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A) INTRODUCTION:

Feet First is Washington state’s only pedestrian advocacy non-profit organization and an established leader in working to ensure all communities are walkable. Since 2001, we have worked with communities, schools, government agencies, and elected officials to promote policies and actions proven to improve pedestrian safety, mobility, and access for all.

We thank the City of Langley for the opportunity to provide written feedback to the City’s Comprehensive Plan review. Our understanding is that the City of Langley has revised or is in the process of revising each element of their Comprehensive Plan with the intent of adopting these changes sometime in 2017. Feet First shares the City’s visions for making this community walkable, livable, sustainable and economically viable for people of all ages and abilities. Hence, the following sections describe Feet First’s approach, findings, and recommendations for the City of Langley’s Comprehensive Plan.

B) APPROACH:

Feet First developed an understanding of City of Langley’s physical and socio-economic context through a variety of internet-based tools such as Google Earth and City-Data.com. These resources provided information regarding geographical and built environment features such as urban form, land-uses, demographics, and climate. This virtual-based research method was the alternative that best supported Feet First’s resources. However, we would welcome the opportunity for a more comprehensive review through a walking audit or field visit. Feet First offers these types of service on a fee for service basis.

With our current understanding of the physical and socio-economic context, Feet First reviewed the City’s Comprehensive Plan, mainly focusing in the land use, street connectivity and pedestrian/bike/transit sections and anything relevant to the aforementioned topics.
C) FINDINGS:

Feet First found the following from Internet-based sources:

Environment:

- The privately-owned property and steep cliffs restrict shoreline access (a natural asset).
- There is an oceanic climate with warm summers, cool winters, generally overcast/cloudy and rainy weather during cooler months.
- The terrain, away from the shoreline cliffs, is generally flat, but with rolling hills and an increase in elevation towards the south.
- The city is located a bit off the main state highway of Whidbey Island – SR525.
- City boundary is highly irregular, though future and upcoming land annexations may make the boundary less irregular.
- Single family home neighborhoods dominate land use for the city. There are only a few multifamily housing complexes immediately to the south of the Downtown commercial core.
- Farm fields and forested terrain outside of the developed area.

Transportation:

- Infrequent bus service (> 30 to 60 min headways) and it is unclear if these transit trips are timed to meet the Clinton – Mukilteo ferry.
- Single-occupancy vehicle trips comprise less than 50% of commute mode share, with carpool, walking and work-at-home taking up a sizeable proportion of the commute mode share.
- The street network around the Downtown area resembles a grid, but residential neighborhoods outside this core have dead-ends streets and cul-de-sacs.

Community:

- The median age of residents is higher than the Washington average, and females comprise almost 60% of Langley’s population.
- Tourists frequent the Downtown commercial core and contribute greatly to the City’s economy.

D) RECOMMENDATIONS:

Based on our review of the City of Langley’s Comprehensive Plan, and Internet-based sources regarding the natural surroundings, built environment and social-economic conditions, Feet First has the following recommendations for the City. NOTE: When Feet First mentions access, we refer to universal accessibility, which means that people of all ages and abilities are able to use the facility or infrastructure in question. An example is using pictograms on wayfinding infrastructure such as signs, which communicates the type and location of the pedestrian facility in question to people (tourists) whose first language is other than English (see more details under Universal Design/Accessibility recommendation).
Furthermore, the City of Langley deserves commendation for putting policies for environmental sustainability into the Comprehensive Plan. On this topic of sustainability, in terms of transportation, Feet First would like to point out that the carbon footprint of walking and biking is much smaller than that of automobile, and even that of public transit running on fossil fuels. Getting more people to walk and to bike is a prudent strategy for achieving the City’s sustainability goals, and Feet First provides recommendations in this regard.

**General recommendations:**

1. **Performance metrics**

   With the large number of transportation, land-use and sustainability related goals in Langley’s Comprehensive Plan, Feet First recommends that the City develop performance metrics for these goals with quantifiable actions, items and programs. An example measure and its attendant objective(s) is the annual number of pedestrian fatalities in a city (pedestrian safety or Vision Zero). Such measures allow progress tracking or benchmarking for the respective goals, and demonstrate that the city is committed to achieving the objectives in question. These measures should have an established baseline or initial condition (e.g. number of pedestrian fatalities in 2016), a desired trend (decreasing number of pedestrian fatalities per year) and a target (<5 pedestrian fatalities per year by 2018). Another example is “length of Langley’s complete streets network in miles (or linear feet)”, with a baseline of “X miles of complete streets in 2016”, a desired trend of “increasing” and a goal of “XX miles of complete streets by 2020”.

