

GLEN COVE BOUNDARY ANALYSIS

**Web Copy – Does not include Figures 1-7 or Appendices
To view or copy these figures and appendices please contact the
Department of Community Development**

**Prepared by
Jefferson County Department of Community Development**

March 7, 2002

Introduction

This report builds on previous analysis and position papers including *Glen Cove Land Use Options: A Strategic Analysis* dated September 2001 and *Task VI: Tri-Area & Glen Cove Special Study Implementation Plan* dated November 28, 2001. Further background regarding Glen Cove can be found in the *Glen Cove/Tri-Area Special Study: June 11, 2001 Final Decision Document*. All of these documents are available on the Jefferson County website at www.co.jefferson.wa.us/commdevelopment.

The purpose of this report is to provide information to the Board of County Commissioners regarding the *Glen Cove Light Industrial/Commercial (LI/C)* district consistent with policy language in the Comprehensive Plan (CP) contained at Land Use Policy 11.3.2:

Designate the Glen Cove area as Light Industrial/Commercial as shown on the Land Use Map, as an interim designation and boundary that shall be revisited upon completion of the Tri-Area/Glen Cove Study through an amendment to the Comprehensive Plan, consistent with [Land Use Policy] 1.4 (CP, p. 3-83).

On December 3, 2001 the final tasks related to the *Tri-Area/Glen Cove Special Study* were delivered to the Board of County Commissioners and the *Special Study* was deemed complete. On this date, through formal motion (3-0 vote), the Board made clear their intent to re-examine the scope of the Glen Cove area through revisitation of the existing “limited area of more intensive rural development” (LAMIRD) boundary rather than through Urban Growth Area (UGA) designation. This decision represented a policy change for the Board and was facilitated by a consultant prepared “White Paper” analysis in September of 2001 that discussed options for final land use designations in Glen Cove. This analysis is also contained in the document titled *Task VI: Tri-Area & Glen Cove Special Study Implementation Plan* dated November 28, 2001 and it recommended pursuing a revised LAMIRD in Glen Cove rather than undertaking UGA planning at this time. This shift in policy direction by the Board is based on a number of factors

including City of Port Townsend policy regarding UGA expansion and 2001 Growth Management Hearings Board decisions related to the scope and applicability of the GMA's LAMIRD provisions. With this in mind, the goal of this revisitation is to more fully utilize the provisions of RCW 36.70A.070(5) as they have been clarified and expanded upon through recent Growth Management Hearings Board decisions (see, for example, Western Washington Growth Management Hearings Board, Durland et al. V. San Juan County, Case No. 00-2-0062c and City of Anacortes, et al. V. Skagit County, Case No. 00-2-0049c).

Jefferson County was one of the first jurisdictions to utilize the LAMIRD provisions contained at RCW 36.70A.070(5)(d) during the adoption of their 1998 CP and, as such, had little to rely on in terms of case law or agency guidance related to the establishment of rural commercial and industrial areas. With this in mind, the county took a conservative approach to designating these areas and further identified these boundaries as "interim" with the stated intent to revisit the boundaries upon completion of the *Tri-Area/Glen Cove Special Study* (see, for example, page 3-28 of the CP).

As the record established through CP adoption demonstrates, when the County adopted its interim "tightline" LAMIRD boundary at Glen Cove it utilized above ground *structures* (i.e. buildings) as the key determinant comprising the "built environment." Recent clarification by the Western Board has expanded this definition. According to the Western Board, the "built environment" as it relates 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 (Case No. 00-2-0062c, Final Decision and Order issued 5-7-01)

The Durland definition of "built environment" is quite similar to the definition of "built environment" found in the State Environmental Protection Act, or SEPA, codified at Title 43.21C RCW. This report will examine and analyze existing infrastructure in the Glen Cove area based on this expanded definition of "built environment."

The Jefferson County CP provides a glossary definition for "built environment" (at page G-3) that is consistent with the Hearings Board interpretation, although there is no explicit reference to below ground facilities beyond reference to "infrastructure:"

Built Environment: A combination of buildings and related activities along with associated impervious surfaces, infrastructure, parking and landscaping.

