

U.S. Department of  
Homeland Security

United States  
Coast Guard



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Ms. Susan Fletcher, Federal Transit Administration Region 10 Administrator  
Mr. Ralph J. Rizzo, Federal Highway Administration WA Division Administrator  
Mr. Keith Lynch, Federal Highway Administration OR Division Administrator

Subject: Interstate Bridge Replacement Program (IBR), Notice to Supplement

Greetings:

It was a pleasure meeting all of you on January 19<sup>th</sup> to discuss the future of the Interstate 5 Bridge Replacement Project. The Coast Guard is committed to working through all aspects of the Bridge Permitting Process for this critical infrastructure project in a timely manner in accordance with the 2014 Memorandum of Understanding and Memorandum of Agreement.

As discussed, the U.S. Coast Guard's Bridge Permitting responsibilities are to ensure that the proposed bridge design will meet the reasonable needs of navigation. The 2014 MOU states that the Operating Administration will consider unreasonable obstructions to navigation as a reason to eliminate alternatives from further consideration in the environmental review. The 2014 MOA states that although the Coast Guard has identified an alternative as unreasonably obstructing navigation, it does not preclude the project sponsor from conducting further analysis of that alternative at its own risk. Including only one alternative in the Supplemental Environmental Impact Statement (SEIS) introduces risk that no permittable alternative will be evaluated in the SEIS. It is my sincere hope that the SEIS will include evaluation of an alternative that meets the preliminary navigation clearance determination (PNCD) requirement of 178 feet.

The use of a Notice to Supplement is unfamiliar to the USCG to supplement an EIS. Regardless, I recommend that the Notice to Supplement clearly state the alternatives to be evaluated in the SEIS to include the no build alternative, the locally preferred alternative (116-foot vertical clearance), and an alternative that meets the 178-foot vertical clearance established in the PNCD. This will ensure that an alternative that meets the initially identified needs of navigation is evaluated in the SEIS and could be adopted by the Coast Guard. As stated previously, the Coast Guard will review an updated NIR supporting the locally preferred alternative, if submitted, and provide an updated PNCD. Until such time, the above course of action is needed to align with the Coast Guard's current PNCD for this project. I appreciate the opportunity to provide input in advance of the public release and look forward to a continued partnership on this important project that supports numerous modes of transportation on and over the Columbia River. Please feel free to reach out at any point to continue this critical conversation.

Sincerely,

M. W BOUBOULIS  
Rear Admiral, U.S. Coast Guard  
Thirteenth Coast Guard District