



**CITY OF LANGLEY**

**DRAFT- SPECIAL COUNCIL MEETING AGENDA**

**Monday, October 27, 2025, 5:30 pm**

**Langley Library, 104 Second Street, Langley, WA 98260**

**And via Zoom:**

<https://us02web.zoom.us/j/85016739615?pwd=hmD9ouWjXMUdgXZ1j92U5TNdXAENA4.1>

Webinar ID: 850 1673 9615      Passcode: 378405

**1. CALL TO ORDER – (5 minutes)**

- a. Opening Words/Minute of Silence
- b. Roll Call

**2. APPROVAL OF AGENDA (2 minutes)**

**3. EXECUTIVE SESSION (45 minutes)**

Discussion with legal counsel regarding potential litigation, real estate ([RCW 42.30.110\(1\)\(b\),\(i\)](#)).

**4. PUBLIC COMMENT \* (10 minutes)**

**5. DISCUSSION (60 minutes)**

Comprehensive Plan, Director Penny, p. 2

**6. COUNCIL REPORTS (10 minutes)**

- c. Councilmember Harolynne Bobis
- d. Councilmember Rhonda Salerno
- e. Councilmember Chris Carlson
- f. Councilmember Craig Cyr
- g. Councilmember Gail Fleming

**7. ADJOURN**

**\*Public Comment:** We welcome requests to comment on subjects that are not on the agenda or requests to comment on a particular agenda item at the time the item is being discussed. The purpose of a public comment is to allow the public to inform the Council of your views. We appreciate and welcome your comments, but please note that we will not be entering into dialogue at this time. Please limit your comments to no more than three minutes and address subjects, not individuals, in an orderly and courteous manner. Please state your name, the city in which you reside, and the subject of your comment. If you wish to make a public comment at a City Council meeting and are attending from a remote location, please submit a request no later than 3:00 pm the day of the meeting using our [public comment request form](#). This form is not necessary for those attending in person.

Thank you for participating! If reasonable accommodation for a disability is needed, please contact us at (360) 221-4246 at least 24 hours prior to this meeting.



## City of Langley

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### MEMORANDUM

**To:** City Council  
**From:** Meredith Penny, Director of Community Planning  
**Re:** Summary of Revisions to Draft Comprehensive Plan and Implementing Regulations  
**Meeting Date:** October 27, 2025

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### Background

As required under RCW 36.70A.130, the City of Langley is conducting a periodic review and update of its Comprehensive Plan. This update ensures the Plan remains consistent with the Growth Management Act (GMA) and is supported by corresponding updates to implementing development regulations and the zoning map.

The proposed changes include both state-mandated updates and City-initiated amendments intended to better align the Plan and regulations with local goals and community input.

On August 2, 2025, a SEPA Determination of Nonsignificance (DNS) was issued, initiating a 14-day public comment period. Concurrently, the draft Plan and associated code amendments were submitted to the Washington State Department of Commerce for the required 60-day review period. Commerce also distributed the draft to state agencies and departments for their input.

During this period, the City conducted several public outreach meetings to gather community feedback.

#### Outreach Meetings Conducted:

- *September 4, 2025*  
Roundtable Workshop with local architects and developers on Multifamily Infill Overlay
- *September 9, 2025*  
Community Meeting on the Land Use Element, Housing Element, and Implementing Regulations
- *September 16, 2025*  
Community Meeting on the Parks & Open Spaces Element, Transportation Element, and Capital Facilities & Utilities Element
- *September 22, 2025*  
Roundtable Workshop with local architects and developers on Multifamily Infill Overlay
- *September 25, 2025*  
Roundtable Workshop on the Americans with Disabilities Act (ADA) Transition Plan
- *September 20, 2025*  
Community Meeting on the Climate Element and Economic Development Element

Based on feedback received from the public, agency reviewers, and the Department of Commerce, staff made a number of revisions to the draft Comprehensive Plan and implementing regulations. These changes are summarized below.

## **Summary of Changes to Implementing Regulations**

### **Changes to Multifamily Infill Overlay Per Roundtable Workshop Input**

- Maximum Front Yard Setback: Reduced from 25ft to 20ft.
- Maximum Side Street Setback: Removed. Allows flexibility to locate open space on the side.
- Height Limits:
  - Two-story buildings: increased from 25ft (including 5ft pitched roof allowance) to 30ft.
  - Three-story buildings: increased from 35ft (including 5ft pitched roof allowance) to 40ft.
- Lot Coverage: Removed maximums to eliminate redundancy with stormwater and open space requirements.
- Building Separation: Adjusted minimum separation for multi-story buildings from 25ft to 20ft where walls are parallel for 35ft or more (up from 20ft in prior draft).
- Multifamily Courtyard Shared Open Space: Adjusted minimum dimensions from 20ft × 20ft to 16ft × 20ft.
- Private Open Space: re-established a minimal private open space requirement for all housing types of 50sf with minimum dimensions of 6ft x 6ft.
- Total Open Space: Reduced total open space to 300sf per unit.
- Encroachments: Limited bay/bow window and balcony encroachments to street setbacks only.
- Mezzanine: Removed mezzanine illustration (covered under building code).

### **Changes to Regulations to Address WA State Department of Commerce Comments**

- Accessory Dwelling Units (ADUs):
  - Allow conversion of existing structures into ADUs even when nonconforming with setbacks or lot coverage.
  - Increase allowed height for ADUs from 15ft to 24ft.
- Emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP housing):
  - Per state law, STEP housing must be allowed in all zones which allow hotels.
  - Fairgrounds overlay currently lists hostels as an allowed use. To keep hostels as an allowed use means the City would also have to allow STEP housing at the Fairgrounds.
  - Removed hostels as an allowed use at the fairgrounds to remove issue of non-compliance with state requirements for STEP housing.
  - Discussion of whether to allow housing at the Fairgrounds is proceeding through a separate process from the City's Comprehensive Plan Update.

### Other Regulatory Changes

- Clarified that there is no density limit in the P-1 zone for residential development.
- Refined and updated street standards to implement ultimate multimodal network.
- Updated LMC 18.04, Innovative Permanently Affordable Housing Projects to match new definition and incomes limits on affordable housing as required by state law.
- Removed provisions related to special events from the Fairgrounds Overlay, the newly updated special events code will apply.

## Summary of Changes to the Comprehensive Plan

### Utilities & Capital Facilities Element

- Added new policy UCF 2.4 to address public comment:
  - The City will continue to identify, prioritize, and implement measures to reduce inflow and infiltration (I&I) within the sanitary sewer system to maintain system capacity, protect public and environmental health, and defer costly infrastructure expansion.
- Added clarifying language to page UCF-21:
  - Although I&I is expected to remain constant at current rates, total sanitary sewer flows will increase as population and employment grow. As a result, I&I will represent a smaller proportion of total system flow over time, indicating improved relative system efficiency even as overall wastewater volumes rise.
- Revised Policy UCF 2.2(e) to read “reduces demand while still providing quality service.”

### Land Use Element

- Updated Goal LU 12 and related policies to emphasize the relationship between land use and transportation.
- Added descriptions of each future land use designation and a new table linking designations to zones, intensities, and building types (per Dept. of Commerce comment).
- Updated page LU-21 reference to the Langley Creative District to reflect that it is now managed solely by the Langley Chamber of Commerce.
- Added geohazard area description (pg. LU-8) and Hazard Mitigation Plan references (pg. LU-12) (per WA DNR comment).

### Housing Element

- Added a description of barriers to housing development and actions to address those barriers and referenced the Housing Action Plan (per Dept. of Commerce comment).

### Climate Element

- Replaced the October 2024 Climate Mitigation Memo in Appendix F with the December 2024 version, which refines emissions calculations to the Langley city limits rather than the zip code.
- Added reference to the Hazard Mitigation Plan (per WA DNR comment).

## Next Steps

At their October 22 meeting, the PAB held a public hearing on the draft Comprehensive Plan, implementing regulations, and zoning map amendments. Following the hearing, staff will convey the public testimony and PAB input to City Council at their October 27<sup>th</sup> workshop. Following the Council workshop, a revised draft will be created for a recommendation by the PAB.

- November 5: PAB to make its final recommendation to City Council.
- November 17: City Council first reading of adopting ordinance.
- December 1: City Council second reading and potential adoption.

## Enclosures

1. Public and Agency Comment Matrix
2. Draft Response to Commerce 60-Day Review Letter
  - a. Commerce 60-Day Review Comment Letter

Matrix of Written Public and Agency Comments Received During 60-Day Review Period (Aug-Sept 2025)

Last Name	First Name	Agency or Public	Date	Plan Element/ Code Section	Topic/ Theme	Comment Summary	Action	Response
Allamano	Alexa	Public	8/14/2025	Land Use	Creative District	<p>The last sentence of the first paragraph on page LU-21 reads "This area is also designated as part of the Langley Creative District through Arts WA and managed by Langley Creates and the Chamber of Commerce."</p> <p>Langley Creates is no longer managing the Creative District, so for accuracy this should be corrected to "...managed by the Langley Chamber of Commerce."</p>	Incorporate	This change has been incorporated into the current draft.
Arndt	Damon	Public	10/2/2025	Land Use Zoning Map	Rezoning	<p>Disagree with proposal to rezone parcels south of Edgecliff from RS15000 to RS7200.</p> <p>- reduces the ability to subdivide their property from 5 lots to 2</p> <p>-this neighborhood is one of the last parts of Langley that still has increased density potential</p> <p>- one of the more affordable areas of Langley</p> <p>- the proposed change limits the use of the brand new services being installed</p>	Needs Discussion	<p>Should the City have further discussion or revise this proposal?</p> <p><b>PAB Response:</b> PAB recommends not moving forward with this rezoning.</p>
Finlay	Leanne	Public	8/1/2025	Parks & Open Space	Seawall Park	<p>Request that City stop using term "Seawall Park" and instead use term "Seawall Walkway", "Seawall Promenade" or "Seawall Walk".</p> <p>Request that the City include in the plan as an exhibit, the survey to show the walking path and emphasize that all the flat area below First St is not owned by the City.</p> <p>Request the City verify the 1.44 acres cited in the plan.</p>	Needs Discussion	<p>Should the City change the terminology used to refer to this public area behind the seawall? Parks and Open Space Commission recommends keeping the name Seawall Park and finding other ways to encourage users to respect the adjacent private properties.</p> <p><b>PAB Response:</b> Do not think changing the name will address the concerns. Would prefer to address the concerns in other ways such as signage or moving the path. Would like to see consensus from the adjacent property owners on this issue before changing the name. Recommend this is handled separately from the Comprehensive Plan process.</p>

