



FMSIB Policy on changing evaluation requirements based upon commodity

The board shall develop and recommend policies that address operational improvements that primarily benefit and enhance freight movement. (RCW 47.06A.020 (7))

The Freight Mobility Strategic Investment Board has studied the various comments and reactions to announced plans for proposed bulk import/export marine terminals in the state of Washington. The board has discussed the concerns that have been raised about these facilities, specifically the concerns about the commodity impacts not the terminal design and operating impacts, and considered their relationship to the FMSIB mission of enhancing freight capacity and efficiency within the state.

FMSIB believes that bulk import/export facilities are important to stimulate more trade within the state and across state borders. We believe this is congruent with the federal export policy of doubling exports over the next five years and of the state's export policy. Bulk product terminals, as well as container terminals and other cargo handling terminals, regardless of the commodity shipped, create the economic basis that stimulates investments in roads, rail, port connections and terminal infrastructure so necessary to our state economy. The import/export of bulk cargo also stimulates investment in basic infrastructure that supports the movement of non-bulk cargoes, such as containerized traffic, home-building supplies, industrial products, autos and much more, the movement of which creates jobs, payrolls and tax revenue for state and local governments.

The FMSIB mission, in part, is to recommend policies that address operational improvements that benefit and enhance freight movement and that recognize the economic importance of freight movement to Washington State. FMSIB is very concerned of the precedent that will be set if Washington State Agencies require new marine terminal infrastructure environmental review to include an analysis of the source and destination effects of the commodity that is being moved. This would be a substantial deviation from existing commonly followed environmental impact analysis procedures. The new analysis that is being requested asking for this broad-scale impact analysis of the production and consumption effects of a particular commodity far away from project sites will create significant delays and economic problems for the development of freight infrastructure in our state. If such procedures were applied to a variety of projects, such as grain elevators or manufacturing centers, it is doubtful whether projects could ever come to fruition or whether the state could continue to attract the investment for a first-class road, rail and air freight system.

In addition, the calls for a broad programmatic analyses of unrelated projects, in very different locations, with separate environmental concerns and solutions, based solely on the proposed movement of a similar commodities through these projects sets a policy that will undermine the ability of this State to attract investment in freight infrastructure. Broad programmatic analysis of projects that are only related due to the commodity, or a related use, will serve to significantly and unnecessarily delay any development and force those developments to occur outside our State. FMSIB is also concerned that the precedent of broad programmatic analysis on related projects would in the future be expanded, and used to prevent the development of other freight related infrastructure.

In taking this policy position FMSIB is not taking a position, either in favor or opposed, to any specific project.