

Urban Growth Area Review

CITY OF FERNDALE
2025 COMPREHENSIVE PLAN



UGA / UGA Reserve Proposal

September 15, 2025

I. Introduction

The Growth Management Act (GMA) requires each county to designate urban growth areas (UGAs) within which urban growth will be encouraged (RCW 36.70A.110(1)). GMA planning goal 11 requires coordination between jurisdictions in the comprehensive planning process (RCW 36.70A.020(11)). Additionally, the GMA indicates that county and city comprehensive plans must be coordinated and consistent when they share common borders or related regional issues (RCW 36.70A.100). Therefore, Whatcom County and the cities have undertaken a joint planning process to allocate population, housing and employment growth, review permitted densities, and review UGA boundaries. The joint planning process includes a number of steps, including:

- Approval of interlocal agreements (2022).
- Preliminary County and city UGA population and employment proposals (2024).
- County Planning Commission review of preliminary city and County population and employment growth proposals (2024).
- County and city approval of non-binding multi-jurisdictional resolutions regarding preliminary population, housing and employment allocations (2025). See Whatcom County Council Resolution 2025-011.
- Draft Environmental Impact Statement (2025).
- Final Environmental Impact Statement (2025).
- City and County UGA boundary proposals (2025).
- County Planning Commission review (2025).
- County Council and City Council approval of comprehensive plans (2025-26).

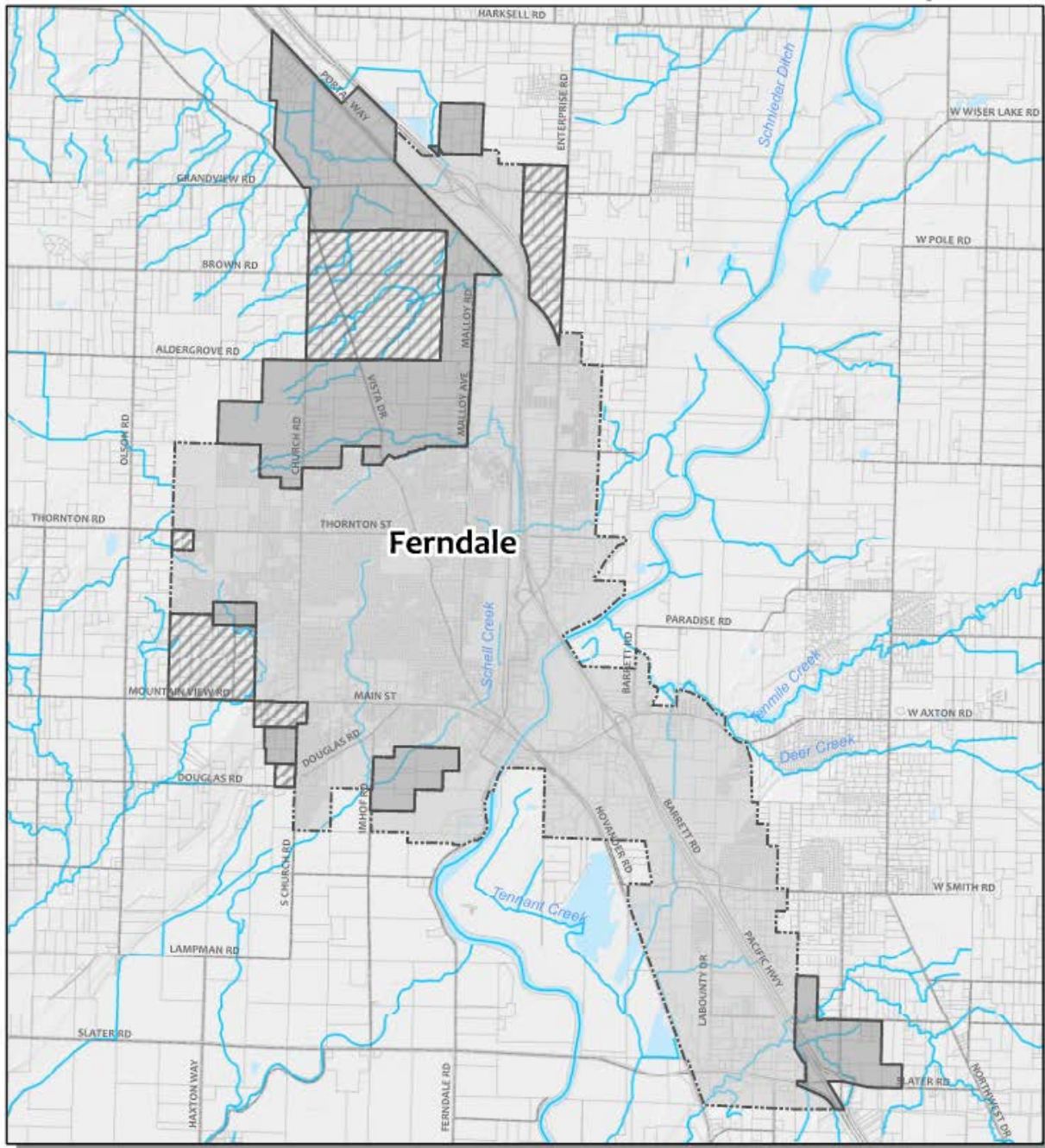
UGAs must include areas and densities sufficient to accommodate the projected urban growth for the 20-year planning period (RCW 36.70A.130(3)), which extends through 2045. However, cities and the County are not required to plan for the future based solely upon past trends. Local government goals and policies, public input, new GMA requirements to plan for and accommodate housing for all economic segments of the community, infrastructure availability, capital facility planning, land capacity, and other factors are also taken into consideration.