Last Name	First Name	Agency or Public	Date	Plan Element/ Code Section	Topic/ Theme	Comment Summary	Action	Response
								<p>The City of Edmonds map circles areas in a black outline that have been rezoned subject to a development agreement. This is when the City Council approves a zoning change in exchange for, or contingent upon, certain developer commitments. Development on those parcels must comply with the associated contract or development agreement, which is usually adopted by ordinance and recorded against the property. The City of Langley does not have any contract rezones.</p> <p>The Edmonds map also outlines planned residential developments (PRDs) because these can also be subject to case-specific requirements.</p> <p>PRDs are discretionary project approvals rather than legislatively adopted zoning districts, and including them on the zoning map can make it difficult to distinguish official zoning boundaries from individual project areas. Because PRDs can expire, be amended, or remain vested under outdated regulations, mapping them alongside zoning districts may also misrepresent the current regulatory status of a property.</p>
Finlay	Leanne	Public	9/1/2025	Zoning Map	Map Format	Request that the City update the zoning map to show infill areas similar to the City of Edmonds zoning map.	No Action	
						<p>Request that the City consider revisions to LMC 18.03 Mixed Use Housing Demonstration Project, and 18.04 Innovative Permanently Affordable Housing Projects.</p> <p>Both chapters require neighborhood meetings and/or review panels.</p> <p>Neighborhood meetings should be for sharing information, and for neighbors to voice concerns, but not an opportunity to veto projects.</p>		<p>Should the suggested changes be made to Chapters 18.03 and 18.04 of the Langley Municipal Code?</p>
Hofius	Doug	Public	8/11/2025	Regulations	LMC 18.03 and LMC 18.04	Review and compliance should remain the purview of planning.	Needs Discussion	<b>PAB Response:</b> recommend staff review and ensure that none of the language implies the neighbors get to veto projects.
						<p>Request that the City add "Bay Type Car Wash" as a conditional use in the Neighborhood Business (NB) zone.</p> <p>Comment cites environmental, waste reduction, community, accessibility benefits, accountability, and energy benefits.</p>	Needs Discussion	<p>Should the City add car wash as an allowed use to the Neighborhood Business zone?</p> <p><b>PAB Response:</b> Do not recommend allowing car washes in Langley</p>
Shipman	Paul	Public	9/10/2025	Regulations	Carwash			

Last Name	First Name	Agency or Public	Date	Plan Element/ Code Section	Topic/ Theme	Comment Summary	Action	Response
								City Council has indicated support for revising the MFI and PUD codes as part of this update process and to monitor how those changes play out, rather than to completely remove or rethink the approach entirely. The land capacity analysis was conducted in accordance with the adopted Countywide Planning Policies and State Department of Commerce guidance. Revisions to the Countywide Planning Policies may be considered prior to the next update cycle. The wastewater treatment plant will not exceed design hydraulic capacity during the next 5 years. However, if the City's population increases as allocated, the treatment plant and pumping station planning requirements will be triggered within the 20-year planning period. The City intends to update the sewer comprehensive plan in 2025 – 2026 to develop a better picture of when this will be triggered and what will be needed. The City has added affordable housing as an allowed use to the public use zone which opens the door for housing at the school district property.
Soules	Jim	Public	9/1/2025	Regulations	LMC 18.13 Multifamily Infill	Concern that Langley has based its residential future on the MFI and PUD codes which don't fit the City's needs. Concern that the land capacity analysis is inaccurate. Concern there is not sewer capacity. Concern that inclusionary zoning will discourage the use of the MFI code. Comment that the City should be more proactive in pursuing affordable housing at the school district property.	No Action	
Sears	Tricia	Agency - WA DNR	8/14/2025	Land Use	Critical Areas	Page 7. Natural environment. In the Topography and Geology section, which is nicely written, it would be helpful to state what the geologically hazardous area hazards are in Langley.	Incorporate	This change has been incorporated into the current draft.
Sears	Tricia	Agency - WA DNR	8/14/2025	Land Use	Critical Areas	Page 8: LU-1 Langley Critical Areas Map. The map shows steep slope, along with a lot of animal species. Are steep slopes the only geologically hazardous area hazard in Langley? Suggest having the map take up a full page for easier reading	No Action	Langley has other geologically hazardous areas such as erosion and landslide hazard areas but these are identified on a site by site basis. A full sized map is included in Appendix J to the plan.
Sears	Tricia	Agency - WA DNR	8/14/2025	Land Use	Critical Areas	Suggest including a reference to the hazard mitigation plan to further the connections of land use, climate, and hazard mitigation planning.	Incorporate	The City does not have a current Hazard Mitigation Plan but is in the process of working with Island County on an updated one. This reference has been added to the current draft.
Sears	Tricia	Agency - WA DNR	8/14/2025	Climate Element	Critical Areas	Suggest including a reference to the hazard mitigation plan to further the connections of land use, climate, and hazard mitigation planning.	Incorporate	The City does not have a current Hazard Mitigation Plan but is in the process of working with Island County on an updated one. This reference has been added to the current draft.



Matrix of Public Comments Received During September 2025 Community Meetings

Meeting Date	Comment Topic/Theme	Comment Summary	Action	Response
9/9/2025	Bluff Stability	What about the security of the bluff?	No Action	The City added policies to the Land Use Element addressing stormwater and vegetation management. The City is also proposing to rezone the parcels on the south side of Edgecliff Drive, with the intent that reduced development pressure will help protect the bluff.
9/9/2025	Building Height Restrictions	Last time we talked about keeping First Street to two stories. Will the City be allowing three stories on First Street?	No Action	First Street already allows three-story buildings, with a maximum height of 35 feet.
9/16/2025	Capital facilities - Sewer	Does development, especially large development, have to pay for the capacity of the sewer that they are using up?	No Action	If a development were to use enough of the wastewater treatment plant’s capacity to reach 85% of the available total, that would trigger a requirement for the developer to mitigate the impact by providing additional capacity to serve their project. If a development does not reach that threshold, mitigation is not required because the City’s long-range system planning already accounts for anticipated growth over the next 20 years.
9/17/2025	Capital facilities - Utility Rates	Senior rates for those who live in condos. City currently does not allow applications from those who are not billed directly.	No Action	Policy UCF 4.5 calls for conducting rate studies when updating the City's utility plans and examining the feasibility of reduced rates for low-income residents. This comment can be considered as part of that process.
9/9/2025	Design	Are you aware that a lot people in the community don't like the new color of the library?	No Action	The City does not regulate building colors. The library color was chosen by the Library Board, which operates independently of the City. The Board has stated that they selected the color to match the library’s historic appearance.
9/9/2025	Drinking Water	Concerned about the impact of the Coles valley development on the amount of drinking water the City will have	No Action	This permit application is proceeding through a separate process from the Comprehensive Plan update. However, as part of the plan update, the City’s Public Works Director reviewed water data to confirm that there is sufficient supply to serve anticipated growth. The Director is also reviewing the specific project application to ensure adequate service. Additionally, the City received a state grant to study Langley’s groundwater resources and develop a more detailed model of its aquifers.
9/9/2025	Drinking Water	Langley's water is brown. Is there a plan to get rid of that?	No Action	Iron and manganese occur naturally in Langley’s groundwater. Because the City pumps water directly from the ground into the reservoir, these minerals are sometimes present at levels that exceed the state Department of Health’s secondary contaminant standards — which address aesthetic issues, not health concerns. However, emerging research in other countries has suggested there may be potential health implications for youth. When you experience brown water, the City recommends flushing your cold water through an outdoor faucet or bathtub. If the water does not clear after about 15 minutes, please contact Public Works so they can investigate.

Meeting Date	Comment Topic/Theme	Comment Summary	Action	Response
9/30/2025	Economic Development	<p>Is there a way that the City could study the difference in sales tax revenue lost between when the downtown was fully occupied compared to today where there are nine vacancies?</p> <p>Response from another attendee: The City could identify the square footage of the vacant spaces. Then review the standards published by the urban land institute for how much sales tax different types of commercial uses typically generate per square foot of space. The City could then use this information to estimate how much revenue could be received if the space was occupied by different types of commercial businesses.</p>	Needs Discussion	<p>Policy ED3.4 of the Economic Development Element directs the City to explore strategies to encourage the timely occupancy and revitalization of vacant commercial spaces in the Central Business District. Should the City consider adding another policy focused on calculating the economic impact of vacant storefronts on the local economy and city revenues?</p> <p><b>PAB Response:</b> Add data about the impact to the background/introduction section of the Element but a separate policy is not needed to address this request.</p>
9/9/2025	Housing	Only 24 people both live and work in the City - how was that number determined	No Action	<p>This data comes from the American Community Survey, which surveys a sample of the population over a five-year period. The results are estimates extrapolated from those responses. Smaller communities like Langley can have greater margins of error because of the limited sample size. Whether 24 is the exact number or not, the City likely has very few people who both work and can afford to live here. It’s also worth noting that this statistic does not account for residents who work remotely for employers outside of Langley</p>
9/9/2025	Housing	Is it true that Langley does not need to make any regulatory changes to address the housing need for those making 120% of AMI and above?	No Action	<p>That’s correct — the state does not require cities to plan for housing for households earning more than 120% of the area median income. However, there are reasons a city might choose to do so. When there isn’t enough housing available for higher-income households, those households “rent or buy down,” reducing the housing available to lower-income households who cannot afford to “rent or buy up.”</p>
9/9/2025	Housing	Suggest adding a goal that the City work with nonprofits to spread information about fair housing rules to educate sellers, landlords, and homeowners.	Incorporate	<p>This comment can be incorporated into the Housing Element.</p>
9/30/2025	Housing	Can the City pursue an assisted living facility in Langley? This could help older residents age in their community while freeing up underutilized homes for more families.	Needs Discussion	<p>Should policy language be added to the Housing Element to support the location of assisted living facilities?</p> <p><b>PAB Response:</b> An additional policy is not needed but staff should check that it is listed as an allowed use in the zoning code</p>
9/30/2025	Housing	Is there a tax that the City can place on vacant and/or second homes? Can the City determine which ones are vacant or occupied only seasonal and send them a targeted flyer?	No Action	<p>The City’s ability to impose taxes is restricted to those specifically allowed by the state legislature. Currently, the state has not authorized any cities to tax vacant or second homes. The City does have a proposed action in its Housing Action Plan to analyze utility usage to track second homes (Action 3.4) and to conduct targeted outreach to property owners whose homes remain vacant for extended periods of time (Action 3.5). These two actions are supported by Policy H5.7 of the Housing Element. Policy H4.6 of the Housing Element addresses potential incentives to encourage long term rentals.</p>
9/30/2025	Housing	Is there a plan to establish a multifamily tax exemption as allowed by state law?	No Action	<p>Policy H4.3 of the Housing Element and Action 2.1 of the Housing Action Plan both support the implementation of a Multifamily Tax Exemption.</p>

