

U.S. Department of  
Homeland Security

United States  
Coast Guard



Commander  
U.S. Coast Guard  
Thirteenth District

915 Second Avenue  
Attention dpw/Bridges  
Seattle, WA. 98174-1067  
Phone: (206) 220-7282  
d13-smb-d13-bridges@uscg.mil

October 13, 2021

Mr. Greg Johnson, Interstate Bridge Replacement Program (IBR)  
Program Administrator  
Mr. Thomas Goldstein, Federal Highway Administration  
Mr. James Saxton, Federal Transit Administration

Subject: Interstate Bridge Replacement Program (IBR), Coast Guard Bridge Permitting Process

Dear Sirs:

I am writing to ensure our Federal, State, and Local partners are aware of the revised U.S. Coast Guard (USCG) bridge permitting requirements that were promulgated in the USCG Bridge Permit Application Guide (BPAG) in 2016 as provided in enclosure (1). The BPAG aligns with the 2014 Federal Highway Administration (FHWA), the Federal Transit Administration (FTA), Federal Railroad Administration (FRA) and USCG Memorandum of Understanding (MOU) (enclosure (2)), and the 2014 FHWA and USCG Memorandum of Agreement (MOA) (enclosure (3)). In accordance with the MOU, it is the responsibility of the Department of Transportation Operating Administration to prepare a Navigation Impact Report (NIR) for USCG review prior to or concurrent with the National Environmental Policy Act (NEPA) scoping process. The NIR informs a USCG Preliminary Navigation Clearance Determination (PNCD), which informs the applicant's NEPA alternatives by ruling out any alternatives that will unreasonably obstruct navigation.

The BPAG provides a template for the applicant to complete the USCG Bridge Permit application. To this end, we want to ensure the IBR team understands the changes to the USCG bridge permit process since the 2012 Columbia River Crossing (CRC) project and understands a new bridge permit application must be submitted in accordance with the 2016 BPAG.

The USCG was recently notified that the IBR project also includes replacement of the existing bridge crossing Oregon Slough, otherwise known as the Portland Harbor I-5 Bridge. The USCG considers the Oregon Slough Bridge replacement and the Columbia River I-5 Bridge replacement as two separate bridges. Each bridge requires a separate USCG Bridge Permit application and a separate USCG Bridge Permit decision. Both the proposed Columbia River Bridge and the Oregon Slough Bridge permit applications need to be processed in accordance with the MOU and MOA in enclosures (2) and (3). All documents associated with the proposed Oregon Slough Bridge need to include requisite information related to that bridge. The bridge permit application outlines the environmental requirements that must be fully documented and evaluated in a new or supplemental NEPA document.

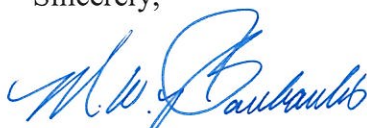
In accordance with the aforementioned MOU and MOA, the USCG requests the lead Federal agency develop a project plan for successful completion of NEPA and the bridge permitting process. The plan should include a proposed project timeline with projected dates for receipt of all federal permits, authorizations, reviews, and address which milestones are dependent on other

agencies in order to proceed. For example, the USCG cannot make a permit decision without a U.S. Army Corps of Engineers (USACE) Section 408 approval or reasonable assurance thereof. Additionally, the USACE and the USCG cannot make their permit decisions without Section 401 of the Clean Water Act water quality certification.

Once the IBR team completes the mariner/maritime stakeholder outreach and submits a draft NIR, the USCG will evaluate the navigation requirements and issue a PNCD as outlined by the MOU and MOA. If the navigation clearance requirements differ from the alternative clearances previously evaluated in 2012, the determination will be made as to what, if any, additional NEPA analysis will be required in order to evaluate an alternative that meets the reasonable needs of navigation.

We look forward to partnering with you on this exciting project. My point of contact for this project is Mr. Steve Fischer.

Sincerely,



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

Enclosures:

- (1) 2016 USCG Bridge Permit Application Guide, COMDTPUB P16591.3(D)
- (2) Memorandum of Understanding Between USCG, FHWA, FTA, and FRA dated January 14, 2014
- (3) Memorandum of Agreement Between USCG and FHWA dated January 14, 2014