   Example:
   - June 2016 Draft Seattle Pedestrian Master Plan
     - Page 39 (Table 3-2) provides past performance measures from 2008 to 2015
     - Pages 114 and 115 (Table 6-7) provides six performance measures for the 2016 plan

2. **Universal design/accessibility**

   Given Langley’s median population age, majority female residents and tourist volumes, Feet First suggests that the City consider the needs of people who walk, bike, and take the bus with various ages, linguistic backgrounds, levels of familiarity with local environment, physical and mental abilities by incorporating universal accessibility (UA) into the design of pedestrian, bike and transit facilities.

   Universal Accessibility (UA) is the process of providing products or facilities that are usable by the greatest number of people possible. UA is distinct from the Americans with Disability Act (ADA) since the former encompasses people of various ages, abilities, and needs, while the latter focuses strictly on people with mental or physical impairments. Furthermore, UA goes beyond ADA to include aids such as signs, maps, and wayfinding infrastructure. In this regard, UA aims to make the design, symbology and placement of wayfinding facilities usable for a diverse audience. Use of pictograms and symbols to convey necessary information or function about a particular facility (e.g. water fountain on a signpost), is a simple and efficient way to communicate with people of various linguistic backgrounds.
Examples and resources:

- September 2009 City of Bellevue ADA Self-Evaluation Report
- July 2012 City of Bellingham Pedestrian Master Plan
  
  Note: When prompted for username and password, please click cancel.
  
  - Page 4-20 provides design guidance on ADA Compliant Curb Ramps
- ADA compliance common problems and FAQ

3. Street connectivity

Outside of Langley’s Downtown Core, there are a number of cul-de-sacs and dead-end streets that inhibit vehicular and/or non-motorized access. Such disconnected street networks are very difficult to retrofit for improved connectivity for motorized and non-motorized traffic circulation. In addition, cul-de-sacs and dead-end streets create barriers for emergency vehicle access. Feet First suggests that the City strengthen goals focused on maintaining and improving street network connectivity. It is commendable that the City of Langley has plans for an interconnected network of trails, but this is not a substitute for general street network connectivity. This theme of street connectivity is reiterated in the specific recommendations section below, such as the one for Land Use 2.8.

4. Outreach programs

Reaching out and interacting with the local community allows the City to understand assets (e.g. weekly afternoon neighborhood barbeques at the park) and challenges, and to foster collaborative strategies to help achieve the City’s goals. Additionally, these programs build trust between city government and the local community. Thus, Feet First recommends adding goals to the Comprehensive Plan that explicitly support community outreach programs to promote walking, biking and transit use.

Examples:

- Feet First Neighborhood Walking Ambassador Program: (NWA) develops local leaders from their respective neighborhoods to guide group walks. These interactive gatherings educate local residents about walkable places, strengthen community ties and boost walking rates.

- Feet First Walktober: An annual, statewide challenge to get all participants to cumulatively walk and track miles during the month of October. These walks can be to/from school, work or for fun. The intention of the campaign is to strengthen communities by connecting people by foot to places. This fun challenge can be tied into the city’s outreach program to motivate residents to walk more.

- City of Shoreline 185th Street Light Rail Station Area Tour: City staff conducted “walkshop” tours of the neighborhood around the future 185th Street light rail station in 2014 summer. These tours allowed city staff to ground truth the neighborhood characteristics (such as walkability and local issues), as well as for citizens to share ideas for the city’s future and to provide feedback.
These programs have additional benefits. First, these gatherings, walks and/or tours provide the opportunity for attendees to network together to discover more about their local neighborhood, each other’s shared interest(s) and to make friends, which builds social capital and community cohesion. Second, for programs that involve walking tours, this physical activity helps attendees stay in shape and connect with their city. In addition, these programs are an ideal forum for raising awareness of the physical and mental health benefits of walking.

5. **Objective design guidelines for new and/or renovated infrastructure, streetscapes and building**

A high quality built environment supports walkability and the general civic spirit of a community. The City of Langley has stated that there is a desire to provide greater clarity and certainty for developers building projects in Langley. The City likewise wants to assure residents of a predictable level of quality and a consistent style of development that is compatible with the community. All of these goals can be supported with the development and adoption of an Architectural and Urban Design Guidelines document. An illustrated document, developed with input from both City residents and developers, can provide reasonable and objective standards that support a high quality built environment. See LU-6 for more specifics.

