

May 14, 2016

Washington Department of Ecology
Cowlitz County Planning Department

Millennium Bulk Terminal – Longview SEPA DEIS Comments

I am William Brake, a retired Energy Engineer and Registered Professional Engineer and have reviewed nearly 8,000 entries in the Energy Information Administration and Department of Commerce for the period 2002 through 2015 related to US Coal Exports of Steam Coal, Metallurgical Coal, and Coke.

Based on this review, I do not see a need for additional diversification of exports from Washington State or need for an additional coal export terminal (MBTL- Longview) and recommend the “No Action Alternative”.

Thank You

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Attachment : Coal Historical Exports 2
BRAKE – Observations from US EIA and Department of Commerce

1. USA Exports 2002 -2015 with 7,982 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	427,677,338	\$ 25,886,132,667	\$60.53
Metallurgical Coal	605,897,755	\$ 70,884,352,831	\$116.99
Coke	16,955,726	\$ 2,272,260,263	\$134.01

2. Pacific Ocean Exports 2002-2015 with 938 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	48,962,872	\$ 2,238,829,386	\$45.73
Metallurgical Coal	2,001,410	\$ 136,589,166	\$68.25
Coke	358,137	\$ 37,055,593	\$103.47

3. Seattle Washington Exports 2002-2015 with 285 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	26,350,048	\$ 855,277,140	\$32.46
Metallurgical Coal	119,990	\$ 6,106,740	\$50.89
Coke	8,118	\$ 3,639,721	\$448.35

4. USA Exports 2015 Only with 599 load tickets

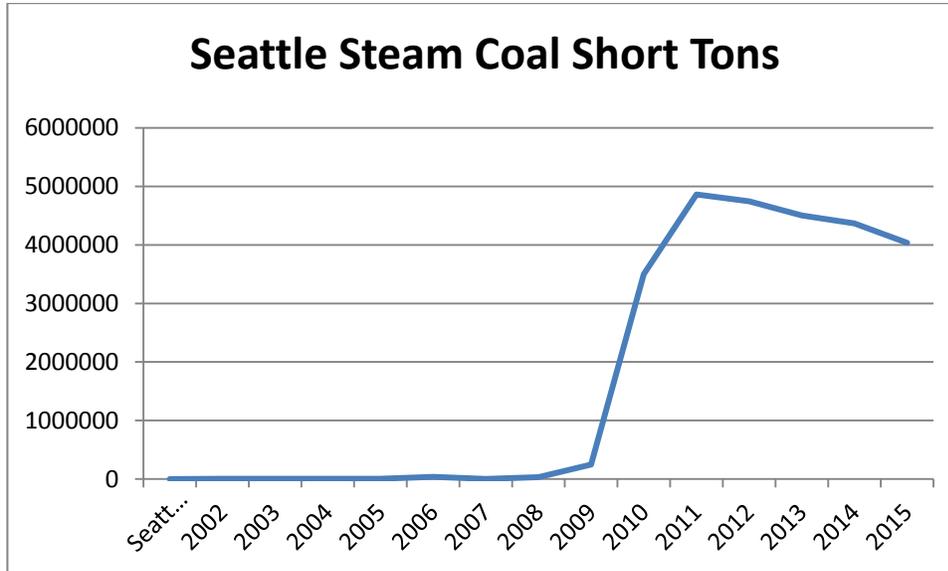
Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	27,951,029	\$ 1,577,475,160	\$56.44
Metallurgical Coal	46,006,859	\$ 4,108,921,314	\$89.31
Coke	856,878	\$ 197,114,970	\$230.04

5. Seattle Washington Exports 2015 Only with 60 Load Tickets

Type	Short Tons	Revenue	Revenue per Short Ton
Steam Coal	4,036,724	\$ 130,764,680	\$32.39
Metallurgical Coal	0	0	0

Coke	829	\$ 616,903	\$744.15
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6. Seattle Washington Steam Coal Exports by Year 2002-2015



7. Pacific Ocean Port Exports to the following 41 Countries (List Only) with the numbers and Bold from the Port of Seattle Only

South Korea - 45	Thailand - 28	Peru	India - 5
Brazil	New Zealand - 1	Pakistan	Italy
Chile	Australia - 20	Saudi Arabia	Oman
Singapore - 23	France	Philippines	Sweden
Ivory Coast	Vietnam	Kazakhstan	Greece
Japan - 29	El Salvador	Mexico	Belgium
Taiwan - 15	Russia	Netherlands - 1	South Africa
China - 25	Slovenia	Guatemala	Brunei - 9
Hong Kong - 8	Malaysia - 24	Kuwait	Bolivia
Indonesia	Canada - 54	Libya	United Arab
Spain - 1			

8. Observations by Bill Brake

- Metallurgical Coal is Top Export from USA followed by Steam Coal
- Steam Coal is Top Export from Pacific Ocean Port Cities
- Pacific Ocean Port Cities are San Diego, Los Angeles, San Francisco, Portland, Seattle and Anchorage
- Seattle Washington is over half of Steam Coal Exports from Pacific

Ocean Cities

- Pacific Ocean Ports and Seattle have significantly Lower Revenue per short Ton than the rest of the USA Coal Exports
- Seattle Export Demand has fallen 20 % from peak in 2011
- The Port of Seattle has Exported Coal to 15 Countries
- Millennium Bulk Terminal – Longview proposal at 48,500,000 Short Tons per Year is larger than any USA Port
- Washington Economy is sufficiently diversified in Coal Exports now without a new Coal terminal