Meeting Date	Comment Topic/Theme	Comment Summary	Action	Response
9/9/2025	Land Use	The proposed changes to LU 8.4 - is this saying that the City is going to add more units that are not connected to the sewer and allow them to develop their own septic within the city limits and then we will have to go through the current effort all over again to extend sewer to them?	No Action	The proposed plan language mirrors what is already in the code: if a property is within 200 feet of a sewer main, it must connect. Many parts of the city, such as Brackenwood, are farther away than that. It would be unreasonable to require a single-family homeowner in those areas to extend the sewer just for one house. However, subdivisions, multifamily projects, or any other higher-intensity developments are required to connect.
9/9/2025	Langley Infrastructure Project	A bunch of us have questions about the infrastructure project currently underway - what's that going to accomplish?	No Action	This is a major project that has been in planning for about six years and is expected to be completed by the end of this year. It includes 14 utility improvements — water, sewer, and stormwater — many of which were identified as needs decades ago. It has taken time to secure the funding to make it possible. As part of this work, the City was also able to incorporate a separated pedestrian walkway on 6th Street.
9/9/2025	Langley Infrastructure Project and Bluff Stability	I would like to emphasize that the stormwater on Edgecliff Dr that will be collected by the LIP is more vital than anything else that's being done and our next job is to educate people who live near the new sewer lines to hook up so they're not putting their domestic water into the ground and the bluff every time they flush their toilets. Is there some kind of grant that can help with the cost to hookup?	No Action	The City is exploring whether it can activate an existing program that would offer loans to help property owners cover sewer connection costs. The City previously looked into state grants for connection assistance, but those programs would have required the entire neighborhood to connect, which the City has made clear it will not mandate
9/9/2025	LMC 18.13 Multifamily Infill	If developers can pay a fee instead of providing affordable housing what good will that do?	No Action	The current draft changes to LMC 18.13 include a requirement that 15% of dwelling units in new developments be affordable. Projects with six or fewer units may instead pay a fee-in-lieu, which would be placed in a City fund dedicated to future affordable housing projects
9/9/2025	LMC 18.13 Multifamily Infill	Does the requirement for space between buildings apply to just the multifamily infill code or does it apply to the other multifamily performance standards as well?	Incorporate	These same separations are now proposed within the general multifamily performance standards as well.
9/16/2025	Parks Survey	Concern that when surveys are sent out via utility bills, some people do not receive utility bills directly from the city.	No Action	The City recognizes the lack of diversity among respondents to the parks survey and the need to identify additional ways to reach a broader cross-section of the community in future outreach efforts
9/16/2025	Parks Survey	How are people's needs being met for children's play equipment?	No Action	Survey responses indicated that residents' needs for children's play equipment are generally being met. The City currently has two playgrounds within city limits, and respondents may also be using nearby facilities, such as those on Maxwellton owned by the South Whidbey Parks and Recreation District.
9/9/2025	Pets	Concerns about dangerous dogs	No Action	Dogs are not addressed in this Comprehensive Plan update. However, the City does have regulations related to dangerous dogs in Title 6 of the Langley Municipal Code
9/9/2025	Population Projections	What is going on with the Oak Harbor population projection issue	No Action	Island County and the City of Oak Harbor are discussing possible adjustments to population projections to ensure that growth can be supported by urban services. They are also exploring how to plan for potential future Urban Growth Area expansions. Updates to the Countywide Planning Policies may be needed as a result of these discussions.

Meeting Date	Comment Topic/Theme	Comment Summary	Action	Response
9/9/2025	Population Projections	We need to add a certain number of people, which is a given number. So isn't it immaterial where we need to add it? Whether it's at Coles or somewhere else?	No Action	The City is not required to add a specific number of people — rather, we must ensure that our land use regulations can accommodate the level of growth projected by the state. Choosing a population projection does not mean the City is guaranteeing that number of people will move here, nor does it mean the City must build housing itself. It simply requires that we provide enough appropriately zoned land to accommodate expected growth in both residential and commercial areas
9/9/2025	Recreation	Where the new pool is proposed, is that location in the City limits?	No Action	That property is not within City limits; it is located in unincorporated Island County.
9/9/2025	Rezoning	Find it curious that the properties south of Edgecliff Dr were rezoned while at the same time stormwater runoff from the Edgecliff right-of-way is now being contained and now that sewer service is in the street. Rezoning this area to RS15000 removes the potential to use the Multifamily Infill Code and reduces options for affordable housing. Request that this be discussed openly and with all the facts laid out in a way that is untestable to the lay public.	Needs Discussion	Should the City have further discussion or revise this proposal?  <b>PAB Response:</b> PAB recommends not moving forward with this rezoning.
9/9/2025	Rezoning	Downzone on south side of Edgecliff is not fair or approvable or appropriate without the engineering and science behind it. Rezone eliminates affordable housing possibility.	Needs Discussion	Should the City have further discussion or revise this proposal?
9/16/2025	Rezoning	Would the proposed addition of housing as an allowed use to the Public Use zone affect the fairgrounds?	No Action	The City excluded the Fairgrounds from this change because housing at the Fairgrounds is being considered through a process separate from the Comprehensive Plan update
9/9/2025	School Property	What is the City planning to do about schools and school properties	No Action	The City is proposing to change zoning regulations to allow affordable housing on school-owned properties. Whether that moves forward is up to the School District, as the property owner. The City is open to engaging in discussions.
9/16/2025	Traffic	If traffic counts were taken in March how did they account for higher levels of summer traffic?	No Action	The project team obtained WSDOT traffic data for the highway during the summer months and compared it to other times of the year, applying a similar seasonal adjustment factor to traffic estimates within Langley
9/16/2025	Transportation	Our town has grown a lot since 2016, is the FHWA guidance for small and rural towns still applicable?	No Action	Yes, Langley is still considered a small city located in a rural area
9/16/2025	Transportation	Some of our current walkways don't allow bicycles	No Action	Correct. Under the proposed changes to the City's transportation network, bicycles are expected to use shared roadways or shoulders, while walkways are reserved for pedestrians

Meeting Date	Comment Topic/Theme	Comment Summary	Action	Response
9/16/2025	Transportation	Concern that removing the center line stripe on roadways is dangerous	No Action	Striping is not required on low-volume roads. For example, 2nd Street in the downtown core currently has no lane striping, which helps slow traffic by encouraging drivers to pay closer attention and proceed cautiously.
9/16/2025	Transportation	Comment regarding edge lane roads - cars already operate this way on Al Anderson when there are pedestrians in the roadway and the narrowing of the lane with the advisory should striping helps people slow down. Have almost been hit on that road.	Needs Discussion	This comment will be shared with the City’s transportation consulting team to determine whether Al Anderson Road is better suited as a shared facility or an edge-lane road. <b>PAB Response:</b> recommend Al Anderson be an edge-lane road.
9/16/2025	Transportation	Concern about safety on Al Anderson Road with undefined lanes and pedestrian areas	Needs Discussion	This comment will be shared with the City’s transportation consulting team. <b>PAB Response:</b> recommend Al Anderson be an edge-lane road.
9/16/2025	Transportation	What is meant by a separated sidepath?	No Action	A separated side path is an asphalt pedestrian walkway that is typically set apart from the roadway by a landscaped or grass strip. A side path may be located on one or both sides of a street
9/16/2025	Transportation	Comment that they live on 6th Street and are looking forward to a sidepath	No Action	Acknowledged. A side path will be installed on 6th Street as part of the Langley Infrastructure Project.
9/16/2025	Transportation	Is it set in stone that development would have to provide a sidewalk to nowhere?	No Action	Yes, as new development occurs, it is required to improve its portion of street frontage. Depending on the property’s location, this could mean constructing a sidewalk, a side path, or no improvements. The intent is that as redevelopment continues, sidewalks and side paths will eventually connect over time. If most of a corridor has been completed but small gaps remain, the City could seek grant funding to complete the missing sections
9/16/2025	Transportation	Why are development impact fees being restricted to only funding ADA crossings?	No Action	The City cannot charge new development to correct existing deficiencies. Setting impact fees high enough to address past deficiencies would place the burden of previous underinvestment on new development and negatively affect housing affordability. For example, if the City is planning for 446 housing units and required them collectively to fund \$10 million in projects over 20 years, it would add significant cost to each home. Local Improvement Districts (LIDs) provide another way to capture funding from existing development to address these needs
9/16/2025	Transportation	Comment about how incremental development with street frontage improvements is how the sidewalk on Anthes was developed.	No Action	Correct. This same process will be used to implement street frontage improvements citywide moving forward
9/16/2025	Transportation	Concern that the tiny house project proposed at the corner of Camano Ave and Edgecliff Dr will be required to install a new sidewalk and dedicate right of way.	No Action	Under the current proposal, Edgecliff Drive is designated as a shared-use lane, meaning a separate sidewalk will not be required. Due to its low traffic volumes and speeds, separate pedestrian facilities are not necessary
9/16/2025	Transportation	Are impact fees going to be implemented?	No Action	Yes, that will be the next step. The Comprehensive Plan update has positioned the City well to establish impact fees in code once this process is complete
9/9/2025	Trees	When will the tree ordinances be discussed?	No Action	The City will begin drafting updates to its tree ordinances in 2026

Meeting Date	Comment Topic/Theme	Comment Summary	Action	Response
9/16/2025	Trees	Concern about impact of Langley Infrastructure Project on 4th St trees	No Action	As part of the Langley Infrastructure Project, an arborist evaluated all trees within and near the right-of-way that could be affected by the project prior to construction. The City also has an on-call arborist to assess any roots or trees impacted as work progresses
9/16/2025	Trees	Concerns that increasing tree canopy is in conflict with having open space and solar grids	No Action	Sometimes goals may appear to conflict, and the City must find ways to balance them. After extensive discussion with City commissions, one policy was modified to reflect that while some trees may be removed for community solar or community gardens, trees should not be removed for individual installations or gardens

Public Comments Received Between 10/11/25 and 10/24/25

Last Name	First Name	Agency or Public	Date	Plan Element/ Code Section	Topic/ Theme	Comment Summary	Staff Response	PAB Response
Finlay	Leanne	Public	10/16/2025	Parks and Open Space	Seawall Park name	Objects to using the name “Seawall Park,” saying it misleads the public into thinking the entire area is public when much is private. Urges City to clarify public vs. private areas with signs or redesign. Suggests removing bushes, relocating picnic tables to Boy & Dog Park and east Seawall lot, and improving maintenance/amenities there.		Do not think changing the name will address the concerns. Would prefer to address the concerns in other ways such as signage or moving the path. Would like to see consensus from the adjacent property owners on this issue before changing the name. Recommend this is handled separately from the Comprehensive Plan process.
Finlay	Leanne	Public	10/16/2025	Zoning Map	Multifamily areas	Request that the zoning map show where multifamily housing is allowed.		Recommend implementing this suggestion.
Finlay	Leanne	Public	10/16/2025	Regulations	Downtown height limits	Request that First Street allow 4 to 5 story buildings on both sides of the street.	This is beyond the scope of this update process	
Ohrvik	Susanne	Public	10/17/2025	Zoning	Proposed Edgecliff Rezone	Expresses support for protecting the bluff but concern with the proposed rezone. Notes that the larger sideyard setback in the RS1500 zone will preclude them from adding a shed, garage, or ADU to their property. Suggests excluding the side yard setback change for the smaller properties.		Recommend not moving forward with the proposed rezone.
Hofius	Doug	Public	10/22/2025	Regulations	Private open space under MFI	Concerns about the private open space requirements included in the revised MFI code. Notes they are problematic for rentals due to fire risks and long-term maintenance issues. Cites a client they have who has regular fire incidents at decks on their properties and Glenhaven's problems as examples.		Issue of fires is a property management issue, not one to be addressed by this process. Would like more information and discussion on whether the requirement for private open space impacts the feasibility of affordable housing developments.



Zourzouvyls	Theo	Public	10/22/2025 Regulations	New commissary use	Concern that there is a wording conflict resulting in a commissary kitchen not being allowed within the Fairgrounds despite being listed as an allowed use there. Question about why commissary is not an allowed use in the CB or NB zones. Concern about not allowing same-day or event-driven orders and not allowing customer pick-up or deliveries to retail and wholesale partners elsewhere. Request that the definition is clarified to allow a commissary to be used by a single operator in addition to multiple operators.	As an overlay, the Fairgrounds District allows additional uses beyond those that would typically be permitted only in the P-1 zone. The CB and NB zones already allow retail and restaurant uses. Staff can review the language to ensure delivery to retail or wholesale partners elsewhere is permitted. The City is trying to avoid turning the fairgrounds into a second commercial district that draws in customers and competes with the downtown. The intent is not to allow individual food orders for to-go pickup or onsite consumption. Staff can also adjust the language to address single and multiple business use.
Hofius	Doug	Public	10/22/2025 Regulations	Affordability	Request that as the City progresses through this process, they move towards removing barriers to affordability and not adding new barriers.	
Hughes	Rose	Public	10/22/2025 Regulations	Open space requirements of MFI	If Generations Place had one fewer unit or two units priced for a lower AMI, they would not have been able to cover their operating costs which is a funding requirement. The project would not have been feasible. Request that the distinction between private and shared open space be removed. Comment that the requirement that open space be permeable removes ADA accessibility, shaded area, or places to rest. Request to return to the previous draft of the code. Notes they will provide comments on other ways to improve the permitting process.	Would like more information and discussion on open space requirements.
Chapin	Ross	Public	10/22/2025 Regulations	Street trees	Disagree with requirement that street trees be located on private property. Suggests this reduces the room for the trees and that it doesn't provide the framing of the street that can help to slow traffic and contribute to the city character.	



