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The Evergreen State College
Thurston Conservation District
Thurston Economic
Development Council
Timberland Regional Library

MEMORANDUM

TO: Housing Allocation Project Partners
FROM: Michael Ambrogi, Senior Planner
DATE: June 25, 2024
SUBJECT: GMA Housing Need Allocations
Land Capacity Analysis

OVERVIEW

TRPC is working with Lacey, Olympia, Tenino, Tumwater, Yelm, and Thurston County to implement new requirements in the Growth Management Act (GMA) that ask jurisdictions to plan for housing affordable to all economic segments of the population in their periodic Comprehensive Plan updates. In Phase 1 of the project, the partners agreed on a housing need allocation that was provisionally accepted by TRPC on March 1, 2024. In Phase 2 of the project, the partners contracted with TRPC to complete the land capacity analysis required by HB 1220 to show there is sufficient capacity to accommodate the housing need allocated to each jurisdiction.

This memo documents the land capacity analysis. The analysis determined that there is insufficient capacity in some jurisdictions to accommodate the low- and moderate- income housing allocations. At the next partner meeting — scheduled for July 10, 2024 — the partners will review the findings of the land capacity analysis and discuss how to address the deficits.



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BACKGROUND

HB 1220 amended the Growth Management Act, which now requires jurisdictions to “plan for and accommodate housing affordable to all economic segments of the population.” Specifically, jurisdictions must estimate the number of housing units needed for moderate, low, very low, and extremely low-income households; and emergency housing, emergency shelters, and permanent supportive housing.

In Phase 1 of this project, the project partners agreed on an allocation of the countywide housing need for each income to individual jurisdictions. This housing need allocation (Appendix I) was accepted by TRPC on March 1, 2024 as a provisional step for completing a land capacity analysis — Phase 2, the current phase of this project. The goal of the land capacity analysis is to determine whether there is sufficient land in each jurisdiction to accommodate the housing need allocated to each jurisdiction in each income category.

The Dept. of Commerce’s guidance for updating housing elements¹ outlines five steps for completing a land capacity analysis, which are described in this report:

1. Summarize Land Capacity by Zone
2. Categorize Zones by Allowed Housing Types and Density Category
3. Relate Zone Categories to Potential Income Levels and Housing Types
4. Summarize Capacity by Zone Category
5. Compare Allocated Housing Need to Capacity

Thurston County also requested that TRPC complete a housing need allocation and land capacity analysis consistent with the Sustainable Thurston land use alternative described in the 2021 Buildable Lands Report² as an alternative scenario to the allocations accepted by TRPC. The land use alternative increases the housing allocated to cities and unincorporated urban areas to reduce the amount of development in the rural areas to about five percent — consistent with the Sustainable Thurston vision for Thurston County³. This work — completed under a separate contract between TRPC and Thurston County — is also documented in this memo.

¹ Dept. of Commerce (2023) Guidance for Updating Your Housing Element
[\[https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpowh8isjpirh\]](https://deptofcommerce.app.box.com/s/1d9d517g509r389f0mjpowh8isjpirh)

² TRPC (2021) Buildable Lands Report for Thurston County
[\[https://www.trpc.org/164/Buildable-Lands\]](https://www.trpc.org/164/Buildable-Lands)

³ TRPC (2013) Creating Places — Preserving Spaces: A Sustainable Development Plan for the Thurston Region
[\[https://www.trpc.org/260/Sustainable-Thurston-Plan\]](https://www.trpc.org/260/Sustainable-Thurston-Plan)

1. SUMMARIZE LAND CAPACITY BY ZONE

“Capacity” refers to the potential number of new dwelling units that could be built on a parcel based on zoning, development regulations, development trends, and market factors. Capacity includes greenfield development, infill development, and redevelopment. Under the ILA for Phase 2, the partners agreed to use the land capacity model developed for TRPC’s most recently adopted forecast and the 2021 Buildable Lands report. The documentation for that model — including the assumptions that went into it — can be found in TRPC’s forecast documentation⁴ and the Buildable Lands report.

The capacity estimates for each zone under the adopted forecast and the Sustainable Thurston land use alternative are shown in Appendix II.

Changes from Adopted Forecast

While TRPC used the same land capacity model to develop TRPC’s adopted forecast and the 2021 Buildable Lands Report, the capacity estimates differ from those published in 2021 Buildable Lands Report for the following reasons:

Extension of Planning Horizon to 2045. The planning horizon for the Buildable Lands Report was 2040 while the planning horizon for Comprehensive Plans is 2045. The capacity for housing need allocations includes additional capacity due to:

- Land expected to be redevelopable after 2040
- Accessory dwelling units and family member units expected to be built between 2040 and 2045
- Development of some master planned communities that occurs after 2040
- Difficult-to-sewer areas and areas without sewer expected to have sewer after 2040

Recent development. TRPC also adjusted the capacity to account for recent housing development. If a project was permitted that exceeded the capacity estimate in TRPC’s model, the capacity was revised to the permitted number of units.

TRPC did not revise capacity to account for changes in zoning or development regulations that have occurred since the last forecast was updated. Doing so would require substantial updates to the population and housing forecast adopted by TRPC in 2018 that serves as the foundation for the housing need allocations and was not included in the scope of the current ILA. However, Appendix II does include notes where jurisdiction staff felt the capacity may be higher or lower than estimated due to recent or potential changes.

