



**U.S. Department
of Transportation**

U. S. DEPARTMENT OF TRANSPORTATION

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March 16, 2023

M.W. Bouboulis
Rear Admiral
U.S. Department of Homeland Security
U.S. Coast Guard
Thirteenth Coast Guard District
915 Second Avenue, Room 3510
Attention dpw/Bridges
Seattle, WA 98174-1067

**Subject: Interstate Bridge Replacement (IBR) Program
Notice to Supplement the Environmental Impact Statement for the IBR Program, and
Movable Span River Crossing Design Option**

Dear Admiral Bouboulis:

We are writing in response to your letter dated February 8, 2023, concerning the Notice to supplement the Environmental Impact Statement for the Interstate Bridge Replacement (IBR) Program, in which the United States Coast Guard (USCG) requested the Supplemental Environmental Impact Statement (SEIS) include analysis of a design option over the Columbia River that meets the current Preliminary Navigation Clearance Determination (PNCD) of 178 feet of vertical clearance. The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) appreciate the opportunity to continue to work cooperatively with USCG to meet the requirements of the National Environmental Policy Act (NEPA) and USCG's bridge permitting process.

FHWA and FTA would like to inform USCG that the SEIS will include analysis of a movable span river crossing design option to the build alternative, as a design option that will satisfy the current PNCD. The movable span river crossing design option will provide for night-time

openings that minimize impacts to both highway traffic, transit operations, and aviation. The IBR Program will also continue to analyze the 116-foot fixed span river crossing design option, with the intention of seeking a revised PNCD prior to completion of the SEIS process. The 116-foot fixed span bridge design is the river crossing design option that was selected for the Columbia River Crossing (CRC) Project that was determined to best balance the competing needs of air, land, and water travel modes while minimizing and addressing environmental impacts and constraints.

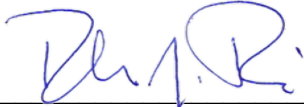
FHWA and FTA would also like to provide additional clarifying information about the NEPA process for the IBR Program. As you may recall, the Final Environmental Impact Statement (EIS) for the CRC Project was completed in 2011, and FHWA and FTA signed a Record of Decision (ROD) on December 7, 2011. A re-evaluation was completed in 2012, to address raising the vertical navigation clearance of the proposed bridges over the Columbia River from 95 feet to 116 feet. When the CRC Project was restarted in 2019—as the IBR Program—a re-evaluation of the CRC Final EIS and ROD was completed on December 29, 2021, which determined the Purpose and Need statement for the IBR Program would remain the same, and the range of alternatives and selected build alternative are still valid. Additionally, FHWA and FTA concluded in the re-evaluation that additional review is needed under NEPA, but based on the limited design changes and refinements to the selected build alternative proposed by the IBR Program, the IBR Program team could complete the additional review by supplementing the 2011 Final EIS, as modified by the 2012 re-evaluation. The two river crossing design options being analyzed in the SEIS are part of the selected build alternative for the CRC Final EIS and ROD, and there is no additional alternatives analysis being conducted as part of the SEIS for the IBR Program.

FHWA and FTA plan to publish the Notice to supplement the Environmental Impact Statement for the IBR Program in the Federal Register in the near future. This notice will not include specific design details of the build alternative being evaluated in the SEIS, since the IBR Program will only be analyzing changes affecting the selected build alternative, and because FHWA and FTA do not typically include design details of alternatives in this type of notice.

As the IBR Program pursues acquiring bridge permits for the IBR Program bridges, FHWA and FTA are committed to ensuring the IBR Program meets USCG requirements including those in the 2014 Memorandum of Understanding Between the USCG and FHWA and FTA and Federal Railroad Administration to Coordinate and Improve Bridge Planning and Permitting, the 2014 Memorandum of Agreement Between the USCG and FHWA to Coordinate and Improve Bridge Planning and Permitting, and the USCG Bridge Permit Application Guide. FHWA and FTA acknowledge the bridge permits being pursued by the IBR Program represent new applications, but the NEPA process for the IBR Program is a continuation of the NEPA process which resulted in the 2011 ROD for the CRC Project.

FHWA and FTA appreciate the opportunity to continue to work with USCG on this challenging but important project. If you have any questions or comments, please contact Tom Goldstein for FHWA at 503-316-2545 or Thomas.Goldstein@dot.gov or Jeff Horton for FTA at 260-220-4463 or Jeff.Horton@dot.gov.

Sincerely,



Ralph J. Rizzo
Washington Division Administrator
Federal Highway Administration

Keith Lynch
Oregon Division Administrator
Federal Highway Administration

Susan K. Fletcher
Acting Regional Administrator, Region 10
Federal Transit Administration

cc:

Steve Fischer, Bridge Administrator, USCG, Thirteenth District
Greg Johnson, Program Administrator, IBR Program
Thomas Goldstein, IBR Program Oversight Manager FHWA, Oregon and Washington Divisions
Jeff Horton, General Engineer, FTA, Region 10

U.S. Department of
Homeland Security

United States
Coast Guard



Commander
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16591
08 February 2023

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 19th 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