Chapin	Ross	Public	10/22/2025 Regulations	Affordability requirement in MFI	Concerned that the requirement for affordable housing will have the opposite effect. Concern that private developers will increase the price of the market rate units to cover the cost of the affordable units. Concern that developers will either build larger, luxury units, or bypass the MFI code all together. Concern that when a project is built using the MFI code, the higher priced homes become the new comparable sales for the area, driving up property values. Comment that research shows that the administrative costs of inclusionary zoning outweigh the benefits in small towns. Suggestion to focus efforts on the underutilized school site, streamline approvals for 100% affordable developments, help developers access infrastructure grants, and encourage creative, lower-cost solutions like in-home suite conversions, ADUs, and tiny homes.	
Arndt	Damon	Public	10/22/2025 Zoning	Proposed Edgecliff Rezone	Commenter owns property on Edgecliff Dr and waited for sewer to go in to further develop their property with small homes/cottages. Now that the sewer is in and they have paid for their utility upgrades, the area is being rezoned to prevent their development plans. The LIP is making improvements to groundwater management through the stormwater and sewer systems. Only four parcels in the proposed rezone area have the potential to subdivide - with this rezone those property owners are having to carry the burden for the impacts of a whole neighborhood.	Recommend not moving forward with the proposed rezone.

						Request eliminating the distinction between shared and private open space. Request to remove the requirement that all open space be permeable and replace with a 50% threshold. In affordable housing, all common areas need to be wheelchair accessible and people need ares for four season use such as gazebos and overhangs or bike storage. Request to remove the requirement that open space be useable. Concern that the amount of open space required in the standard multifamily zones is higher than in the MFI code. Request to raise the allowed density for standard multifamily dwellings, stating that the current standard is 6du/acre. Request to adjust the definition of townhouse so they can be used as rentals on a common lot instead of ownership-only. Comment that the existing definition of intersection sight distance is confusing and limiting.	<b>For further discussion:</b> Elimination of distinction between shared and private open space. Addition of impervious surface threshold of 50% in open space. <b>Other items:</b> The requirement that open space is useable was added to address concerns previously raised by this commenter. The commenters calculations were off, the amount of open space required in the standard multifamily code is less than in the MFI code. The density in the RM and NB zones is 15du/acre. There is no density limit in the CB zone. The definition of townhouse can be revised. The comments on the sight distance defintion can be relayed to the City's engineering team.	PAB would like more information and discussion on open space requirements.
Hughes	Rose	Public	10/23/2025	Regulations	Open space requirements of MFI and standard multifamily			
						Request that additional policies are added to the Housing Element to improve affordable housing permit processes. Request revisions to LU 5.3 noting that the segment slated for encouragement over others is already well represented, and economic diversity is important for economic resiliency. Recommend against using the term unique character in LU 6 or provideing a clear definition for it. Concerns about LU 6.3 and how it will be impelmented and whether it conflicts with the MFI code.	<b>For further discussion:</b> Additional Housing Element policies addressing affordable housing permit processes. Revisions to LU 5.3 <b>Other:</b> LU 6 goal can be revised accordingly. The MFI code implements this policy by focusing on regulations that complement the scale of residential neighborhoods.	
Hughes	Rose	Public	10/23/2025	Housing and Land Use Elements	Affordable housing and economic development			
						Comment that this is the wrong way to address environmental concerns which are adequately addressed by critical areas regulations and new infrastructure. Concern that for owners of the affected properties, the proposed downzoning could provide a legitimate reason to sue the City.		Recommend not moving forward with the proposed rezone.
Hofius	Doug	Public	10/23/2025	Zoning	Proposed Edgecliff Rezone			

Hofius	Doug	Public	10/23/2025 Zoning Map	Multifamily areas	Comment that overlay zones, including the MFI overlay need to be defined, or attached in some way, so that these zones are understandable.	Recommend implementing this suggestion.	
					<p>Comment that the definition of lot coverage is redundant to other regulations and does not seem to have a purpose. Other jurisdictions use the term impervious area, which is fully regulated by stormwater codes. Lot coverage should only refer to building bulk.</p> <p>Commenter notes that “open space” is used inconsistently in the code, with related terms like “private,” “usable,” “shared,” and “permeable” not always defined, and suggests distinguishing open space from common, recreational, or amenity space to better address on-site resident use.</p> <p>Comment that review panel process described in 18.03.30 through 18.03.50 is excessive and likely deters use of this code.</p> <p>Comment that street trees should be provided, along with sidewalks, in the right-of-way.</p> <p>Concern that LMC 18.25 requires private open space to be provided at the ground floor level and directly accessible to each unit. Unsure how this can be implemented for upper story units.</p> <p>Request that appeals should require the appellant to bear the full cost of City staff, consultant, and Hearing Examiner's time associated with their appeals.</p>	<p><b>For further discussion:</b></p> <p>Eliminate distinction between shared and private open space</p> <p>Remove review panel process from LMC 18.03</p> <p><b>Other:</b></p> <p>Langley limits impervious surfaces (defined as lot coverage) to protect the aquifer recharge area and reduce heat island effects; limits remain necessary where no open space standards exist.</p> <p>Permeable surface requirements stem from existing code; Council removed “private/shared” distinctions and added “useable” to ensure functionality. Architects later requested reinstating private open space, now under PAB/Council review.</p> <p>Not all multimodal streets will have sidewalks or landscape strips; requiring street trees in setbacks (8–20 ft) improves tree health and prevents infrastructure and accessibility issues.</p> <p>Current draft of 18.25 does not require private open space at ground level.</p> <p>Appeal fee discussion to occur with Council during budget process.</p>	<p>PAB would like more information and discussion on open space requirements.</p>
Hofius	Doug	Public	10/23/2025 Regulations				



## City of Langley

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### MEMORANDUM

**To:** City Council  
**From:** Meredith Penny, Director of Community Planning  
**Re:** Addressing comments from the Washington State Department of Commerce raised during the 60-day review process  
**Meeting Date:** October 27, 2025

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### Background

The Growth Management Act (GMA) requires cities and counties to review and update their Comprehensive Plans every ten years. As part of this process, jurisdictions must submit their draft plans to the Department of Commerce at least 60 days prior to adoption for review and comment. While the Department of Commerce does not have approval authority over a city's Comprehensive Plan, addressing their comments helps ensure that the plan aligns with the GMA and other state requirements, and reduces the City's potential liability. Below is a summary of the comments received from the Department of Commerce during their 60-day review of the City of Langley's draft Comprehensive Plan, along with staff responses indicating how each comment has been addressed in the latest draft. A copy of the full letter from Commerce is attached.

### Washington State Department of Commerce

#### 1. Land Use Element – Estimates of Population Densities and Building Intensities

In Commerce's review, they were unable to find where estimates of population densities and building intensities based on future land uses and housing needs were included in the element.

Staff have added a section with additional detail to address this requirement (pgs. LU-22 – LU-25).

#### 2. Housing Element – Identification of Land Capacity for Emergency Housing

In Commerce's review, they did not see that the City demonstrated sufficient capacity of land to accommodate allocated emergency housing needs.

Emergency shelters are allowed in the P-1 zone which has capacity for 53 units. Emergency housing and emergency shelters are also allowed as a conditional use in NB and CB zones. The City was allocated 14 units of emergency housing which can be accommodated by the capacity in the P-1 zone and additionally by the CB and NB zones.

#### 3. Housing Element – Identification of Land Capacity for Low-Income Housing

As currently proposed Commerce is concerned that the City's draft land capacity analysis may not sufficiently demonstrate capacity of land for housing to accommodate allocated growth targets for all income segments.

Per Commerce guidance, it is acceptable to analyze capacity by affordability using broader income ranges than those used in the housing allocations. For example, we can combine the

allocation ranges between 0–80% of area median income (AMI) when analyzing capacity. This approach is appropriate because households earning within the 0–80% AMI range can generally afford similar types of housing. Our capacity analysis by zoning district found that there is sufficient capacity for housing types affordable to households within this income range. See page 32 of Appendix A.

**Table 1. Net Capacity after Implementation of Residential Capacity Actions 1-4**

Income Level	Zones Included	Projected Need	Capacity	Surplus (Deficit)	Change
0-80% AMI	RM, NB, P-1, RS5000, RS7200, RS15000	261	305	<b>44</b>	+78
80-100% AMI	RS7200, RS5000, RM	37	84	<b>47</b>	-12
100-120% AMI	RS15000, RS7200, RS5000	35	88	<b>53</b>	-28
>120% AMI	RS15000, RS7200	113	222	<b>109</b>	0
<b>Total</b>		<b>446</b>	<b>698</b>	<b>252</b>	<b>+38</b>

#### 4. Housing Element – Affordable Housing in MFI Overlay and Public Use Zones

Commerce suggests including additional analysis to substantiate assumptions for affordable housing development in the MFI overlay zone and public use zones.

Staff have added additional explanations for these assumptions in the latest draft (pgs. LU-22 – LU-25 and LU-31 – LU-32).

#### 5. Housing Element – Market Factor for Redevelopment

Commerce does not recommend the City use a market factor above 25% unless indicated by local conditions. If a higher market factor is used, they recommend that local data which supports the chosen market factor be included in the capacity analysis.

The City conducted an analysis to justify the use of a 50% market factor in the commercial, mixed-use, and multifamily zones in accordance with the adopted Countywide Planning Policies. This will be added to Appendix A of the Comprehensive Plan in the next published version.

The first step in this analysis was to identify all building permits issued over the last ten years (2015–2025) for parcels located in the Central Business (CB), Neighborhood Business (NB), and Residential Mixed (RM) zones. The City only included permits for parcels that already had existing development (excluding vacant parcels) and that involved either (1) demolition and replacement of a building or (2) an expansion or addition that increased floor area. Interior remodels, tenant improvements, routine maintenance, and changes of use that did not add new floor area were excluded. The full table of permits included in this analysis is listed below.

Over the past ten years, the City observed six redevelopment “events.” According to the City’s recent land capacity analysis, there are currently 35 redevelopable parcels within the CB, NB, and RM zones. Because the number of redevelopable parcels today is likely smaller than it was ten years ago, the total was adjusted by adding back the six parcels that redeveloped during that period to estimate the number of redevelopable parcels that existed in 2015:

$$N_{2015} \approx N_{\text{today}} + E$$

$$41 = 35 + 6$$

From this, the ten-year redevelopment rate can be calculated as:

$$\text{Redevelopment rate (10-year)} = E / N_{2015} = 6/41 = 14.6\%$$

The twenty-year redevelopment rate can then be projected as:

$$\text{Redevelopment rate (20-year)} = (E / N_{2015}) \times 2 = 29.3\%$$

This analysis suggests that over the next 20 years, the City can expect only about 29% of redevelopable properties to redevelop, implying a **market factor of roughly 71%**. Therefore, the 50% market factor established in the Countywide Planning Policies is more accurate for Langley than the 25% market factor recommended by Commerce. Langley is a small, rural community with high land prices, high construction costs, and a limited workforce to support extensive commercial redevelopment. A higher market factor is therefore appropriate in this context.

