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San Francisco Chronicle

Opponents of Oakland coal shipping target governor's pal

By Matier & Ross | July 25, 2015 | Updated: July 25, 2015 4:02pm

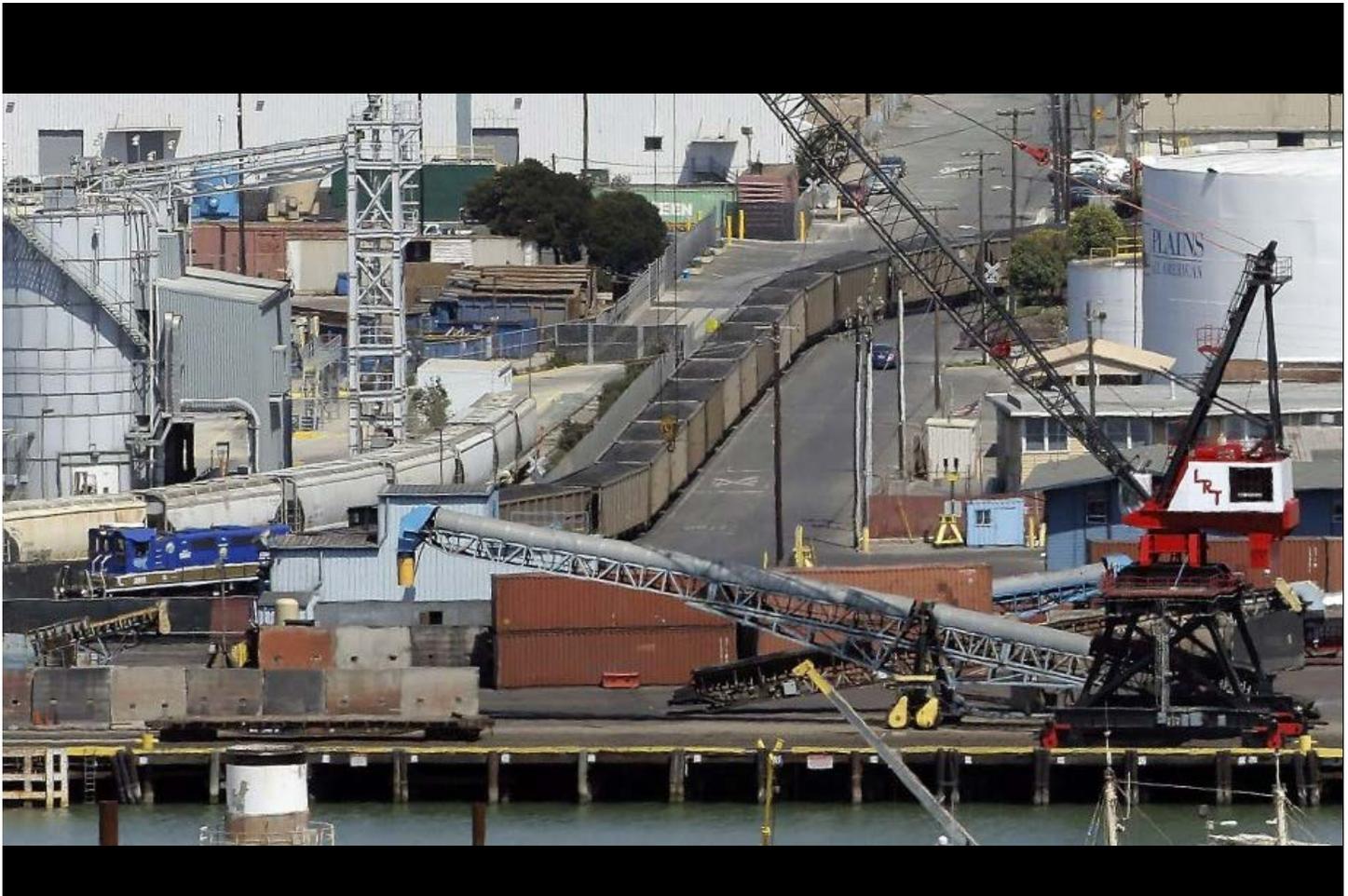


Photo: Carlos Avila Gonzalez, The Chronicle

IMAGE 1 OF 2

A train loaded with coal approaches the Levin-Richmond Terminal in Richmond, Calif., on Thursday, July 23, 2015. A similar plan for a coal exporting operation has been proposed at the old Oakland Army Base by ... [more](#)

While Gov. **Jerry Brown** was busy at the Vatican [warning of possible human extinction](#) from global warming, his business partner and friend **Phil Tagami** was treading hot water with environmentalists and civic leaders over a plan to ship millions of tons of coal from city docks in Oakland.

