Bobby Wright

My name is Bobby Wright, and I help run WIP Properties, a family-owned company that owns and manages apartment homes in the Puget Sound region, including North Forest Apartments in Shoreline. I appreciate Ecology's multi-year outreach on this rule and share the goals of protecting shoreline ecology and planning responsibly for sea level rise. I am writing to ask that the final rule better account for its effect on housing supply and affordability.

Washington faces a serious housing shortage, and every added cost or delay on a multifamily project shows up in the rents our residents pay. Several provisions concern me:

1. Multiunit housing as a non-preferred use. Requiring non-water-oriented apartments to provide public access or ecological improvements as a condition of approval, with signage and parking maintained for the life of the project, adds cost and uncertainty to a building type the state otherwise encourages. Please allow flexible, proportionate options, such as fee-in-lieu or off-site contributions.

2. Sea level rise and vegetation standards. Requiring alternative siting, raised foundations, studies and vegetation mitigation across all of shoreline jurisdiction can add significant cost. Industry estimates put it at $117,000 to $468,000 per affected multifamily development. Please provide clear, predictable statewide standards, scale requirements to actual risk, and avoid new case-by-case studies for small and infill projects.

3. Existing buildings. Narrower exemptions, locally drafted nonconforming rules and new damages provisions could make routine repair, replacement and maintenance of existing housing harder. Please make sure owners can keep maintaining and reinvesting in the homes people already live in without new permit hurdles.

4. Cost analysis. The Preliminary Regulatory Analysis gives statewide totals but not per-project housing costs or rent impacts. I ask Ecology to estimate the per-unit cost to multifamily housing and consider less burdensome alternatives before adoption.

Thank you for considering the perspective of housing providers who are working to keep homes available and affordable.

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