An alternative way to estimate the City's redevelopment rate is by comparing the total square footage of improvements added over the past ten years to the total square footage of redevelopable land. This method provides a complementary perspective by weighting redevelopment activity according to the relative size of properties, rather than simply counting parcels.

In this approach, the total redevelopable square footage in 2015 is estimated by adding the square footage of redevelopment activity over the past ten years to the amount of redevelopable square footage remaining today. For example, in the Neighborhood Business (NB) zone, 0.37 acres (16,117 square feet) remain redevelopable today, and approximately 2,972 square feet were redeveloped between 2015 and 2025. This suggests that 19,089 square feet were redevelopable in 2015, resulting in a 10-year redevelopment rate of 15.6%.

A similar calculation was performed for the Central Business (CB) and Residential Mixed (RM) zones, as shown below:

**Redevelopment Rate by Zone (Square Footage Method, 2015–2025)**

Zone	Redevelopable Area 2025 (sf)	Redeveloped (2015–2025) (sf)	Estimated Redevelopable Area 2015 (sf)	10-Year Redevelopment Rate
Neighborhood Business (NB)	16,117	2,972	19,089	15.6%
Central Business (CB)	76,230	4,291	80,521	5.3%
Residential Mixed (RM)	0	1,151	1,151	100%
<b>Total (All Zones)</b>	<b>92,347</b>	<b>8,414</b>	<b>100,761</b>	<b>8.35% (10-year)</b>

The total 10-year redevelopment rate across all zones is therefore approximately 8.35%, which translates to a 20-year rate of 16.7%. This implies a **market factor of approximately 83%**.

While the square-footage-based method results in a slightly higher market factor than the parcel-based method (71%), both approaches demonstrate that the 50% market factor used in the Countywide Planning Policies remains a reasonable and conservative estimate for Langley,

particularly given the City's limited redevelopment activity, high construction costs, and small development market.

**Table of Redevelopment Permits 2015-2025**

Permit #	Type	Address	Zone	Added Sq. Ft.	Description
BCR 18-045	Commercial - Addition	117 Anthes Ave	CB	947	Add bldg onto property
BSFR-18-051	Residential - Addition	130 5th St D101	RM	276	Add 2 bedrooms to unit
BCR-19-024	Residential - Addition - MF	125 4th St	RM	875	Add unit for triplex
BSFN-21-007	Residential - Addition - MF	722 Camano Ave	NB	2496	Add 9 tiny homes and 120sf laundry bldg
BSFN-21-002 & BSFNADU-21-001	Residential - Addition	325 Wharf St	CB	3344	Demo existing 728sf house. Add new house & adu
BCR-22-011	Commercial - Addition	914 3rd St	NB	476	Add kiln shed

## 6. Housing Element – Barriers and Actions for Affordable Housing

Commerce recommends adding to the housing element a list of barriers to affordable housing needs and actions needed to remove those barriers to align with statute.

Staff have added a reference to the adopted Housing Action Plan to address this requirement (pgs. H-28 – H-29).

## 7. Development Regulations – Accessory Dwelling Units

- a. Commerce noted that Section 18.22.155 does not allow ADUs to be converted from existing structures this is inconsistent with RCW 36.70A.681(1)(j), which requires allowing ADUs to be converted from existing structures even when they violate current setback or lot coverage requirements.

Staff have made this adjustment in the latest draft of the implementing regulations (pg. 137, LMC 18.22.155.B.1.i).

- b. Commerce noted that Section 18.22.155(B)(1)(e)(1) has a maximum height for a detached ADU of 15-feet this is inconsistent with RCW 36.70A.681(1)(g), which requires that roof height limits on an ADU be no less than 24-feet unless the height limitation applies to the principal unit.

Staff have made this adjustment in the latest draft of the implementing regulations (pg. 136, LMC 18.22.155.B.1.e).

- c. Commerce noted that Sections 18.22.155(B)(1)(a)(5) and (g) restrict entry door locations, this is inconsistent with RCW 36.70A.681(1)(h), which states that local requirements may not put restrictions on entry door locations.

Staff have made this adjustment in the latest draft of the implementing regulations on pg. 136, section LMC 18.22.155.B.1.a.5. Section LMC 18.22.155.B.1.g was missed in this round of updates and will need to be removed in the next published version of the revisions.

**8. Development Regulations - Emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP) housing.**

- a. Based on Commerce's review of the City's draft zoning regulations in this submission, they noted that permanent supportive housing (PSH) and transitional housing are not allowed in the Fairgrounds Overlay zone, which allows hostels. This is inconsistent with RCW 35A.21.430 and RCW 36.70A.070(2)(c).

Staff have removed hostels as an allowed use from the Fairgrounds Overlay (pg. 86, LMC 18.09.010).

**Next Steps**

If the PAB and City Council are comfortable with the changes staff have made in response to the Department of Commerce's feedback, this memo will be used to prepare a letter to the Department of Commerce, which will also be included in the City's record alongside the adopting ordinance.





STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE

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[www.commerce.wa.gov](http://www.commerce.wa.gov)

October 1, 2025

City Council  
City of Langley  
c/o Meredith Penny  
Director of Community Planning

Sent Via Electronic Mail: [planning@langleywa.org](mailto:planning@langleywa.org)

Re: Review of the City of Langley draft 2025 Comprehensive Plan and Development Regulations periodic update

Dear City Council:

Thank you for the opportunity to comment on the proposed changes to the City of Langley (City) draft comprehensive plan and development regulations periodic update. We appreciate the ongoing coordination with our agency as you work to achieve the community's vision consistent with the goals and requirements of the Growth Management Act (GMA). Growth Management Services received the proposed amendments on July 29, 2025, and processed them with material identification number 2025-S-9685.

Your submission represents a great deal of work and substantial progress towards the 2025 periodic update of your comprehensive plan, due December 31, 2025.

We have reviewed your submittal using Commerce's [Periodic Update Checklist-Updated July 2024](#), [Expanded Housing Checklist](#), and [Accessory Dwelling Unit\(ADU\) Checklist](#). We encourage you and your community to consider the following as you finalize your drafts:

## Comprehensive Plan

### 1. Land Use Element

- a) *Estimates of population densities and building intensities based on future land uses and housing needs.* [RCW 36.70A.070\(1\)](#), [WAC 365-196-405\(2\)\(i\)](#)

In our review, we were unable to find where estimates of population densities and building intensities based on future land uses and housing needs were included in the land use element. We recommend this information be added, if necessary, to align with [RCW 36.70A.070\(1\)](#).

## 2. Housing Element

- a) *Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing.* [RCW 36.70A.070\(2\)\(c\)](#), [WAC 365-196-410\(e\)](#) and [\(f\)](#)

We did not see that the City demonstrated sufficient capacity of land to accommodate allocated emergency housing needs, as required by [RCW 36.70A.070\(2\)\(c\)](#). Guidance on completing this requirement can be found in chapter 3 of [Guidance for Updating Your Housing Element](#) (see pg. 43-50).

As currently proposed, we are concerned that the City's draft land capacity analysis may not sufficiently demonstrate capacity of land for housing to accommodate allocated growth targets for all income segments. The analysis does not result in identification of a unit estimate by income segment that shows sufficient capacity at each income level (see *Table 9. Final Housing Capacity Results*). We recommend adding such an estimates by income segment to better align with [RCW 36.70A.070\(2\)\(c\)](#). Additionally, we suggest including additional analysis to substantiate assumptions for affordable housing development in the MFI overlay zone and public use zones.

Additionally, we do not recommend the City use a market factor above 25% unless indicated by local conditions. If a higher market factor is used, we recommend that local data which supports the chosen market factor be included in the capacity analysis. Per [RCW 36.70A.110\(2\)](#), market factors should be "reasonable," which is interpreted to mean defensible. For additional guidance on selecting an appropriate market factor deduction, please refer to the [Draft Urban Growth Areas Guidebook](#) (pg. 36).

- b) *Adequate provisions for existing and projected housing needs for all economic segments of the community.* [RCW 36.70A.070\(2\)\(d\)](#), [WAC 365-196-010\(q\)\(ii\)](#), [WAC 365-196-300\(f\)](#), [WAC 365-196-410](#) and see Commerce's Housing Action Plan (HAP) guidance: [Guidance for Developing a Housing Action Plan](#)

The housing element does not include documentation of programs and actions needed to achieve housing availability, as required by [RCW 36.70A.070\(2\)\(d\)\(ii\)](#). We recommend adding to the housing element a list of barriers to affordable housing needs and actions needed to remove those barriers to align with statute. Guidance on completing this

requirement can be found in chapter 4 of [Guidance for Updating Your Housing Element](#) (pg. 52-68).

## Development Regulations

### 3. Accessory Dwelling Units (ADUs):

- a) Section 18.22.155 does not allow ADUs to be converted from existing structures. As proposed, we do not believe this is consistent with [RCW 36.70A.681\(1\)\(j\)](#), which requires allowing ADUs to be converted from existing structures even when they violate current setback or lot coverage requirements. We recommend adding language to section 18.22.155 for existing structure conversions to better align with [RCW 36.70A.681\(1\)\(j\)](#). For more information, please see Commerce's [ADU guidance document, page 8](#).
- b) Section 18.22.155(B)(1)(e)(1) has a maximum height for a detached ADU of 15-feet. As proposed, we do not believe this is consistent with [RCW 36.70A.681\(1\)\(g\)](#), which requires that roof height limits on an ADU may be no less than 24-feet unless the height limitation applies to the principal unit. We recommend revising section 18.22.155(B)(1)(e)(1) to allow 24-feet in height for detached ADUs to better align with [RCW 36.70A.681\(1\)\(g\)](#). For more information, please see ADU guidance document, page 18.
- c) Sections 18.22.155(B)(1)(a)(5) and (g) restricts entry door locations. As proposed, we do not believe this is consistent with [RCW 36.70A.681\(1\)\(h\)](#), which states that local requirements may not put restrictions on entry door locations. We recommend removing section 18.22.155(B)(1)(a)(5) and (g) to align with [RCW 36.70A.681\(1\)\(h\)](#).

### 4. Emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP) housing:

- a) Based on our review of the City's draft zoning regulations in this submission, it appears that permanent supportive housing (PSH) and transitional housing are not allowed in the fairgrounds overlay zone, which allows hotels. For consistency with [RCW 35A.21.430](#) and [RCW 36.70A.070\(2\)\(c\)](#), we recommend updating your code to reflect that these housing types are allowed in all areas that allow residential uses or hotels.
- b) Based on our review of the City's draft zoning regulations in this submission, it appears that emergency housing and shelter are not allowed in the fairgrounds overlay zone, which allows hotels. For consistency with [RCW 35A.21.430](#) and [RCW 36.70A.070\(2\)\(c\)](#), we recommend updating your code to reflect that these housing types are allowed in all areas that allow hotels.

Department of Commerce: Submittal ID 2025-S-9685

As a friendly reminder, copies of adopted plans shall be submitted to Commerce within ten days after final adoption ([RCW 36.70A.106\(2\)](#)).

Again, we appreciate the work your proposed amendments represent, and we wish you success in meeting the goals of the Growth Management Act. We are available for technical assistance and, if requested, can attend upcoming meetings with your Planning Commission and/or Council. If you wish to discuss these comments, you may reach me at [lexine.long@commerce.wa.gov](mailto:lexine.long@commerce.wa.gov) or 360-480-4498.