⁴ TRPC (2019) Population and Employment Land Supply Assumptions for Thurston County
[\[https://www.trpc.org/236/Population-Employment-Forecasting\]](https://www.trpc.org/236/Population-Employment-Forecasting)

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Capacity for Accessory Dwelling Units

TRPC’s method for projecting accessory dwelling units (ADUs) mirrors Commerce’s guidance. TRPC projects the number of ADUs likely to be built over the next 20 to 25 years based on past trends and recent changes to development regulations. The units are then allocated to “potential ADU lots.” The estimated number of ADUs for each jurisdiction is shown in Table 1.

Within urban areas of Thurston County (including cities, towns, and unincorporated urban areas), TRPC projects 565 ADUs across 11,886 potential ADU lots — a participation rate of about five percent. Potential lots have only one single-family unit and no additional dwellings and are located in areas platted prior to 1970 (referred to as “infill areas”). For the Sustainable Thurston land use alternative, the number of ADUs increases to 830 (a seven percent participation rate).

For the rural unincorporated county, TRPC projects 280 ADUs across 24,271 potential ADU lots — a participation rate of about one percent. Potential lots have one single-family unit and no additional dwellings. For the Sustainable Thurston land use alternative, the number of ADUs shrinks to 170 (a 0.7 percent participation rate).

Table 1: Estimates of Accessory Dwelling Units by Jurisdiction.

Jurisdiction		Accessory Dwellings		Potential ADU Lots
		Adopted Forecast	Sustainable Thurston	
Bucoda	City	9	14	195
Lacey	City	97	143	2,045
	UGA	43	63	906
Olympia	City	309	454	6,502
	UGA	1	1	16
Rainier	City	5	7	104
	UGA	0	0	0
Tenino	City	19	28	395
	UGA	0	0	0
Tumwater	City	73	107	1,536
	UGA	0	0	0
Yelm	City	9	13	185
	UGA	0	0	2
Grand Mound	UGA	0	0	0
Urban Total		565	830	11,886
Rural Total		280	170	24,271
Countywide		845	1,000	36,157

Capacity for Emergency Housing

Per Commerce’s guidance, jurisdictions do not need to do a land capacity analysis for emergency housing if:

- The jurisdiction has one or more zones that allow hotels, all of which allow for emergency housing by right. Alternatively, this condition may be met by demonstrating that emergency housing is allowed by right in a majority of zones within a one-mile proximity to transit.
- The jurisdiction has no regulations that limit the occupancy, spacing, or intensity of emergency housing.

The project partners confirmed at least one of these conditions applied to their jurisdictions, therefore TRPC did not complete a land capacity analysis for emergency housing.

2. CATEGORIZE ZONES BY ALLOWED HOUSING TYPES AND DENSITY CATEGORY

Step 2 of Commerce’s guidance recommends that jurisdictions assign a density category to each zone based on the density and types of housing allowed. The partners agreed to use the example categories in Commerce’s guidance shown in Table 2. In May 2024, TRPC met with jurisdiction staff to review the housing types allowed in each zone and assign a density category; this information is shown in Appendix II.

Table 2: Categories for Classifying Zones by Housing Types Allowed

Zone Category	Typical housing types allowed
Low Density	Detached single-family homes
Moderate Density	Townhomes, duplex, triplex, quadplex
Low-rise Multifamily	Walk-up apartments (up to 3 floors)
Mid-rise Multifamily	Apartments in buildings with ~4-8 floors (~40-85 feet in height)
High-rise/Tower	Apartments in buildings with ~9 or more floors (>85 feet in height) and requiring steel frame construction

Note: Adapted from Commerce’s guidance. Manufactured homes are not listed as a housing type because by law they should be allowed in all zones. High-Rise/Tower zones are likely to be relevant only in major metropolitan cities. Condominiums are omitted since they are a type of ownership, not housing.

3. RELATE ZONE CATEGORIES TO POTENTIAL INCOME LEVELS AND HOUSING TYPES

For the land capacity analysis, housing types must be tied to an affordability level. Commerce’s guidance provides examples of this relationship for moderate- and high-cost communities in Washington State which may be used in the land capacity analysis if a more detailed market analysis is not available. The project partners agreed to use the relationship for moderate-cost communities (Table 3) for this analysis.

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Note that the assigned affordability levels are intended to indicate the potential for that zone to accommodate housing affordable to different income levels, not a guarantee that any housing in those zones actually will be affordable at specific household income levels.

Table 3: Relationship of Zone Categories to Housing Income Levels Served in Moderate-Cost Communities

Zone category	Lowest potential income level served		Assumed affordability level for capacity analysis
	Market Rate	With subsidies and/or incentives	
Low Density	Higher income (>120% AMI)	Not typically feasible at scale	Higher income (>120% AMI)
Moderate Density	Moderate income (>80-120% AMI)	Not typically feasible at scale	Moderate income (>80-120% AMI)
Low-rise Multifamily	Low income (>50-80% AMI)	Extremely low and Very low income (0- 50% AMI)	Low income and PSH (0-80% AMI)
Mid-rise Multifamily	Low income (>50-80% AMI)	Extremely low and Very low income (0- 50% AMI)	Low income and PSH (0-80% AMI)
ADUs (all zones)	Low income (>50-80% AMI)	N/A	Group with Low-rise and/or Mid-rise Multifamily

Note: Adapted from Commerce’s guidance

4. SUMMARIZE CAPACITY BY ZONE CATEGORY

In Step 4, the total capacity in each zone category is summarized. This provides the total capacity that could accommodate housing in each income level. These totals are shown in Table 4, and Appendix III (“Total Capacity” columns).

