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March 8, 2013

Paula Hammond, Secretary of Transportation
Washington State Department of Transportation
PO Box 47316
Olympia, WA 98504-7316

Matt Garrett, Director
Oregon Department of Transportation
355 Capitol Street NE, MS11
Salem, OR 97301-3871

BRIDGE PERMIT APPLICATION REVIEW: COLUMBIA RIVER CROSSING

I received the bridge permit application for the Columbia River Crossing submitted on 30 January 2013 and have conducted a sufficiency review in accordance with 33 CFR § 115.60(a).

Clearly, this is a very complex project. While I find much of the application sufficient, there are certain areas where more information is required before I can commence the public notice and comment process. Toward that end, I have attached a detailed listing of those additional needs.

Issues of particular importance are:

- a. New Information: The application indicates the project will require the establishment of new navigational channels and a reduction in the size of the Upper Vancouver Turning Basin. As this information is new and will certainly bear upon my recommendation, you should conduct a preliminary assessment as soon as possible. My staff is available to provide guidance on how best to accomplish the assessment.
- b. Mitigation: As you know, mitigation of impacted users is critical to the success of this project. While I do not need finalized agreements at this point in the application review, I do require more specific information. This should include types of mitigation contemplated for each user, key milestones for achieving mitigation agreements and the mitigation itself, the feasibility of mitigation being considered, and confirmation that the mitigation process is proceeding in a timely manner.
- c. Economics: More information about the economic impact on current river users and the future use of the river is required. The application identifies a projected financial impact to three industrial fabricators, but does not provide the underlying data or analysis that supports it. Neither does it analyze the long-term affect on those entities or the industry segments they serve. I also need a separate forward-looking analysis of the reduced commercial capacity of the waterway due to the navigational limitations associated with the proposed bridge. For example, the Columbia Business Center, which was identified in the Navigation Impact Report as not being able to continue to support existing uses, should be addressed in this analysis.

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d. Technical/Administrative Requirements: There are a number of technical and administrative items in the application that remain to be addressed. Some of these are required before I am able to proceed with the public notice and comment process. None should be difficult to resolve. My staff will address these issues with yours directly.

Your timely attention to these matters is essential to evaluate the application and enable the Coast Guard to make a final permit decision by 30 September 2013.

While you work to provide the required additional information, I will engage directly with the affected waterway users, and other stakeholders. Additionally, I will request input from the U.S. Department of Defense, the U.S. Department of Commerce and the U.S. Department of Energy regarding their agency-specific concerns about potential impacts of the proposed project.

The Coast Guard understands the importance of this project to the citizens of the region, and to the nation as a whole. My staff and I are fully committed to working with you to address these concerns. Last, I must reemphasize that this letter does not constitute final Coast Guard action on the application, but rather highlights additional information necessary for my review and evaluation. Upon receipt of this information, I will commence the public comment period, which is essential to inform my permit recommendation to the Commandant.

Should you need clarification on any of the items I've identified, we stand ready to assist.

Sincerely,



K. A. TAYLOR

Enclosure

Enclosure to Coast Guard letter dated: March 8, 2013

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CRC must address the following items before the Coast Guard can issue a public notice for comment and initiate procedures to hold a public meeting.

- The permit application states that mitigation negotiations are ongoing. However, there is no indication that those negotiations are progressing towards a solution that preserves the navigational capability of the river. Mitigation should include types of mitigation contemplated for each user, key milestones for achieving mitigation agreements and the mitigation itself, and confirmation that the mitigation process is proceeding in a timely manner. Absent additional information on mitigation, the impacted waterway users will be identified as burdened in the public notice.
- The permit application identifies a projected economic impact to three industrial fabricators, but does not provide the underlying data or analysis that supports it (i.e., the raw data provided by these waterway users). Similarly, the projected economic impact fails to analyze the long-term affect on neither those entities nor the industry segments they serve. A forward-looking analysis of the reduced commercial capacity of the waterway due to the navigational limitations associated with the proposed bridge is also required.
- The proposed location of the replacement bridge falls within the turning basin of the deep-draft system between the BNSF Bridge and the current I-5 bridges. Although not described in the application or the NIR, it appears that the proposed bridge may effectively reduce the turning basin by as much as 18 percent. The navigational impacts of this encroachment must be reflected in the bridge permit application. This may require additional fact gathering, and a note of those facts that you relied upon when making your assessment.
- The application states that the location of the proposed bridge project will be located in the shallow-draft navigation system with a controlling depth of 15 feet. According to USACE documentation, the actual federal project, whose description coincides with the area described in your proposed bridge application, has a Congressionally-authorized navigational depth of 27 feet, and is currently maintained at 17 feet. The federally authorized channel will need to be realigned as a result of the placement of the bridge piers. The proposed realignment and associated impacts to navigation, both individually and cumulatively, and the USACE responsibilities to establish and maintain the realigned channel requires further fact-finding and assessment. This assessment must consider the effect that the proposed bridge will have on this ongoing federally-maintained navigation channel and directly relates to any determination that the Coast Guard will make regarding navigation safety and its attendant effect on the human environment.
- The application indicates a temporary vertical clearance reduction to 98 ft above CRD once the new steel truss is erected. This requires additional explanation. The application must indicate how this restriction will exist, and how it impacts the ability of the USACE to use its dredge and maintain the waterway during this period.
- The application did not contain a Wetlands Finding, but indicated that the project may impact wetlands. Anticipated wetlands impacts must be provided.
- The Biological Opinion, issued 19 Jan 2012, regarding Fish and Wildlife impacts, did not include consultation for Eulachon or Lower Columbia River Coho Salmon. The application must include a Biological Opinion for these species as well.
- Provide a copy of the application for the Washington State Water Quality.
- Additional administrative items are needed on the plan sheets per the Bridge Permit Application Guide. My bridge staff will provide these items under separate cover or during a meeting with your staff.

ENCLOSURE