



April 21, 2022

Commander B.J. Harris
Chief, Waterways Management Branch
Coast Guard District Thirteen
915 2nd Ave, Room 3510
Seattle, WA 98104

Dear Commander Harris,

We are providing comments on the bridge height for the Interstate Bridge Replacement project pursuant to USCG Public Notice 02-22. Vigor is a diversified industrial business operating across the Pacific Northwest and Alaska, and one of the largest federal contractors in the state of Oregon. Among Vigor's four Portland Metro area industrial facilities, two are in and adjacent to the Columbia Industrial Park east of the Interstate 5 Columbia River bridge. These facilities, with river access, support private industry as well as local, state and federal government agencies on projects such as bridge construction, locks and dams, marine vessels, and other large infrastructure goods, some of which are key assets for national defense.

Our business is not only reliant on the bridge for employee and product movement, we are also regular users of the critically important marine highway beneath the bridge for transport of our large, complex goods. Decisions made regarding the design of the new bridge will impact businesses like ours, and we have substantial concerns about the recent proposal from the Interstate Bridge Replacement Project to reduce the height of the new bridge from today's clearance.

As during the Columbia River Crossing project design, we are concerned the significant reduction in height from today's 178-foot clearance will limit our ability to serve certain customers, including but not limited to local and state transportation authorities and national security customers. Previously Vigor has constructed bridges, gates and other components for hydroelectric dams, and projects in service of national security, which have required a higher air draft clearance. Some of these projects have included:

1. Folsom spillway for the Folsom Dam
2. Launch towers for NASA
3. Wheel gates for dams on the Ohio River

Vigor regularly evaluates opportunities for projects up to 110 feet in height, which with the added needs from transport barge freeboard and clearance margin, would regularly result in air draft requirements of 130 feet or higher. A key element enabling Vigor's competitiveness in these markets is our ability to preassemble bridge spans in wider, longer, and taller sections, which require a higher air draft clearance to transport on the river and to their final destinations all over the U.S. The proposed height could

eliminate this key enabling element for Vigor, and could lead to those projects being won by other builders and constructed elsewhere.

Because of these unique needs, we recommend a height of not less than 150 feet air draft.

We expect the increased infrastructure project demand prompted by the Infrastructure Investment and Jobs Act, combined with the planned Washington State Ferry program construction expected to be performed in Vancouver, will lead to a substantial increase in family-wage, skilled jobs at Vigor's Vancouver facilities, which currently employ 120 people. While mitigation efforts have been suggested in some cases, these are unlikely to address the impact to Vigor's work at the facilities. Efficient river transport is essential to Vigor's ability to continue winning work for our Vancouver facilities, supporting family-wage jobs and the significant associated economic contributions to the area.

The Interstate 5 bridge is a critical part of the transportation corridor on the West Coast, and one our own employees use every day. We join the many who believe strongly that it needs to be replaced. However, as the planning and design of that work continues, we trust consideration is also made for the notable marine highway beneath it, and the needs of community members, businesses, and jobs which rely on it.

Thank you for considering our comments.

Sincerely,



Chris Palmer
Vice President, Fabrication

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