At issue: a proposal to ship Utah coal through an \$820 million cargo facility that Tagami is building at the old Oakland Army Base — a big chunk of which is being paid for by public money.

“The governor just told the pope that we need to leave 90 percent of the world’s coal in the ground or face an environmental catastrophe,” said **Jess Dervin-Ackerman**, conservation program coordinator for the San Francisco Bay chapter of the Sierra Club. “If he is serious about doing something, he could and should start with his own hometown and with his own friend.”

Coal is the issue where two powerful forces in Oakland run straight into each other. One is the city’s longtime dream of turning the old Army base into an economic engine. The other is the desire to adopt an environmentally progressive stance that can change the city’s hardscrabble image.

“Stop it immediately,” Mayor **Libby Schaaf** said of the proposed coal-export plan in a May 11 e-mail to Tagami that the Sierra Club obtained under a Freedom of Information Act request.

“If you don’t do that soon we will all have to spend time and energy in a public battle that no one needs and will distract us from from the important work at hand,” Schaaf wrote.

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Schaaf's fear, and the fear of environmentalists and many people who live in West Oakland, is that dust from the coal trains will blow into surrounding areas and cause health problems. There's also the question of pinning Oakland's economic health to transporting an energy source that's a leading contributor to global warming.

The Port Commission, on which Tagami served from 2000 to 2003 while Brown was mayor, has also voiced unanimous opposition to coal being moved through the cargo facility.

However, the old Army base isn't port land — it's owned by the city. So short of blocking coal-loaded trains from crossing their property, port officials have no real say in the matter.

Port officials have also been told by legal staffers that the Army base development deal struck in 2012 between Tagami's California Capital & Investment Group and the city has no provision prohibiting coal handling.

The coal fight is a sharp departure for Tagami, who for years has been known as the quintessential "friend to all" in Oakland politics — especially Brown.

It was Brown who appointed Tagami to the Port Commission. As governor, he named Tagami to the state Lottery Commission.

With Brown's help, Tagami got city funding for the \$91 million restoration of the historic Fox Theater in the city's Uptown district — a project that also houses Brown's pet charter School for the Arts.

Brown was married in Tagami's downtown Rotunda Building, which houses Tagami's California Capital & Investment Group.



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Pier slaying suspect's twisted road to S.F.



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And Brown's 2014 statement of economic interest lists the governor as an investor in the Edgewood Park Plaza office building, an Oakland property managed by Tagami's investment group.

Brown's office said the governor had no comment regarding Tagami's plan for shipping coal through Oakland.

Funding for the project is coming from a variety of public and private sources, including \$242 million authorized in 2012 by the California Transportation Commission.

It was Tagami's company that initially lobbied Utah coal interests to invest \$53 million in the Army base bulk cargo facility. Tagami then cut a deal to turn over the operation to a newly formed company, Terminal Logistics Solutions — which is headed by two former Port of Oakland executive directors, **Jerry Bridges** and **Omar Benjamin**.

In a statement, Tagami described the arrangement between his investment group and Terminal Logistics as an “arm's length contractual relationship.” He also said that regardless of what was transported — and so far, no one “has committed to the transport of any particular commodity” — any rail cars would be covered and that other measures would be taken “to minimize and potentially eliminate fugitive dust.”

The project's website says the terminal — the first piece of a much bigger logistics center — envisions “handling up to 12 50-car trainloads per day.”

In an interview, Bridges said it is premature to discuss the coal operation, because no deal has been signed with Utah officials to bring coal to Oakland.

Nonetheless, Bridges said, Terminal Logistics has agreed to sublet the facility from Tagami's group “based on our ability to handle any of the 15,000 bulk commodities handled on the West Coast” — and that includes coal. Bridges noted that coal from out of state is already being shipped overseas from ports in Richmond and Stockton.