As proposed, the revised Glen Cove boundary is defined by a combination of the factors referenced in this definition.

Existing Conditions

Glen Cove is a non-urban area of predominantly light industrial development located in close proximity to the Port Townsend Paper Mill—the only area designated as Heavy

Industrial in the unincorporated County. It is provided with vehicular access via Highway 20 and with non-motorized access via the Larry Scott Trail – a pedestrian, biking, and equestrian trail that runs from the city of Port Townsend to Mill Road. The pre-GMA light industrial/commercial designation for Glen Cove covered 295 acres but was “tightlined” (decreased) 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 with uses and development standards consistent with this designation now contained in the Unified Development Code (UDC), which became effective in January 2001. 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 serving the industrial employees of Glen Cove and are not intended for urban or regional 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 primarily businesses that were in existence in 1990. Approximately two-thirds of the “tightline” LI/C area is already developed and 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. Many of these projects were vested prior to adoption of the CP. These uses have very limited expansion potential. Much of the area has already been platted for development, including roads and road rights-of-way. The area is served by a public water system (formerly by PUD No. 1 and now by the City of Port Townsend) but relies on on-site septic systems and rural roads and stormwater drainage facilities.

According to the Jefferson County CP (at page. 3-31), “*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 based on an assumed 4% employment growth rate, although the report indicated the future need for commercial land in the County exceeds that for industrial (58 acre deficit for manufacturing/industrial and a 222 acre deficit for commercial based on the assumptions used in the Trottier Report). 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 although city staff has indicated a desire to remove these provisions from the Port Townsend CP, possibly during the 2002 update. The Special Study discusses the rationale behind UGA expansion in the June 1999 Draft Supplemental Environmental Impact Statement (at pg. 4-12).

Local and Historic Context

The Glen Cove Industrial area is the logical outgrowth of comprehensive planning that began well before the establishment of the Growth Management Act. The County's 1979 Comprehensive Plan provided direction for industrial development through the following somewhat broad goal:

Provide for industrial expansion in Jefferson County for the net benefit of County residents (see page 56).

The first policy intended to implement this goal states:

New industry should be located either adjacent to existing industrial development, or in planned industrial parks which afford neighboring properties protection from noise, vibration, drainage, dust, excessive traffic, view blockage, etc (see Policy #1, page 56).

Consistent with this policy direction, the Glen Cove Industrial area was located immediately west of Port Townsend Paper Mill, an established heavy industrial use in Jefferson County since the 1920s. Glen Cove is heavily influenced by the impacts associated with this established industrial use. Most notably the area is characterized by increased traffic flow due to paper mill activity and odors related to the processing of paper products (locally referred to as the mill plume). These conditions affect the entrance to the city and the Glen Cove Industrial area.

The first discussion of the Glen Cove area as a formal industrial area appeared in County draft documents related to the establishment of policies to guide development along Highway 20. A May 1986 draft of this policy document makes reference to the *Glen Cove Industrial area*. This reference was carried forward to the final version of the *Highway 20 Corridor Policies* which were adopted by the Board of County Commissioners in 1988. These policies established a regulatory framework for development along Highway 20 between the Port Townsend city limits and Old Fort Townsend Road. Policy direction contained in this document addressed setback and buffer requirements, road access, outside storage, drainage, signs, and parking. Narrative language within the document explicitly discusses the Glen Cove Industrial area (see Appendix Item 1):

Efforts have been made to accommodate commercial and industrial activities within the corridor over the past several years. The Glen Cove Industrial area with its frontage road (Otto Street), dedicated buffer, controlled access, and water utility provisions is the primary example (Highway 20 Corridor Policies, 1988, 1).

Establishment of the Glen Cove Industrial area followed a deliberative planning process that was consistent with the existing Comprehensive Plan and policy direction provided

through the *Highway 20 Corridor Policies*. This pre-1990 process resulted in a discrete and concentrated area characterized by controlled access points off of Highway 20, a frontage road that provides interior access, and adequate infrastructure to support light industrial/manufacturing uses. [The terms “Pre July 1, 1990” and “Pre-1990” are used interchangeably – both refer to the statutory requirement contained at RCW 36.70A.070(5)(d)(v)(A)].

