

INTRODUCTION

The purpose of this report is to assess options for final land use designations for Glen Cove. This includes an analysis of three primary alternatives:

- ?? Expansion of Port Townsend UGA
- ?? Non-Municipal UGA designation; and
- ?? Limited Area of More Intensive Rural Development (LAMIRD) designation

This analysis is built upon the foundation of the significant amount of planning and policy analysis completed by the County to date and embodied in the *Tri-Area/Glen Cove Special Study*, hereafter “Special Study”. It is not intended to revisit the issues or analysis previously made in the Special Study, except where needed for clarification or consistency. It is also not intended to recommend a final boundary for development in Glen Cove. The purpose of this report is to recommend a final course of action for land use designations in Glen Cove—consistent with the goals and policies of the Comprehensive Plan (CP) and the principles of the County in regards to Glen Cove as stated in the Special Study “Final Decision Document” dated June 11, 2001.

EXISTING CONDITIONS

Glen Cove is a rural area of light industrial development. It is located in close proximity to the Port Townsend Paper Mill—the only area designated as Heavy Industrial in the unincorporated County. The pre-GMA CP light industrial designation for Glen Cove covered 295 acres but was “tightlined” to 69 acres when the “interim” boundaries were established and the GMA-consistent CP was adopted in 1998. It is currently designated as Light Industrial/Commercial (LI/C) in the CP. The principal uses allowed are light industrial “with an allowance for commercial and retail uses that are directly associated with a light industrial use”. These commercial uses are envisioned as those which serve the industrial employees of Glen Cove and are not intended for regional types of commercial uses that serve a broader range of the County’s residents or the traveling public.

The “interim” boundary of the LI/C area was conservatively drawn in accordance with the criteria for LAMIRDs under RCW 36.70A.070(5)(d) in order to preserve planning options pending final designation. It includes mostly businesses that were in existence in 1990 consistent with the provisions of the statute. Approximately two-thirds of the “tightline” LI/C area is already developed. There is limited potential for new industrial uses to locate in the area due to its limited size. The remaining undeveloped land in the area that was formerly zoned industrial prior to adoption of the current CP is now designated as rural residential. As a consequence of the “tightline” boundary, there are a significant number of existing businesses now located outside the boundary (in the RR-5 zone) that are governed as non-conforming uses. These uses have very limited expansion

potential. Much of the area has already been platted for non-residential development, including roads and road rights-of-way.

According to the Jefferson County CP (at pg. 3-30), “*it is anticipated that the Glen Cove area will be determined to be the appropriate location for the majority of the County’s future industrial development*”. The Trottier Report (included as a part of the Special Study) indicated that there is a demonstrated need for additional commercial/industrial land in Jefferson County over the next 20 years. The report indicated that as many as 280 net acres of additional non-residential land was needed in the County—assuming 18 employees per acre for industrial uses and 35 employees per acre for commercial uses—to meet projected employment growth. Although the report indicated the future need for commercial land in the County exceeds that for industrial (assuming the 4% employment growth rate analyzed in the Special Study). The Port Townsend CP identifies the Glen Cove area as a conceptual Final Urban Growth Area (FUGA) in recognition of a possible expansion of the City’s UGA. The Special Study discusses the City’s rationale for the UGA expansion (at pg. 4-12).

The area is served by a public water system (via the PUD No. 1) but relies on on-site septic systems and rural roads and stormwater drainage facilities.

URBAN GROWTH AREA (UGA) REQUIREMENTS

The GMA intends UGAs to allow urban levels of development and to have public facilities and services provided primarily by municipalities (not counties). UGAs that extend outside of municipal boundaries receive a much higher level of scrutiny and require a detailed public facility capacity, land supply and demand, and population projection analysis in order to justify the amount of “urban” growth to be allocated within them over the 20 year planning period.