Existing interlocal agreements indicate that the County and cities will work together to develop proposed population and employment allocations to UGAs and review UGA boundaries. The County and cities are recommending UGA boundary proposals for their respective UGAs. Review of these proposals includes opportunities for public comments and County Planning Commission recommendations. Final growth allocations and UGA boundaries will be adopted by the County Council in the Comprehensive Plan update in 2025 or 2026.

II. Ferndale Profile

Whatcom County | Current
Comprehensive Plan

Map UGA-4



- Ferndale Urban Growth Area

-  City of Ferndale
-  Urban Growth Area
-  Urban Growth Area Reserve

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From 2013 to 2023, the City of Ferndale experienced a 2.6% average growth rate. During the Growth Management Act (GMA) era, the City has more than tripled in size, going from ~5,500 residents in 1990 to 16,762 residents in 2023. The City has a vibrant downtown, strong school system, a range of housing choices, and a growing job market.

While some may view Ferndale as a bedroom community, the City envisions itself as a transitioning community working towards a vision where community members can live, work and shop within the City. The City has approximately 8.8% of the total jobs within Whatcom County, and the second highest percentage of manufacturing jobs, behind only Bellingham. As the population continues to grow, so do the employment numbers. Ferndale is proud of our manufacturing base and the many products that are made within the City. The City is equally proud of the downtown and the locally owned business that make it thrive.

Ferndale is centrally located with Whatcom County with easy access to other communities. The Nooksack River flows through Ferndale adjacent to the downtown on its path from Mount Baker to the Pacific Ocean. The City is bisected by Interstate 5 running north to south through the community, with four (4) interchanges along the corridor at Slater Road, Main Street, Portal Way, and Grandview Road.

The City has sought to manage and guide growth through the adoption of development standards that result in efficient development. The City has also been adding new multifamily units throughout the community, with those multifamily projects comprising approximately 36% of the new units permitted between 2013 and 2021.

III. Review of Permitted Densities

The GMA, at RCW 36.70A.130(3)(a), requires that:

Each county that designates urban growth areas under RCW 36.70A.110 shall review . . . its designated urban growth area or areas, patterns of development occurring within the urban growth area or areas, and the densities permitted within both the incorporated and unincorporated portions of each urban growth area. In conjunction with this review by the county, each city located within an urban growth area shall review the densities permitted within its boundaries, and the extent to which the urban growth occurring within the county has located within each city and the unincorporated portions of the urban growth areas.

Zoning districts and permitted densities in the city and the portion of the UGA within unincorporated Whatcom County are shown below.

<i>Table 1. Permitted Densities in the City</i>		
Zoning Abbreviation	Zoning	Permitted Densities
CC	City Center	Minimum 15 units/acre, no maximum
UR	Urban Residential	Minimum 15 units/acre, no maximum
RS Low	Low-Single Family Residential	Minimum 3 units/net acre, maximum five units/net acre
RS Medium	Medium-Single Family Residential	Minimum 4 units/net acre, maximum 7 units/ net acre
RS High	High-Single Family Residential	Minimum 6 units/net acre, maximum 9 units/net acre
RMM	Residential Multifamily Medium	Minimum 10 units/acre, maximum 30 units/acre
RMH	Residential Multifamily High	Minimum 15 units/acre, no maximum
RO	Residential Office	Maximum 27 units/acre
GB	General Business	Dwelling units permitted for watchman or custodian
MXD	Mixed Use Commercial	Residential requires “nonresidential” use to allow no minimum or maximum density Nonresidential use requirement is based on size of lot/development
RR	Regional Retail	Allows vertical mixed use with ground floor retail, no minimum or maximum density
PI	Public/Institutional	No residential permitted