Glen Cove’s Regulatory History

The first distinct regulatory boundary for the Glen Cove area was established through the *Highway 20 Corridor Policies* adopted by the Board of County Commissioners on June 21, 1988 (see Appendix Item 1). This same boundary was further refined as a regulatory tool and was adopted as a distinct “light industrial” zone on January 27, 1992 (See Appendix Item 2). The Board of Commissioners adopted a similar boundary, with minor refinements, on August 22, 1994 as the *Highway 20 Corridor Light Industrial/Commercial* zone (see Appendix Item 3). The 1994 boundary continued to be in effect until the adoption of the Comprehensive Plan on August 28, 1998. At the time of Comprehensive Plan adoption an “interim” boundary was established that significantly reduced the Glen Cove area in order to achieve compliance with the Growth Management Act pending the outcome of the Special Study (see Appendix Item 4). This boundary reduced the size of the Glen Cove zone from 295 acres to 69 acres. All areas proposed for revision through this analysis were within the 1994 boundary and were zoned light industrial/commercial until CP adoption in 1998. In making this observation, it is understood that previous commercial zoning is just one factor for consideration in establishing LAMIRDs and cannot stand alone as the sole reason to include or exclude a particular parcel or area.

Identifying the Glen Cove “Limited Area of More Intensive Rural Development”

For the purposes of LAMIRD designation, RCW 36.70A(5)(d)(v)(A) requires that an existing area or use is one that was in existence on July 1, 1990. While reference and discussion related to the Glen Cove Industrial area contained in the 1988 *Highway 20 Corridor Policies* provides narrative and anecdotal support for Glen Cove’s existence prior to July 1, 1990, further evidence must be provided through analysis of the built environment to determine the “logical outer boundary.”

In order to establish the extent of the Glen Cove LAMIRD Jefferson County used its Geographic Information System (GIS), 1990 and 2000 aerial photos, and parcel specific Assessor’s data. Discussions related to existing infrastructure were conducted with PUD #1 and Puget Sound Energy. Figure 1 shows a June 21, 1990 that visually demonstrates the presence of significant above ground “built environment.” This aerial photo has been overlaid with the existing Glen Cove LI/C boundary, the Glen Cove Provisional Urban Growth Area Boundary, and the areas proposed for addition. Based on reference to these data sources and the criteria contained at RCW 36.70A.070(5)(d)(iv) Jefferson County has attempted to craft a boundary that reconciles past land use assumptions and planning with the limits placed upon rural industrial/commercial development through the GMA.

Identifying the Pre-July 1, 1990 Built Environment

Significant pre-1990 capital facility improvements exist in Glen Cove to support industrial development. These include water mains, roads and drainage improvements, three-phase electrical power, existing utility corridors, on-site septic systems, and denuded areas in addition to above ground structures. In identifying the pre-1990 built environment Jefferson County is relying on Growth Management Hearings Board clarification defining built environment as those facilities which are manmade whether they are above or below ground. This section should be read in conjunction with the maps contained in Figures 1 through 7.

Assertions made related to pre-1990 infrastructure such as water lines, roads, utilities, and denuded areas are made in the context of the entire Glen Cove area and are meant to be addressed along with existing above ground structures (i.e. buildings) and the desire to establish a “logical outer boundary.” The conditions are discussed in the context of the Glen Cove area and its history. In identifying below ground infrastructure that is present in and about the Glen Cove Light Industrial LAMIRD, Jefferson County observes that significant public and private expenditures were made with the goal of providing industrial and manufacturing land use opportunities in an area that is well suited for such uses and that also meets the intent of the GMA. The extensive and heavy-duty infrastructure that is found below ground in and about the Glen Cove Light Industrial LAMIRD is distinctly different than the infrastructure, or rather the lack of infrastructure, that might be found in other rural residential regions of unincorporated Jefferson County.

