



September 25, 2019

Washington State Building Code Council  
1500 Jefferson St. SE  
Olympia, WA 98501

RE: Public Comment on Proposed Amendments to Group 2 Codes (IRC, IMC, UPC and WSEC-Residential)

To Whom It May Concern:

Ginn Homes is writing to testify in opposition to several proposed amendments to the Washington code.

We are a residential single-family home builder serving the needs of first time buyers and work force participants in Clark County, Washington. The proposed amendments will have a significant impact on our ability to keep housing affordable. Clark County is one of the least affordable housing markets in the state with a median home price of \$369,300.<sup>1</sup> In order to serve the needs of first time home buyers, we try to keep our products below the county median home price, with a price point between \$300,000 - \$340,000. The attached townhome style homes of five or more are the most affordable product we deliver.

The following are a few examples of how the proposed changes will negatively impact our ability to deliver affordable housing to first-time home buyers or work force participants:

- The existing energy code credits helps us maintain our target price point; however, the proposed amendments will alter and reduce the amount of credits available to us, which will result in substantial cost increase for consumers. We estimate an additional \$3,000 per door cost increase, with a total operational impact of close to \$1,000,000 per year.
- The proposed amendments requiring sprinkler installation for our most affordable product will add an additional \$4,000 per door cost increase.

These proposed construction cost increases will increase the median home price and further contribute to the lack of affordable housing availability to working families in Clark County and across the state of Washington. In Clark County, each \$1,000 increase in the cost of a home, prevents an additional 776 people from entering the new home market.

We urge you to reject the proposed amendments and work to preserve housing affordability for Washington's working families.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Ginn", is written over a horizontal line.

Patrick Ginn, Owner

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<sup>1</sup> 2019 Quarter 2 Market Summary. Washington State Housing Market Report: WCRER. University of Washington College of Built Environments: Runstad Department of Real Estate. <http://realestate.washington.edu/research/wcrer/housing-reports/> (accessed September 13, 2019).