The GMA establishes several criteria for the adoption of UGAs contained in RCW 36.70A.110:

- ~~///~~ Cities must be included in UGAs
- ~~///~~ Territory outside a city may be included only if it is already characterized by urban growth or adjacent to territory already characterized by growth.
- ~~///~~ Urban growth should be located first in areas characterized by urban growth which have existing public facility and service capabilities and second in areas characterized by urban growth that will be served by existing and additional needed facilities and services.
- ~~///~~ The sum total of UGAs within a county must be of sufficient size to permit the urban growth that is projected to occur in the county for the next twenty years.

The sometimes broad nature of the Act's language authorizing adoption of UGAs has, over the decade since adoption of the Act, been refined a great deal by the precedence cases before the Growth Management Hearings Boards (GMHBs). Several of the most prominent decisions regarding UGAs are highlighted in the following discussion as a way to best define the current interpretation of the UGA statutes and determine likely areas of potential compatibility or conflict with regard to the particular circumstances surrounding Glen Cove.

UGAs are generally limited to existing municipal boundaries and can be extended beyond city limits only in particular circumstances (especially where warranted by projected future "urban" population growth). Although Glen Cove is not incorporated, the UGA alternative for Glen Cove analyzed in the Special Study presumed a physical connection to the City and that, if formed, that UGA could eventually be annexed by Port Townsend. Case law regarding non-municipal UGAs (i.e., where the UGA is not associated with an adjacent incorporated municipality and service provider) is briefly discussed here as another alternative. The GMHBs have ruled that the GMA provides six basic exceptions to the general rule governing locations where UGAs can be extended beyond existing city or town limits.

1. UGAs can be located outside existing city limits if the detailed requirements for a new fully contained community are met. RCW 36.70A.350.
2. UGAs can be located outside existing city limits if the detailed requirements for master planned resorts are met. RCW 36.70A.360.
3. UGAs *may* include territory outside existing city limits *only* if that additional territory is already "land having urban growth located on it". RCW 36.70A.110(1); or
4. UGAs *may* include territory outside existing city limits *only* if that additional territory is already "land located in relationship to an area with urban growth on it as to be appropriate for urban growth". RCW 36.70A.110(1); or
5. UGAs *may* include territory outside existing city limits *only* if that additional territory is adjacent to territory already "having urban growth located on it". RCW 36.70A.110(1); or
6. UGAs *may* include territory outside existing city limits *only* if that additional territory is adjacent to territory already "...located in relationship to an area with urban growth on it as to be appropriate for urban growth". RCW 36.70A.110(1).

The first and second exceptions do not apply in the case of Glen Cove. The third exception only applies to the very small core area of the "tightline". The last three

exceptions are the only applicable “windows” for consideration of UGA adoption for Glen Cove. The Hearings Boards have ruled that counties must:

“convincingly demonstrate their rationale for drawing urban boundaries to include lands within the fourth, fifth, and sixth exceptions, specifically utilizing the statistical information that has been compiled”. (Rural Residents v. Kitsap County, CPSGMHB Case No. 93-3-0010)

Although this is a Central Puget Sound Growth Management Hearings Board case, its attributes still apply to general UGA delineation. The Western Washington Hearings Board has made similar rulings:

“Because the GMA directs that growth will first be channeled to municipalities and then areas already characterized by urban growth, non-municipal UGAs which include assignment of new urban population to unincorporated areas not already characterized by urban growth will be closely scrutinized.” (Abenroth v. Skagit County, WWGMHB Case No. 97-2-0060).

The GMA does not preclude local governments from planning for urban growth in areas where growth or infrastructure to support urban growth does not currently exist, as long as they simultaneously plan for the infrastructure necessary to support such growth.