Pre-1990 Water Infrastructure

The Glen Cove area is served by the Glen Cove Water System (see Figure 4). The Jefferson County Public Utility District originally constructed the system in 1983. 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 the entire Glen Cove industrial area (as well as adjacent rural areas). Recently the City of Port Townsend has acquired the eastern portion of the water system within the area that includes the existing 69-acre Glen Cove LI/C zone and the areas proposed for addition. Figure 4 shows pre and post 1990 water lines in the Glen Cove area.

Of significant note is the fact that the east side of Glen Cove and a portion along Fredericks Street located west of Highway 20 are served by a 10” water line. This line was installed prior to 1990 and extends from Glen Cove Road south along Otto Street branching off to the west and crossing Highway 20 at Fredericks Street. This pre-1990 10” water line is sized to serve industrial rather than residential uses. By contrast most

rural residential regions of unincorporated Jefferson County do not have any water lines, and residents in those regions must obtain their potable water from individual wells or community water systems that in turn draw their water from wells.

Pre-1990 Road Infrastructure

As reference to the June 21, 1990 air photo indicates (see Figure 1 and Figure 5), the Glen Cove area is characterized by an established road network that predates the GMA. The road network indicates a deliberate and intentional attempt to provide restricted access from Highway 20 into the Glen Cove Industrial area. Primary access to the east and west portions of Glen Cove is provided by Fredericks Street. In the eastern portion of Glen Cove, Otto Street runs parallel to Highway 20, thereby serving as a frontage road running between Glen Cove Road and Old Fort Townsend Road. Seton Road and Old Fort Townsend Road also provide controlled access from Highway 20 in the southern portion of the Glen Cove area. The majority of these access points and the frontage road were established prior to July 1, 1990 and have been used to delineate portions of the logical outer boundary (LOB) for Glen Cove. Figure 5 shows the pre and post 1990 road network.

Pre-1990 Three-Phase Electrical Power

Puget Sound Energy (PSE) currently serves the Glen Cove area. A 100 foot wide electrical utility corridor located east of Otto Street runs from north to south through Glen Cove and serves the Port Townsend Paper Mill as well as current businesses and residences. In addition to PSE power lines the utility corridor contains the City of Port Townsend Gravity Water line and Clallam County PUD electrical lines that exclusively serve the Paper Mill.

Of significant note is the fact that the Glen Cove area is served by three-phase power (see Figure 6). Three-phase power is typically required for energy intensive manufacturing and light industrial uses and is typically not provided in residential areas. Based on discussion with PSE, the three-phase power provided in the Glen Cove area has been in existence since at least the 1960's and currently serves numerous businesses. Three phase power in this area is available upon property owner request. In addition to above ground lines, existing underground electrical infrastructure (PVC conduit) that crosses Highway 20 along Fredericks Street is sized to accommodate the extension of three-phase power west of Highway 20.

Pre-1990 Buildings

As reference to the June 21, 1990 air photo indicates (see Figure 1), in addition to significant pre-1990 capital facilities improvements the Glen Cove area is characterized by approximately thirty industrial/commercial buildings that pre-date the GMA. These buildings extend from the northern most structure located at the intersection of Glen Cove Road and Otto Street to the southern most structure located south of the intersection of Otto Street and Seton Road.

Pre-1990 Denuded Areas

In addition to pre July 1, 1990 capital improvements, significant areas within Glen Cove were denuded prior to July 1, 1990 (see Figure 1). These man-made alterations are typically a precursor to development and presumably indicate a desire to improve land within the Glen Cove Industrial area as that industrial area existed prior to the passage of the GMA.

In sum, the Glen Cove region of Jefferson County, which includes more than merely the land inside the existing Glen Cove LAMIRD boundary, is unique in at least four ways:

- It is served by existing pre-1990 water lines that are larger than would be required if only residences were seeking water connections from those water lines,
- It is served by a pre-1990 internal road system that limits egress/ingress points to the nearby state highway and has its own frontage road (Otto Street),
- It is served by proximity to pre-1990 three-phase power, a type of power not normally found in neighborhoods that are solely rural residential,
- It is characterized by pre-1990 denuded areas which reflect man-made alterations to the landscape.

