



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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May 22, 2025

City Council
City of Medina
c/o Jonathan Kesler
Senior Planner

Sent via electronic mail: jkesler@medina-wa.gov

Re: Review of Proposed Amendments to City of Medina Municipal Code

Dear Council Members,

Thank you for the opportunity to comment on proposed amendments to the City of Medina's (City) development regulations. Growth Management Services received the proposed amendments on March 25, 2025, and processed them with material identification number 2025-S-8221.

The draft amendments include proposed changes to the City's accessory dwelling unit (ADU), middle housing, and subdivision regulations.

We appreciate the City's efforts to amend its housing regulations and, based on our review of the proposed amendments, offer our comments and recommendations below:

Accessory Dwelling Units:

1. Proposed section MMC 16.12.020 does not include the other housing types within the definition of an accessory dwelling unit. As proposed, we do not believe this is consistent with [RCW 36.70A.696\(1\)](#), which defines an ADU located on the same lot as a single-family housing unit, duplex, triplex, townhome, or other housing unit. We recommend modifying the definition in MMC 16.12.020 to align with RCW 36.70A.696(1).
2. The draft amendments do not explicitly state detached ADUs may be sited at a lot line if the lot line abuts a public alley. For clarity, we encourage the city to modify MMC 16.34.020 to specify that detached ADUs may be sited at a lot line if the lot line abuts a public alley ([RCW 36.70A.681\(1\)\(i\)](#)).

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

Please note that development regulation amendments related to middle housing and ADUs must be adopted on or before June 30, 2025. If the city does not adopt middle housing and/or ADU regulations consistent with state law on or before June 30, 2025, they will be preempted by state law. Please see our [fact sheet](#) regarding preemptive state laws for infill housing for additional information.

Again, we appreciate the opportunity to work with the City of Medina and provide comment on the proposed amendments. 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 any of the comments presented in this letter, you may reach me at Lexine.long@commerce.wa.gov or 360-480-4498.

Sincerely,



Lexine Long, AICP
Senior Planner
Growth Management Services

cc:

David Andersen, AICP, Managing Director, Growth Management Services
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