July 24, 2026

Commander (dpw)
United States Coast Guard
Northwest District
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Seattle, WA 98174
Transmitted via: smb-cgd-nw-bridges@uscg.mil

RE: U.S. Coast Guard Public Notice DNW-PN-01-26 – Application Received for the Replacement of the I-5 Twin Bridges

Attn: Mr. Steven Fischer

Thank you for the opportunity to provide comments on behalf of Pacific Northwest Waterways Association (PNWA), in response to the U.S. Coast Guard Public Notice DNW-PN-01-26 – Application Received for the Replacement of the I-5 Twin Bridges.

PNWA is a non-profit, non-partisan trade association that advocates for federal policies and funding in support of regional economic development. Over the past 90 years, PNWA has grown to over 150 members, including ports, barge companies, steamship operators, cruise ship 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.

PNWA participated in the I-5 Bridge Replacement (IBR) Citizen Advisory Group (CAG) representing river users. The CAG meetings were primarily focused on bridge design elements and did not focus on construction schedule or construction logistics. Our main concern with the design of the bridge was ensuring the navigation clearance would be tall enough to allow our members and maritime commerce to continue to transit under the new bridge and operate safely.

During the U.S. Coast Guard Preliminary Navigation Clearance Determination comment period in 2022, PNWA expressed concerns about construction impacts and reiterated those concerns during the 2025 Navigation Impact Report comment period. As noted previously, *"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."

It is our understanding the I-5 Bridge Replacement project does not intend to close highway traffic to freight trucking, commuters, the general public, or tourism traffic and will keep the existing bridge in place and open while the new bridge is under construction. We believe it is equally important to keep the federal navigation channel (Marine Highway 84) open to marine freight movement, commercial fishing, cruise vessels, and recreational boaters during the period of bridge construction. A closure of any duration would be unacceptable if it is not carefully and safely coordinated with river and cruise operators, shippers, ports, and other maritime stakeholders.

After reviewing Public Notice 01-26, PNWA's membership is concerned about the following impacts to navigation during construction of the I-5 Bridge Replacement:

Overall responsibility for vessel and river traffic coordination is unclear.
PNWA respectfully requests additional information regarding:

- Which agency or entity will be responsible for the administration of vessel traffic coordination on the river?
- Specifically, how will vessel movements be coordinated during construction?
- Will a temporary vessel traffic management system be implemented?
- What are the current expected commercial vessel delays?
- What are the procedures for safely managing interactions between commercial vessels and recreational traffic within the shared navigation channel?
- What are the procedures for safely managing interactions between the U.S. Army Corps of Engineers and the IBR program to ensure maintenance dredging can occur safely during the appropriate fish windows?

Like our colleagues at the Columbia River Towboat Association (CRTA), PNWA respectfully requests a detailed marine traffic management plan addressing bridge opening schedules, vessel coordination, construction activities, and communication protocols throughout construction.

Creation of maritime traffic bottleneck.
As we understand it, the IBR anticipates a 17-month period of time where all navigation users, including commercial traffic including cruise ships, recreational vessels, and sailboats will be required to transit the primary navigation channel only. Currently, river users share safe passage across three lanes of vessel traffic including unmarked channels for small recreational vessels. PNWA is concerned a significant marine bottleneck will be created by limiting passage to the primary channel. With all vessels utilizing a single lane, there is increased potential for vessel congestion leading to delayed commercial transit times impacting delivery schedules, cruise ship schedules, and contracts. In addition, increased vessel traffic through one lane, without careful coordination, could increase vessel conflicts which impacts safety.

Simulation modeling does not appear to match anticipated conditions.
We understand from our members and CRTA that navigation simulations demonstrated transiting through the temporary construction channels could be accomplished safely under modeled conditions. However, the simulations conducted in 2023 did not fully evaluate the operational impacts of

concentrating all commercial traffic into a single lift span or the day-to-day impacts of construction staging, equipment, and traffic management.