5. COMPARE ALLOCATED HOUSING NEED TO CAPACITY

The final step is to compare the allocated housing need for each jurisdiction to the capacity for new housing. The difference between the allocated housing need and capacity is shown in Appendix III (“Surplus or Deficit” columns). A positive number (surplus) indicates that there is sufficient capacity to accommodate the allocated housing need for a given income level while a negative number (deficit) indicates that there is insufficient capacity.

All jurisdictions had a deficit in at least one income level (Table 5). Deficits were most likely in the rural unincorporated County, UGAs, or other areas with less capacity for multifamily housing. If a deficit is found, the jurisdictions may either revise the housing need allocations and request that TRPC accept them or identify policies to increase capacity. The ILA includes budget to revise the housing need allocations if needed. HB 1220 does not require jurisdictions to plan for and accommodate housing affordable to high-income households (120% AMI or above) although data for this income level are included.

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Deficits were identified in both the adopted forecast and in the Sustainable Thurston land use alternative, however the Sustainable Thurston housing need allocations significantly reduced the deficit for housing affordable to low-income households for the rural unincorporated County while generally increasing deficits for the urban areas.

NEXT STEPS

The next meeting for the project partners is scheduled for July 10, 2024. At that meeting the partners will review this memo and discuss how to address the deficits found in the land capacity analysis. Questions to be discussed at the next meeting include:

- Are there any questions or concerns about the land capacity analysis (the methodology or findings)?
- How do the partners wish to resolve the deficits? Options could include:
 - Revising the housing need allocations. The ILA includes scope and budget for this.
 - Jurisdictions can revise zoning or development regulations to increase capacity.
- How should deficits in the UGAs be resolved?
- Do the partners prefer the Sustainable Thurston land use alternative allocations?

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Table 4: Capacity by Zone Category

Jurisdiction		Adopted Forecast				Sustainable Thurston			
		Mid-rise Multifamily	Low-rise Multifamily	Moderate Density	Low Density	Mid-rise Multifamily	Low-rise Multifamily	Moderate Density	Low Density
		0-80% AMI; PSH		80-120% AMI	> 120% AMI	0-80% AMI; PSH		80-120% AMI	> 120% AMI
Bucoda	City	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Lacey	City	3,988	1,482	1,916	38	5,476	1,572	2,260	38
	UGA	1,096	906	8,818	11	1,321	906	9,454	11
	Total	5,085	2,387	10,735	50	6,796	2,478	11,715	50
Olympia	City	7,352	2,599	4,943	929	13,101	2,659	6,013	959
	UGA	0	868	1,614	326	0	868	1,899	326
	Total	7,352	3,468	6,557	1,255	13,101	3,528	7,912	1,285
Rainier	City	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	UGA	0	0	0	108	0	0	0	108
	Total	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Tenino	City	0	39	376	184	0	57	376	184
	UGA	0	0	0	27	0	0	0	27
	Total	0	39	376	211	0	57	376	211
Tumwater	City	3,195	1,343	4,842	465	3,697	1,343	5,656	477
	UGA	0	615	440	1,976	0	615	583	2,264
	Total	3,195	1,958	5,283	2,441	3,697	1,958	6,239	2,742
Yelm	City	655	3,776	3,834	0	830	3,776	3,834	0
	UGA	0	0	0	745	0	0	0	745
	Total	655	3,776	3,834	745	830	3,776	3,834	745
Grand Mound	UGA	0	0	406	0	0	406	0	
Unincorporated	Rural	0	0	0	17,748	0	0	0	17,748
	Combined UGAs	1,096	2,390	11,278	3,193	1,321	2,390	12,342	3,482
	Total	1,096	2,390	11,278	20,942	1,321	2,390	12,342	21,230

Note: Bucoda and Rainier did not participate in the ILA so data are not available.

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Table 5: Capacity Surplus or Deficit by Jurisdiction and Affordability Range

Jurisdiction		Surplus or Deficit					
		Adopted Forecast			Sustainable Thurston		
		0-80% AMI	80-120% AMI	>120% AMI	0-80% AMI	80-120% AMI	>120% AMI
Bucoda	City	N/A	N/A	N/A	N/A	N/A	N/A
Lacey	City	3,121	1,450	-2,203	4,178	1,759	-2,322
	UGA	-3,151	8,068	-3,012	-3,466	8,745	-2,847
	Total	-31	9,518	-5,215	712	10,505	-5,169
Olympia	City	4,391	2,883	-3,786	8,349	2,948	-4,105
	UGA	119	1,374	-335	99	1,591	-329
	Total	4,510	4,257	-4,121	8,448	4,539	-4,434
Rainier	City	N/A	N/A	N/A	N/A	N/A	N/A
	UGA	-8	-6	98	-12	-7	97
	Total	N/A	N/A	N/A	N/A	N/A	N/A
Tenino	City	-37	159	-23	-9	117	-4
	UGA	-3	-3	24	-3	-3	24
	Total	-41	157	0	-12	114	20
Tumwater	City	1,313	3,806	-1,877	1,345	4,356	-1,813
	UGA	-807	51	1,272	-1,037	85	1,583
	Total	506	3,857	-605	308	4,441	-230
Yelm	City	-1,484	4,519	-2,266	-1,555	4,452	-2,074
	UGA	-52	-34	687	-77	-41	669
	Total	-1,536	4,486	-1,579	-1,632	4,411	-1,405
Grand Mound	UGA	-204	350	-50	-208	341	-41
Unincorporated	Rural	-5,037	-2,214	17,748	-955	-631	17,748
	Combined UGAs	-4,106	9,800	-1,316	-4,704	10,711	-844
	Total	-9,143	7,586	16,432	-5,659	10,081	16,905

Note: Red indicates a deficit, or insufficient capacity to accommodate the housing in an income category that needs to be addressed. Bucoda and Rainier did not participate in the ILA so data are not available.

