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January 9, 2026

CDR Brendan J. Harris
Waterways Management Branch Chief
Coast Guard District Northwest
915 Second Avenue, Rm 3510
Seattle, WA 98174

Re: Preliminary Navigation
Clearance Determination for the I-
5 Interstate Bridge Replacement
(IBR) Program (Public Notice 04-
24)

Dear CDR Harris:

The American Waterways Operators (AWO) 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 40,000-vessel domestic maritime fleet, our industry safely and efficiently moves 665 million tons of cargo each year and enables the flow of goods through ports on the 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 proposal to reevaluate the Preliminary Navigation Clearance Determination for the Interstate Bridge Replacement (IBR) Program.

The Columbia River System is an integral part of the U.S. inland marine transportation system and in 2023 facilitated the transportation of over 51 million short tons of cargo¹. AWO thanks the Coast Guard for its key role in maintaining this active working waterway and ensuring bridges over navigable waterways do not create unreasonable obstructions to navigation.

AWO confirms that the navigation clearances in the Coast Guard's Public Notice 04-25 are sufficient for our members who operate on the Columbia River. Additionally, as we understand it, the IBR configuration will allow towing vessels and barges to use the primary channel under the new bridge rather than the barge channel. This will increase safety as vessel operators will not have to make a sharp turn to clear the railroad bridge and then immediately line up to use the barge channel.

¹ <https://ndc.ops.usace.army.mil/wcsc/webpub/#/report-landing/year/2023/region/4/location/9800>

Furthermore, we understand the IBR Program has worked closely with the U.S. Army Corps of Engineers to ensure the Corps' dredge *Yaquina* can clear the bridge configuration at 116 feet to maintain the federal navigation channel and model anticipated changes in water levels over time. Stable and predictable flows help to ensure the safety of all waterway users.

As the project progresses, we ask the Coast Guard and project team to coordinate with AWO and with local barge and towing vessel operators so stakeholders are informed of potential impacts and can give feedback or suggest alternatives, plan alternate routes, and adjust operations for safety during construction. AWO looks forward to working with the Coast Guard and other stakeholders to support this important infrastructure project while maintaining operational safety, efficient navigation, and the movement of vital commerce on the Columbia River.

Thank you for the opportunity to comment on Public Notice 04-25. AWO would be happy to provide any additional information or participate in further discussions as requested.

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Schrappen".

Peter Schrappen
Pacific Region Vice President & Regional Team Lead