6. **Use of qualifiers in goal statements**

Use of the qualifier “where possible” occurs in the text for many City of Langley goals. Rather than comment on each of these individually, Feet First comments globally on the use of “where possible” here. The use of this qualifier seems aimed exclusively at non-motorized transportation. One example should suffice. Goal T-3.3 states “New developments shall provide public access for pedestrian and other non-motorized vehicles that connects to... *where possible*”. Goal T-5.3 states “Review road design standards to ensure adequate provision has been made for safe and efficient vehicular access to individual properties...”, etc. There is no use of “where possible” in this second goal, whose topic is motor vehicle access. A number of other similar comparisons could be made. Feet First strongly urges the City of Langley to drop the use of this qualifier entirely. It gives a strong impression of inequitable intent and in practice is extremely subjective to apply. The State of Washington Transportation Improvement Board (TIB) rejects the use of “where possible” qualifiers in Complete Street ordinance language. Ordinances written with this qualifier disqualify cities from consideration under the latest TIB grant program.

**Specific recommendations to the draft comprehensive plan:**

**Land Use Section / Goal 1**

- **Land Use 1.1 Part C:**
  Add equitable access to ensure people of all ages and abilities are able to use these facilities.

**Land Use Section / Goal 2**

- **Land Use 2.8:**
  Provide accessible footpaths for pedestrian connectivity in open space corridors. These open spaces should not force people to walk circuitous detours nor on vegetation (which creates bandit/informal paths).
Land Use Section / Goal 4

- **Land Use 4.10-4.12**
  Modify language so that it reads “these buffers shall not inhibit pedestrian circulation, connectivity, access and wayfinding”. While these buffers offer privacy for residents, these barriers are often implemented in a manner that blocks pedestrian access and complicates navigation, which discourages people from walking.

Land Use Section / Goal 6

- **Land Use 6.2 & 6.4**
  Consider design guidelines – prescriptive and objective
  Goals 6.2, 6.3, 6.4 and 10.4 would all be well supported by the development of a community-based set of architectural and urban design guidelines. Other communities of Langley’s size have elected to develop and adopt this type of document with good results.

Land Use Section / Goal 7

Add a requirement for new development to have streets with through connectivity for all modes of traffic, except where constrained by topography and/or other pre-existing physical barriers. Dead end streets are otherwise not permitted. Having through connectivity, such as a street grid, improves walkability, wayfinding and access to facilities and services for all modes of traffic.

- **Land Use 7.2**
  Reword to LOS of any mode, such as mixed-multimodal level of service, to reflect a more multifaceted approach to transportation, rather than just automobiles.

- **Land Use 7.5**
  Correct typo - “sidwalks” to sidewalks.

Land Use Section / Goal 9

Add new language stating that the city should initiate and encourage the use and the development of on and off-road facilities that support non-motorized forms of transportation, such as benches for bus stops and footpaths at open space corridors.

As a comment, despite the title of this section 9, its policies seem to leave out consideration of youth education. Thus, Feet First advises that the City strengthen the language of this section in regards to educating the young.

Land Use Section / Goal 11

As an observation, the document does make the split between land use and transportation-oriented policies very clear. However, Feet First understands that transport and land use are interrelated to the degree that splitting land use and transportation policies may not be possible.
Add a new policy to develop a prioritization plan to retrofit all city streets to comply with the standards of the City’s adopted complete streets ordinance.

- **Land Use 11.2**
  This goal describes design strategies for complete streets, but does not make explicit mention of this term. Given the City has an adopted complete street ordinance per the Transportation Improvement Board, Feet First advises the City to clarify the language in this policy by mentioning the city’s adopted complete street ordinance.

- **Land Use 11.6**
  It is unclear if the “land use and economic development goals” include transportation goals. Feet First advises revising the language to be more clear on this matter.

**Transportation Section / Goal 1**

- **Transport 1.6**
  Clarify “levels of service” to say “levels of service for all modes” to reflect a multimodal approach to transportation policy.

- **Transport 1.9**
  Mandate that dead end streets are not permitted except where constrained by natural features or pre-existing physical barriers.

**Transportation Section / Goal 6**

Consider using mixed-multimodal level of service as a performance metric rather than level of service, since the former metric falls more in line with the City’s sustainability, walkability, transport and land use objectives.

**Transportation Section / Goal 11**

- **Transport 11.5**
  Having policies for parking minimums encourages the use of the automobile, which seems to run in conflict with the City’s sustainability, walkability and other transport goals. Thus, Feet First advises against having parking minimum requirements in the City of Langley and have the city look into shared parking spaces (e.g. church parking lots) to meet parking demand in the short term.

**E) CONCLUDING REMARKS:**

Our review of City of Langley’s current situation suggests that the City could do more to promote a community that is walkable, livable, sustainable and economically viable for people of all ages and abilities. Thus, we offer both general and specific recommendations to Langley’s Comprehensive Plan to help the City achieve such a community, such as outreach programs and shared parking. Furthermore, Feet First looks forward to continue helping the City of Langley evolve towards a more walkable built environment. Should you have any questions about the information in this report, feel free to contact us directly by calling John Stewart, chair of Feet First’s Policy Committee, at (206) 658-3700, or emailing john@feetfirst.org.
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