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APPENDIX I: HOUSING NEED ALLOCATIONS

2020-2045 Housing Need Allocations

Provisionally accepted by TRPC on March 1, 2024

	Total Housing Units	Income Level (Percent of Area Median Income)							Seasonal/Migrant	Emergency Housing Beds
		0-30%		30-50%	50-80%	80-100%	100-120%	120%+		
		PSH	Non-PSH							
Bucoda	134	7	13	0	5	39	24	47	0	2
Lacey	5,154	335	849	1,053	210	0	466	2,241	0	89
Olympia	12,644	818	2,011	2,777	264	973	1,087	4,714	0	218
Rainier	571	41	100	0	79	22	107	222	0	10
Tenino	519	32	62	0	0	115	102	208	0	9
Tumwater	6,676	513	1,211	1,033	541	400	636	2,342	0	115
Yelm	7,504	549	1,341	1,196	1,062	274	817	2,266	0	129
Unincorporated	21,155	1,300	3,171	2,373	6,109	2,550	1,142	4,510	0	364
... Lacey UGA*	8,970	650	1,599	1,552	1,395	0	750	3,024	0	154
... Olympia UGA*	1,651	128	226	397	0	103	136	661	0	28
... Rainier UGA*	23	2	4	0	2	0	5	10	0	0
... Tenino UGA*	9	1	2	1	1	1	1	3	0	0
... Tumwater UGA*	2,516	181	439	364	439	190	199	704	0	43
... Yelm UGA*	144	8	19	25	0	0	34	58	0	2
... Grand Mound UGA*	310	21	52	34	97	40	16	50	0	5
... Rural	7,531	311	832	0	4,174	2,214	0	0	0	130
Thurston County	54,356	3,594	8,758	8,431	8,270	4,373	4,381	16,549	0	936

Note: Numbers may not add to totals due to rounding. *HB 1220 does not require jurisdictions to allocate the unincorporated housing need to urban and rural areas, however the jurisdictions requested this information to inform future planning. Thurston County — in consultation with the cities — has discretion over how the housing need is allocated between urban and rural unincorporated areas as long as the total housing units align with column 1.

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2020-2045 Alternate Housing Need Allocation
Sustainable Thurston Land Use Alternative

	Total Housing Units	Income Level (Percent of Area Median Income)							Seasonal/Migrant	Emergency Housing Beds
		0-30%		30-50%	50-80%	80-100%	100-120%	120%+		
		PSH	Non-PSH							
Bucoda	147	7	13	0	9	56	21	42	0	3
Lacey	5,874	394	1,000	1,115	503	0	501	2,361	0	101
Olympia	15,994	1,019	2,520	2,938	1,388	1,856	1,209	5,064	0	275
Rainier	586	40	99	0	111	34	97	204	0	10
Tenino	541	32	62	0	0	168	91	189	0	9
Tumwater	7,392	541	1,290	1,023	947	679	622	2,290	0	127
Yelm	7,630	532	1,308	1,088	1,470	417	742	2,074	0	131
Unincorporated	16,191	1,030	2,466	2,266	3,842	1,164	1,098	4,325	0	279
... Lacey UGA	9,324	655	1,620	1,462	2,019	0	709	2,858	0	161
... Olympia UGA	1,733	136	245	390	0	172	136	655	0	30
... Rainier UGA	29	2	5	0	5	1	5	11	0	1
... Tenino UGA	9	1	1	1	1	2	1	3	0	0
... Tumwater UGA	2,831	186	456	353	658	305	192	681	0	49
... Yelm UGA	194	13	30	34	0	0	41	76	0	3
... Grand Mound UGA	315	18	45	27	117	53	13	41	0	5
... Rural	1,755	19	63	0	1,043	631	0	0	0	30
Thurston County	54,356	3,594	8,758	8,431	8,270	4,373	4,381	16,549	0	936

Note: Numbers may not add to totals due to rounding.

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APPENDIX II: ESTIMATED CAPACITY AND DENSITY CATEGORY BY ZONE

Notes: P: housing type is permitted; C: housing type is conditionally allowed. Information is included to support the density category assigned to each zone. Consult jurisdiction code for specifics on which housing types are allowed. The city of Rainier and town of Bucoda are not included in the interlocal agreement so are omitted from the TRPC analysis. Per Dept. of Commerce guidance, manufactured homes are omitted since they should be permitted in all zones.

Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
Bucoda										
All Zones	City	—	—	N/A						Not included in analysis
Lacey										
AG	UGA	11	11	Low Density	P				P	
AQUATC	City	0	0	Nonresidential						
AQUATC	UGA	0	0	Nonresidential						
C	City	0	0	Nonresidential						
CBD 4	City	44	88	Mid-rise Multifamily	P	P	P	P	P	
CBD 5	City	110	163	Mid-rise Multifamily		P		P		
CBD 6	City	55	109	Mid-rise Multifamily				P		
CBD 6	UGA	0	0	Mid-rise Multifamily				P		
CBD 7	City	12	12	Mid-rise Multifamily				P		
CCD	City	144	235	Low-rise Multifamily		P		P		
CO	City	227	227	Mid-rise Multifamily		P		P		
GC	City	0	0	Nonresidential						
HD	City	1,598	1,598	Mid-rise Multifamily		P	P	P	P	
HD	UGA	386	386	Mid-rise Multifamily		P	P	P	P	
HPBD-BC	City	68	68	Mid-rise Multifamily		P		P		May accommodate more capacity

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
HPBD-C	City	17	17	Mid-rise Multifamily		P		P		May accommodate more capacity
LD	City	1,666	2,010	Moderate Density	P	P	P		P	
LD	UGA	4,933	5,569	Moderate Density	P	P	P		P	
LHN	City	31	31	Low Density	P				P	
LI	City	0	0	Nonresidential						
LI	UGA	0	0	Nonresidential						
LI-C	City	0	1	Nonresidential						
MD	City	1,338	1,338	Low-rise Multifamily	P	P	P	P	P	
MD	UGA	906	906	Low-rise Multifamily	P	P	P	P	P	
ME	UGA	0	0	Nonresidential						
MGSA	UGA	3,166	3,166	Moderate Density	P	P			P	
MHDC	City	525	582	Mid-rise Multifamily		P		P		
MHDC	UGA	710	935	Mid-rise Multifamily		P		P		
MMDC	City	73	73	Moderate Density	P	P	P	P	P	
MMDC	UGA	172	172	Moderate Density	P	P	P	P	P	
NATURL	City	1	1	Low Density	P				P	
NC	City	0	14	Nonresidential				P		
NC	UGA	0	32	Nonresidential				P		
OS-I	City	1	1	Nonresidential						
OS-I	UGA	0	0	Nonresidential						
OSI-P	City	0	1	Nonresidential						
OSI-P	UGA	0	0	Nonresidential						

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
OSI-S	City	0	0	Nonresidential						
OSI-S	UGA	0	0	Nonresidential						
SHORES	City	3	3	Low Density	P	P	P		P	
SMU	City	0	0	Nonresidential						
URBCON	City	3	3	Low Density	P				P	
V(U)C	City	178	178	Moderate Density	P	P	P	P	P	
V(U)C	UGA	547	547	Moderate Density	P	P	P	P	P	
WD	City	1,332	2,611	Mid-rise Multifamily		P		P		
Olympia										
AS	City	0	0	Nonresidential						
CAP	City	0	10	Nonresidential						
COSC	UGA	31	31	Low-rise Multifamily	P	P	P	P	P	
CSH	City	0	0	Nonresidential	P	P	P	P	P	
DB	City	1,442	1,772	Mid-rise Multifamily	P	P	P	P	P	
GC	City	168	169	Low-rise Multifamily	P	P	P	P	P	
HDC-1	City	3	25	Moderate Density	P	P	P	P	P	
HDC-2	City	4	33	Moderate Density	P	P	P	P	P	
HDC-3	City	37	102	Moderate Density	P	P		P	P	
HDC-4	City	3,019	8,251	Mid-rise Multifamily	P	P	P	P	P	
I	City	0	0	Nonresidential						
LI-C	City	0	0	Nonresidential						

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
LI-C	UGA	0	0	Nonresidential						
MHP	City	0	0	Moderate Density	P	P	P		P	
MR-10-18	City	117	117	Low-rise Multifamily	P	P	P	P	P	
MR-7-13	UGA	0	0	Moderate Density	P	P	P	P	P	
MS	City	217	217	Mid-rise Multifamily	P	P	P	P	P	
NR	City	2	21	Moderate Density	P	P	P	P	P	
NR	UGA	10	30	Moderate Density	P	P	P	P	P	
NV	City	410	410	Low-rise Multifamily	P	P	P	P	P	
PO/RM	City	688	745	Low-rise Multifamily	P	P	P	P	P	
PUD	City	83	83	Mid-rise Multifamily	C	C	C	C	C	
R-1/5	City	4	4	Low Density	P	P	P		P	
R-1/5	UGA	39	39	Low Density	P	P	P		P	
R-4	City	16	16	Low Density	P	P	P		P	
R-4	UGA	154	154	Low Density	P	P			P	
R-4-8	City	3,758	4,551	Moderate Density	P	P	P		P	
R-4-8	UGA	1,553	1,815	Moderate Density	P	P			P	
R-4CB	City	445	475	Low Density	P		P		P	
R-6-12	City	1,141	1,281	Moderate Density	P	P	P		P	
R-6-12	UGA	51	55	Moderate Density	P	P	P		P	
RLI	City	464	464	Low Density	P	P	P	P	P	
RLI	UGA	133	133	Low Density	P	P	P	P	P	
RM-18	City	945	947	Low-rise Multifamily	P	P	P	P	P	

