



December 4, 2023

The Honorable Keith Scully, Mayor of Shoreline
and Members of the Shoreline City Council

Ordinance No. 996 - Establishing a New Chapter, Chapter 9.35, of the Shoreline Municipal Code Regarding Tenant Protections

Dear Mayor Scully and Members of the City Council:

I am reaching out on behalf of the Washington Multi-Family Housing Association (WMFHA) to provide comments regarding your consideration of new tenant protections and regulations to the housing industry in Shoreline. WMFHA is a statewide organization of multifamily rental property owners, managers, and suppliers. Our members own and/or manage more than 2,200 multifamily properties across the state. These properties have more than 328,000 rental units providing quality housing for at least that many Washington residents. WMFHA members own or manage at least 3,800 units in Shoreline.

There are a few aspects of the proposals that our membership is especially concerned about, listed below:

1. Late Fees

Late fees have already been addressed at the state level. Housing providers need to have the ability to implement an adequate late fee to encourage and incentivize tenants to pay their rent on time. In jurisdictions where similar protections have passed and the late fee has been limited to smaller numbers, housing providers are seeing residents who had otherwise paid on time begin to pay their rent late, as there are such nominal costs to a resident to do so. Late fees exist to help residents prioritize paying their rent, as housing providers must pay their mortgage with those funds in a timely manner or face late fees of their own.

2. Barring requirement of a social security number

Social security numbers allow housing providers necessary information that they can't otherwise obtain. This is both a safety and an administrative concern, as social security numbers allow for adequate screening for things that could present a safety issue to other residents and community staff. In addition, it is difficult for housing providers to collect in collection action, any unpaid rent or damages from residents who may violate their lease and vacate with back rent owed, without having a resident's SSN.

3. Tenant Right of Action

Tenants already have the right to seek civil remedies if there are damages using existing law. The main concern here is that the housing provider takes on all the risk, and that the ambiguous wording of this section of the ordinance will be cause for likely abuse. We should be encouraging residents and housing providers to seek other remedies for problem solving instead of defaulting to legal action.

4. Alteration of rent due date due to tenant's fixed income.

The State of Washington already offers protections that fall under this issue. As different jurisdictions pass certain protections that often differ from other neighboring cities, it becomes more difficult for our providers who operate in multiple jurisdictions to adjust accordingly, and the addition of altering due dates makes managing finances much more difficult. As it stands now, our members have systems and schedules in place that allow for them to budget and pay their bills to keep their properties running. If those dates can shift for any tenant, this could significantly affect the processes.

While we know this proposal is well intentioned, our members are concerned about additional regulations, as a burdensome regulatory environment places increased risk and costs on the owners providing housing. Housing providers are already seeing their operating costs increase exponentially as insurance costs and other expenses continue to rise. More regulations disincentivize developers from investing in jurisdictions that have them, in fact we are beginning to see the initial effects on development that these types of regulations in major cities of King County are contributing to. [The Washington Center for Real Estate research Housing Market Snapshot \(Q2 2023\)](#) notes a statewide 28% decline year-over-year in permit issuance, with more than a 50% decline year-over-year in building permit issuance in King County.

We respectfully request that you consider the concerns expressed by WMFHA and other housing providers in Shoreline. The state has addressed tenants rights and already offers robust protections. We should be highlighting the rights residents already have, as opposed to implementing regulations that won't get us closer to our common goal of getting, and keeping, more people housed in the region.

Carter Nelson

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Washington Multifamily Housing Association

CC: Councilor Betsy Robertson
Councilor Doris Fuijoka McConnell
Councilor Laura Mork
Councilor Eben Pobee
Councilor John Ramsdell
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