



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • 360-725-4000
www.commerce.wa.gov

August 6, 2025

City Council
City of Ferndale
c/o Michael Cerbone
Community Development Director

Sent via electronic mail: michaelcerbone@cityofferndale.org

Re: Review of draft elements of the City of Ferndale's Comprehensive Plan Update

Dear City Council,

Thank you for the opportunity to comment on proposed draft 2025 Comprehensive Plan elements for the City of Ferndale (City). Growth Management Services received the draft elements on June 4, 2025, and processed them with material identification number 2025-S-8548.

The submittal includes drafts of the City's Housing, Utilities, and Transportation elements of the 2025 Comprehensive Plan Update. We reviewed your submittal using Commerce's [Periodic Update Checklist-Updated July 2024](#), [Expanded Housing Checklist](#), and [Supportive Housing Checklist](#).

We appreciate the City's efforts to update its comprehensive plan and, based on our review of the submitted elements, offer our comments and recommendations below:

Housing Element

a) Goals, policies and objectives for:

- *the preservation, improvement and development of housing, [RCW 36.70A.070\(2\)\(b\)](#), and*
- *moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes, within an urban growth area boundary. [RCW 36.70A.070\(2\)\(b\)](#) amended in 2021, and [WAC 365-196-410\(2\)\(a\)](#)*

The housing element includes goals, policies, and objectives for the preservation, improvement, and development of housing generally, as required by [RCW 36.70A.070\(2\)\(b\)](#). Housing element goals 1 and 2 and supporting policies address

promotion of a variety of residential densities and housing types, and cottage housing. To better align with [RCW 36.70A.070\(2\)\(b\)](#), we suggest more explicitly addressing moderate density housing options in these goals and policies, such as by specifying an intent to promote development of moderate-density housing types in particular. Example policy language to support preservation, improvement, and development of moderate-density housing options can be found in [Appendix C of "Guidance for Updating Your Housing Element" \(see pg. 130-131\)](#).

- b) *Identification of capacity of land for housing including, but not limited to, government-assisted housing, housing for moderate, low, very low, and extremely low-income households, manufactured housing, multifamily housing, group homes, foster care facilities, emergency housing, emergency shelters, permanent supportive housing.* [RCW 36.70A.070\(2\)\(c\)](#) [WAC 365-196-410\(e\)](#) and [\(f\)](#)

During our review we did not find analysis indicating sufficient land capacity to accommodate housing needs at all income levels, as required by RCW 36.70A.070(2)(c). To demonstrate sufficient land capacity for projected housing needs at each income level, including emergency and permanent supportive housing, we recommend modifying the existing analysis to include an estimate of how many affordable housing units at each income level may be accommodated under existing or planned zoning and infrastructure availability. Please see chapter 3 of [Guidance for Updating Your Housing Element](#) (starting on page 18) for additional information on meeting this requirement.

- c) *Adequate provisions for existing and projected housing needs for all economic segments of the community.* [RCW 36.70A.070\(2\)\(d\)](#), [WAC 365-196-010\(g\)\(ii\)](#), [WAC 365-196-300\(f\)](#), [WAC 365-196-410](#) and see Commerce's Housing Action Plan (HAP) guidance: [Guidance for Developing a Housing Action Plan](#)

The current draft does not include documentation of programs and actions needed to achieve housing availability, as required by [RCW 36.70A.070\(2\)\(d\)\(ii\)](#). Please see Chapter 4 of [Guidance for Updating Your Housing Element](#) (pg. 51-71) for additional guidance on meeting this requirement. We recommend modifying the housing element accordingly prior to final adoption.

- d) *Identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, including:*
- *Zoning that may have a discriminatory effect;*
 - *Disinvestment; and*
 - *Infrastructure availability*
- [RCW 36.70A.070\(e\)](#)

The current draft does not include identification of local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing, as required

by [RCW 36.70A.070\(e\)](#). Please see [Guidance to Address Racially Disparate Impacts](#) for additional information about how to complete this evaluation. Data on racially disparate impacts in Ferndale is available on Commerce's [Affordable Housing Planning Resources](#) webpage. We recommend completing this analysis and including it in the city's 2025 comp plan prior to final adoption.

- e) *Identification of areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments.*
[RCW 36.70A.070\(2\)\(g\)](#)

The housing element does not include identification of areas at risk of residential displacement, as required by [RCW 36.70A.070\(2\)\(g\)](#). This requirement can be met by including a displacement risk map, such as [Commerce Draft Displacement Risk Map](#), or a discussion of areas that may be at risk of displacement.

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

Again, we appreciate the opportunity to work with the City and provide comment on the proposed amendments. We look forward to seeing future drafts of your Comprehensive Plan elements. 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
Senior Planner, AICP
Growth Management Services

cc:

David Andersen, AICP, Managing Director, Growth Management Services
Valerie Smith, AICP, Deputy Managing Director, Growth Management Services
Ben Serr, AICP, Eastern Regional Manager, Growth Management Services
Carol Holman, MUP, Western Regional Manager, Growth Management Services
Anne Fritz, AICP, Housing Section Manager, Growth Management Services
Laura Hodgson, Housing Planning and Data Manager, Growth Management Services