		No floor area ratio requirements
LI	Light Industrial	Caretaker permitted as accessory use, must be employee cannot be rental
M	Manufacturing	No residential permitted

Table 2. Permitted Densities in the UGA (outside the City)		
Zoning Abbreviation	Zoning	Permitted Densities
GC	General Commercial	Hotels and motels shall not exceed a floor area ratio of .60 Duplexes and multifamily dwellings not to exceed 18 units per gross acre (when public water and sewer are available) Residences on premises in a commercial structure: The overall residential density will not exceed 12 units per acre
LII	Light Impact Industrial	N/A
UR4	Urban Residential	Maximum gross density: 4 dwelling units/1 acre, if public water and sewer are available Minimum net density: 4 dwelling units/1 acre, if public water and sewer are available 1 dwelling/10 acres, if public water sewer are not available

IV. UGA Growth Allocation Proposal

This section of the proposal compares population and employment growth allocations in the 2025 City proposal to those in the non-binding multi-jurisdictional resolutions approved by the County and all cities in 2025.

Table 3. UGA Population Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	10,961
2	City Growth Allocation Proposal	10,961
3	Difference	0

Table 4. UGA Housing Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	4,659
2	City Growth Allocation Proposal	4,659
3	Difference	0

Table 5. UGA Employment Growth Allocation Proposal (2023-2045)		
1	Multi-jurisdictional Resolution Growth Allocation	3,337
2	City Growth Allocation Proposal	3,337
3	Difference	0

The proposed population, housing, and employment growth allocations are as proposed in the multi-jurisdictional resolution for the City of Ferndale. The City of Ferndale can accommodate the projected growth over the next 20 years through a series of rezones within the City Limits and Urban Growth Area.

V. UGA / UGA Reserve Boundary Proposal

Urban Growth Area

With targeted rezones the existing Ferndale Urban Growth Area is adequately sized to accommodate the selected growth allocations for both population and employment uses. Below is a discussion of the actions that will be completed to accommodate the projected growth.

Population:

For future population growth the City is focused on rezoning low density residential (RS Low and RS Medium) to medium density residential (RS High) and high density residential (Multifamily zoning). Within City Limits the city will be looking at rezoning areas from low density residential to multifamily residential. Within the unincorporated UGA the city is proposing to rezone from low density residential to medium density residential, multifamily residential, mixed use commercial and neighborhood commercial.

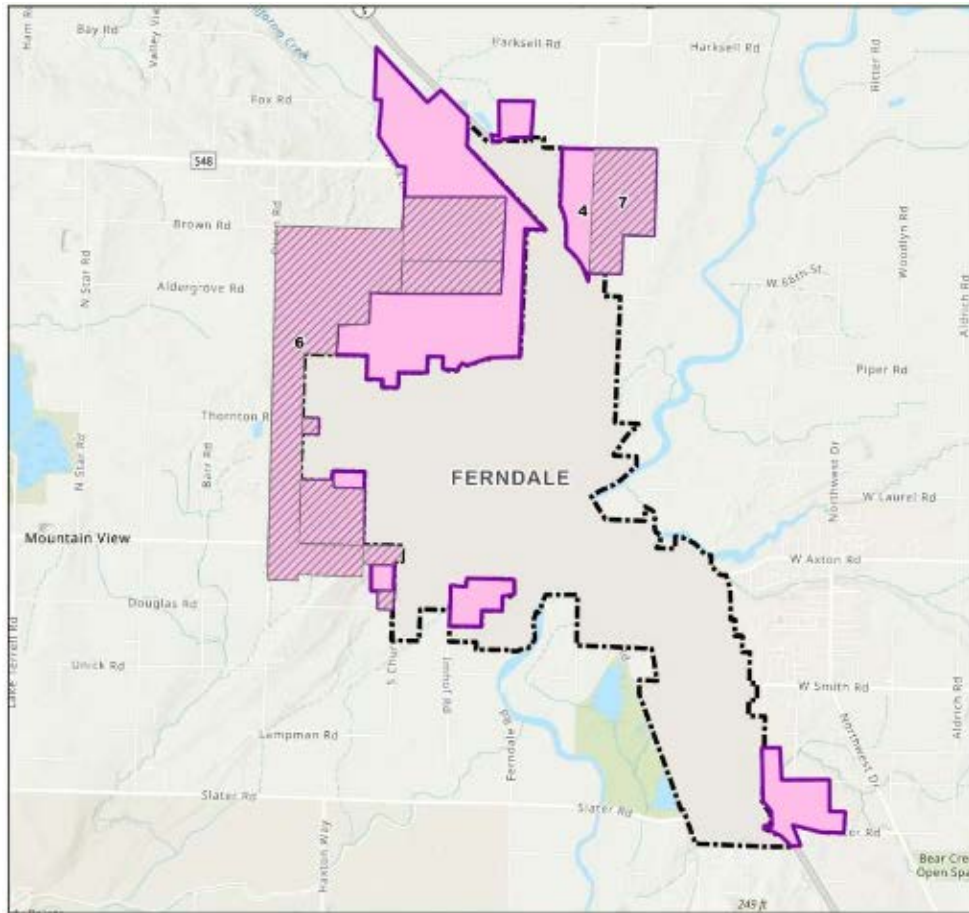
Employment:

For future employment growth the City is proposing a series of rezones. The City currently has a significant amount of Regional Retail zoning around the Grandview I-5 interchange. The City will be rezoning this area to a mix of Light Industrial, Manufacturing, and General Business. The Grandview Interchange will be focused on providing employment areas and commercial services.

The City has also created a new zone, Neighborhood Commercial, a mixed use zone that will allow for neighborhood commercial uses and residential uses. The NC zone is proposed to be applied within the unincorporated UGA in close proximity to existing and proposed residential centers. In the unincorporated UGA the City is also proposing Mixed Use Commercial and General Business to provide future commercial services in close proximity to residential uses.

Urban Growth Area Reserves:

The City is requesting designation of study areas 6 and 7 as Urban Growth Area Reserves. The City is proposing to add Area 7 to provide for future employment uses. Area 6 is proposed to be added for future housing and commercial uses.

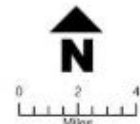


Whatcom County

Preferred Alternatives Ferndale

Legend

- City Limits
- Ferndale UGA
- UGA Update
- UGA Reserve



Date: 07/08/2025
Sources: Whatcom County (2025)



VI. Land Capacity Analysis Overview

A land capacity analysis compares the proposed growth allocations to the capacity of the UGA to accommodate growth. The land capacity analysis is an important tool for sizing UGAs. Land capacity analysis results for the 2025 City Proposal, based upon proposed UGA densities and boundaries, are shown below.

Table 6. Proposed UGA - Population Land Capacity Analysis Results		
1	Population Growth Capacity of Proposed UGA	11,261
2	Population Growth Allocation Proposed	10,961
3	Surplus	300

Table 7. Proposed UGA – Housing Land Capacity Analysis Results

Income Band (AMI)	Aggregated Housing Needs	Total Capacity of Proposed UGA	Surplus
0-80%	3,109	3,351	242
80-120%	605	856	251
120+ %	944	1,294	250
Total	4,658	5,501	743

NOTE: AMI means “Area Median Income”

The land within the existing UGA can accommodate approximately 743 more dwelling units than allocated during the planning period. With proposed zoning changes the UGA can accommodate a variety of housing types to meet the needs of the community based on income levels specified within House Bill 1220. No changes are proposed to the UGA boundary to accommodate projected housing growth.

Table 8. Proposed UGA - Commercial/Industrial Land Capacity Analysis Results		
1	Employment Growth Capacity of Proposed UGA	3,359
2	Employment Growth Allocation Proposed	3,337
3	Surplus	22

The land within the existing UGA can accommodate approximately 22 more jobs than allocated during the planning period. With proposed zoning changes the UGA can accommodate employment opportunities to meet the needs of the community. No changes are proposed to the UGA boundary to accommodate projected employment growth.

VII. Capital Facility Planning

The City and special districts, as applicable, have undertaken the following capital facility planning efforts in order to assure adequate public facilities and services are planned for the UGA.

Water – The City has contracted with Wilson Engineering to complete an update to the City of Ferndale Water System Plan. This update is in process and will be completed prior to final action on the City's Comprehensive Plan.

The City obtains water from wells, currently operating two wells, a third well is currently being developed to improve production. Groundwater is pumped to the city's water treatment plant for processing. The treatment process includes reverse osmosis to reduce the hardness and mineral levels. The City completed upgrades to the Water Treatment Plant in 2020, and has recently completed upgrades in 2024 to provide 100% full reverse osmosis, the same technology used in producing bottled water. The existing plant is designed to be able to be expanded. The City has adequate water rights to support the projected growth over the planning period.

The City collects a Water Connection Fee for new connections to the water system in order to collect an equitable share of the costs to construct and maintain the water system. The connection fees for the City are updated annually to account for inflation.