And although Bridges promised to pursue the Army base project in an “honorable” and “environmentally friendly” way, he also said, “Our plan is to proceed under the entitlements we think we have.”

Meanwhile, the Sierra Club and others are stepping up their opposition, calling on the city to ban the coal exports as a danger to both the environment and the health of West Oakland residents.

“I bet Mr. Tagami would like us to go away,” said the Sierra Club’s Dervin-Ackerman. “But of course we won’t.”

San Francisco Chronicle columnists Phillip Matier and Andrew Ross appear Sundays, Mondays and Wednesdays. Matier can be seen on the KPIX TV morning and evening news. He can also be heard on KCBS radio Monday through Friday at 7:50 a.m. and 5:50 p.m. Got a tip? Call (415) 777-8815, or e-mail matierandross@sfchronicle.com. Twitter: @matierandross



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9/14/15

RE: Public Health Impacts of Coal Exports at the Former Oakland Army Base

Dear Oakland City Council Members:

I am a public health epidemiologist with over 25 years of experience in assessing public health impacts of environmental exposures, including hazardous material spills, pesticides, and air pollution. I am an Alameda County resident and hold a doctorate degree in epidemiology from the University of California, Berkeley, School of Public Health which I feel especially qualifies me to comment on the potential health impacts of possible coal exports at the Former Oakland Army Base.

I would like to focus my comments on three areas:

1) Coal dust exposures will add pollution to an already disproportionately burdened community suffering long-standing health risks.

Exposure to coal dust is a public health hazard and exposure to West Oakland residents will be adding pollution to a community with already **some of the highest pollution burden in the State** with long-standing health risks. For example, published work conducted by myself and my colleagues showed that areas of West Oakland had **some of the highest rates of emergency room visits for asthma for children in Alameda County**. An accompanying economic analysis showed that the highest costs in the County to society for treating asthma also incurred in this region. Adding coal dust exposures will add pollution to a minority area already suffering from disproportionate pollution effects and will increase health care costs. Children suffering from asthma would be likely to experience a further loss of lung function from inhaling even low levels of coal dust (especially those particles of coal dust less than 10 microns in diameter). The California Environmental Protection Agency has rated parts of the West Oakland area as some of the highest census tracts in the State burdened by pollution. For example, census tract 4017 in West Oakland is rated at the 78th percentile for overall pollution burden and the top percentile for clean-up sites compared to all other CA census tracts.

2) The potential for fire and/or explosion especially during the terminal processing and storage stages, is real, and the onus should be on the developers/owners to show that proper control measures will be implemented to reduce this risk.

Dust explosions and/or fire can occur when coal dust concentrations are high enough, there is an ignition source, and oxygen is present. The owners/developers must show how the suspended dust will be kept at or below 25% of the lower explosive limit (LEL) at all times. Water misting is one of the main control methods for reducing coal dust explosion/fire potential. At the Westshore terminal near Vancouver, British Columbia, which is the largest existing coal export terminal on the West Coast, water costs are approximately \$1.5 million/year. This does not seem like a good investment to be making during a historic drought crisis.

English comments, page 2

3) Investing in fossil fuel development/transport at this critical time is bad for public health.

At a time when large institutions such as the University of California are divesting funds from fossil fuel holdings, the timing could not be worse for the City of Oakland to invest in coal transport. This obviously goes against the Council's own resolution (7/17/14) opposing the transport of fossil fuels by rail through the city. **Climate Change has been called the biggest global health threat of the 21st century.** It would be unconscionable for Oakland to support this effort, no matter what the financial gain. Health effects such as increased heat illness and death, increased air pollution and respiratory disease, increased wildfires and deteriorated air quality, drought and effects on water quality, are among only a few of the consequences of continued burning of fossil fuels. The City of Oakland would be complicit in contributing to the climate change crisis with the approval of this facility.

Thank you for letting me outline some concerns with the proposed coal export terminal at the former Oakland Army Base. I hope that the City will decide on the right side of history and not allow this health-damaging facility be approved in Oakland.

