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Peter J. Schrappen, CAE
Pacific Region Vice President & Regional Team Lead

July 24, 2026

RADM Arex B. Avanni
Commander
Northwest Coast Guard District
915 2nd Ave, Rm 3510
Seattle, WA 98174

Re: Public Notice 01-26 –
Interstate Bridge Replacement
(I-5) over the Columbia River,
Portland, OR and Vancouver,
WA

Dear Admiral Avanni:

The American Waterways Operators is the tugboat, towboat and barge industry's advocate, resource and united voice for safe, sustainable and efficient transportation on America's waterways, oceans and coasts. As the largest segment of the nation's 45,000-vessel domestic maritime fleet, our industry moves commerce across U.S. inland and intracoastal waterways, the Atlantic, Pacific and Gulf Coasts, and the Great Lakes. On behalf of our more than 300 member companies, we appreciate the opportunity to comment on the U.S. Coast Guard's Public Notice 01-26 regarding navigation impacts during the seven-year construction of the new Interstate 5 highway bridge over the Columbia River.

The Columbia River System is a vital corridor to the U.S. inland marine transportation system and a linchpin in U.S. agricultural trade, ranking first in U.S. wheat exports and second in corn and soy exports in 2025. We appreciate the Coast Guard's stewardship of this working waterway and its commitment to preventing unreasonable obstructions to navigation. AWO also continues to support the Interstate Bridge Replacement (IBR) Program and the replacement of the aging I-5 Interstate Bridge with a modern fixed-span structure.

Based on our review of Public Notice 01-26 and consultation with AWO members operating on the Columbia Snake River System and local partners, including the Columbia River Towboat Association (CRTA) and Pacific Northwest Waterways Association (PNWA), AWO requests continued coordination on a construction-period navigation management plan that addresses several key concerns.

Extended Consolidation of Traffic into a Single Navigation Route

From approximately November 2029 through April 2031, alternate channels will be closed for approximately 17 months, requiring all commercial traffic to use the primary navigation

channel. While the primary channel will retain 39 feet of vertical clearance in the closed-to-navigation position, vessels needing more clearance would require a lift of the existing movable span. Currently, many of these river users share safe passage across three designated channels.

Consolidating traffic into a single primary-channel lane raises concerns about creating bottlenecks, congestion, vessel conflicts, and increased commercial-recreational vessel interactions. AWO therefore requests more information on how vessel movements will be coordinated and navigation impacts minimized, including:

- Whether a temporary vessel traffic management system will be used in the construction corridor;
- The agency or entity responsible for coordinating traffic and serving as the point of contact for commercial operators;
- Expected commercial vessel delays from increased lift frequency;
- Procedures for managing commercial and recreational traffic in the shared navigation channel;
- Whether existing Bridge Lift Restrictions (0630-0900 and 1430-1800 weekdays) will remain in effect during construction; and
- How the project team and USCG will address potential reliability issues with the aging movable span during the 17-month channel closures, particularly given member concerns that a bridge lift failure could significantly disrupt navigation.

We encourage the Coast Guard, Oregon Department of Transportation, and the IBR Project team to work with local operators and associations, including AWO, CRTA, and PNWA, to answer these questions and develop a lift schedule and construction operations plan that balances highway and marine transportation system needs on the Columbia River.

Lighting and Marking of In-Water Fixtures and Equipment

During construction, operators anticipate equipment in the water near designated channels and bridge piers. Proper lighting of in-water fixtures, equipment, and work barges, along with clear boundary protection, will be necessary for safe passage, particularly during nighttime, low-visibility, and inclement weather operations.

Assist Tug Support During Restricted Transits

The 2023 IBR Navigation Simulation Study highlighted the potential need for an onsite assist tug to support commercial barge tows transiting between construction piers and through designated channels. Inclement weather, high river flows, reduced visibility, and bare-steerage operations may necessitate tug assistance. If an assist vessel is needed, AWO recommends that it have adequate horsepower and maneuvering capability, be operated by qualified personnel, and be available on a schedule supporting commercial transits.

We look forward to continued coordination with CRTA, PNWA, and our shared members to present a unified industry voice as the project advances. Thank you for the opportunity to

comment on Public Notice 01-26. We would be pleased to answer any questions or provide additional information.

Respectfully,

A handwritten signature in black ink, appearing to read "Peter J. Schrappen". The signature is fluid and cursive, with the first name "Peter" and last name "Schrappen" clearly distinguishable.

Peter J. Schrappen, CAE
Vice President – Pacific Region & Regional Team Lead
The American Waterways Operators