Langley City Council
Langley Planning Advisory Board
Langley Mayor

Hi everyone,

Please consider this a Public Record.

This letter has 2 major concerns regarding the substantial elimination of the Langley UGA.

**Concern # 1** is that the public was denied full participation in the UGA discussions by the City of Langley from about 2012 to present.

There was no specific UGA "elimination" outreach to the public, and I can't find any evidence of formal Public Hearings regarding the elimination/keep as is choices by the Langley City Council or the Langley PAB; yet public hearings are a very strong requirement component of the GMA and State Department of Commerce Comprehensive Planning requirements.

Attached is The Buildable Lands Analysis report prepared by Island County Planning & Community Development. I highlighted in yellow the Langley segments, which tell me Langley does not have 20 years supply of actually buildable lands inside the Langley City limits.

This is the link to this report on the County Comprehensive Plan Update section: https://www.islandcounty.net/planning/documents/BuildableLandsAnalysisResults.pdf

As you know, the elimination, full or partial, of the Langley UGA is the single largest land use change in more than 20 years.

- The current reduction of the UGA has not been adequately discussed, and a lot of the data points/assumptions are very concerning in this County report.
- We kept hearing from the City and PAB this fall that "the County makes the decisions regarding the UGA". But this is not entirely correct, because Island County's Countywide Planning Policies stipulate that the County will not change UGA boundaries except upon the request of a City.
- And the County, held a Joint Public Meeting with the City Council and the PAB September 17, 2015 where the County presented 3 Options to the City, keep the UGA as is, reduce it partially, reduce it entirely. Clearly — the choice was the City's choice.
- BUT — and I think this is important to note — Jeff Arango was involved with the County on the County Comp Plan work since 2012. All 3 Island County cities were of course. But over and over, Jeff kept telling Island County that Langley wanted to eliminate the UGA. I never found any evidence that this was discussed in full with the PAB or the City Council, or that he had City knowledge he was doing this. This is very concerning, because it certainly has the effect of having Island County have the expectation that Langley really did want the UGA eliminated. But without full public participation — nobody at the City should have been making that statement.

- Attached is a letter dated 10.21.14 from Island County Planning & Community Development asking Jeff to provide a letter from Mayor McCarthy confirming that the City wants to eliminate their UGA, along with Jeff's Staff Report dated 10.29.14 recommending that PAB support the resizing of the UGA. From the Island County Planning & Community Development files, there is an email from Fred McCarthy to Jeff on 10.22.14 stating that Helen Price Johnson requested a statement from the Langley Community Planning Department to Brad Johnson at the County Planning Office stating whether Langley's UGA is increasing, decreasing or staying the same so he can incorporate this information into the Island County Comprehensive Plan.
• There also are copies of emails replies from Jeff to Fred that indicate that PAB and Council need to discuss before Langley sends a response. This certainly is another confirmation that the UGA size choice was Langley’s choice – not the County’s choice.
• It is clear by the many emails between Jeff and the Island County Planning & Community Development that the County needed to move forward with all of their own Comprehensive Plan Elements, and had deadlines they needed to work with – so if they got no “numbers crunching” from Langley, they would proceed in their planning with the South Whidbey allocation estimates from one of the three population models. This is not to say that in the fall of 2014 that Island County “set in stone” what populations numbers could be used.
• It is a major flaw in the Langley procedure that apparently sometime in 2012 Langley simply decided to use the County’s numbers, without full analysis or public input.
• There is confirmation that there was some public meeting discussion by PAB and Council, mainly in the form of “we’re eliminating the UGA because we don’t need it”, along with several votes to eliminate it … but no actual outreach program by Langley to the public and no Public Hearings regarding the UGA.

Folks, I think the public process got stepped on here. Rather than belabor that, I believe the City and the County need to host a public meeting to discuss how to fix this mess. Because it really is a mess – you can’t escape the GMA requirements for full and constant public participation. This could invalidate both Langley and Island County’s Comp Plans.

**Concern # 2** is that the County’s own Buildable Lands Analysis report clearly shows that Langley city limits have only 39 more housing units to be built to meet the growth estimate of 89 new residents in the next 20 years. 39 more units total!! But this isn’t actually quite correct …

• The County report uses 2.3 people per unit, but the 2010 Census Report shows Langley actually has just 1.86 people per unit – which means that Langley actually only has 72.54 new units.
• I sent you a real estate market analysis in December for the 2015 residential sales inside Langley city limits. The report also confirms that Langley average square footage for housing units are quite a bit smaller than the average square footage for housing units in South Whidbey.
• The average square footage for homes in Langley for 2015 was 1699 sf, for the rest of South Whidbey, it was 2028 sf.
• It is apparent that families with children may be choosing outside Langley because Langley doesn’t offer the size of homes they want to live in.
• Without larger homes, Langley will continue to get an older demographic, with a large percentage of that demographic living alone in their homes.
• Langley has 1.86 people living in their homes per the 2010 Census – not 2.3 people.
• This average of fewer than 2 people per household is a major item to consider – you have to “know what you’ve got before you can get what you want”.
• Ask your building department how many new homes have been built, or are in the permit process today, going back to 2012. How many of the 72.54 number of housing units have already been built? This question needs study too.

I am pleased with the addition of Ron Kasprisin to the PAB, as he’s got excellent background to help shed light on the actual growth needs for the future.

I look forward to continuing to work with all of you to resolve this major situation.

Sincerely,

Leanne Finlay
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