

December 1, 2025

Subject: Comment on Proposed Zoning Change for Subarea 7

Dear Members of the City of Ferndale Planning Commission,

Please accept the following comments regarding the proposed 2025 Comprehensive Plan redesignation of Subarea 7, located north of Douglas Road and west of South Church Road. I reside at 5550 Douglas Fir Lane within Subarea 7, and my neighbors and I would be adversely affected by the proposed rezoning.

Current and Proposed Zoning for Subarea 7

Subarea 7 is currently zoned UR-5, allowing one dwelling unit per five acres. The draft 2025 Comprehensive Plan proposes redesignating the area to Medium-Density Multifamily Residential (MMR), allowing up to 150 dwelling units per five acres (based on 10–30 DU/acre). This represents a 150-fold increase in allowable density, an extreme change to the character of the neighborhood. This rezoning is not supported by existing infrastructure or by the policy direction outlined in the Housing or Utilities Elements of the Comprehensive Plan.

Housing Element – Inconsistencies and Policy Conflicts

Key references: Housing Element pp. 6–8, 14, 26–28, 37

- Page 7 identifies the Douglas Road area as not within walking distance of schools or parks and lacking transit access.
- Pages 26–28 identify transition corridors—Portal Way, LaBounty Drive, and West Main—as appropriate locations for multifamily development.
- Page 37 notes that existing multifamily housing is primarily located near downtown, close to transit and essential services.
- Page 14 explains that manufactured home communities along Douglas Road are at high displacement risk, and that upzoning contradicts the City's stated goal of minimizing displacement.

Note: Although the Housing Element does not include a single section titled “multifamily siting criteria,” it is clear from the plan’s descriptions that multifamily development is intended for areas with transit service, walkable access to amenities, and proximity to commercial or mixed-use corridors. Subarea 7 meets none of these conditions.

Utilities Element – Infrastructure Limitations

Key references: Utilities Element pp. 12–15

- Utility system expansion must align with planned growth nodes, and Subarea 7 is not identified as one.
- The increased electrical, gas, and telecommunications capacity needed for MMR zoning is not planned in this area.
- Rights-of-way limitations along Douglas Road make the required infrastructure upgrades challenging and costly.

Transportation and Access Constraints

- Douglas Road is the sole point of access to services in Ferndale for the neighborhood
- Seasonal Slater Road closures frequently divert additional traffic onto Douglas Road, worsening congestion.
- There are no capital improvement projects planned that would expand or upgrade Douglas Road to accommodate medium-density multifamily development. The roadway already shows clear signs of deterioration, with frequent asphalt repairs and ongoing surface degradation. Even at today's traffic levels, the road is not adequately maintained.

Summary and Request

Based on the Housing and Utilities Elements of the draft Comprehensive Plan, the proposed MMR upzoning of Subarea 7 is inconsistent with:

- Multifamily siting expectations
- Displacement mitigation goals
- Infrastructure capacity and planning
- Transportation limitations and lack of planned improvements

Request: I respectfully ask the Planning Commission to retain Subarea 7's low-density residential designation in the 2025 Comprehensive Plan.

Ed Bills • 5550 Douglas Fir Ln • Ferndale, WA 98248

Thank you for your time and consideration. I would welcome the opportunity to provide additional information or participate further in the review process.

Sincerely,

Ed Bills

5550 Douglas Fir Ln

Ferndale, WA 98248

360-319-3510

Ralph Lloyd

5547 Douglas Fir Ln

Ferndale, WA 98248

360-201-9940

Ed Bills • 5550 Douglas Fir Ln • Ferndale, WA 98248