Bradley Schnell

Dear Department of Ecology Shoreline Rulemaking Team,

I am writing to express my concerns about the Department of Ecology's proposed Shoreline Master Program rule changes and their potential impacts on housing affordability and development across Washington.

House Bill 1181 directed Ecology to update shoreline guidelines to address the impacts of sea level rise and severe storms. While preparing for the effects of climate change is important, the proposed regulations raise serious concerns about additional restrictions on developable land, increased construction costs, and new barriers to housing production.

I am particularly concerned about provisions that could expand shoreline buffers, impose additional mitigation and permitting requirements, and reduce the amount of land available for housing development. Washington has spent years working to address its housing shortage by expanding opportunities for residential development. We should not undermine that progress by introducing new regulations that make housing more difficult or expensive to build.

The financial implications are also significant. Additional studies, mitigation requirements, and development restrictions can substantially increase project costs. For multifamily housing developments, where financial feasibility is already a significant challenge, these additional expenses could prevent otherwise viable projects from moving forward. Ultimately, higher development costs contribute to higher housing costs for Washington residents.

Local governments could also face additional administrative responsibilities without sufficient resources to implement them. These costs do not simply disappear. They can be passed along through increased permitting fees, additional development expenses, and ultimately higher housing costs.

Washington can and should prepare for the impacts of climate change while continuing to address our housing affordability crisis. These objectives are not mutually exclusive.

I urge the Department of Ecology to revise its proposed Shoreline Master Program guidelines to fulfill the intent of HB 1181 without unnecessarily restricting developable land, increasing housing costs, or creating additional barriers to housing production.

Thank you for your consideration.