

KEYPORT COMMUNITY PLAN

Limited Area of More Intensive Development

Staff Report

August 16, 2007

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Land Use & Community Planning

Introduction

The purpose of the report is to provide information to the Planning Commission and Board of County Commissioners regarding the Keyport Community Plan and proposed designation of the community as Limited Area of More Intensive Rural Development (LAMIRD) under the Revised Code of Washington (RCW) Section 36.07036.70A.070 (5)(d). The Keyport Community Plan document is consistent with language and direction contained in Resolution No. 040-2007 - Relating to Growth Management, Amending the Comprehensive Plan and Map for 2007 and making corresponding amendments to the Kitsap County Zoning Code and Map.

RESOLUTION NO. 040-2007 Section B. 1.

Area-wide amendments for the 2007 Comprehensive Plan Amendment specifically include the following:

1. Keyport: Consideration of a LAMIRD at Keyport

Process:

- a. *Develop a scope of work for the subject area that outlines the structure of the planning process, the proposed schedule, issues to be addressed and roles of the various participants.*
- b. *Conduct a local community planning process that includes a local advisory committee ideally composed of area residents, interest groups, tribal members and County representatives. In accordance with the Kitsap County Comprehensive Plan, the purpose of this committee is to determine appropriate area-specific land uses, development standards, design guidelines and public service needs. This committee also should consider appropriate area boundaries, rural character of the subject property and surrounding area, appropriate mix of uses, densities and intensities, feasibility, cost and need for public services, significant natural constraints or features to be preserved, provision for a monitoring and evaluation process as well as the benefits to the local community.*
- c. *Establish a Logical Outer Boundary (LOB) based on existing development, giving consideration to the following GMA requirements [RCW 36.70A.070(5)(d)(iv)]:*
 - *Preservation of the character of existing natural neighborhoods and communities;*
 - *Physical boundaries such as bodies of water, streets and highways, and land forms and contours;*
 - *Prevention of abnormally irregular boundaries; and*
 - *The ability to provide public facilities and public services in a manner that does not permit low-density sprawl.*

On February 26, 2007 through formal motion (3-0 vote), the Board directed staff to provide an analysis of the Keyport area for the potential designation as a LAMIRD, as provided for under the Growth Management Act [RCW 36.70A.070 (5)(d)].

Location

Keyport is a small peninsula of 72.6 acres located at the southwest entrance of Liberty Bay in Kitsap County Commissioner District 1 (North Kitsap), South of Poulsbo, North of Brownsville, and at the east terminus of Washington State Route 308.

Public Participation

A community planning process began for Keyport in the fall of 2003, with the intention that the community, through the Keyport Improvement Group and its committees, would be instrumental in the development of the Keyport Community Plan (Please refer to the Keyport Community Plan, Chapter 1, Section 1.4, Pages 4 – 5). The public process included numerous public meetings, surveys, email discussions, and staff conversations with citizens and agency representatives as noted below:

- Early Keyport Community Plan public meetings with Department of Community Development staff held on February 1, Feb 22, and March 15 of 2005.
- Board of County Commissioners 2007 Comprehensive Plan Update Docket for 2007, approved February 26, 2007 directing the analysis of Keyport as a LAMIRD by the Department of Community Development.
- Eight Keyport Community Plan public meetings with Department of Community Development staff held on February 13th & 27th, March 13th & 27th, April 10th & 24th, and May 8th & 22nd of 2007.
- Postcard mailings of meeting times and online access for Keyport Online Survey to all property owners within 400 feet of Keyport.
- Articles in the Kitsap Sun on February 13 & July 20, and in the North Kitsap Herald on February 14, July 24 & July 28.
- Public Distribution of the draft Keyport Community Plan on July 18th, 2007.
- Public Meetings with Kitsap County Planning Commission and separate meeting with the Keyport Community for Plan Introduction and discussion on July 24th, 2007.
- Public Hearing with the Kitsap County Planning Commission on August 14, 2007.

