

## Whidbey Environmental Action Network

PO Box 293, Langley, WA 98260

[www.whidbeyenvironment.org](http://www.whidbeyenvironment.org)

City of Langley City Council and Mayor Kennedy Horstman

112 Second Street / P.O. Box 366

Langley, WA 98260

May 22, 2026

### **Re: Proposed Service Station, 249 Cascade Avenue**

Dear Mayor Horstman and Council Members,

I write to raise serious concerns about the pre-application for a convenience store and gas station at 249 Cascade Avenue, as noted in the meeting packet for May 18, 2026. We urge the Council to use every available tool — including the interim moratorium now before you — to prevent petrochemicals from being stored at and distributed from this singularly inappropriate location.

The site sits on a high bluff above the Langley Marina and one of the most beloved waterfront recreation corridors on Whidbey Island. The bluff is subject to ongoing erosion and geologic instability — conditions that increase the risk of underground storage tank compromise, surface drainage of spilled fuel, and the migration of petroleum contamination downslope. Cascade Avenue at this location is a narrow corridor that was not designed for and cannot safely accommodate fuel-delivery trucks or the turning movements and idling traffic a gas station generates.

The risks are not hypothetical. Petroleum contamination at a bluff-top location drains directly toward the marina, the beach, and the nearshore marine environment. A spill — during construction, fueling operations, or a delivery gone wrong — could cause lasting damage to the ecology of the entire waterfront. This is not an appropriate location for petrochemical retail; it belongs in a light industrial zone, not on an unstable bluff above a fragile and cherished marine ecosystem.

We recognize that the conditional use permit process affords the City meaningful discretion here. We urge the Council and Planning Director to apply that discretion rigorously. The City's own Comprehensive Plan identifies the waterfront and its

approaches as defining features of Langley's character and economy. A gas station at 249 Cascade is inconsistent with that vision — environmentally, geologically, and operationally. It also makes little sense from a community needs perspective: a driver entering Langley from Langley Road, Bayview Road, East Harbor/Saratoga Road, or Bob Galbreath Road will have their choice of gas stations.

We support the interim moratorium on service station applications and ask that it be applied to this pre-application without delay. We also ask that staff's review be guided by the full weight of the City's critical areas, shoreline, and design standards. Furthermore, we ask that the Washington State Department of Ecology, the Marine Resources Council, the Washington State Department of Fish and Wildlife, the Puget Sound Partnership, and the Port of South Whidbey be notified about this pre-application and explicitly invited to comment on the risks to marine ecosystem health posed by petrochemical retail at this blufftop location.

Thank you for being wise stewards of our community's environmental health. Adopting a moratorium to develop common-sense siting guidelines for petrochemical retail and other higher-risk uses will be a positive, protective step.

With appreciation,

A handwritten signature in blue ink, appearing to read 'M. Jackson', with a long, sweeping underline.

Marnie Jackson  
Executive Director  
Whidbey Environmental Action Network