Sincerely,



Lexine Long, AICP  
Senior Planner  
Growth Management Services

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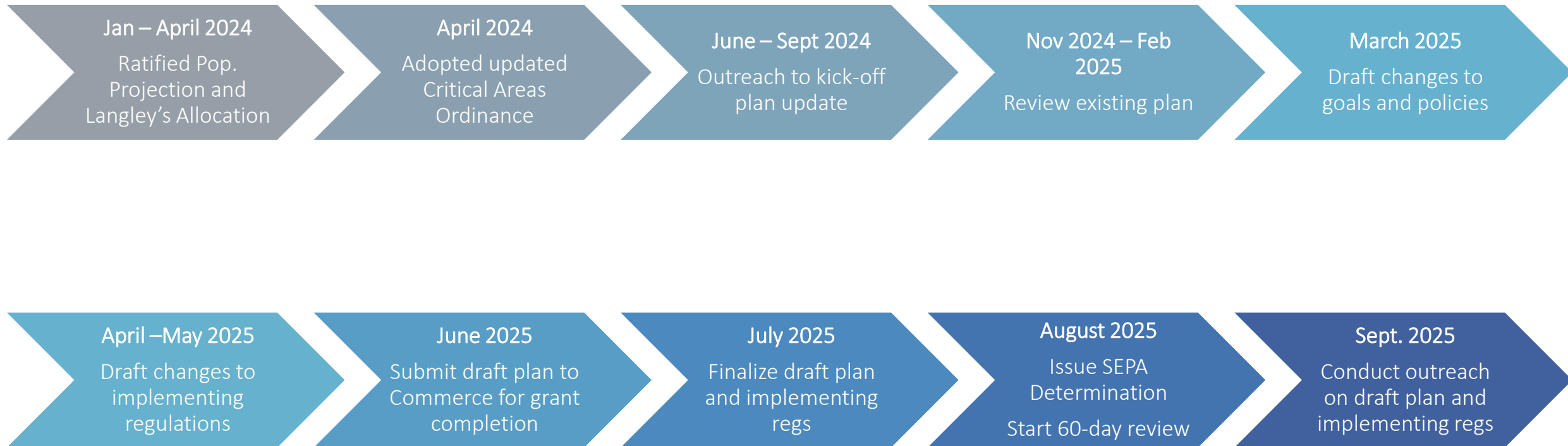


# **DRAFT 2025 Comprehensive Plan, Implementing Regulations, and Zoning Map**

Meredith Penny  
Community Planning Director



# Comprehensive Plan Timeline





# Changes to Plan and Regulations Since July Draft

# Changes to Utilities & Capital Facilities Element

- Added new policy **UCF 2.4** to address public comment:
  - The City will continue to identify, prioritize, and implement measures to reduce inflow and infiltration (I&I) within the sanitary sewer system to maintain system capacity, protect public and environmental health, and defer costly infrastructure expansion.
- Added clarifying language to page **UCF-21**:
  - Although I&I is expected to remain constant at current rates, total sanitary sewer flows will increase as population and employment grow. As a result, I&I will represent a smaller proportion of total system flow over time, indicating improved relative system efficiency even as overall wastewater volumes rise.
- Revised Policy **UCF 2.2(e)** to read “reduces demand while still providing quality service.”



# Changes to Land Use Element

- Updated **Goal LU 12** and related policies to emphasize the relationship between **land use and transportation**.
- Added descriptions of each **future land use designation** and a new table linking designations to **zones, intensities, and building types** on **page LU-26** (per Dept. of Commerce comment).
- Updated page **LU-21** reference to the **Langley Creative District** to reflect that it is now **managed solely by the Langley Chamber of Commerce**.
- Added **geohazard area description** (pg. LU-8) and **Hazard Mitigation Plan** references (pg. LU-12) (per WA DNR comment).

## Changes to Housing Element

- Added a description of barriers to housing development and actions to address those barriers and referenced the Housing Action Plan (per Dept. of Commerce comment).

## Changes to Climate Element

- Replaced the October 2024 Climate Mitigation Memo in Appendix F with the December 2024 version, which refines emissions calculations to the Langley city limits rather than the zip code.
- Added reference to the Hazard Mitigation Plan (per WA DNR comment).

# Changes to Address WA State Department of Commerce Comments

- Accessory Dwelling Units (ADUs):
  - Allow conversion of existing structures into ADUs even when nonconforming with setbacks or lot coverage
  - Increase allowed height for ADUs from **15ft to 24ft**
- Emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP housing):
  - Per state law, STEP housing must be allowed in all zones which allow hotels.
  - Fairgrounds overlay currently lists hostels as an allowed use. To keep hostels as an allowed use means the City would also have to allow STEP housing at the Fairgrounds.
  - Removed hostels as an allowed use at the fairgrounds to remove issue of non-compliance with state requirements for STEP housing.
  - Discussion of whether to allow housing at the Fairgrounds is proceeding through a separate process from the City's Comprehensive Plan Update.

# Other Regulatory Changes

- Clarified that there is **no density limit** in the **P-1 zone** for residential development
- Updated **LMC 18.04**, Innovative Permanently Affordable Housing Projects to match **new definition and incomes limits on affordable housing** as required by state law
- Refined and **updated street standards** to implement ultimate multimodal network

Table 15.04.470

Street Segment	From	To	Functional Classification	Ultimate Street Network Section	Target/Design Speed	Pedestrian Facility	Bicycle Facility	Minimum ROW Width	2-Way Surface Width for Autos	Minimum Pavement Width	Minimum Grade	Maximum Grade	Maximum Curb Radius	Curb and Gutter	Improvements Needed to Meet Standard
Fairgrounds Rd	Al Anderson	Langley Rd	Minor Collector	Shared Street and sidepath	25	Sidepath	Sharrow	50'	20'	22'	0.50%	15%	25'	N	Speed limit and no passing signs. Add sidepath on north side .
Sandy Point Rd	Camano Ave	City Limits	Minor Collector	Shared Street and sidepath	20	Sidepath	Sharrow	50'	20'	22'	0.50%	15%	25'	N	Add sidepath on north side and pedestrian crossing at Furman Ave/Cedar Circle
Edgecliff Dr	Camano Ave	City Limits	Minor Collector	ELR	15	ELR	ELR	50'	12'	22'	0.50%	15%	25'	N	Speed limit signs, ELR signage and pavement markings
6th Street	Park Ave	Cascade	Major Collector	Shared Street and sidepath	20	Sidepath	Shared	60'	20'	22'	0.50%	10%	35'	N	Speed limit and no passing signs. Sidepath on south side under construction.
3rd Street	Coles Rd	380 W of DeBruyn	Major Collector	2-lane with shoulders	25	Shoulder	Shoulder	60'	20'	34'	0.50%	10%	35'	N	Add sidepath on west side.
3rd Street	380 W of DeBruyn Ave	DeBruyn Ave	Major Collector	2-lane sidepath on both sides	25	Sidepath	Shared	60'	20	22'	0.50%	10%	35'	N	Speed limit and no passing signs.
3rd Street	DeBruyn Ave	Park Ave	Major Collector	2-Lane sidewalk north side/sidepath south side	25	Sidewalk Sidepath	Shared	60'	20'	22'	0.50%	10%	35'	Y	Complete sidepath on south side and construct curb gutter and sidewalk on sidewalk on north side
3rd Street	Park Ave	Anthes Ave	Major Collector	2-Lane sidewalk north side/sidepath south side	25	Sidewalk Sidepath	Shared	60'	20'	22'	0.55	10%	35'	Y	Construct sidepath on south side and construct curb gutter and sidewalk on sidewalk north side

# Changes to Multifamily Infill Overlay Per Roundtable Workshop Input

- **Maximum Front Yard Setback:** Reduced from 25ft to **20ft**.
- **Maximum Side Street Setback:** **Removed**. Allows flexibility to locate open space on the side.
- **Height Limits:**
  - Two-story buildings: increased from 25ft (including 5ft pitched roof allowance) to **30ft**.
  - Three-story buildings: increased from 35ft (including 5ft pitched roof allowance) to **40ft**.
- **Lot Coverage:** **Removed maximums** to eliminate redundancy with stormwater and open space requirements.
- **Building Separation:** Adjusted minimum separation for multi-story buildings from 25ft to **20ft** where walls are parallel for **35ft** or more (up from 20ft in prior draft).
- **Encroachments:** Limited bay/bow window and balcony encroachments to **street setbacks only**.
- **Mezzanine:** **Removed** mezzanine illustration (covered under building code).

# Changes to Multifamily Infill Overlay Per Roundtable Workshop Input

- **Multifamily Courtyard Shared Open Space:** Adjusted minimum dimensions from 20ft × 20ft to 16ft × 20ft.
- **Private Open Space:** re-established a minimal private open space requirement for all housing types of 50sf with minimum dimensions of 6ft x 6ft.
- **Total Open Space:** Reduced total open space from 400sf per unit to 300sf per unit.

Other Jurisdictional Examples					
Langley	Coupeville	Steilacoom	Sequim	Woodinville	Anacortes
Original: 400sf/unit <i>Proposed:</i> 300sf/unit	300sf/unit	250sf/unit	200sf/unit	200sf/unit	100-150sf/unit

Example Developments Provided by Workshop Participants								
Market-Rate Multifamily					Affordable Multifamily Rentals	Affordable Cottage Courts		
<i>Edinburg</i>	<i>Lander</i>	<i>Santa Rosa – North Clusters</i>	<i>Strawberry Court</i>	<i>Santa Rosa – SE Cluster</i>	<i>Twin Lakes</i>	<i>Lopez Landing - South</i>	<i>Rhody Court 1</i>	<i>Rhody Court 2</i>
888sf/unit	883sf/unit	314sf/unit	230sf/unit	151sf/unit	300sf/unit	888sf/unit	460sf/unit	336sf/unit

Example Scenarios Run by Staff on Properties in Langley		
Example 1	Example 2	Example 3
358sf/unit	309sf/unit	160sf/unit





# Commerce 60-Day Review and Staff Response

# Commerce 60-Day Review Comments and Staff Responses

## Land Use Element – Estimates of Population Densities and Building Intensities

- *Commerce*: Need estimates of population densities and building intensities based on future land uses and housing needs
- *City Staff*: added a section to address (pgs. LU-22 – LU-25)

## Housing Element – Identification of Land Capacity for Emergency Housing

- *Commerce*: City did not demonstrate sufficient capacity of land to accommodate allocated emergency housing needs
- *City Staff*: P-1 Zone has capacity for 53 units, also allowed in the NB and CB zones – this is sufficient to accommodate the 14 units allocated to the City

## Housing Element – Identification of Land Capacity for Low-Income Housing

- *Commerce*: land capacity analysis does not demonstrate capacity for all income segments
- *City Staff*: analyzed capacity using broader income ranges. Combined allocation ranges between 0-80% AMI because they are served by similar housing types.

## Housing Element – Affordable Housing in MFI Overlay and Public Use Zones

- *Commerce*: additional analysis needed to substantiate assumptions for affordable housing development in the MFI overlay and public use zones
- *City Staff*: added additional explanations for these assumptions (pgs. LU-22 – LU-25 and LU-31 – LU-32)



# Commerce 60-Day Review Comments and Staff Responses

## Housing Element – Market Factor for Redevelopment

- *Commerce*: does not recommend the City use a market factor above 25% unless indicated by local conditions in the land capacity analysis
- *City Staff*: conducted an analysis to justify the use of a 50% market factor in the commercial, mixed-use, and multifamily zones in accordance with the adopted Countywide Planning Policies. Local market factor closer to 70-80%

## Housing Element – Barriers and Actions for Affordable Housing

- *Commerce*: add a list of barriers to affordable housing needs and actions to remove those barriers
- *City Staff*: added a reference to the adopted Housing Action Plan

## Development Regulations – Accessory Dwelling Units

- *Commerce*: need to allow ADUs to be converted from existing structures even when they do not meet lot coverage or setback requirements, ADU height of 24 feet must be allowed, entry door locations may not be restricted
- *City Staff*: made the required revisions

## Development Regulations - Emergency shelters, transitional housing, emergency housing, and permanent supportive housing (STEP) housing.