Phasing of development within UGAs is explicitly recognized by the GMA as one means to match urban development commensurate with the availability of capital facilities and services. RCW 36.70A.110(3) provides for urban growth to first be allowed in areas that have adequate existing facilities and services and, secondarily, in areas where a combination of existing and additional facilities and services could be provided through public or private sources. Such a phasing scheme could fit in the case of Glen Cove, where, for example the initial UGA could be tightly drawn (e.g., around the existing “tightline”) if both community sewer and water can be adequately provided. Then a secondary growth (i.e., reserve) area could be designated based on the long term ability (i.e., plans) of the service providers to serve those areas. To establish orderly phasing of development within UGAs, some communities distinguish between ten and 20-year UGAs. Criteria is then required to define the differences between the short- and long-term urban growth areas (i.e., land not yet committed to urban development, land currently outside of capital facility service areas, etc.). The major capital facility yet to be provided in this case being sanitary sewer.

A potential problem here is the application of appropriate land development measures to the longer term growth area to ensure that the development allowed in the interim period (prior to the availability of public facilities) does not preclude the later development of the land into urban land uses. It would also require close cooperation and joint planning with the special district or municipal sewer and water service providers to ensure adequate financing and availability of services. The Special Study discusses this in some detail.

Rather extensive and rigid mathematical exercises are typically required for traditional UGA formation or sizing, especially where new urban residential population allocations are involved. However, in all of the alternatives considered in the Special Study (and in this report) the assumption was made that Glen Cove would remain an exclusively non-residential area. Therefore, the UGA “sizing” analysis was made in the Special Study to ensure that the land area allocated under the provisional UGA alternative was sufficient to accommodate all or some portion of the projected commercial/industrial land needed (i.e., the 280 acres total assuming 18 employees per acre for industrial uses and 35 employees per acre for commercial uses) based on the 4% projected employment growth rate. However, since there is no additional projected (residential) population growth to be accommodated by any of the Glen Cove UGA alternatives, there is no need to allocate any residential population to Glen Cove. It is presumed that any additional residential population growth would be accommodated in the rural area, Port Townsend UGA, or the potential Tri-Area UGA.

EXPANSION OF PORT TOWNSEND UGA

This alternative was extensively discussed in the Special Study. In short, this alternative requires a *collaborative* land use and capital facility planning approach between the City of Port Townsend, Jefferson County, and the PUD No. 1. It would result in the designation of the largest area for non-residential development in the unincorporated county—an area comprising as many as 245 acres for light industrial uses “with an allowance for commercial and retail uses that are directly associated with a light industrial use”. It is presumed that the City of Port Townsend would provide water (currently provided PUD No. 1) and sewer service to the area. It is also presumed that the UGA would eventually be annexed in to the City. This alternative would provide the necessary delivery of urban levels of service to the area (i.e., primarily road, sewer, water and stormwater improvements) beyond the rural LOS currently provided. Commensurate with the need for upgrading the levels of service to the area, it is the most expensive option for local property owners and service providers. Capital facility costs for the extension of sanitary sewer service from Port Townsend being the single largest capital improvement component cost.

The Special Study indicated that this alternative could meet the projected demand for additional commercial/industrial land needed based on the Trottier Report.

Interestingly, the proposed land uses allowed within the UGA appear to be the same as or similar to those proposed under any of the other alternatives considered in the Special Study. Under this alternative they could just occur more intensively (e.g., greater lot coverage or floor area ratios). This may be problematic given that the Trottier Report indicates commercial uses are projected to account for the vast majority of future employment growth. For consistency, therefore, permitted uses allowed in the UGA under this alternative should reflect a bias towards commercial—rather than industrial—activity. This is an issue that would need to be addressed during the UGA Subarea Plan process.

The situation does, however, raise two important questions for Jefferson County policy makers, Glen Cove property owners and urban service providers:

1. Is Glen Cove better suited (or envisioned) for primarily commercial or light industrial future economic development activity? and
2. Does the increased cost for extension of public services outweigh the benefit received by UGA status in terms of potential new economic development opportunities?