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
RM-18	UGA	837	837	Low-rise Multifamily	P	P	P	P	P	
RM-24	City	999	999	Mid-rise Multifamily	P	P	P	P	P	
RM-H	City	0	0	Mid-rise Multifamily	P	P	P	P	P	
RMU	City	23	23	Mid-rise Multifamily	P	P	P	P	P	
UR	City	187	187	Mid-rise Multifamily	P	P	P	P	P	
UV	City	271	271	Low-rise Multifamily	P	P	P	P	P	
UW	City	778	965	Mid-rise Multifamily				P		
UWH	City	604	604	Mid-rise Multifamily		P		P		
Rainier										
All Zones	City	—	—	N/A						Not included in analysis
NC	UGA	0	0	Low Density						
RRR1/5	UGA	108	108	Low Density	P	P			P	
Tenino										
C-1	City	2	6	Low-rise Multifamily		C		C		
C-2	City	2	5	Low-rise Multifamily		C		C		
C-3	City	26	39	Low-rise Multifamily	C	C		C		
I	City	0	0	Nonresidential						
MF	City	8	8	Low-rise Multifamily	P	P	P	P	C	
P/SP	City	0	0	Nonresidential						
PO	City	1	1	Moderate Density	P				C	May accommodate additional capacity

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
RRR1/5	UGA	27	27	Low Density	P	P			P	
SF	City	346	346	Moderate Density	P				C	
SF-D	City	28	28	Moderate Density	P		P		C	
SF-ES	City	69	69	Low Density	P				C	
WT	City	115	115	Low Density	P				C	May accommodate less capacity
Tumwater										
ARI	City	0	0	Nonresidential						
BD	City	666	678	Mid-rise Multifamily	P	P	P	P	P	May accommodate less capacity
CBC	City	742	1,189	Mid-rise Multifamily				P		May accommodate less capacity due to lot sizes.
CS	City	0	0	Nonresidential						
GB	City	0	0	Nonresidential	P					
GB	UGA	0	0	Nonresidential	P					
GC	City	1,344	1,353	Mid-rise Multifamily				P		
GC	UGA	0	0	Mid-rise Multifamily				P		
HC	City	0	0	Mid-rise Multifamily				P		
HI	City	0	0	Nonresidential						
HI	UGA	0	0	Nonresidential						
LI	City	0	0	Nonresidential						
LI	UGA	-1	-1	Nonresidential						Permitted demolition
MFH	City	404	404	Mid-rise Multifamily		P	P	P	P	Capacity may be less due to HCP mitigation
MFM	City	975	975	Low-rise Multifamily		P	P	P	P	Capacity may be less due to HCP mitigation

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
MFM	UGA	615	615	Low-rise Multifamily	P	P	P	P	P	
MHP	City	46	46	Moderate Density	P					May accommodate less capacity. Density is closer to SFL or SFM but affordability more in line with "Moderate Density"
MU	City	368	368	Low-rise Multifamily		P	P	P	P	Capacity may be less due to HCP mitigation
MU	UGA	1	1	Low-rise Multifamily		P	P	P	P	
NC	City	0	12	Low Density		P	P	P		May accommodate less capacity
NC	UGA	0	4	Low Density						
OS	City	3	3	Nonresidential	P					
OS	UGA	0	0	Nonresidential	P					
R/SR	City	465	465	Low Density	P		P		P	
R/SR	UGA	53	53	Low Density	P				P	
SFL	City	2,807	3,054	Moderate Density	P		P		P	Capacity may be less due to HCP mitigation. Sustainable Thurston capacity may be lower
SFL	UGA	1,923	2,207	Low Density	P				P	Sustainable Thurston capacity may be lower
SFM	City	1,989	2,556	Moderate Density	P	P	P		P	Capacity may be less due to HCP mitigation
SFM	UGA	440	583	Moderate Density	P	P	P		P	
TC-C	City	0	0	Nonresidential						
TC-MU	City	7	40	Mid-rise Multifamily				P		
TC-PO	City	0	0	Nonresidential						
TC-R	City	33	33	Mid-rise Multifamily				P		

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Zone		Capacity		Density Category	Select Housing Types					Project Partner Staff Notes
		Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU	
Yelm										
AC	UGA	2	2	Low Density			P			
C-1	City	91	190	Mid-rise Multifamily				C	P	May accommodate more capacity
C-2	City	58	93	Mid-rise Multifamily				C	P	May accommodate more capacity
C-3	City	15	15	Mid-rise Multifamily				C	P	May accommodate less capacity
CBD	City	99	108	Mid-rise Multifamily	P		C		P	
I	City	0	0	Nonresidential					P	
LI	UGA	0	0	Nonresidential						
MPC	City	3,776	3,776	Low-rise Multifamily	*	*	*	*	*	Multiple housing types/densities likely in planned community. Capacity split into two density categories for LCA.
		2,000	2,000	Moderate Density	*	*	*	*	*	
OS/ID	City	0	0	Nonresidential						
R-16	City	390	423	Mid-rise Multifamily	P	P	P	P	P	May accommodate less capacity
R-4	City	928	928	Moderate Density	P	P	P	P	P	
R-6	City	906	906	Moderate Density	P	P	P	P	P	
RR1/5	UGA	743	743	Low Density	P	P			P	
Grand Mound										
AC	UGA	120	120	Moderate Density	P	P	P	P	P	Includes 2023 rezones
LI	UGA	0	0	Nonresidential						
PID	UGA	0	0	Nonresidential						
R3-6/1	UGA	239	239	Moderate Density	P	P	P	P	P	
R4-16/1	UGA	47	47	Moderate Density	P	P	P	P	P	