Sewer – The City has contracted with Wilson Engineering to complete an update to the City of Ferndale Comprehensive Sewer Plan. This update is in process and will be completed prior to final action on the City's Comprehensive Plan.

In 2022, the City of Ferndale Wastewater Treatment Plant was upgraded to replace the existing lagoon system which was functionally obsolete. The new

treatment plant is an activated sludge facility that features fine screens, grit removal, and UV disinfection. The existing plant is designed to be able to add treatment capacity.

The City collects a Sewer Connection Fee for new connections to the sewer system in order to collect an equitable share of the costs to construct and maintain the sewer system. The connection fees for the City are updated annually to account for inflation.

Stormwater – In 2023 the Cit of Ferndale adopted the *Ferndale 2023 Stormwater Comprehensive Plan*. Since adopting this plan, the City has completed the following updates:

- 2023 Stormwater Management Program Plan
- 2024 Stormwater Management Program Plan
- 2025 Stormwater Management Program Plan

These plans identify potential problems as well as solutions and are intended to provide guidance for how stormwater quality and quantity is addressed within the community. The City does own and operates regional facilities that have capacity and can support subsequent development. Much of the future development is expected to address stormwater onsite as part of the development review process.

The City has a storm sewer mitigation fee that is collected during the development review process. The City also has a storm drainage utility that supports the construction, reconstruction, maintenance, and expansion of the storm drainage system.

Fire Protection – Whatcom Fire District #7 (District) serves the entire City of Ferndale and associated Urban Growth Area and Urban Growth Area Reserves. The District is in the process of updating their Capital Facility Plan to accommodate the projected population and employment growth. The District has a DRAFT Plan available. The plan will be complete and adopted prior to final action on the City's Comprehensive Plan.

Schools – The Ferndale School District serves the entire City of Ferndale and associated Urban Growth Area and Urban Growth Area Reserves. The District is in the process of updating their Capital Facility Plan to accommodate the projected population and employment growth. The plan will be complete and adopted prior to final action on the City's Comprehensive Plan.

The City of Ferndale ensures a School Impact Fee is collected as part of the development review process.

Transportation – The City completed an update to the City Ferndale Transportation Element in 2023. The City has contracted with the Transpo Group to update the transportation element, this work is in process. The

revised element will be completed and adopted prior to final action on the City's Comprehensive Plan.

The City collects transportation impact fees to assist with completing new infrastructure that adds capacity to the transportation system. The City's impact fee is updated annually to account for inflation. The City also has a Transportation Benefit District which is designed to generate revenue to preserve and maintain the City's transportation infrastructure.

VIII. UGA Expansions into UGA Reserves (if applicable)

Is the City proposing to expand the UGA into the UGA Reserve?

No, the City is not proposing to expand the UGA into the UGA Reserve. The City can accommodate the projected growth within the existing UGA.

IX. UGA Expansion in the Floodplain

Is the City proposing to expand the UGA into the floodplain?

No, the City is not proposing to expand the UGA. Existing and planned UGA Reserves do not contain any Federal Emergency Management Agency (FEMA), City of Ferndale, or Whatcom County special flood hazard areas.

X. UGA Expansions into Resource Lands (if applicable)

Is the City proposing to expand the UGA or UGA Reserve into lands designated as Agriculture, Rural Forestry, Commercial Forestry, or Mineral Resource Lands on the Whatcom County Comprehensive Plan map?

No, the proposed UGA Reserve expansion does not contain any Whatcom County designated Resource Lands. The City desires to avoid these areas being designated near the existing and proposed UGAs and UGA Reserves.

XI. UGA Swap (if applicable)

Is the City proposing a UGA swap under the GMA?

No, the City is not proposing a UGA swap.

XII. Conclusions

The City of Ferndale has experienced significant and consistent growth over the past three decades. The City's growth rate has not dipped or peaked substantially within this time period. The City of Ferndale is strategically located in close proximity to the largest population and employment center within the County. The City is bisected by Interstate 5 and is adjacent to the airport. The City has one of the last underdeveloped highway interchanges between Seattle and Vancouver British Columbia.

The City is proud of the employment opportunities that are supported within the community and seeks to continue to provide and expand these opportunities. The most recent Industrial Land Study prepared by Maul Foster Alongi for the Port of Bellingham identifies Ferndale as an important area for future job growth for the region.

The City has actively managed their infrastructure to make improvements to the water, sewer, and transportation systems to accommodate growth. This proactive approach includes efforts to make sure impact fees, connections fees, and utility rates are set appropriately to allow for the maintenance and expansion of these systems.