Local and Historic Context

Kitsap County adopted its original Comprehensive Plan in 1998 (Comprehensive Plan) and adopted an update of that plan in December, 2006. Kitsap County

also issued a Rural Issue Paper Appendix on January 30, 1998, as part of the 1998 Kitsap County Comprehensive Plan regarding rural LAMIRD designation and which identified Keyport as a rural village with a potential for designation as a Limited Area of More Intensive Rural Development. The Issue paper defined Rural Village as:

A “Rural Village” is a predominantly built, mixed-use rural environment, which includes residential, commercial, industrial, community and recreational uses. It often contains a broad mix of land use and densities, including some urban densities, with varying parcel sizes throughout, and is served by public sewer and water. Residential densities in the heart of the Rural Village vary in size. While recognizing existing densities, new development may respect similar historical densities. Commercial and industrial uses will be small in scale, providing necessary services to the Village community.

The issue paper further identifies Keyport and describes the community as candidate/ examples of an existing Rural Village Area:

Keyport is located near the mouth of Dyes Inlet on the west. This village contains 186 parcels with an average density of 4.7 units per acre. Dominated by older, single-family housing on small, platted lots, Keyport also includes a Naval Base and Museum, a motel, a marina, post office, tavern, fire station, deli/general store, service station and auto repair shop. Public water and fire flow are provided by Public Utility District No. 1, and public sewer service is provided by Kitsap County. The community is defined by the naval base to the south, Dyes Inlet to the east, and Dogfish Bay to the north and west.

The Keyport Community Plan partially implements the Comprehensive Plan and those documents by addressing the specific issues and features of a limited geographic area, and provides more detailed policies and implementation strategies that are tailored to the geographic area. The plan also identifies the Keyport community as a Limited Area of More Intensive Rural Development (LAMIRD), under the Washington State Growth Management Act and resolves the specific issues identified in the Comprehensive Plan such as community densities and land uses, identification of, and regulation to protect critical areas, and adequacy of infrastructure, facilities, and services, and provides planning level guidance for future public and private projects within the Keyport Community.

Identifying the “Limited Area of More Intensive Rural Development”

Direction for establishing limited areas is set forth in the Act under section 36.70A.070(5)(d), which provides in part:

...the rural element may allow for limited areas of more intensive rural development, including necessary public facilities and public services to serve the limited area as follows:

- (i) Rural development consisting of infill, development, or redevelopment of existing commercial, industrial, residential, or mixed-use areas...A commercial, industrial, residential, shoreline, or mixed-use area shall be subject to the requirements of (d)(iv) of this subsection...An industrial area is not required to be principally designed to serve the existing and projected rural population;...
- (iv) A county shall adopt measures to minimize and contain the existing areas... Lands included in such existing areas... shall not extend beyond the logical outer boundary of the existing area... thereby allowing a new pattern of low-density sprawl. Existing areas are those that are clearly identifiable and contained and where there is a logical boundary delineated predominantly by the built environment, but that may also include undeveloped lands if limited as provided in this section. The county shall establish the logical outer boundary of an area of more intensive rural development. In establishing the logical outer boundary the county shall address: (A) the need to preserve the character of existing natural neighborhoods and communities, (B) physical boundaries such as bodies of water, streets and highways, and land forms and contours, (C) the prevention of abnormally irregular boundaries, and (D) the ability to provide public facilities and public services in a manner that does not permit low-density sprawl;
- (v) For purposes of (d) of this subsection, an existing area...is one that was in existence: (A) on July 1, 1990...

The first step for a limited area of more intensive rural development is to define a logical outer boundary. This boundary is a **permanent boundary**, not subject to the review and revision procedures applicable to Urban Growth Area's (UGA's).

Establishing the Logical Outer Boundary

Pursuant to the GMA [(RCW 36.70A.070(5)(d)(iv))] Kitsap County must adopt measures to minimize and contain existing area or uses within LAMIRDs and those areas shall not extend beyond the logical outer boundary (LOB). While LAMIRDs must be delineated predominately by the pre-July 1, 1990 built environment they also may 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 analysis for **Keyport** includes review of the following:

- (A) The need to preserve the character of existing natural neighborhoods and communities: Preserving the character of the existing development was taken into consideration. The Keyport community was a historically a Mosquito Fleet ferry stop, was platted as a town in 1918, and is a classic example of a ferry based community planned in rural Kitsap County.
- (B) Physical boundaries such as bodies of water, streets and highways, land forms and contours: This community is a geographic peninsula and is bound on three sides by salt water and is bordered to the east by Naval Base Keyport which occupies approximately half of the peninsula. The community is served by a single vehicular and pedestrian access via State Route 308 which crosses a narrow causeway across Dogfish Bay and terminates at the Naval base boundary.
- (C) The prevention of abnormally irregular boundaries: The physical boundaries can be easily established by natural shorelines surrounding the community and the Naval Base boundary to the East, however some irregularity in the boundary is due to the inclusion of the sole vehicular and pedestrian access to the community. The irregular extension of the boundary to include this link across Dogfish Bay provides for the ability to plan and improve the vehicular and pedestrian community access. The causeway linking the Keyport community was constructed as early as 1918, prior to the Pre-1990 conditions.
- (D) The ability to provide public facilities and services in a manner that does not permit low-density sprawl: The immediate area is currently served by natural gas, water facilities, sewer systems, and some on site septic systems. There is an extensive distribution system for power with a voltage adequate for both the community and the Naval Base needs. There is adequate service/ capacity with no immediate plans for upgrades to any of these facilities.

For the purpose of a LAMIRD designation, RCW 36.70A(5)(d)(v)(A) requires that an existing area or use be one that was in existence on July 1, 1990. While the reference and discussion related to the Keyport area was contained within the Rural Appendix Issue Paper, further evidence must be provided through the analysis of the built environment to determine the potential for identifying a “logical outer boundary” (LOB). The Keyport Community Plan notes the public process and online survey that was conducted to analyze the alternatives for a

potential Logical Outer Boundary. The resulting analysis and community consensus resulted in more than 60% community survey support for the alternatives that limited the proposed LAMIRD boundary to contain only the peninsula and the access route to the peninsula. (Please refer to the Keyport Community Plan, Chapter 1, Section 1.6, Pages 6 – 8)

Pre-1990 Conditions

1. Keyport Historic Town Plat – The Keyport community was a historic Mosquito Fleet Ferry stop, with original structures as early as 1903. The Keyport Naval Base was secured and began construction in 1914. The majority of the residential and commercial components of the Keyport Community was platted as a town in 1918 creating approximately 230 lots at an average density of 5 units per acre. The existing lots have been developed throughout the decades with over 93 structures remaining in Keyport that were built within or before the historic period of significance (50 years ago or more) and that may qualify for the historic status under the Washington State Department of Archaeology & Historic Preservation.
2. Keyport Parcels west of Sunset Avenue – The area west of Sunset Avenue was where platting has occurred piece meal at densities of 2 to 3 units per acre. Individual short plats over the years have created areas without consistent lot sizes. This development pattern is due to the changing zoning over the years with the average size for developed lots in these areas is just over 0.50 acre (21,780 square feet), though several smaller lots currently exist.
3. Keyport State Route 308 Causeway – The Washington State Route 308 provides the sole necessary vehicular and pedestrian service to the community. The historical access road was relocated to the existing location with the 1964 construction of the WA State Route 308 and causeway across Dogfish Bay.

Keyport Community Plan Components

The elements of the Keyport Community Plan include Land Use and Economic Development, Transportation & Pedestrian Improvements, Public Facilities & Infrastructure, Port Improvements & Waterfront Development, Natural Environment / Parks & Recreation, Arts & Culture, Sustainability, and Community Building / Plan Implementation. Within these sections, goals and policies are arranged by subject and present the long-term objectives for each Keyport Community Plan element.

Goals are ends toward which the plan is directed. They are usually somewhat general in form and express ideals.

Policies are intermediate milestones on the way to reaching goals. They are expressed in a form that is measurable and achievable.

Key Projects are specific projects that would achieve both goals and policies for the community.

The final element, Implementation and Community Building, proposes specific actions to carry policies and further specifies how the Keyport Community Plan will be applied. Appendices of supporting data are also provided.

Within the draft Keyport Community Plan are proposed elements and development code proposals which are provided as a result of the community planning process and have been included within the draft plan or have been excluded from the draft plan as a result of the community input. These items of further discussion and request for guidance and recommendations from the Kitsap County Planning Commission are included below with detailed descriptions of each element.

1. Logical Outer Boundary for the Keyport LAMIRD:

Within the draft Keyport Community Plan, all of the elements for a logical outer boundary were identified for the Keyport area and alternatives were established to gain community input and preference. While the Keyport Online Survey identified over 87% support for identification of Keyport as a LAMIRD, each of the alternatives for Logical Outer Boundaries included the essential elements of “pre-1990” development patterns with urban densities greater than 3 units per acre and that possessed existing public services of water and sewer.