Sincerely,



Paul B. English, PhD, MPH

References

[Progress in pediatric asthma surveillance II: geospatial patterns of asthma in Alameda County, California.](#) Roberts EM, English PB, Wong M, Wolff C, Valdez S, Van den Eeden SK, Ray GT. *Prev Chronic Dis.* 2006 Jul;3(3):A92. Epub 2006 Jun 15

California Environmental Protection Agency. CalEnviroscreen 2.0 <http://oehha.ca.gov/ej/ces2.html>
[Accessed 9/14/15](#)

"What Coal Train Dust means for human health" Oregon Public Broadcasting, 2015.
<http://www.opb.org/news/article/coal-dust-a-closer-look/> Accessed 9/14/15

Monetta, John

From: Michelle Levinson <levinson.m@gmail.com>
Sent: Wednesday, September 16, 2015 5:06 PM
To: Monetta, John; Cappio, Claudia
Subject: Fwd: Information on proposed coal terminal ahead of 9/21 hearing
Attachments: 2015.09.16 Michelle Levinson comments.docx

Sorry, I finally should have the correct email address here.

Many thanks,

Michelle

----- Forwarded message -----

From: **Michelle Levinson** <levinson.m@gmail.com>
Date: Wed, Sep 16, 2015 at 5:03 PM
Subject: Fwd: Information on proposed coal terminal ahead of 9/21 hearing
To: jmonnetta@oaklandnet.com, ccappio@oaklandnet.com

First attempt didn't go through - sorry for my mistake.

Most appreciatively,

Michelle

On Wed, Sep 16, 2015 at 4:59 PM, Michelle Levinson <levinson.m@gmail.com> wrote:
Please find attached evidence and comments that I request the Council consider ahead of the public health and safety hearing called for September 21.

Most appreciatively,

Michelle Levinson
District 3

--

Michelle Levinson
Oakland, CA
[\(510\) 703-1426](tel:(510)703-1426)

--

Michelle Levinson
Oakland, CA
[\(510\) 703-1426](tel:(510)703-1426)

Overview:

One aspect of the Oakland Global Trade and Logistics Center under development at the former Oakland Army Base is a proposed bulk and oversized commodity export terminal (OBOT).¹ This memo affirms that, contrary to claims made by developers, **coal is not a necessary commodity for the successful operation of a bulk and oversized export terminal in Oakland.**

Ports up and down the Pacific Coast prove that coal is not needed at major ports nor essential to bulk export operations. Everything from agricultural products to machinery are shipped as non-containerized commodities out of each major port on the west coast, including cereals and grains, fruits and vegetables, iron, steel, slag, ash, and ores, wood and wood pulp, vehicles, boilers, and other machinery and parts. None of these ports relies on coal for more than 0.8% of the total value of their transactions, and ports in the Seattle, Columbia-Snake, and San Diego districts do not export any coal as bulk at all. The conclusions in this memo are based on information and data pulled from the World Customs Organization, USA Trade Online (the official source of trade information from the US Census Bureau), and the Port of Oakland.^{2, 3, 4, 5}

In the letter from David Smith of Stice & Block, LLP to City Administrator Landreth dated September 8, 2015 (CCIG Rep letter) there are a number of claims regarding the character of the bulk commodity market. The letter cites misleading and outdated data and obscures important current information about the bulk commodity export market and best estimates of future trends. Lastly, reliance on outdated data hides the *economic risk* posed to the City by construction of long-term infrastructure that is designed and operated for a specific commodity when the legal and economic viability of that commodity is very uncertain.

¹ Oakland Bulk and Oversized Terminal, "About," posted 02/03/2015 (<http://obotjv.com/uncategorized/hello-world/>)

² World Customs Organization, "HS Nomenclature 2012 Edition Chapter 27," accessed 8/18/15 (http://www.wcoomd.org/en/topics/nomenclature/instrument-and-tools/hs_nomenclature_2012/~media/8D23259F053446A0A1C0ED3F526B0C7B.ashx)

³ USA Trade Online, "Help Section Table of Contents – Ports," accessed 8/18/15 (<https://www.census.gov/foreign-trade/statistics/dataproducts/uto-help/uto-help.html#ports>)