In addition, there is the timing and joint city-county processes involved in ensuring consistency with the County-wide Planning Policy (CWPP) regarding designation of urban growth areas and the provision of urban facilities and services. There may be some problematic consistency issues with the CWPP under this alternative. One example is the criteria (in Policy #1, Item #3) that requires UGA delineation to only include lands within incorporated city limits. Findings would have to be made by the Joint Growth Management Steering Committee—consistent with the provisions of Policy #1, Item #6—that the referenced *criteria* can no longer be met in order to be able to expand the UGA into unincorporated Glen Cove. The provisions for UGA separators in Policy #1, Item #8 also must be addressed. This and the City’s (and presumably PUD No.1’s) time and effort needed to plan for expanded water and sewer service may require significant time to complete.

In addition, the County will have to enter into formal interlocal agreements with the urban service providers (e.g., Port Townsend, PUD) to ensure that adequate urban services and facilities can be provided to Glen Cove commensurate with the rate and level of development allowed. The Western Hearings Board has clarified that counties planning for unincorporated UGAs:

“must have interlocal agreements with cities ensuring that growth and development of commercial and industrial uses are timed, phased, and efficiently provided with services”. Abenroth v. Skagit County 97-2-0060c (CO 6-10-99)

Such agreements should also address “*transformance of governance*” issues. Again, the Western Hearings Board:

“within urban growth areas (including non-municipal UGAs) urban infrastructure must be efficiently timed and phased. Transformance of governance should occur prior to urban development...Efficient phasing of infrastructure is the key and annexation should occur before urban infrastructure is extended.” Friends of Skagit County, et. al., v. Skagit County (No. 00-2-0050c) (FDO 2-6-01)

The GMA clearly states that counties—and not cities—are the final decision-makers in the formation of UGAs. Nevertheless, ultimately, it is the City of Port Townsend’s decision as to the efficacy of this alternative—since they would be the primary urban

service provide of water and sanitary sewer service. A decision by the City not to plan for the extension of urban services and capital facilities to Glen Cove would render this UGA alternative untenable.

The reliance on Port Townsend to engage pro-actively in the joint city-county UGA planning process and enter into an interlocal agreement with the County regarding provision of services and transformance of governance for Glen Cove instills some uncertainty as to how efficiently this alternative could be implemented at the present time.

NON-MUNICIPAL UGA DESIGNATION

This alternative would assume that a Glen Cove UGA would not be physically connected to the City of Port Townsend. It would therefore, presumably remain unincorporated and the County would be responsible for planning for adequate capital facilities and public services at urban levels of service. However, the urban service providers are still assumed to be either (or both) the City or the PUD No.1 for sewer and water service, respectively. A probable boundary for this alternative would be the same as the provisional UGA, except for exclusion of the approximately 30 acre section of undeveloped land located immediately south of the intersection of Mill Road and SR 20.

Contrary to statements made in the Special Study (see DSEIS, page 3-4, para. 1), non-municipal or “free standing” UGAs are not prohibited by the GMA. However, they would require a high level of analysis and a presumption that public facilities and services will be available and provided by a municipal service provider other than the county. For example:

“The [CPSGMHB] finds no absolute prohibition in the [GMA] against the inclusion of land in a UGA that cannot be associated with an existing or potential city. Nevertheless, it is clear that the long term future of urban growth areas is for them to have urban governmental services provided primarily by either existing or potential future cities”. (Tacoma et. al. v. Pierce County, CPSGMHB Case No. 94-3-0001).

While the Port Townsend UGA Expansion alternative fits the criteria well, it is more problematic for the non-municipal UGA alternative. Nevertheless, the Western Board has ruled that:

“where a county has limited resources and a predominantly rural configuration a GMHB will give latitude to implement new UGAs in a way that reflects the county’s unique character”. (Dawes v. Mason County, WWGMHB Case No. 96-2-0023).

Where capital facilities and services within a UGA are not provided by the county, however, special implementation mechanisms will be required to assure that they will be provided commensurate with urban development. Again the Central Board:

“If a county has limited authority to locate and finance needed infrastructure because those aspects of capital facility decision-making rest with special districts, other jurisdictions, or private interests, then a county should be cautious and judicious in designating UGAs until assurances are obtained that ensure public facilities and services will be adequate and available.” (Bremerton v. Kitsap County, CPSGMHB Case No. 95-3-0039c)

However, the availability of capital facilities and services alone cannot be the sole criterion for including a particular area within an urban growth area.

