

Comments on [Director's Rule \(DR 9-2020\) Verification of floating on-water residences](#):

	Comments	SDCI Responses to Comments	Comment Provided By
1.	Requiring a voter's registration is not equitable	The DR does not require a voter's registration. A voter's registration is an example of information that can be used to establish that a floating on-water residence meets the requirements of the SMP.	Dan Lofstrom Riley and Bill Haggard Mauri Shuler
2.	Why are you including the standards for verification in this DR?	The standards are included in the DR because of the length of time that has passed since 2015, which is the year that the SMP first allowed floating on-water residences and the need to ensure that a floating on-water residence meets the standards.	Dan Lofstrom
3.	What if the State Legislature amends the RCW regarding floating on-water residences?	SDCI will address amendments to the RCW at the time of such amendments.	Dan Lofstrom
4.	What if the city incorporates part of the Duwamish River down south or some other area with marinas sometime in the future?	The floating on-water residences regulations are statewide and if the City of Seattle incorporates part of the Duwamish River in the future SDCI will address any issues to floating on-water residences at that future time.	Dan Lofstrom
5.	Regarding applications for verification that have already been submitted to SDCI: Will these applications be grandfathered in and evaluated separately from any potential changes to the FOWR placard application requirements?	Your application will be evaluated according to the standards in the code. The DR provides clarification regarding the information that is required in order for a floating on-water residence to be evaluated for verification. The total of information will be evaluated including the information submitted and the information that is available publicly.	Riley and Bill Haggard
6.	Does the FOWR regulation apply to vessels, built as such, used for cruising and as a residence?	The code standards that apply to vessels are the following Sections: 23.60A.214 Standards for vessels containing dwelling units and 23.60A.942 Definitions - "V" Additionally Tip 229 Residential Use of a Floating Home, House Barge, Floating On-Water Residence, or Vessel With a Dwelling	Bruce F. Ramon

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		<p>Unit provides additional information on this topic.</p>	
7.	<p>1) In the first sentence the word “complete” verification application is troublesome. The way your department operates with any application having to do with house boats is rounds and rounds of “corrections”. We fear that if DCI issues a “correction letter” after August 31st, 2020, you could then claim the application was not complete and rule it ineligible.</p>	<p>An application can be complete and still require corrections. The DR provides a link to the Floating On-Water Residence Verification Form that is on SDCI’s website and contains the list of the required information to be submitted with the application in order for an application to be considered complete.</p> <p>Additionally, the DR states “An application is complete if the Floating On-Water Residence Verification Form is filled out, in full, and submitted with the required additional information.”</p>	Mauri Shuler
8.	<p>As to the evidence you are looking for, we prefer the original wording. What is your justification for changing the wording? Are you trying to give applicants more options or fewer?</p> <p>1) Many marinas do not provide written leases. Mine did not. I used a letter from my landlord. We discussed this 6 years ago.</p> <p>2) Many leases do not show that it is a liveaboard.</p> <p>3) There are OWNED slips, like my own on Allison St. (I remember the original wording accommodated this because I talked with Faith about it at the time.) ((I have had interest in 4 slips in Seattle, all with different circumstances.))</p> <p>4) Many boats are only used as vacation or weekend residences, not lived on full-time</p>	<p>The examples do not limit the options. They provide guidance on the type of information that ensures that a floating on-water residence meets the standards.</p>	Mauri Shuler