⁴ Port of Oakland, "Port of Oakland Top 10 Commodities By Tonnage – Exports (Containerized) Calendar Year 2014," source: U.S. Dept of Commerce, Bureau of Census, accessed 08/17/15 (<http://www.portoakland.com/maritime/commodities.aspx>)

⁵ Port of Oakland, "Maritime Operations at a Glance – Principal Exports," accessed 8/17/15 (<http://www.portoakland.com/maritime/operations.aspx>)

Common questions and data:

1. Is coal 45% of the U.S. export market? **No.**
 - In 2014 coal was less than 14% of the export market by weight and **only 1.4% of the export market by dollar value.**⁶
 - The CCIG Rep letter quotes a report by the American Trucking Association, an industry advocacy group, which states that coal is 40-50% of bulk freight tonnage.
 - This misleading statistic gives coal as a share of all exports *by weight* rather than by value, a more relevant statistic on which to base business decisions.⁷
 - The statistic is outdated, asserting the prevalence of coal based on the vague claim that “coal is still king, accounting for 40-50% of total tonnage **historically**” [emphasis added]. There is neither evidence to corroborate nor explanation of the time parameters.
 - The CCIG Rep letter also cites the “Freight Facts and Figures 2013” report by the U.S. Department of Transportation (DOT) (CCIG Rep Letter, p. 10). This is another instance where the firm representing OBOT highlights the share of export commodities by weight rather than by value.
 - “The leading commodities by weight are bulk goods including gravel, cereal grains, and coal. **The leading commodities by value are high value-per-ton goods requiring more rapid delivery, including machinery, electronics, and motorized vehicles.**” [emphasis added]⁸
 - The CCIG Rep letter lastly cites the Bureau of Transportation Statistics within the U.S. DOT (CCIG Rep Letter, p. 10). The material referenced by the Developer has not been updated since 2011, does not differentiate between bulk and containerized commodities, and again reports weight rather than value.⁹

2. Do you need coal to operate a successful bulk and oversized commodity export terminal? **No.**
 - **Coal accounts for only 2.5%** of non-containerized export commodities, by value.¹⁰
 - Of the top 50 bulk and oversized commodities by value, only 6 commodities are fossil fuels.¹¹

⁶ 2015.08.05 Port-level Exports v.A; sheet Target commodities; cells I8, I11 and D8, D11 – via USA Trade Online (<https://usatrade.census.gov/>)

⁷ Letter from David Smith, Stice & Block, to City Administrator Sabrina Landreth, 9/8/15, “Letter from CCIG Rep,” (<http://www2.oaklandnet.com/w/oak054816>)

⁸ Federal Highway Administration, U.S. Department of Transportation, “Freight Facts and Figures 2013,” accessed 9/16/15 (http://www.ops.fhwa.dot.gov/freight/freight_analysis/nat_freight_stats/docs/13factsfigures/pdfs/fff2013_highres.pdf)

⁹ Bureau of Transportation Statistics, Office of the Assistant Secretary for Research and Technology, “Table 3-4: Rail Shipments: 2011,” July 2013. (http://www.rita.dot.gov/bts/sites/rita.dot.gov.bts/files/publications/state_transportation_statistics/state_transportation_statistics_2012/html/table_03_04.html)

¹⁰ 2015.08.05 Port-level Exports v.A; sheet Target commodities; cell G25 – via USA Trade Online

¹¹ 2015.08.05 Port-level Exports v.A; sheet Target commodities; cells C34-C84 – via USA Trade Online

3. Are there other bulk and oversized commodities readily available to exporters? **Yes.**
 - The top 50 bulk commodities exported from the U.S. include things like **soybeans, corn, rice, wheat, zinc and other metal ores, fertilizers, and scrap metal.**¹²
 - Additionally, a number of oversized items top this list, such as **tractors, bulldozers, aircraft and parts, machinery, wood, pipes, pumps, and turbines.**¹³
 - Currently, Oakland's Top 10 *containerized* export commodities are **wood pulp, fruit and nuts, meat, fish, beverages, oil seeds, grains, seeds, cereals, iron and steel, preserved vegetables, fruits, and nuts, plastics, food waste.** Oakland will be able to export a number of these commodities even more efficiently and at a higher margin through its bulk and oversized commodity terminal.^{14, 15}