- *Commerce*: if the Fairgrounds Overlay zone allows hostels, then permanent supportive housing and transitional housing must also be allowed there.
- *City Staff*: removed hostels as an allowed use from the Fairgrounds Overlay. Housing at the fairgrounds is being discussed through a separate process.



# Public Comments to Discuss



# Public Comments that Require Additional Discussion

1. Request that City stop using term "Seawall Park" and instead use term "Seawall Walkway", "Seawall Promenade" or "Seawall Walk".

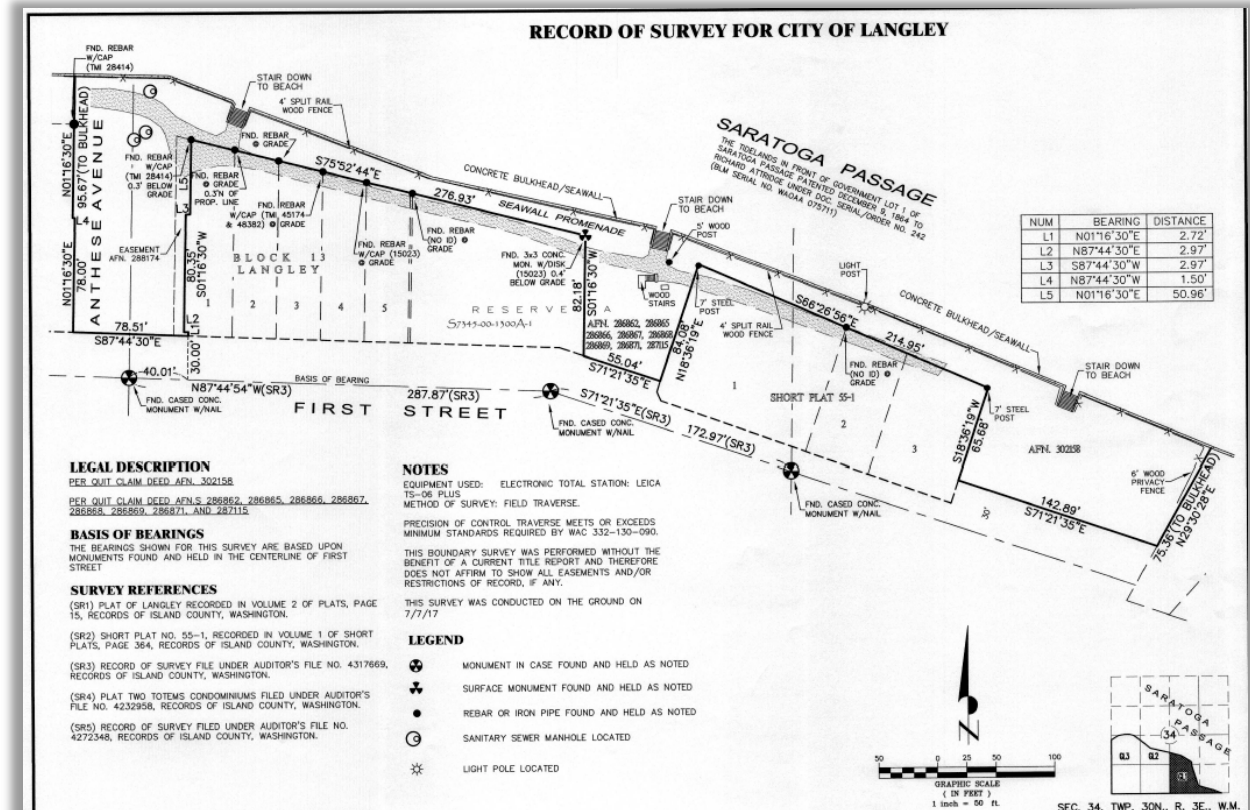
Request that the City include in the plan as an exhibit, the survey to show the walking path and emphasize that all the flat area below First St is not owned by the City.

Should the City change the terminology used to refer to this public area behind the seawall?

## Parks and Open Space Commission:

Keeping the name Seawall Park and finding other ways to encourage users to respect the adjacent private properties.

**Planning Advisory Board:** Do not think changing the name will address the concerns. Would prefer to address the concerns in other ways such as signage or moving the path. Would like to see consensus from the adjacent property owners on this issue before changing the name. Recommend this is handled separately from the Comprehensive Plan process



# Public Comments that Require Additional Discussion

## 2. Request that the City consider revisions to LMC 18.03 Mixed Use Housing Demonstration Project to remove requirement for review panel.

Should changes be made to these code sections?

§ 18.03.030 Review panel and authorization to proceed.

### Purpose:

Selects which *innovative mixed-use housing proposals* may advance to formal development review.

### Timeline:

- Within 6 weeks of proposal revisions (or 30 days after neighborhood meeting if none).

### Panel Composition (9 members + youth advocate):

- 2 Planning Advisory Board members
- 2 Design Review Board members
- 1 Chamber of Commerce rep
- 1 Main Street rep
- 1 development professional
- 1 resident interested in innovative housing
- 1 affordable housing advocate
- *Optional*: 1 nonvoting youth (age 13–18)

### Panel Duties:

- Meet with staff to review site plans
- Recommend modifications and decide which projects proceed
- Evaluate consistency with design standards, trip generation, affordability, and critical areas compliance
- Preference for ownership and mixed-income housing

### Evaluation Criteria:

- 1.Supports innovative/mixed-use housing goals
- 2.Promotes infill development
- 3.Compatible with surroundings
- 4.Improves housing affordability

### Next Steps:

Authorized projects proceed to binding site plan review and other required permits. Decisions may be appealed to City Council per LMC 18.36.120

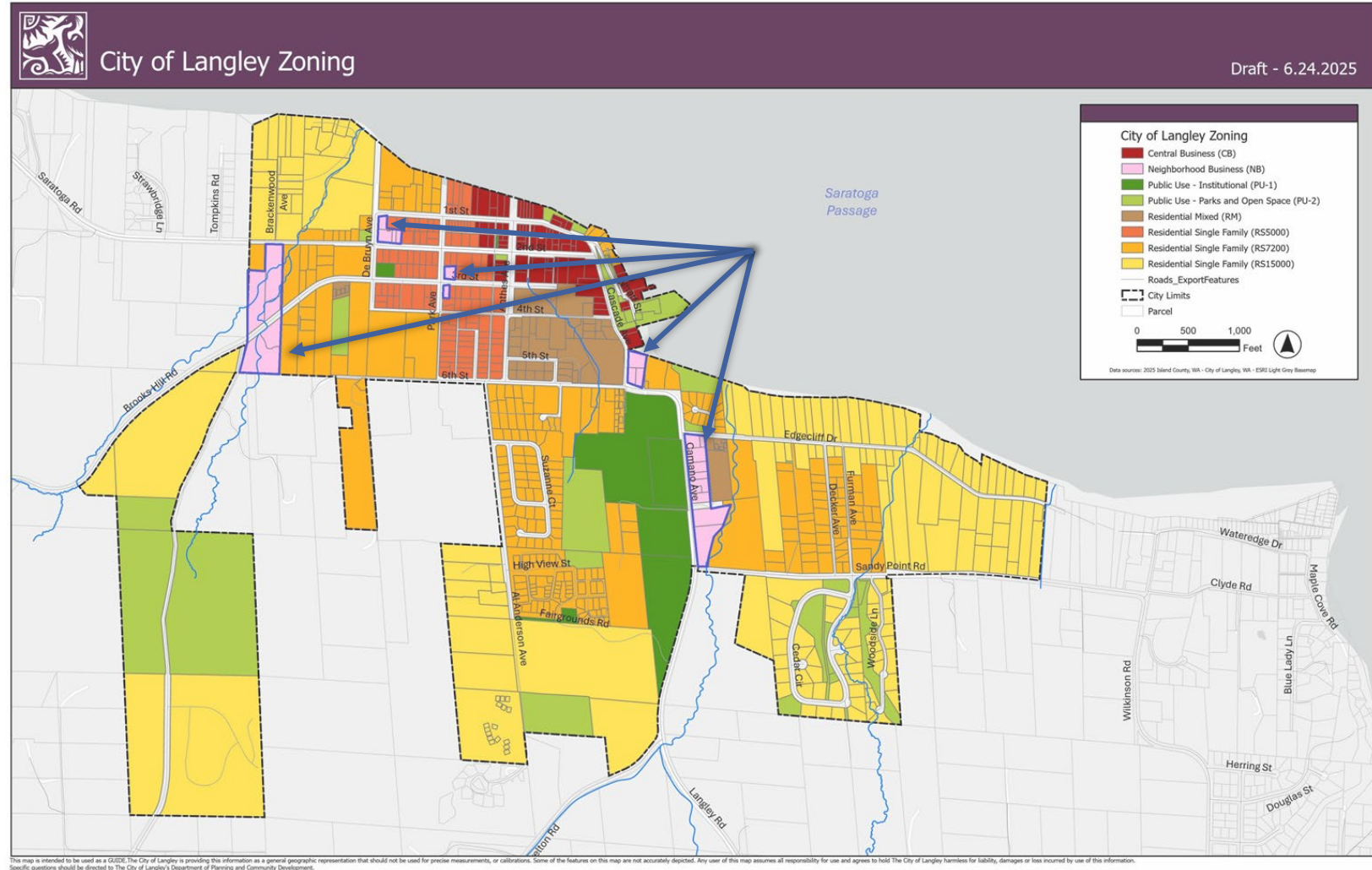
# Public Comments that Require Additional Discussion

3. Request that the City add "Bay Type Car Wash" as a conditional use in the Neighborhood Business (NB) zone. Comment cites environmental, waste reduction, community, accessibility benefits, accountability, and energy benefits.

Should the City add car wash as an allowed use to the Neighborhood Business zone?



**PAB:** Do not recommend allowing car washes in Langley.



# Public Comments that Require Additional Discussion

4. Is there a way that the City could study the difference in sales tax revenue lost between when the downtown was fully occupied compared to today where there are nine vacancies?

Policy ED3.4 of the Economic Development Element directs the City to explore strategies to encourage the timely occupancy and revitalization of vacant commercial spaces in the Central Business District.

Should the City consider adding another policy focused on calculating the economic impact of vacant storefronts on the local economy and city revenues?

**PAB:** recommend including this data in the background section of the Element but do not recommend adding an additional policy.





# Public Comments that Require Additional Discussion

5. Can the City pursue an assisted living facility in Langley? This could help older residents age in their community while freeing up underutilized homes for more families?

Should policy language be added to the Housing Element to support the location of assisted living facilities?

**PAB:** An additional policy is not needed but staff should check that it is listed as an allowed use in the zoning code.



## Public Comments that Require Additional Discussion

6. The Langley zoning map does not specifically show where multi-family type housing can be. I think it is important to show that data, whether it is a color code - or a typed notation that indicates 'multi-family construction is possible in these zones x, y z or whatever they are

Should the zoning map be updated to show the MFI overlay?

