PLANNING DEPARTMENT • SCOTT R. CHESNEY, AICP, PLANNING DIRECTOR

July 23, 2025

Sean Boyd, CEO & president
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Regarding: Project Big Rock/ 11703 W Medical Lake Rd, Spokane, WA 99224

Mr. Boyd and Mr. Coleman,

We received your letter dated July 3, 2025, which described the attributes of a proposed project, "Big Rock," and requested a zoning interpretation regarding permitted use within the Rural Traditional zone.

Your letter describes project Big Rock as a multi-purpose industrial facility that will produce energy via solar and hydrogen for power distribution, vehicle fuels, data centers, and agricultural products for use in the Pacific Northwest.

You identify parcels totaling approximately 515 acres generally at 11703 W. Medical Lake Road, generally in the vicinity of the northwest quadrant of the I-90 Medical Lake Interchange. These parcels are all zoned Rural Traditional and are adjacent to lands east and north within the Spokane County Urban Growth Area, and zoned light industrial.

You describe project Big Rock specifically as follows:

> Operational Overview:
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> The Data Center will utilize treated gray water from Collins Aerospace and additional municipal wastewater sources for cooling. The 'spent' cooling water will then be cleaned via advanced treatment to purify it for use as "feedstock" to produce hydrogen.
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> The Hydrogen facility will produce agricultural ammonia using purified data center gray water. This supports local farming by providing domestically produced ammonia for agrarian purposes, aligning with Spokane County's long-term goals for sustainable rural economic development.
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> Hydrogen generation will be used for transportation fuel, material handling equipment, and as a backup power source for the data center.
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> This process reduces demand for industrial use of potable water resources and also reduces

industrial wastewater flows to municipal treatment facilities, along with a lower burden on the sewer network.

The size and scale of the proposed Big Rock project suggest it may qualify as a "major industrial development," which is a specific use permitted in Rural Traditional zoned areas with qualifying parameters.

The Spokane County Comprehensive Plan in Chapter 3 – Rural Land Use, Industrial and Commercial Uses, Goal RL.5b states, "Ensure the availability of adequate industrial land to accommodate major industrial developments that cannot be sited in the Urban Growth Area."

Under Major Industrial Development, goal 5.1 states: "Major industrial developments outside the Urban Growth Area (UGA) are allowed in certain instances (RCW 36.70A.365). These developments are intended to meet the need for industrial uses in which adequate land within the UGA is not available to accommodate the development. For instance, the development may require a parcel of land so large that no suitable parcels are available in the UGA."

Spokane County has no parcel or assemblage of industrial parcels within the Urban Growth Area that meets this 515-acre demand.

The Growth Management Act [RCW 36.70A.365] has specific criteria that must be met to allow use of the "major industrial development" permitting approach. These are as follows:

(1) "Major industrial development" means a master planned location for a specific manufacturing, industrial, or commercial business that: (a) Requires a parcel of land so large that no suitable parcels are available within an urban growth area; or (b) is a natural resource-based industry requiring a location near agricultural land, forestland, or mineral resource land upon which it is dependent. The major industrial development shall not be for the purpose of retail commercial development or multitenant office parks.

(2) A major industrial development may be approved outside an urban growth area in a county planning under this chapter if the criteria, including, but not limited to the following, are met:

(a) New infrastructure is provided for, and/or applicable impact fees are paid;

(b) Transit-oriented site planning and traffic demand management programs are implemented;

(c) Buffers are provided between the major industrial development and adjacent nonurban areas;

(d) Environmental protection, including air and water quality, has been addressed and provided for;

(e) Development regulations are established to ensure that urban growth will not occur in adjacent nonurban areas;

(f) Provision is made to mitigate adverse impacts on designated agricultural lands, forestlands, and mineral resource lands;

(g) The plan for the major industrial development is consistent with the county's development regulations established for the protection of critical areas; and

(h) An inventory of developable land has been conducted, and the county has determined and entered findings that land suitable to site the major industrial development is unavailable within the urban growth area. Priority shall be given to applications for sites that are adjacent to or in close proximity to the urban growth area.

(3) Final approval of an application for a major industrial development shall be considered an adopted amendment to the comprehensive plan adopted pursuant to RCW 36.70A.070, designating the major industrial development site on the land use map as an urban growth area. Final approval of an application for a major industrial development shall not be considered an amendment to the comprehensive plan for the purposes of RCW 36.70A.130(2) and may be considered at any time.

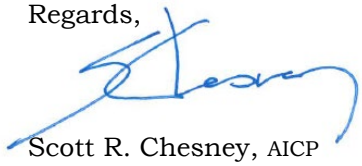
Spokane County Planning interprets that the proposed Big Rock project meets the Spokane County Code zoning definition for a major industrial development.

The designated parcels are adjacent to current light industrial parcels within the Urban Growth Area in an area with commercial and industrial utilities and infrastructure.

If you choose to proceed, please contact us to schedule a pre-application meeting, where the requirements of SCZC and RCW will be reviewed. Your detailed application will be fully evaluated based on the appropriate criteria.

This letter is considered an administrative interpretation of the Spokane County Building and Planning Department under SCC 14.504.200, and is appealable under SCC 14.502.060 and SCC 13.900. If you have any questions or need additional information, don't hesitate to get in touch with me at 509.477.1500.

Regards,



Scott R. Chesney, AICP
Planning Director

C: Al French, Commissioner, District 5
C. De Bruhl, Deputy Prosecuting Attorney – Civil Division