4. Are there other bulk and oversized commodities that the Central Utah Counties might export through Oakland instead of coal? **Yes.**
 - Utah county representatives identified **hay from Sanpete County and salt from Redmond mine** as two specific exports that would benefit from rail service to the port.¹⁶
 - **Fossil fuel products account for only 3.4% of total value** of exports out of Utah.¹⁷
 - Despite the relatively low value of this commodity, coal represents an outsized portion of rail capacity by weight and volume, making it one of the least efficient and most environmentally damaging products exported from the region.¹⁸
 - Alternatives to coal that top the list of bulk and oversized products exported from Utah include **large machinery and parts, vehicles and parts, precious stones and metals, vegetables, fruits, nuts, oil seeds, and grains.**¹⁹

5. Won't another port step in and export coal even if Oakland bans the product? **No.**
 - **Coal accounts for 0.15% and 0.8%** of the value of all exports out of the entire Los Angeles district and the entire San Francisco district, respectively.^{20, 21}
 - Ports in the San Diego, Columbia-Snake, and Seattle districts **do not export any coal** as bulk and oversized commodities.^{22, 23, 24}

¹² 2015.08.05 Port-level Exports v.A; sheet Target commodities; cells A34-A84 – via USA Trade Online

¹³ *Id.*

¹⁴ Port of Oakland, "Port of Oakland Top 10 Commodities By Tonnage – Exports (Containerized) Calendar Year 2014," source: U.S. Dept of Commerce, Bureau of Census, accessed 08/17/15

(<http://www.portoakland.com/maritime/commodities.aspx>)

¹⁵ Port of Oakland, "Maritime Operations at a Glance – Principal Exports," accessed 8/17/15

(<http://www.portoakland.com/maritime/operations.aspx>)

¹⁶ GRAMA request: Utah Department of Workforce Services, "April 2 Meeting Materials," 4/2/15

¹⁷ 2015.08.17 Utah State Exports; sheet All Utah State Exports; cell B3 – via USA Trade Online

¹⁸ 2015.08.17 Utah State Exports; sheet All Utah 27; cell G3 – via USA Trade Online

¹⁹ 2015.08.17 Utah State Exports; sheet All Utah State Exports; column D – via USA Trade Online

²⁰ 2015.08.19 West Coast exports; sheet LA 27; cell B3 – via USA Trade Online

²¹ 2015.08.19 West Coast exports; sheet SF 27; cells B3 – via USA Trade Online

²² 2015.08.19 West Coast exports; sheet SD27; column A – via USA Trade Online

- **Other coal export terminals have been blocked**, losing public battles up and down the Pacific coast at the Ports of Morrow, Tacoma, Vancouver, Kalama, Portland, Grays Harbor, **and face intense public opposition** in Long Beach, Cherry Point (WA), and Longview (WA).^{25, 26, 27, 28}
 - **Alternative routes from Utah to the sea are not as commercially viable** – Oakland is the closest deep water to Utah and is the terminus of the two major West Coast rail lines, Union Pacific and Burlington Northern Santa Fe.^{29, 30}
6. Does designing a terminal specific to coal undermine the long-term viability of the infrastructure? **Yes.**
- Experts at Goldman Sachs predict declining coal prices and declining coal exports.

²³ 2015.08.19 West Coast exports; sheet CS 27; column A; cell D7 – via USA Trade Online

²⁴ 2015.08.19 West Coast exports; sheet SEA 27; cells D7 and D10 – via USA Trade Online

²⁵ Sightline Institute “Coal Export: A History of Failure at Western Ports,” 08/2012

(<http://www.sightline.org/research/coal-export/>)

²⁶ Inside Climate News, “Losing Streak Continues for U.S. Coal Export Terminals,” 1/12/15

(<http://insideclimatenews.org/news/20150112/losing-streak-continues-us-coal-export-terminals>)

²⁷ Daily 49er CSU-Long Beach, “Port of Long Beach Receives Backlash from Environmental Groups,” 4/30/15

(<http://www.daily49er.com/news/2015/04/30/port-of-long-beach-receives-backlash-from-environmental-groups/>)

