigation measures, and contingency plans addressing the concerns identified above. We appreciate the opportunity to provide these comments and look forward to continued coordination as the project advances.

Respectfully,

Josh Nichols

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Public Comment IBR -CRTA

Final Audit Report

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