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Zone	Capacity		Density Category	Select Housing Types					Project Partner Staff Notes	
	Adopted Forecast	Sustainable Thurston		Single-Family	Townhome	2 to 4-Plex	Apartment	ADU		
County										
HC		0	0	Nonresidential						
LTA		359	359	Low Density	P				P	
LTF		1	1	Nonresidential	P					
MEI		0	0	Nonresidential						
MGSA		724	724	Low Density	P				P	
MR		0	0	Nonresidential						
NA		0	0	Nonresidential						
NC		0	0	Nonresidential						
PP		0	0	Nonresidential						
R 1/10		210	210	Low Density	P				P	
R 1/20		374	374	Low Density	P				P	
RCC		1	1	Nonresidential						
RL1/1		837	837	Low Density	P	P			P	
RL1/2		347	347	Low Density	P	P			P	
RL2/1		588	588	Low Density	P	P			P	
RR1/5		257	257	Low Density	P	P			P	
RRI		0	0	Nonresidential						
RRR1/5		13,819	13,819	Low Density	P	P			P	Does not include three rezone requests submitted in 2024
UR 1/5		235	235	Low Density	P				P	

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APPENDIX III: HOUSING NEED COMPARED TO CAPACITY

Lacey

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	335	650	985	2,446	5,196	7,643	5,567	2,045	7,612	3,121	-3,151	-31
0-30% Other		849	1,599	2,447									
30-50%		1,053	1,552	2,605									
50-80%		210	1,395	1,606									
80-100%	Moderate Density	0	0	0	466	750	1,217	1,916	8,818	10,735	1,450	8,068	9,518
100-120%		466	750	1,217									
>120%	Low Density	2,241	3,024	5,265	2,241	3,024	5,265	38	11	50	-2,203	-3,012	-5,215
Total	—	5,154	8,970	14,124	5,154	8,970	14,124	7,522	10,874	18,397	2,368	1,904	4,273

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	394	655	1,049	3,013	5,756	8,769	7,191	2,290	9,481	4,178	-3,466	712
0-30% Other		1,000	1,620	2,621									
30-50%		1,115	1,462	2,577									
50-80%		503	2,019	2,522									
80-100%	Moderate Density	0	0	0	501	709	1,210	2,260	9,454	11,715	1,759	8,745	10,505
100-120%		501	709	1,210									
>120%	Low Density	2,361	2,858	5,219	2,361	2,858	5,219	38	11	50	-2,322	-2,847	-5,169
Total	—	5,874	9,324	15,198	5,874	9,324	15,198	9,490	11,756	21,245	3,615	2,432	6,047

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Olympia

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	818	128	945	3,013	5,756	8,769	10,261	869	11,130	4,391	119	4,510
0-30% Other		2,011	226	2,236									
30-50%		2,777	397	3,174									
50-80%		264	0	264									
80-100%	Moderate Density	973	103	1,076	501	709	1,210	4,943	1,614	6,557	2,883	1,374	4,257
100-120%		1,087	136	1,223									
>120%	Low Density	4,714	661	5,375	2,361	2,858	5,219	929	326	1,255	-3,786	-335	-4,121
Total	—	12,644	1,651	14,295	5,874	9,324	15,198	16,133	2,808	18,941	3,489	1,158	4,647

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	1,019	136	1,155	7,865	771	8,635	16,214	870	17,084	8,349	99	8,448
0-30% Other		2,520	245	2,765									
30-50%		2,938	390	3,328									
50-80%		1,388	0	1,388									
80-100%	Moderate Density	1,856	172	2,028	3,065	308	3,373	6,013	1,899	7,912	2,948	1,591	4,539
100-120%		1,209	136	1,346									
>120%	Low Density	5,064	655	5,719	5,064	655	5,719	959	326	1,285	-4,105	-329	-4,434
Total	—	15,994	1,733	17,727	15,994	1,733	17,727	23,186	3,094	26,280	7,192	1,361	8,553

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Rainier

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	41	2	42	220	8	227	N/A	0	N/A	N/A	-8	N/A
0-30% Other		100	4	104									
30-50%		0	0	0									
50-80%		79	2	81									
80-100%	Moderate Density	22	0	23	129	6	135	N/A	0	N/A	N/A	-6	N/A
100-120%		107	5	112									
>120%	Low Density	222	10	232	222	10	232	N/A	108	N/A	N/A	98	N/A
Total	—	571	23	594	571	23	594	N/A	108	N/A	N/A	85	N/A

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	40	2	42	250	12	262	N/A	0	N/A	N/A	-12	N/A
0-30% Other		99	5	104									
30-50%		0	0	0									
50-80%		111	5	116									
80-100%	Moderate Density	34	1	36	132	7	138	N/A	0	N/A	N/A	-7	N/A
100-120%		97	5	103									
>120%	Low Density	204	11	215	204	11	215	N/A	108	N/A	N/A	97	N/A
Total	—	586	29	615	586	29	615	N/A	108	N/A	N/A	79	N/A

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Tenino

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	32	1	33	95	3	98	58	0	58	-37	-3	-41
0-30% Other		62	2	64									
30-50%		0	1	1									
50-80%		0	1	1									
80-100%	Moderate Density	115	1	116	216	3	219	376	0	376	159	-3	157
100-120%		102	1	103									
>120%	Low Density	208	3	211	208	3	211	184	27	211	-23	24	0
Total	—	519	9	528	519	9	528	617	27	644	99	18	116

