BLAKELY ROCK
STRATEGIES

July 25, 2026

Steven M. Fischer
District Bridge Manager
Northwest USCG District
915 Second Avenue
Seattle, WA 98174-1067

Via Email to: smb-cgd-nw-bridges@uscg.mil

RE: Public Notice 01-26

Dear Mr. Fischer:

On behalf of Iron Partners, LLC, a heavy industrial manufacturing enterprise and owner of approximately 10 acres of property roughly two miles upriver from the IBR site, thank you for the opportunity to comment on navigational impacts to Iron Partners during the seven-year construction period of the IBR project.

Iron Partners is owned and operated by Terrance Aarnio and Robert Beal. They have owned the site since 1974 and have improved the site through the construction of several structures. The most prominent of these structures is Building 48, a specialized building featuring heavy manufacturing infrastructure including two 80-ton cranes, one 25-ton crane, related equipment, and sufficient utilities for building large metal fabrications. Additionally, Iron Partners retains a right of permanent access to and a first right of refusal to acquire the Columbia Business Center's (CBC) east barge slip. The site has served as a maritime manufacturing and services facility since at least the 1960s. Iron Partners' principals have over 50 years of experience in the metals fabrication sector along the Columbia River. The site, Iron Partners, and Iron Partners tenants have relied on the 178-foot vertical clearance of the existing moveable span bascule I-5 bridge over the Columbia River to facilitate shipment of manufactured products from the site.

The status of the Columbia River as a federal navigable waterway ensures that the U.S. Coast Guard maintains authority over bridge operations. Iron Partners commends the Coast Guard's leadership in using this authority to ensure the consideration of maritime stakeholder concerns, as well as the Coast Guard's effective collaboration with both IBR and the maritime industry throughout the planning stages of the proposed replacement of the Interstate 5 bridge at mile 106.5 of the Columbia River.

As we observed in our comment letter of November 24, 2024,

> "A bridge height of 116 feet, as proposed by the fixed span alternative, will permanently and negatively impact the economic viability of Iron Partners' facility for heavy manufacturing for industries that relate to national security, military, as well as critical regional and national infrastructure. There are no alternative navigation routes available that can provide navigation access to the Iron Partners' facility that load through CBC to vessels and cargo ships with air draft requirements greater than 116 feet. Thus, the proposed bridge height effectively eliminates Iron Partners' access to essential navigation."

Iron Partners reiterates that the same concerns and limitations apply during the construction period described in Public Notice 01-26 of June 25, 2026.

The lowest temporary vertical clearances for each navigation channel during construction are substantially less than what would be required to accommodate the transit of Iron Partners' potential prospective major fabrication projects. During this period of construction, and for all times thereafter, Iron Partners will be constrained in its ability to transport large-scale fabrication to market via the Columbia River. This effectively precludes Iron Partners from bidding on large-scale projects that would necessitate riverine transportation from the inception of construction going forward indefinitely. Iron Partners appreciates that the Coast Guard has solicited public comment on this issue and welcomes future opportunities to discuss ways to protect the needs of existing and prospective future navigation on the Columbia River.

Iron Partners also has serious concerns about the bridge permit process and whether the Coast Guard has followed the appropriate process. In connection with the application from IBR, the Coast Guard modified its Bridge Permit Application Guide to remove or relax all language about presumptive denial where air draft is lowered, or navigation restricted. Compare p. 49 of COMDTPUB P16591.3D with p. 14 (appendix A) of new BPAG COMDTPUB P16591.3E. The Coast Guard did not take public comment on this change. Nor were any of the underlying statutes or regulations change. As Iron Partners previously explained, those authorities required the Coast Guard to prioritize the needs of navigation when making a bridge permit decision. Such an unexplained departure from agency practice has often been found to be arbitrary and capricious. *See*, *e.g.*, *Cal. Trout v. F.E.R.C.*, 572 F.3d 1003, 1022-23 (9th Cir. 2009). We are also concerned that despite the Coast Guard's specific request to include a bascule option the IBR program refused to do so without explanation. This may have allowed IBR to overstate the expense of a movable span by eliminating a lower-cost option.

Please do not hesitate to contact me with questions or concerns.

Sincerely,

Charles Constanzo
Blakely Rock Strategies, LLC