May 30, 2017

Brad Botwin, Director, Industrial Studies
Office of Technology Evaluation
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 1093
Washington, DC 20230
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Mr. Botwin:

Thank you for the opportunity to provide comment on Section 232 National Security Investigation of Imports of Steel.

The Port of Vancouver USA is a 105-year-old economic engine located on 2,100 acres along the Columbia River in Vancouver, Washington. The third-largest port in Washington state, our mission is to provide economic benefit to our community through leadership, stewardship and partnership in marine, industrial and waterfront development.

The port has five marine terminals and 13 berths on the Columbia River's deep-draft shipping channel. BNSF Railway and Union Pacific Railroad mainlines converge at the Port of Vancouver, and the port is near major interstate and state highways, including I-5, I-205, I-84, SR 14 and SR 500. More than 3,200 people come to work on port property each day and port activities generate \$2.9 billion in annual economic benefit to the region.

We are the second-largest importer of steel products on the U.S. West Coast, moving slab, pipe, coil and other steel products from Asia to markets in the inland U.S. and Canada. Imported raw steel also moves across the Columbia River to one of several manufacturing companies in Portland, Oregon, where it is made into products that support the construction and manufacturing industries.

Steel imported through the Port of Vancouver supports family-wage maritime and transportation jobs, including longshore workers, stevedores, truck drivers, rail workers and logistics support workers. Manufacturing raw steel into components or finished products at local mills supports additional manufacturing and distribution jobs in our region.

Additionally, 36 percent of the port's revenue is tied to steel products. Our ability to generate revenue is directly connected to our ability to invest in the assets and infrastructure that attract and retain companies that hire workers in our community and region. Increased duties that lower steel imports cut our revenue and limit our ability to continue creating jobs for local workers.

The Port of Vancouver USA respectfully requests the Department of Commerce not implement additional duties on the import of steel, as this will negatively impact local workers as well as the port and our ability to bring economic benefit to the region.

Thank you again for the opportunity to provide comment. Please feel free to contact my office if we can be of assistance.

Sincerely,

Julianna Marler

Chief Executive Officer

Cc: Senator Patty Murray

Senator Maria Cantwell

Congresswoman Jaime Herrera Beutler