Staff and community input were utilized to determine those areas which were not an obvious inclusion or exclusion in the Keyport Village. For example, some parcels on the south end of the causeway across Dogfish Bay included parcels in the Keyport Trace subdivision as three of the alternatives. However, these parcels were not ultimately included in the logical outer boundary due to the fact that they were part of an existing neighborhood that was nearby to Keyport, was divided by a water body (Dogfish Bay) and did not specifically share a great many of the infrastructure, commercial, or historical elements contained within and that defined the Keyport community.

Also consideration of the Keyport Naval Base and Undersea Museum parcels for inclusion or exclusion within the LAMIRD boundaries was evaluated based upon the close relationship that the community enjoys with those entities both in infrastructure support and employment source. Ultimately, after further discussion with naval personnel and the community at large, those parcels were excluded from the logical outer boundary.

The staff analysis of the criteria for determination of LAMIRD logical outer boundary alternatives supported as the most compact alternative that best met

the Growth Management Act requirements was the one that was bound on three sides by water bodies and the fourth by the Naval installation. This proposed boundary served as the preferred logical outer boundary of Keyport and contained the area from the bridge on the Route #308 causeway to the South. Collectively this alternative was supported by over 60% of the response from the Keyport Online Survey. (Please Refer to Keyport Community Plan, Chapter 1, Section 1.6, Pages 6-8; & Appendix A, Pages 9-10).

2. Clustered Development Proposal:

The clustered development proposal would address a number of issues raised by the community in both the community meetings and in the Keyport Online Survey, identifying a desire for more public open space and active recreation opportunities in Keyport combined with another community desire for the restoration of a historical density through performance based developments for subdivision of remaining large parcels in Keyport. To encourage the retention of vegetated or active recreation open space in the Keyport Village, the Plan proposes to create a density bonus for clustered development through a development code proposal to meet both goals.

As an incentive to cluster, developers that propose to dedicate a particular amount of their property in public recreation space or open space will be allowed a maximum of three units per acre. The three units per acre through clustering proposal was utilized historically through the performance based development provision of the pre-growth management zoning code and development regulations as far back as 1978. The provision of the open space percentage is also consistent with historical planned unit developments allowed under historical Kitsap County zoning.

In the analysis of the impact of the Clustered Development Proposal, one outcome would be an increase of 13 additional dwelling units within the Keyport Community. The Keyport Land Use Capacity Analysis identified that the Keyport Village Low Residential zone would have an estimated 7 additional dwelling units that could be provided on vacant parcels and an estimated 10 additional dwelling units that could be provided on larger lots with existing homes. The implementation of the Clustered Development Proposal would increase the number from 10 to 23 additional dwelling units that could be provided on larger lots with existing homes. (Please refer to Keyport Community Plan, Chapter 2, Section 2.1, Pages 14-16; Appendix B, Pages 5-6; & Appendix H).

3. View Protection Proposal:

View protection was discussed heavily in both the Keyport public meetings and in the Keyport Online Survey. The concept of view protection received substantial support when protecting public views from Keyport Saltwater Park, the Port of

Keyport Dock at Washington Avenue and from public street ends. The concept of private view protection was supported in the Keyport Online Survey with the Survey Results as follows:

Survey Question:	Very Important	Somewhat Important	Not Important	No Opinion	Total Answers
Protect Private views through view protection code or language.	60 % (24 of 40)	28 % (11 of 40)	12 % (5 of 40)	0 % (0 of 40)	40

The implementation of private view protection through development code height restrictions became very controversial when the actual development language was discussed and debated in the community meetings. Draft view protection language was proposed, limiting the maximum building height to 28 feet for waterfront parcels. This proposal was consistent with and based upon the view protection language adopted for the Manchester Limited Area of more Intense Rural Development.

The issue polarized the community between those impacted by private view protection language and those benefiting from the protected views. No compromise could be struck in the community meetings and the item was voted to be removed from the draft Keyport Community Plan at the May 22nd, 2007 Keyport Community Planning Meeting by 12 of the 15 (80%) members present. Typical attendance at the community meetings was 25 - 30 members. It was agreed that the draft plan appendix would include the view protection proposal as reference, but that it was to be included for context and not as a recommendation.

