

February 11, 2013

Mr. Stephen R. Oliver
Bonneville Power Administration
905 NE 11th Avenue
Portland, Oregon 97232

Mr. David Ponganis
Northwestern Division
U.S. Army Corps of Engineers
1125 NW Couch Street
Portland, Oregon 97209

Dear Mr. Oliver and Mr. Ponganis:

The Port of Portland appreciates this opportunity to submit comments to the Bonneville Power Administration and the U.S. Army Corps of Engineers (the "U.S. Entity") on the navigation effects that could be caused by possible changes in the Columbia River Treaty.

Established in 1891 by the Oregon Legislature, the Port of Portland owns four marine terminals, three airports (Portland International, Hillsboro, and Troutdale), and five industrial parks. The mission of the Port is to enhance the region's economy and quality of life by providing efficient cargo and air passenger access to national and global markets.

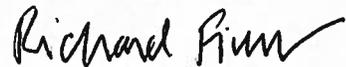
The Port of Portland has historically been concerned with maintaining and improving navigation on the shallow-draft and deep-draft reaches of the Columbia/Snake/Willamette River system. This low-cost, environmentally-friendly system for transporting cargo provides significant benefits to the Pacific Northwest and the United States as a whole. Therefore, the Port urges the U.S. Entity to ensure that any changes in river operations that might result from modifications to the Columbia River Treaty do not harm navigation.

In particular, the higher high flows and lower low flows that the U.S. Entity is modeling may adversely affect navigation on the Columbia River. For example, the higher high flows could diminish the safe handling and commercial efficiency of both deep-draft ships and barges in the federal navigation channel. In addition, the Port is concerned that higher high flows could increase sedimentation in the Columbia River navigation channel. The opposite river operation of lower low flows could also reduce the draft that is available to shipping. If they were to occur, both of these changes in river operations would then require harmful draft restrictions or increased funding for Corps of Engineers maintenance dredging.

The Port of Portland recommends that the U.S. Entity carefully evaluate the implications for navigation of any possible changes to the Columbia River Treaty. The Port's staff has already provided some information that would be relevant to this assessment, and we would be happy to assist in any way that would be helpful.

I apologize that this submission is slightly late, but I hope that you will still be able to consider the Port's views on this matter. Thank you again for this chance to comment.

Sincerely,

A handwritten signature in black ink that reads "Richard Finn". The signature is written in a cursive style with a prominent flourish at the end.

Richard Finn
Federal Affairs Manager