“The fact that water and sewer services are or could be made available to an area does not mean the area is required to be included in an UGA” (Achen v. Clark County, WWGMHB Case No. 95-2-0067).

This alternative is encumbered with the same “planning” constraints as those identified for the Port Townsend UGA. However, this alternative is even more problematic than the Port Townsend UGA extension because it depends even more so on the City to act as the water and sewer service provider—with even less return to the City in terms of potential benefit from incorporation. The incentive for Port Townsend to pro-actively engage in the planning of this alternative is distinctly lacking.

LIMITED AREA OF MORE INTENSIVE RURAL DEVELOPMENT (LAMIRD)

In 1996, the state legislature passed ESB 6094, which provided a number of amendments to the GMA. Chief among these amendments was language that better defined the range of “rural” uses and activities allowed under the Act. These amendments also permit counties to define “limited areas of more intensive rural development” subject to a number of guidelines and criteria (RCW 36.70A.070(5)(d)). In essence, these limited areas are exceptions to the types of development that are generally permitted in rural areas. The exceptions allow identification, recognition, and designation of existing areas with established (non-urban) development patterns. These existing areas may be permitted to accommodate limited additional growth through infill, new development or redevelopment. The areas may contain public facilities and public services, which must be limited to what is necessary to serve the limited area and which does not permit “low-density sprawl” as specified in the statute.

Limited areas of more intensive rural development (LAMIRDs) must have been in existence as of July 1, 1990. Each area must be defined and contained by a logical outer boundary that limits and contains the extent of more intensive development. The boundary must be delineated predominantly by the built environment (i.e., existing development) but may include limited undeveloped land. Establishment of the boundary

must address: the need to preserve the character of existing rural neighborhoods and communities; physical boundaries; prevention of abnormally irregular boundaries; and the ability to provide public facilities and services. Finally, counties must adopt measures to ensure that these areas are limited and contained.

In general, the LAMIRD designation allows for limited areas of more intensive rural development, including necessary public facilities and services to serve those areas or uses in existence on July 1, 1990, that may include:

- ✍ Rural development consisting of the infill, development or redevelopment of existing commercial, industrial, residential or mixed use areas.
- ✍ Intensification of development on lots containing, or new development of, small scale recreational or tourist uses, including commercial facilities to serve those recreational or tourist uses, that rely on a rural location but do not include new residential development.
- ✍ Intensification of development on lots containing isolated nonresidential uses, or new development of isolated cottage industries and small scale businesses that are not principally designed to serve the rural population.
- ✍ Public services and facilities shall be limited to those necessary to serve these uses and shall be provided in a manner that does not permit low density sprawl.

The County must also adopt measures to minimize and contain the existing areas or uses within LAMIRDs and those areas shall not extend beyond the *logical outer boundary* of the existing area or use of more intensive rural development. The Act directs counties to establish the logical outer boundary of LAMIRDs delineated “*predominantly by the built environment, but that may also include undeveloped lands*”, if limited to criteria that would prevent further low-density sprawl. Counties must address the following issues in establishing logical outer boundaries:

- ✍ The need to preserve the character of existing natural neighborhoods and communities;
- ✍ Physical boundaries such as bodies of water, streets and highways, and land forms and contours;
- ✍ The prevention of abnormally irregular boundaries; and
- ✍ The ability to provide public facilities and services in a manner that does not permit low-density sprawl.

The WWGMHB has ruled that counties must “*minimize and contain*” existing areas or uses of more intensive rural development. The concern here is to prevent “low-density

sprawl” and the proliferation of “urban” uses in an otherwise “rural” area. The GMA does not define “existing uses” other than to say an existing use or area is one that was in existence on July 1, 1990. The Hearings Board does, however, take particular notice that:

“[w]hen evaluating densities and uses in areas of more intensive rural development, the question is not whether urban densities and uses are allowed. The question is whether the allowed densities and uses reflect existing density and uses contained within a specific [LAMIRD]”. ICCGMC v. Island County (No. 98-2-0023c) (FDO 6-2-99).