²⁸ Columbia Riverkeeper “Dirty Coal Export Targets the Columbia,” accessed 8/21/15

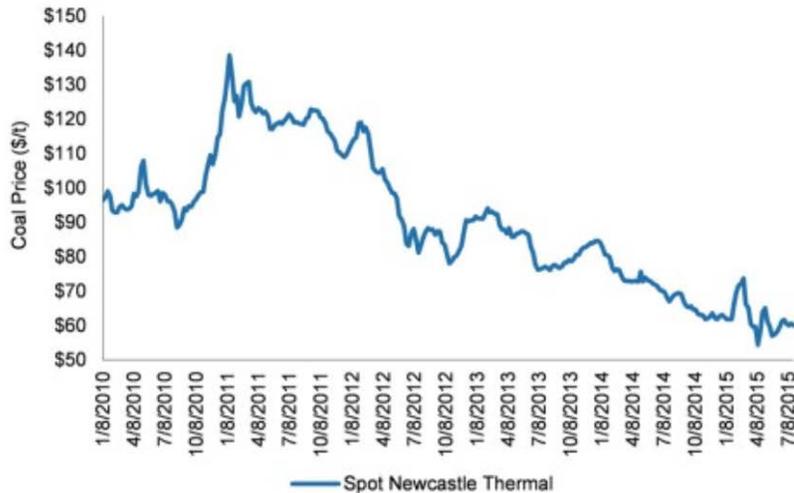
(<http://columbiariverkeeper.org/our-work/coal-export/>)

²⁹ Deseret News “Utah invests \$53 million in California port for coal, other exports,” 4/24/15

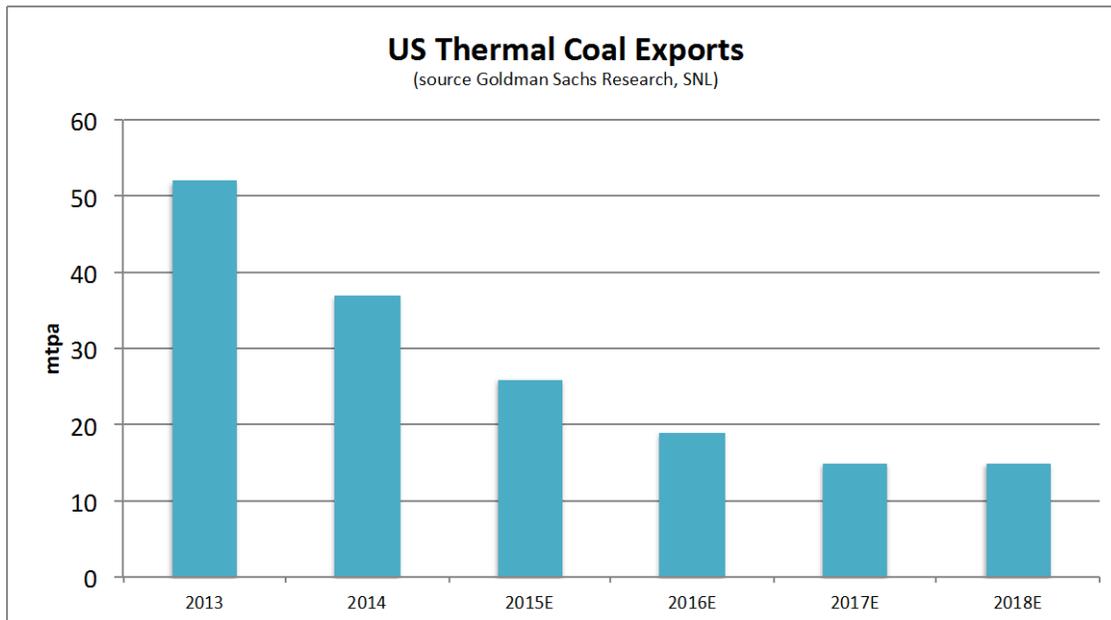
(<http://www.deseretnews.com/article/865627254/Utah-invests-53-million-in-California-port-for-coal-other-exports.html?pg=all>)

³⁰ East Bay Express, “Banking on Coal in Oakland,” 8/19/15 (<http://www.eastbayexpress.com/oakland/banking-on-coal-in-oakland/Content?oid=4463888&showFullText=true>)

Exhibit 45: Spot Newcastle Thermal Coal Price



Source: Bloomberg, Morgan Stanley Research



- Designing the terminal to process coal is a liability because the commodity may disappear from the market. If the coal market declines as predicted, the sunk costs associated with the coal-specific design will undermine the economic benefits of the project for the City and citizens.
- In addition to bankruptcies of coal mining companies throughout the U.S., the coal extraction industry faces almost constant legal and policy challenges that will impact its ability to get coal to export markets.