This combination of pre-1990 above and below ground man-made improvements was used to establish the initial extent of the “limited area of more intensive rural development.”

Establishing the Glen Cove Logical Outer Boundary

Pursuant to the GMA [see RCW 36.70A.070(5)(d)(iv)] Jefferson County must adopt measures to minimize and contain existing areas or uses within LAMIRDs and those areas shall not extend beyond the logical outer boundary (LOB) of LAMIRDs. While LAMIRDs must be delineated predominantly by the pre-July 1, 1990 built environment they may also include undeveloped lands if limited in order to prevent further low-density sprawl. The GMA sets out four issues that must be addressed in establishing the LOB in addition to respecting the predominance of the pre-1990 built environment:

- 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.

In establishing the LOB for the Glen Cove boundary revision, Jefferson County is attempting to reexamine the predominantly pre-1990 built environment and development in order to establish final LAMIRD boundaries for Glen Cove.

Areas Proposed for Inclusion within the Glen Cove Boundary

Jefferson County proposes to revise the *Glen Cove Light Industrial/Associated Commercial zone* so it that would total some 129 acres (excluding roads, water, and dedicated right of way). The area proposed for inclusion (some 59 acres) will be designated as Light Industrial with no provision for associated commercial uses. There will be a prohibition against the establishment of mini-storages within the 59 acre-area. The goal is to meet the requirements of the GMA relating to logical outer boundaries.

The proposed revision involves five discrete areas. Each of these five areas has been proposed to address the four factors referenced above in RCW 36.70A.070(5)(d)(iv). In particular, through defined boundaries and surrounding rural residential land use districts, all five areas can be provided with public facilities and services in a manner that does not permit low-density sprawl. Additional factors related to the establishment of the LOB are discussed below. Figure 1 provides a helpful visual reference while reading this section. The five areas proposed for revision are as follows:

- The **Area North of Glen Cove Road** is a 10 acre portion comprised of nine parcels located immediately north of Glen Cove Road.
- The **Area Between the Existing Zone and Glen Cove Road** is a 17 acre portion comprised of multiple small platted lots located between the existing zone and Glen Cove Road.
- The **Eastern Area** is a 12 acre portion comprised of three parcels located east of the existing zone..
- The **Southern Area** is a 12 acre portion comprised of two parcels located to the south of the existing zone and north of Old Fort Townsend Road.
- The **Western Area** is an 8 acre portion located west of Highway 20 and north and west of the existing zone.

The Area North of Glen Cove Road

This area is defined predominantly by a pre-1990 denuded area that is apparent through reference to the 1990 aerial photo contained in Figure 1. The denuding of this region before 1990 and before the 1998 tightlining (the downzoning from rural industrial/commercial to rural residential) occurred presumably indicates the land was then considered by its owner(s) to be part of the "existing area," i.e., the Glen Cove rural industrial/commercial region as it existed on July 1, 1990. In addition to this cleared area, a pre-1990 railroad right of way runs through the western portion of this area and a pre-1990 power easement defines the eastern boundary. The power easement provides a 100 foot wide separation between the industrially characterized area and the residential area located to east of the power line. The power line easement and the railroad right-of-way provide physical separators that exist on the ground and provide an effective

boundary serving to define and contain this area. This area predates July 1, 1990 and is proposed for inclusion to preserve the character of the existing natural neighborhood that comprises the Glen Cove Industrial area. The denuded area provides a clear limit to the pre-July 1, 1990 built environment and serves as an on-the-ground boundary that takes into account the land forms that characterized Glen Cove prior to July 1, 1990. This portion lies immediately north of a pre-1990 installed 10 inch water line that runs along Otto Street ending at Glen Cove Road. The provision of pre-1990 industrial infrastructure improvements further serves to characterize this area as part of the Glen Cove neighborhood.