Rather, the 2023 simulations modeled transiting between existing piers and construction piers at all three navigation channels. It was determined the south channel (or alternate channel) offered the best passage given both vertical clearance and horizontal clearance. The modeling included an onsite "assist tug" to help commercial tows make safe passage for inclement weather or high current. We understand from our members and CRTA that discussion occurred regarding the potential for equipment barges to be onsite and impeding the modeled clearances. It was noted that these pieces of equipment would need to be moved if they impeded the modeled clearances during transit by commercial vessels because there were no extra margins in the modeled clearances.

Potential need for increased bridge lifts and increased potential for bridge lift equipment or mechanical failure.

PNWA respectfully requests clarification regarding whether bridge lift restrictions will remain in effect during construction or will they be augmented, particularly during the 17-month period where all vessel traffic is concentrated to one lane. Essentially, every commercial vessel requiring more than 39 feet of vertical clearance will require a bridge lift. This could increase the number of bridge lifts needed. If the current restrictions continue while all navigation is consolidated into a single channel, additional delays to commercial navigation should be anticipated and evaluated. There is also concern for bridge lift failure given the age of the existing bridge's mechanical and electrical systems and documented lift-span malfunctions. Like our CRTA colleagues, PNWA requests information regarding the process for altering the bridge lift restrictions as well as contingency plans in the event of bridge mechanical failures or prolonged outages.

Ensuring safety around in-water construction equipment and components.

Safety is absolutely critical. Throughout the construction phase, the maritime industry anticipates varying pieces of equipment in the water, located within close proximity to designated channels and bridge piers. PNWA recommends appropriate lighting of all in-water fixtures, equipment, and work barges as well as boundary protection, for safe passage. PNWA also recommends appropriate lighting of temporary construction barges, cranes, trestles, or other equipment that will occupy portions of the navigation channel or the maneuvering area outside the channel that towboats routinely utilize. To maintain safety, it will be important to ensure construction equipment is removed or repositioned when commercial vessels are transiting. This will ensure the navigation clearances assumed during the vessel simulations are maintained.

Need for onsite qualified tug escort support with adequate vessel capabilities.

During the 2023 IBR navigation simulation study, maritime industry stakeholders discussed the need for an onsite tug escort to support commercial barge tows transiting between construction piers in designated channels. Reduced horizontal clearances within the temporary construction channels and the operational challenges posed by the offset alignment between the existing and new bridge piers were anticipated. Inclement weather, high river flows, reduced visibility, and periods that require bare-steerage operations may necessitate tug assistance. If tug assistance is implemented, PNWA recommends the assist vessel, or vessels, possess adequate horsepower and maneuvering capability to handle the conditions of the Lower Columbia River. In addition, those assist vessels should be operated by appropriately qualified personnel to safely support commercial navigation throughout construction.

Conclusion.
PNWA's members are vested in the success of improving supply chains, freight movement, and increasing economic development opportunities. PNWA understands the importance of the replacement of the I-5 Bridge and the contribution it will make to the efficiency of highway freight movement on the region's transportation system. Likewise, the Columbia River federal navigation channel is designated as Marine Highway 84 (M-84) and facilitates the movement of approximately 51.1 million metric tons of cargo valued at over $25.3 Billion annually. It is critical that marine operations remain safe, efficient, reliable, and that the entire construction project is conducted in a manner causing minimal disruption to the flow of maritime commerce.

PNWA agrees with the concerns and comments expressed by the Columbia River Towboat Association (CRTA) and respectfully requests continued engagement with the U.S. Coast Guard, the Interstate Bridge Replacement Program, and other appropriate agencies. It is hoped continued dialogue and collaborative effort will result in construction scheduling, operational procedures, mitigation measures, and contingency plans addressing the safety, operational, and scheduling concerns identified in addition to any issues that arise throughout construction.

PNWA appreciates the opportunity to provide comments on navigation impacts during construction of the I-5 Bridge Replacement and looks forward to continued coordination as the project advances.

Respectfully submitted,

Neil Maunu
Executive Director
Pacific Northwest Waterways Association