

Kyla Boswell

From: Marilyn Burwell <mburwell@rioussa.com>
Sent: Thursday, June 19, 2025 12:27 PM
To: Kyla Boswell
Subject: comments about FMC 18.72.140 Temporary Homeless Encampments – Religious Organizations

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EXTERNAL EMAIL

Hi Kyla, I am commenting on just one of the draft codes that you sent: FMC 18.72.140 Temporary Homeless Encampments – Religious Organizations (state mandated). I have a new computer with AI on it, and it provided the summary below of host agency responsibilities. I could not have done this summary via the mark up that you sent.

Reading from the AI generated requirements for the host agency (below) - these requirements are so complicated that no non-profit, community minded, religious organization will attempt a 180 day permit for a homeless encampment. The regulations are far too detailed and onerous for a volunteer organization to attempt for only an 180 day solution. SIMPLIFY!!!

I don't understand why this seems to be aimed only at religious organizations. Cannot the regs be generalized to any sector trying to take this on? Generalize and simplify.

Suggest looking at what other WA places are doing: [Homelessness & Housing Toolkit for Cities; MRSC - Regulation of Unauthorized Camping, Loitering, and Solicitation of Aid](#)

From the first report above: report about a safe parking program at a Methodist Church: [Gratitude Report 2023-Test Copy 1.pub](#)

- Marilyn Burwell, Ferndale

The responsibilities of the host agency for temporary outdoor homeless encampments include:

1. Compliance and Permits:

- Ensure compliance with all Washington State laws, Ferndale Municipal Code, and Whatcom County Health Department regulations.
- Jointly apply for a permit with the managing agency and certify compliance with all applicable requirements.

2. Notification:

- Mail a notice of decision to all property owners within 300 feet of the subject property line and submit an affidavit of mailing within 5 days of the mailing.

3. Operation and Maintenance:

- Be primarily responsible for the operation and maintenance of the encampment and the conduct of residents on and near the lot.
 - Address reported concerns and document resolutions, making this information publicly available.
- 4. Facilities and Safety:**
- Provide adequate sanitation facilities, including toilets, handwashing stations, trash removal, and potable water.
 - Ensure compliance with fire and building codes, including fire extinguishers and emergency access.
- 5. Security:**
- Submit an operations and security plan addressing impacts within 500 feet of the site.
 - Provide a code of conduct for residents, prohibiting illegal drugs, violence, littering, excessive noise, and trespassing.
 - Conduct background checks on residents and reject or eject individuals with active warrants or sex offender status.
- 6. Supervision:**
- Provide on-site supervision at all times and appoint a designated representative to serve as the encampment manager.
 - Post the name of the on-duty representative daily in the security tent.
- 7. Transportation and Accessibility:**
- Ensure the encampment is within a quarter-mile of a bus stop with seven-day service or provide alternative transportation access.
- 8. Post-Encampment Cleanup:**
- Remove all debris and restore the site to its original condition within one calendar week after the encampment concludes.
- 9. Community Engagement:**
- Hold an informal community meeting prior to application submission to explain the project, solicit input, and address concerns raised by surrounding property owners.
- 10. Record-Keeping:**
- Maintain a log of all residents, including names, dates of birth, and dates of stay, for a minimum of six months.
 - Obtain verifiable identification from residents and use it for background checks.

Failure to fulfill these responsibilities may result in permit termination or revocation.