

Euler, Gordon



**To:** Nwankwo, Ike (COM)  
**Cc:** Orjiako, Oliver (Oliver.Orjiako@clark.wa.gov), lisa@berkconsulting.com  
**Subject:** RE: Draft comments on your RILB

Ike

Thanks for sending comments along and for allowing us a chance to see them before they are made formal. Oliver and I had a conference call with our consultants (BERK) yesterday, and I'm providing a few comments to you by way of a response.

The two main issues seem to be the possible availability of land at the Port of Vancouver and the de-designation analysis.

The Port of Vancouver does have land available, but there are a number of reasons why the land was not considered. First, it is publicly-owned, which is not one of the criteria that was used in the search for alternate sites. Also, because it is publicly-owned it is not available for purchase, only for lease—again, not a criteria for a successful land bank site. The land is zoned for heavy industrial uses, and is being considered by the Port of Vancouver for use as an oil terminal (Tesoro-Savage), so its availability at this point is questionable.

We share your concern about de-designation, and we are well aware that the biggest obstacle to establishing a land bank on the two proposed sites is the fact that the land is zoned for agriculture. I would be very surprised if the project was not challenged on that basis. De-designation is a very complicated process, and rightly so. But, establishment of a rural industrial land bank is an equally complicated process, and both processes are allowed by the GMA. Our job as the county is to respond to the application for the land bank. We believe we have gone well beyond the requirements of GMA in establishing a record for this project. The analysis by BERK in the record shows that many of the de-designation criteria are met, while others are not. There is no guidance we can find that says all of the criteria have to be met, or that meeting half of the criteria or two-thirds of the criteria is acceptable. It will be up to the Hearings Board to sort things out if the project is challenged.

Again, we appreciate the comments from Commerce. Your letter will be forwarded to the Board for the hearing next week. Thanks!

Gordy Euler  
Clark County Community Planning

---

**From:** Nwankwo, Ike (COM) [<mailto:ike.nwankwo@commerce.wa.gov>]  
**Sent:** Thursday, March 24, 2016 6:35 PM  
**To:** Euler, Gordon  
**Subject:** Draft comments on your RILB

Hi Gordy,  
Hope all is well at your shop.  
I had called a couple of weeks ago and was told you were out of the office. I hope you had a good time away from work.

We have draft comments on your RILB. I know you put so much time and effort into developing this document which, I believe, is the first one in the state. I have to commend you on the great work you did.

---

The major concern we have is the loss of prime agricultural lands and we have expressed those concerns in the attached draft I am providing you this draft to get your feedback or comments before we finalize and send it officially to the county

Thanks so much for giving us the opportunity to comment on your RILB

Ike C Nwankwo  
Western Washington Manager  
Growth Management Services  
[Ike.nwankwo@commerce.wa.gov](mailto:Ike.nwankwo@commerce.wa.gov)  
Office 360 725 3056 cell 360 561 0907

Washington State Department of Commerce  
1011 Plum Street SE, Olympia, WA 98504  
[www.commerce.wa.gov](http://www.commerce.wa.gov)  
Follow us @WASateCommerce

Learn why you should Choose Washington