The Area Between the Existing Zone and Glen Cove Road

This area is defined predominantly by a pre-1990 built environment that includes a 10 inch water line running north on Otto Street to Glen Cove Road -- the northern end of this 17 acre region. Additional pre-1990 improvements found in this 17 acre region include Otto Street itself which provides frontage road access to the Glen Cove area. Otto Street, which runs parallel to SR 20, was and is intended to be the "Main Street" of Glen Cove in order to ease the traffic burden on SR 20. Additional pre-July 1, 1990 improvements found in this 17 acre region are cleared right of ways at Carrol, Stevens, Thomas, and Phillips Streets. These pre-1990 improvements are immediately apparent based on reference to the aerial photo contained in Figure 1. In addition to these below ground infrastructure improvements, there is a pre-1990 building (coded as manufacturing use in the assessors database) located at the corner of Otto Street and Glen Cove Road, i.e., at the far northern end of this 17-acre region. This area is proposed for inclusion based on the presence of pre-1990 built environment as well as the statutory mandate in the GMA to preserve the character of the existing Glen Cove Industrial area.

The Eastern Area

The area located on the eastern portion of the existing boundary is proposed for inclusion based, in part, on a pre-1990 denuded area that occurred in the northern most of portion of this area. The denuding of this region before 1990 and before the 1998 tightlining occurred presumably indicates the land was then considered by its owner(s) to be part of the "existing area," i.e., the Glen Cove rural commercial region as it existed on July 1, 1990. In establishing this portion of the LOB, Jefferson County has taken into account the statutory mandate under GMA to preserve the existing area and to prevent abnormally irregular boundaries. This area is proposed for inclusion to avoid the creation of "pockets" of residential zoning that are surrounded on three sides [in the case of the northern portion to be added] or on two sides [in the case of the southern parcel to be added] by a rural industrial/commercial LAMIRD. This revision serves to "square off" the existing boundary providing for a more logical separator between industrial and residential uses. Establishing the southeastern extent of the LOB at this location provides a clear separation between an existing residential use, located to the south, and the area to the north which is more appropriately characterized as industrial. In this way, the existing character of Glen Cove is preserved and the prevention of abnormally irregular boundaries is achieved.

The Southern Area

This area is included within the proposed revision to address the statutory mandate to preserve the existing character of Glen Cove as well as to provide a logical boundary. Old Fort Townsend Road is a pre-1990 road that provides an effective physical separator between the industrially characterized area to the north and the residential and park (Old Fort Townsend State Park) uses located to the south and southeast. The area south of Old Fort Townsend Road is defined primarily by residential use with the next closest county road located east of Highway 20 over 2 miles away. At present, the extant southern boundary for the Glen Cove LAMIRD is a parcel boundary, invisible, in essence, to the naked eye. In this way the LOB for this southern portion of the Glen Cove LAMIRD is defined by Highway 20 to the west, Old Fort Townsend Road to the south, and Otto Street to the east - providing an effective street and highway physical boundary to serve as the LOB and serving to provide, currently and in the future, a "bright line" to work with.

The Western Area

This area of proposed revision is located on the west side of Highway 20 and to the north and west of the existing zone. The area is defined by pre-1990 denuded environment as well as a 10 inch water line in place before 1990 that, at that time, ran to a location immediately west of Louisa Street. In addition, a pre-1990 northern extension of the water line along Elizabeth Street, and the pre-1990 installation of Fredericks Street itself. The denuding of this region before 1990 and before the 1998 tightlining occurred presumably indicates the land was then considered by its owner(s) to be part of the "existing area," i.e., the Glen Cove rural commercial region as it existed on July 1, 1990. The portion of this area located next to Highway 20 and north of the existing zone is immediately adjacent to the pre-1990 installed 10 inch water line that runs along Fredericks Street. The denuded area located to the west of the existing zone is apparent through reference to Figure 1 and is included to further preserve the industrial character of the existing Glen Cove neighborhood.

In conclusion, the revisions to the Glen Cove boundary proposed in this analysis effectively implement the provisions of RCW 36.70A.070(5) in a manner that preserves the character of the Glen Cove Industrial area as it existed prior to July 1, 1990 and as it exists today while remaining consistent with the requirements and intent of the GMA.

[END]