As view protection is not a required component of a Limited Area of More Intense Rural Development, the view protection language has been excluded from the Keyport Community Plan. The Keyport Community Plan proposes a uniform maximum height of 35 feet for all parcels. The community may request to revisit the issue at a future date, potentially as a development code proposal or as a comprehensive plan amendment, independent of the Limited Area of More Intense Rural Development and Keyport Community Plan approval.

Kitsap County Comprehensive Plan Requirements for Identifying the "Limited Area of More Intensive Rural Development".

The following policy guidelines for designating LAMIRDs are set forth in the Kitsap County Comprehensive Plan.

- Policy RL-24** Establish a community planning process for the designation of LAMIRDs; the process should include interested parties, community groups and other stakeholders.

Policy RL-25 Encourage changes to zones in LAMIRDs to occur via a local community planning process. This process should incorporate local knowledge, experience and preferences to determine appropriate area-specific land uses, development standards, design guidelines, and public service needs. Specific issues that should be considered in this planning process include:

- Appropriate logical outer boundaries.
- Rural character of the subject area and surrounding area.
- Appropriate mix of uses, densities and intensities.
- Feasibility, cost and need for public services.
- Significant natural constraints or features to be preserved.
- Provision for a monitoring and evaluation process.
- Benefits to the local community.

Policy RL-26 Provide development regulations for LAMIRDs that provide for the following:

- Greater setbacks, reduced building height, floor/lot ratios, and maximum impervious surface coverage standards in comparison to standards for urban industrial development.
- Maximum protection of sensitive natural features.
- Building and landscape design that respects the aesthetic qualities and character of the rural area, and provides substantial buffering from the adjoining uses and scenic vistas.
- Building colors and materials that are muted, signs that are not internally illuminated and site and building lighting that is held to the minimum necessary for safety.
- Measures to reduce the impacts of noise, odor, and traffic to surrounding rural areas.
- Uses requiring substantial investments in infrastructure such as water, sewers or transportation facilities shall be scaled to avoid the need for public funding of infrastructure.

Policy RL-28 Consider designating as a LAMIRD areas that have the following rural village characteristics:

- serves as an activity center for the surrounding rural area.
- a broad mix of land use and densities.
- community, recreational, institutional services and public facilities.
- densities that are essentially urban in character.

- served by public water and sewer.
- geographically distinct from the closest urbanized portion of the County.

Policy RL-31 Encourage new development within designated LAMIRDs to strengthen the desirable characteristics and the historic character of the village or community. New development should be supported by necessary public facilities and services, and compatible with historic resources and nearby rural or resource uses. Development should be kept compact, promoting pedestrian travel within the designated area.

Findings

After careful consideration of statutory requirements for the potential designation of a LAMIRD, the following summary of findings are provided to assist/guide the decision making process. Therefore, based on the research conducted for this effort, the findings are as follows:

Keyport Findings:

1. Existing development (a.k.a.: built environment) was established prior to the July 1, 1990 date. The 1914 formation of the Naval Base at Keyport, the 1918 subdivision Plat and development pattern of the town of Keyport, the 1964 construction of the Washington State Route 308 causeway across Dogfish Bay, and the development pattern of the peninsula parcels west of Sunset Avenue NE prior to 1990 all may qualify to satisfy the requirements for a LAMIRD under the Washington State Growth Management Act.
2. The historic built environment of the community including 93 structures which meet the 50 year old eligibility requirement for historic status under the Washington State Department of Archaeology & Historic Preservation and the Washington State National Register.
3. The peninsula is served by existing PUD water as early as 1914 with the installation of the Keyport Naval Base and the historic town east of Sunset Avenue NE by public sewer substantially prior to 1990.
4. The development / uses west of Sunset Avenue NE, which were in place prior to GMA, utilized on-site septic systems and therefore can be used as further justification of the pre-1990 existing built environment requirements established under GMA.
5. The non-built or natural environment can provide useful assistance in delineating a LOB because this area is defined on three sides by marine shoreline and existing water bodies. Therefore, the LAMIRD boundaries

could contain the development using the natural environment as the maximum limits.