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	32	1	32	94	3	97	85	0	85	-9	-3	-12
0-30% Other		62	1	64									
30-50%		0	1	1									
50-80%		0	1	1									
80-100%	Moderate Density	168	2	170	259	3	262	376	0	376	117	-3	114
100-120%		91	1	92									
>120%	Low Density	189	3	192	189	3	192	184	27	211	-4	24	20
Total	—	541	9	550	541	9	550	645	27	672	104	18	122

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Tumwater

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	513	181	694	3,298	1,422	4,720	4,611	615	5,227	1,313	-807	506
0-30% Other		1,211	439	1,650									
30-50%		1,033	364	1,396									
50-80%		541	439	980									
80-100%	Moderate Density	400	190	591	1,036	390	1,426	4,842	440	5,283	3,806	51	3,857
100-120%		636	199	835									
>120%	Low Density	2,342	704	3,046	2,342	704	3,046	465	1,976	2,441	-1,877	1,272	-605
Total	—	6,676	2,516	9,192	6,676	2,516	9,192	9,918	3,031	12,950	3,242	516	3,758

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	541	186	728	3,801	1,652	5,454	5,147	615	5,762	1,345	-1,037	308
0-30% Other		1,290	456	1,746									
30-50%		1,023	353	1,376									
50-80%		947	658	1,605									
80-100%	Moderate Density	679	305	984	1,301	498	1,798	5,656	583	6,239	4,356	85	4,441
100-120%		622	192	814									
>120%	Low Density	2,290	681	2,971	2,290	681	2,971	477	2,264	2,742	-1,813	1,583	-230
Total	—	7,392	2,831	10,223	7,392	2,831	10,223	11,280	3,463	14,743	3,888	632	4,520

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Yelm

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	549	8	557	4,147	52	4,200	2,663	0	2,663	-1,484	-52	-1,536
0-30% Other		1,341	19	1,359									
30-50%		1,196	25	1,221									
50-80%		1,062	0	1,062									
80-100%	Moderate Density	274	0	274	1,091	34	1,125	5,610	0	5,610	6,519	-34	6,486
100-120%		817	34	851									
>120%	Low Density	2,266	58	2,324	2,266	58	2,324	0	745	745	-2,266	687	-1,579
Total	—	7,504	144	7,648	7,504	144	7,648	8,273	745	9,018	769	601	1,370

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		City	UGA	Total	City	UGA	Total	City	UGA	Total	City	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	532	13	545	4,398	77	4,475	2,843	0	2,843	-1,555	-77	-1,632
0-30% Other		1,308	30	1,338									
30-50%		1,088	34	1,122									
50-80%		1,470	0	1,470									
80-100%	Moderate Density	417	0	417	1,158	41	1,199	5,610	0	5,610	4,452	-41	4,411
100-120%		742	41	783									
>120%	Low Density	2,074	76	2,150	2,074	76	2,150	0	745	745	-2,074	669	-1,405
Total	—	7,630	194	7,824	7,630	194	7,824	8,453	745	9,198	823	551	1,374

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Grand Mound

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need	Aggregate Housing Need	Total Capacity	Surplus or Deficit
		UGA	UGA	UGA	UGA
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	21	204	0	-204
0-30% Other		52			
30-50%		34			
50-80%		97			
80-100%	Moderate Density	40	56	406	350
100-120%		16			
>120%	Low Density	50	50	0	-50
Total	—	310	310	406	96

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need	Aggregate Housing Need	Total Capacity	Surplus or Deficit
		UGA	UGA	UGA	UGA
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	18	208	0	-208
0-30% Other		45			
30-50%		27			
50-80%		117			
80-100%	Moderate Density	53	66	406	341
100-120%		13			
>120%	Low Density	41	41	0	-41
Total	—	315	315	406	91

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Unincorporated Thurston County

Baseline Forecast

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		Rural	UGA	Total	Rural	UGA	Total	Rural	UGA	Total	Rural	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	311	990	1,300	5,317	7,636	12,953	280	3,530	3,810	-5,037	-4,106	-9,143
0-30% Other		832	2,339	3,171									
30-50%		0	2,373	2,373									
50-80%		4,174	1,934	6,109									
80-100%	Moderate Density	2,214	336	2,550	2,214	1,478	3,692	0	11,278	11,278	-2,214	9,800	7,586
100-120%		0	1,142	1,142									
>120%	Low Density	0	4,510	4,510	0	4,510	4,510	17,748	3,193	20,942	17,748	-1,316	16,432
Total	—	7,531	13,623	21,155	7,531	13,623	21,155	18,028	18,001	36,029	10,497	4,377	14,874

Sustainable Thurston

Income Level	Zone Categories Serving These Needs	Housing Need			Aggregate Housing Need			Total Capacity			Surplus or Deficit		
		Rural	UGA	Total	Rural	UGA	Total	Rural	UGA	Total	Rural	UGA	Total
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	19	1,011	1,030	1,125	8,479	9,604	170	3,775	3,945	-955	-4,704	-5,659
0-30% Other		63	2,403	2,466									
30-50%		0	2,266	2,266									
50-80%		1,043	2,800	3,842									
80-100%	Moderate Density	631	533	1,164	631	1,631	2,262	0	12,342	12,342	-631	10,711	10,081
100-120%		0	1,098	1,098									
>120%	Low Density	0	4,325	4,325	0	4,325	4,325	17,748	3,482	21,230	17,748	-844	16,905
Total	—	1,755	14,435	16,191	1,755	14,435	16,191	17,918	19,599	37,517	16,163	5,163	21,326