**PAB:** recommend implementing this suggestion.

**Staff:** agree



## Public Comments that Require Additional Discussion

7. I have concerns about the "private open space" requirements. This means building porches and decks at all duplexes, triplexes, townhouses and apartments. Decks can be a fine thing to have on owner-occupied properties, however porches and decks can be really problematic at rental properties. We have a client who regularly has fire incidents at decks on their properties. The other issue is the long term maintenance of decks. The 10 year+ fiasco of the decks at Glenhaven is a good example of this.
8. To address feasibility of affordable housing development request that the distinction between private and shared open space be removed

Should the requirement for private open space be removed from the MFI?

**PAB:** fires are a property management issue not one to be addressed by this process. Would like more information and discussion on impacts to affordable housing development from private open space requirements.

## Public Comments that Require Additional Discussion

9. Recommend removing general statement that open space be permeable and instead establishing a clear threshold that 50% of the required open space be permeable. Helps to address the need for ADA accessibility, places for shade, and basketball courts etc.

Should this change be implemented?

**Staff:** agree with the proposal

# Public Comments that Require Additional Discussion

## 10. Recommend adjusting the draft requirement for useable open space as follows:

Useable Open Space. Open space—whether private or shared—must be designed and constructed to be functional, accessible, and comfortable for active and passive use by residents. Meeting dimensional requirements alone does not guarantee that open space will be considered useable. To be considered useable, open space must:

- Be located and graded in a manner that supports its intended use and does not simply serve as leftover or transitional space;
- ~~• Be relatively level and free of physical barriers that limit general usability, such as steep slopes or dense landscaping, unless those features are intentionally designed to support recreational or ecological function, such as trails across a hillside;~~
- ~~• Be clearly identifiable, visually apparent, and located in a way that encourages use for gathering, recreation, or relaxation;~~
- Provide a clear area that is not used primarily for circulation or access to individual units (e.g., walkways, driveways); and
- ~~• Include features that support usability, such as seating, shade, or other improvements appropriate to the context and scale of the development.~~

Should this changes be included?

**Staff:** agree with this proposal.

# Public Comments that Require Additional Discussion

## 11. Request adding policies to the Housing Element focused on improving the permit process for affordable housing.

- **Adopt inclusionary zoning and add incentives for permanently affordable housing** (e.g., reduced permitting/impact fees, MFTE, sales tax exemptions).
- **Expedite permitting for qualified affordable projects** through pre-application certification and prioritization when capacity is limited (e.g., Pierce County 18A.65.040).
- **Adjust application fees to reflect actual review costs** and offer reduced fees for affordable housing.
- **Expand review capacity by creating a roster of qualified consultants** applicants can pay to use, subject to City approval.
- **Allow concurrent processing of land use and building permits.**
- **Adopt impact fees** to fund service expansion and exempt affordable units proportionally.
- **Establish automatic PAB review** within two years of adopting new design standards to evaluate their real-world impact.
- **Clarify variance, waiver, and appeal procedures** to improve transparency for applicants and the public.
- **Limit appeals on SEPA/NEPA-reviewed topics** to issues raised during those processes and to individuals with a direct, substantial interest.
- **Require appellants who do not prevail to cover the City's full appeal-related costs**, including staff time.

Should staff draft a new policy that addresses this request?

# Public Comments that Require Additional Discussion

12. Recommend revising LU 5.3: Support existing and encourage the establishment of new knowledge, arts, and wellness-based businesses.

The segment slated for encouragement over others is already well represented, and economic diversity is important for economic resiliency.

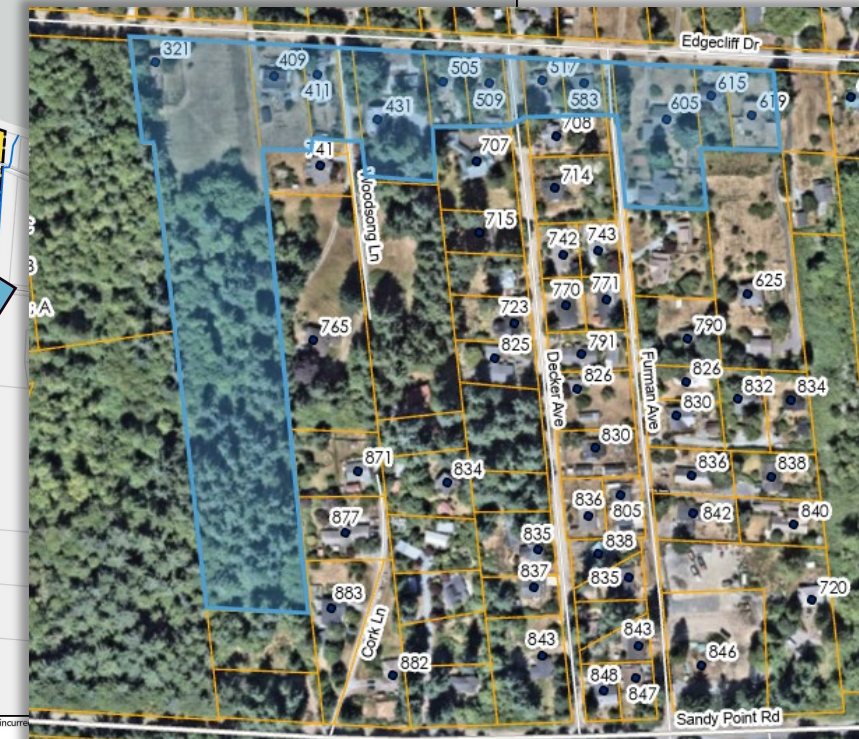
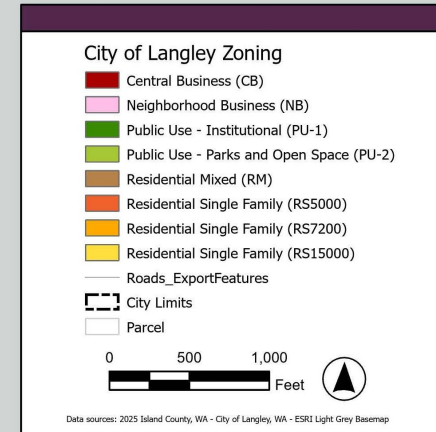
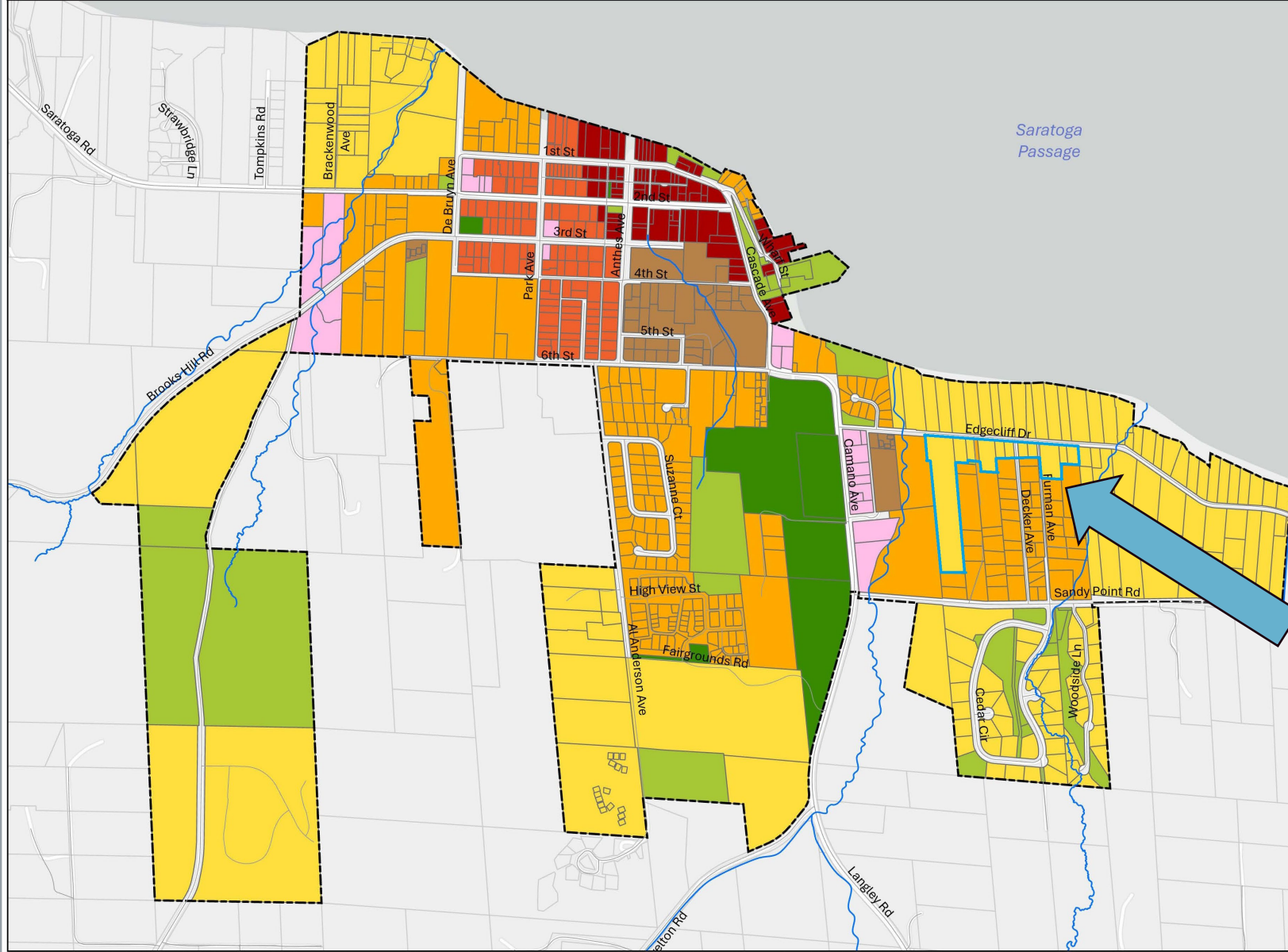
Should staff revise this policy?

## Public Comments that Require Additional Discussion

13. Disagree with proposal to rezone parcels south of Edgecliff from RS15000 to RS7200 - reduces the ability to subdivide their property from 5 lots to 2. This neighborhood is one of the last parts of Langley that still has increased density potential and one of the more affordable areas of Langley. The proposed change limits the use of the brand-new services being installed. Have already paid for utility upgrades with the anticipation of developing property. Only four parcels in this area have the ability to subdivide, this change would mean those parcels are having to carry the burden for impacts that are caused by an entire neighborhood.
14. Find it curious that the properties south of Edgecliff Dr were rezoned while at the same time stormwater runoff from the Edgecliff right-of-way is now being contained and now that sewer service is in the street. Rezoning this area to RS15000 removes the potential to use the Multifamily Infill Code and reduces options for affordable housing. Request that this be discussed openly and with all the facts laid out in a way that is understandable to the lay public.
15. Downzone on south side of Edgecliff is not fair or approvable or appropriate without the engineering and science behind it. Rezone eliminates affordable housing possibility.
16. While we are all for protecting the bluff, the proposed change is unfair to those of us who live on the smaller properties. Adding more setback from the side would significantly limit our planned addition of a garage, shed or ADU to our small house. Exclude the side yard setback change for the smaller properties from this proposed change, only a few properties would need this exception.

Should the City have further discussion or revise this proposal?









# Thank you

Langley 2025 Comprehensive Plan Update website: <https://bit.ly/langley2025compplan>

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Send comments to: [planning@langleywa.org](mailto:planning@langleywa.org)