The definition of the “built environment” has recently been clarified by the Western Hearings Board. According to the Hearings Board, the “built environment”, as it applies to RCW 36.70A.070(5)(d):

“means only those facilities which are ‘manmade’, whether they are above or below ground”. Durland, et.al. v. San Juan County (No. 00-2-0062c) (FDO 5-7-01)

This is presumed to include the installation of above- or below-ground facilities and improvements such as those for road access, utilities, water, and septic systems. It should be noted that when the interim “tightline” LAMIRD boundary was adopted by the County it analyzed *structures* as the key determinant comprising the “built environment”. The recent clarification by the Hearings Board will expand that definition.

Significant capital facility improvements already exist in Glen Cove to support industrial development. These include roads, drainage improvements, water mains, electrical lines, utility corridors, and on-site septic systems in addition to existing buildings and structures.

Chief among these facilities is the Glen Cove water system. The water system was originally constructed in 1983 by the PUD. There were initially 14 connections and the system has grown steadily since then to reach more than 120 connections today. The current system is approved by the Department of Health for a maximum of 154 connections. The system includes a single pressure zone that receives water from the City of Port Townsend. It currently includes more than 16,000 lineal feet of distribution main ranging in size from 2” to 12” in diameter. It provides water service to almost the entire Glen Cove industrial area (as well as adjacent residential areas). The City has expressed an interest in acquiring the eastern portion of the water system that is within the potential final UGA boundary (i.e., that area that includes the tightline and other existing industrial uses). The City and PUD are currently negotiating transfer of the service area.

The Western Washington Growth Management Hearings Board has made some rulings regarding LAMIRD designations that can provide some guidance:

“Activities permitted in [LAMIRDS] must be dependent on a location in a rural area, functional and visual compatibility with that area, and limits in size and

density to preclude need for future urban services.” Dawes v. Mason County 96-2-0023 (FDO 12-5-96).

Furthermore, the Western Hearings Board goes on to say that:

“In rural areas a logical outer boundary delineated by the built environment must preclude allowance of new low-density sprawl. Public facilities and public services can only be provided in a manner that does not permit low-density sprawl.” Dawes v. Mason County 96-2-0023 (CO 1-14-99).

Unfortunately, the Western Board has not clarified the definition of “low-density sprawl”, except as reference to new development that requires the provision of “urban” public facilities and services outside of an urban growth area. The GMA at RCW 36.70A.030 (19) defines “urban governmental services” or “urban services” to:

“include those public services and public facilities at an intensity historically and typically provided in cities, specifically including storm and sanitary sewer systems, domestic water systems, street cleaning services, fire and police protection services, public transit services, and other public utilities associated with urban areas and normally not associated with rural areas.”

Conversely, “rural governmental services” or “rural services” as defined by RCW 36.70A.030 (16):

“include those public services and public facilities historically and typically delivered at an intensity usually found in rural areas, and may include domestic water systems, fire and police protection services, transportation and public transit services, and other public utilities associated with rural development and normally not associated with urban areas. Rural services do not include storm or sanitary sewers, except as otherwise authorized by RCW 36.70A.110 (4).”

While the water is somewhat muddy regarding the application of “*low-density sprawl*” to LAMIRDs, it does appear clear that Glen Cove is currently provided with rural services since storm and sanitary sewers are not present (nor presently planned for). For a non-residential LAMIRD designation this is a limiting factor to economic development. But at the same time—according to the Western Board interpretation—it is also a significant factor that ensures “*low-density sprawl*” does not occur.

