

Ed Bills

5550 Douglas Road

Ferndale, WA 98248

Comments on Proposed MMR Zoning for Subarea 7 — 2025 Comprehensive Plan Update

Submitted to: City of Ferndale Planning Commission and City Council

Date: December 10, 2025

Dear Planning Commission and City Council Members,

Thank you for the opportunity to submit written comments on the proposed rezoning of Subarea 7 from UR-4 to Mixed Medium Residential (MMR) as part of the 2025 Comprehensive Plan Update. I appreciate the time that Planning Director Michael Cerbone and Planner Kyla Boswell have spent helping me understand elements of the proposal.

My comments focus on Subarea 7 located adjacent and west of South Church Road. The rezoning to MMR appears inconsistent with the City's Housing Element goals and siting guidance. I live within Subarea 7, at 5550 Douglas Fir Ln. My property along with the other properties within Subarea 7 have not been annexed into Ferndale yet. I request that an independent review of the proposed rezone of this area takes place to ensure that the goals of the proposed plan are being met before adoption.

Key Stated Goals of the Proposed 2025 Comprehensive Plan:

- Promote diverse housing options for all income levels.
- Encourage infill development and efficient use of existing infrastructure.
- Ensure walkability, connectivity, and proximity to schools, parks, and transit.
- Reduce displacement risk and protect vulnerable communities.
- Maintain strong and sustainable neighborhood character.

- Align growth with access to amenities and services.

1. Nature of the Proposed Change and Selection of Subarea 7

Subarea 7, located outside current city limits, is proposed to shift from UR-4 to Mixed Medium Residential (MMR)—representing an approximately 150× increase in allowable residential density. This is one of the most dramatic density changes in the 2025 Comprehensive Plan Update.

From my discussion with staff, I understood one of the stated goals was a desire to diversify housing in the southwest part of Ferndale. However, this rationale does not appear in the Housing Element or Land Use Element as a criterion for selecting new multifamily locations.

Instead, the Housing Element emphasizes walkability, transit access, proximity to schools and services, connectivity, infill development, and equity considerations—criteria that Subarea 7 does not appear to meet.

2. Housing Element Siting Principles and Douglas Road Non-Compliance

The Housing Element identifies clear siting preferences for multifamily housing, including walkability, transit access, proximity to schools, connectivity, infill priority, and avoiding concentration of disadvantaged households.

The Douglas Road corridor, including Subarea 7, does not meet these criteria. Staff commentary and Housing Element findings confirm:

- Major sidewalk gaps and unsafe pedestrian conditions
- No transit service
- Long distance to parks, schools, and services
- Single-access road conditions
- No infill characteristics
- Adjacent displacement-sensitive communities

Additionally, the proposed MMR zoning would conflict with the Plan's goal of maintaining strong and sustainable neighborhood character. Subarea 7 is currently a low-density, rural-edge area with a cohesive development pattern. A 150× increase in density would significantly alter this established character and introduce a scale of development that is incompatible with the existing neighborhood form and circulation network.

The Housing Element states: "some of Ferndale's fastest-growing neighborhoods (Douglas Road...) are not within walking distance." It also identifies Douglas Road manufactured home communities as displacement-risk areas.

Based on these criteria, the Housing Element does not support locating high-density zoning such as MMR within Subarea 7.

3. State Housing Requirements (HB 1220 / HB 2021)

HB 1220 requires the City to plan adequate housing capacity but does not dictate where specific zoning must be placed. If this interpretation is incomplete, clarification would be appreciated.

4. Connectivity and the Douglas Road Constraint

Subarea 7 relies on a single primary access point along Douglas Road with incomplete sidewalks and no transit. These conditions conflict with Housing Element principles for multifamily siting.

5. Inconsistency with Housing Element Goal 2 (Infill & Use of Existing Infrastructure)

Goal 2 directs the City to promote infill, use existing infrastructure, and avoid unnecessary expansion. Subarea 7:

- Is not infill
- Is not an existing neighborhood
- Requires new infrastructure
- Is not connected to schools, parks, or transit

Because Subarea 7 is entirely undeveloped and outside existing urban infrastructure, it is—by definition—a greenfield development area. The Housing Element specifically states that multifamily siting should prioritize infill rather than greenfield expansion, meaning Subarea 7 does not conform to this core siting principle.

6. Inconsistency with Housing Element Goal 3 (Displacement & Equity)

Douglas Road is identified as a high displacement-risk area. Goal 3 requires displacement analysis and mitigation, yet:

- No displacement analysis has been presented
- No mitigation strategies have been discussed
- No justification has been provided showing consistency with Goal 3

7. Summary of Requested Clarifications

Before adoption, I respectfully request clarity on:

1. How Subarea 7 satisfies multifamily siting criteria
2. How the rezone complies with Goal 2
3. How the rezone complies with Goal 3
4. Whether displacement analysis was performed
5. Whether alternative, compliant locations were considered

8. Conclusion

If only Goal 1 (increasing supply) is applied, the Subarea 7 upzone might appear reasonable. But when Goal 2 (infill) and Goal 3 (equity/displacement) are included, Subarea 7 does not meet the necessary standards.

Subarea 7:

- Does not meet siting criteria
- Does not advance Goal 2

- Does not comply with Goal 3
- Would experience a 150× density increase in an area lacking characteristics required for high-density development

Until these inconsistencies are addressed, I respectfully urge the Planning Commission and City Council not to adopt the Subarea 7 upzone.

Sincerely,

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