6. The Keyport Community Plan utilized a community planning process for the designation of the LAMIRDs and associated community plan elements; and the process included interested parties, community groups and other stakeholders.
7. The Keyport Community Plan proposed changes to zones via a local community planning process and incorporated local knowledge, experience, and preferences to determine appropriate area-specific land uses, development standards, design guidelines, and public service needs.
8. The Keyport Community Plan proposed development language, design guidelines, land uses, and zoning regulations which address the Kitsap County Comprehensive Plan Policies of RL-25, RL-26, RL-28, and RI-31.

Recommendation:

Keyport: The potential designation of a LAMIRD in Keyport could be justified on the historic pattern of existing development and built environment as one of Kitsap County's earliest communities. The records indicate that a majority of the existing development has taken place prior to the conception of GMA and therefore should be taken into consideration. The natural constraints of a marine water body on three sides and the location of a Federal military installation on the fourth, provide the essential ingredient that would limit the size/scale of the LAMIRD.

Keyport possess existing development that arguably exceeds that which was intended for our rural areas, outside the Urban Growth Areas. The potential for infill within Keyport would remain relatively low, based on the amount of undeveloped land or redevelopable parcels contained within the LAMIRD. The development potential of the LAMIRD would not exceed the level or scale at which was projected under current county comprehensive plan analysis or regulations. However, if the overall impacts associated with infill of these areas were to exceed the Level of Service (LoS) standards and/or capacities of any existing public facility (water, roads, septic, storm-water) the development would not be supported through current policy direction and regulations. The Keyport Community is limited by geography and the plan includes more restrictive development standards consistent with the preservation of the historic and rural character of the community. The proposed zoning is reflective of the historic development pattern and would preclude further intensification or re-development beyond that which currently was anticipated and analyzed in the Kitsap County Comprehensive Plan. It should be noted that this area would also continue to serve an important role for the existing and projected population needs of North Kitsap, by providing both employment opportunities and basic service needs for residents of the community.

The following recommendation can be viewed as consistent with the goals of policies of the Kitsap County Comprehensive Plan and consistent with the provisions of the Revised Code of Washington and Growth Management Act in regards to the determination of a LAMIRD. The Keyport Community Plan recognizes historical (Pre-GMA) development patterns that were not considered rural in nature and established the guidelines under the Growth Management Act to minimize the future impacts to the rural areas of Kitsap County.

Therefore, based on the aforementioned findings, staff would recommend approval of the LAMIRD designation for Keyport and recommends approval of the Keyport Community Plan.

- **Based upon the aforementioned findings, Staff would also recommend approval of the proposed Limited Area of More Intensive Rural Development (LAMIRD) Logical Outer Boundary as illustrated Figure 1.9.1 of the Keyport Community Plan, Chapter 1, Section 1.9, Page 8.**
- **Based upon the aforementioned findings, Staff would also recommend approval of the Clustered Development Proposal cited in the Keyport Community Plan, Chapter 2, Section 2.1, Pages 14-16.**
- **Based upon the aforementioned findings, Staff would NOT recommend inclusion of a View Protection Proposal, as cited in the Keyport Community Plan, Appendix F.**

(Attachment “A” provides a list of options for consideration.)

Attachment “A”

Planning Commission Options:

1. Designate Keyport as a LAMIRD and recommend approval of the Keyport Community Plan based on staff findings that recognize the existing development (pre-1990) and natural limitations with limited infill opportunities.

2. Designate Keyport as a LAMIRD and recommend approval of the Keyport Community Plan based on staff findings that recognize the existing development (pre-1990) and natural limitations with limited infill opportunities with modifications to the following components.
 - a. View Protection Proposal (example)

3. Designate Keyport as a LAMIRD and recommend approval of the Keyport Community Plan based on staff findings that recognize the existing development (pre-1990) and natural limitations with limited infill opportunities. Recommend that the Department of Community Development continue to work with the community in 2008 for proposed solutions and potential 2008 comprehensive plan amendments to the following components.
 - a. View Protection Proposal (example)

4. Do not designate Keyport as a LAMIRD and recommend the Keyport Community Plan be deferred for consideration until 2008 with additional community involvement by the Department of Community Development to address the following items:
 - a. View Protection Proposal (example)

5. Do not designate Keyport as a LAMIRD at this time nor recommend approval of the Keyport Community Plan.