- “An environmental group sued the Bureau of Land Management and the Forest Service today for approving the Utah lease of 40 million tons of coal.... The group, which filed its complaint in Colorado U.S. District Court, said the Obama administration failed to adequately weigh mining's climate impacts. Bowie Resource Partners LLC offered a \$17.2 million bid for the tract in June, with sights on expanding its Skyline mine.”³¹
- The seaborne coal trade is “under severe stress” as China’s growth slows and it cracks down on pollution and carbon emissions.³²
 - While Chinese coal imports already fell 38 percent from January to May of this year, the nation’s appetite is expected to dwindle further when China’s national Emissions Trading Scheme launches in 2016.³³
- Because the country represents 23 percent of global steam coal imports and is the price-setting country for the commodity, a decline in China’s appetite will materially decrease demand for seaborne coal, further lowering prices on the international market.³⁴

7. Is the proposal significant relative to current coal exports from Richmond & Stockton?
Yes.

- The **OBOT terminal could handle up to 9.9 million tons of coal per year**, more than triple current coal exports out of Stockton and Richmond *combined*.³⁵
- Richmond coal exports totaled **less than 0.6 million tons** in 2014.³⁶
- The coal export contract between Bowie Resource Partners and the privately owned Levin-Richmond terminal **expires on December 31, 2015**. The future of coal export from Richmond is therefore very uncertain.³⁷
 - Residents in Richmond are very concerned about coal dust blowing off trains and storage mounds.³⁸
- In 2014 there were **2.3 million tons** of coal exported out of Stockton.³⁹
 - In June 2015 Stockton port officials **projected coal exports to fall to just 400,000 tons this fiscal year**, steeply reduced from 2014 due to lower demand for coal exports and the volatility of global coal shipments.⁴⁰

³¹ Environmental & Energy News (E&E News), “Greens sue Obama admin over Utah lease,” 9/11/15 (<http://www.eenews.net/eenewspm/2015/09/11/stories/1060024588>)

³² Financial Times, “Australian miners cry foul over China emissions trading scheme,” 7/5/15 (<http://www.ft.com/intl/cms/s/0/3fcec8a8-2146-11e5-aa5a-398b2169cf79.html?siteedition=uk>)

³³ The Climate Group, “China Will Launch World’s Biggest Carbon Market in 2016,” 9/4/14 (<http://www.theclimategroup.org/what-we-do/news-and-blogs/china-will-launch-worlds-biggest-carbon-market-in-2016/>)

³⁴ Oxford Institute for Energy Studies, “China’s Coal Market: Can Beijing Tame ‘King Coal’?” 12/2014 (<http://www.oxfordenergy.org/wpcms/wp-content/uploads/2014/12/CL-1.pdf>)

³⁵ GRAMA request: Utah Department of Workforce Services, “April 2 Meeting Materials,” 4/2/15

³⁶ 2015.08.06 Port-level Exports SF District 4-digit HS 27; sheet Richmond; cell I7 – via USA Trade Online

³⁷ Bowie Resource Partners, “Form S-1,” filed with United States Securities and Exchange Commission, 6/19/2015

³⁸ KQED Science, “Coal Train Dust Worries Richmond Residents,” 6/22/15

(<http://ww2.kqed.org/science/2015/06/22/coal-train-dust-worries-richmond-residents/>)

³⁹ 2015.08.06 Port-level Exports SF District 4-digit HS 27; sheet Stockton; cell I7 – via USA Trade Online

⁴⁰ The Record, "Slowing coal shipments will undercut Port of Stockton revenue," 6/29/15
(<http://www.recordnet.com/article/20150629/NEWS/150629684>)