In many cases, however, the LAMIRD legislation, RCW 36.70A.170(5)(d), may provide the best “safe harbor” for properties in Glen Cove—especially if the anticipated future land uses are envisioned to mirror the existing rural industrial uses. The criterion for designation of an industrial LAMIRD does not include a demonstrated demand for such land area allocation—as is the case for an urban growth area. Instead, LAMIRDs are subject to the “built environment” and “logical outer boundary” (LOB) constraints in their formation. More detailed analysis is still required to assess precisely how these

criteria would apply to the site-specific characteristics of existing development in Glen Cove in order to determine specific recommendations for a logical outer boundary.

The Central Puget Sound Hearings Board has sometimes used the notion that “*the land speaks for itself*” in its decisions regarding the appropriateness of particular land use designations. Applying that principle to Glen Cove also tends to lend support to the notion of Glen Cove as an industrial area as opposed to being suitable for rural residential—especially in such close proximity to existing non-residential uses. The presence of public water system facilities, electrical utilities, an existing improved internal road network with multiple major arterial access points, land clearing in preparation for non-residential development and an existing pattern of non-residential development all “speak” to the most appropriate use of the land as something other than residential. In addition, many of these “facilities” constitute the “built environment” and can help to shape a “logical outer boundary” (LOB) for an eventual “final” LAMIRD designation.

No “final” LAMIRD boundary for Glen Cove is recommended at this time. This would take additional analysis and time to ascertain the precise boundaries of the “built environment” and detail the “logical outer boundary” based on site-specific characteristics. However, we believe—based on cursory review—that sufficient characteristics are present in Glen Cove to warrant expansion of the “interim” tightline area to accommodate additional land area beyond its present (69 acre) boundary—but one that would constitute an area smaller in scope than the provisional municipal UGA alternative (245 acres).

This alternative could also be implemented relatively quickly and independent of Port Townsend’s potential utility planning (or lack thereof) for Glen Cove. It is not dependent upon another service provider to jointly plan with the County since it is not proposing to adopt urban levels of service for Glen Cove (at the present time). It also preserves future options for Glen Cove. It does not preclude eventual adoption of a UGA for Glen Cove at some point in the future. In fact, if the County so desires, CP amendment language can be added to clarify the potential future UGA options for Glen Cove even after adoption of an expanded LAMIRD boundary.

URBAN RESERVE AREAS

The County must be sensitive to the desires of the City of Port Townsend to potentially expand its UGA boundaries into the now unincorporated industrial area of Glen Cove. The GMA provides for the designation of urban reserve areas outside of UGAs to set aside a supply of land for employment and mixed land uses for possible future inclusion in a UGA. Policies must provide direction for the designation of urban reserve areas and conditions for their future inclusion in the UGA.

The County can utilize the urban reserve area approach in those areas where there is a likelihood that future UGA expansions could occur, although such designation may not

be warranted at this time. This is the best means of declaring where future growth will occur, allowing residents to plan for that eventuality.

In the case of Glen Cove, designation of the 30 acre undeveloped property—located immediately south of the intersection of Mill Road and SR 20—as urban reserve would appear to be one means to preserve such a future UGA option. This could create a potential future linkage or land bridge to an expanded Port Townsend UGA at some point in the future, if so desired.

RECOMMENDATIONS

Proceed with a logical outer boundary (LOB) and supporting analysis for Glen Cove with the intent to designate a revised (and expanded) industrial LAMIRD. This should include suitability analysis of other properties in Glen Cove for designation as potential future urban reserve areas.

This recommendation is based on the following conclusions:

- ?? This is the most efficient route to foster economic development opportunities since it can be implemented relatively quickly—without the extensive and time-consuming joint city-county planning processes and steps necessary for UGA formation;
- ?? It can effectively recognize and better manage pre-existing non-conforming uses in the area;
- ?? It must still address the protection of “rural character” and prevention of “low density sprawl” in Glen Cove and surrounding areas in the Quimper Planning Area;
- ?? It can maintain consistency with the CP, CWPP, and the GMA with less effort and expense than a similar UGA planning approach;
- ?? It minimizes costs to property owners; and
- ?? It still preserves the option for a potential “provisional” Glen Cove UGA based on future joint city-county planning and approval