

MEMORANDUM

Date: June 10, 2025

To: City Council

From: Erika Smith-Erickson, Housing and Land Use Planner, and Brad Medrud,
Deputy Director of Community Development



2025 Comprehensive Plan Update – Housing Element

On a ten-year cycle, Tumwater is required to conduct a Growth Management Act periodic update of its Comprehensive Plan and related development regulations. For the current cycle, Tumwater is required to complete work on the periodic update by December 31, 2025.

The updated Comprehensive Plan addresses diversity, equity, and inclusion throughout the Plan and incorporates the State required changes addressing housing, climate change, and other topics, as well as Tumwater amendments identified through the public engagement process.

The intent of the City Council work session on Tuesday, June 10, 2025, is to continue discussion of the complete draft Housing Element, which consists of two parts:

- **Part 1** contains the Housing Element's goals, policies, and draft implementation actions.
- **Part 2** contains the Housing Element's technical information used to update the Element.

The General Government Committee reviewed an initial draft of the Housing Element's goals, policies, and draft implementation actions at its March 18, 2025, meeting.

Questions

In preparation for the Tuesday, June 10, 2025, work session, the City Council is asked to consider the following questions:

- Are the proposed goals, policies, and draft implementation actions and the information in Part 1 of the Housing Element presented effectively? What should change to make them more usable?
- Is the information in Part 2 of the Housing Element presented in an understandable format? What should change to make it clearer?
- What in the Housing Element would affect you or the things you care about most and what do you expect that affect might be?
- Are there any unintended consequences or burdens associated with the goals, policies, or draft implementation actions for the Tumwater community?

- Do any of the goals, policies, or draft implementation actions not address the concerns of the Tumwater community? If so, how could they be amended?
- Are there any general or specific comments to share about any goals, policies, or draft implementation actions?
- Are there any changes in the draft implementation action timelines?

After a short presentation by staff, there will be a discussion guided by the questions.

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1. The Need for Housing in Tumwater

A. Who Are We Planning For?

The State Growth Management Act requires Tumwater to “**plan for and accommodate housing affordable to all economic segments of the population.**”

Housing is one of the most important parts of the lives of Tumwater residents. One of Tumwater’s top priorities continues to be to work to provide opportunities for residents to have a range of housing options within their budget so that their home is suitable and affordable.

As of April 1, 2025, the area median income for a two-person household in Thurston County was \$93,375 and four-person household was \$116,688.

Table 1 shows typical household income categories for groups of area median income. Income thresholds for grouping households into these categories vary by size, and the typical jobs that may fall in each of the household income categories.

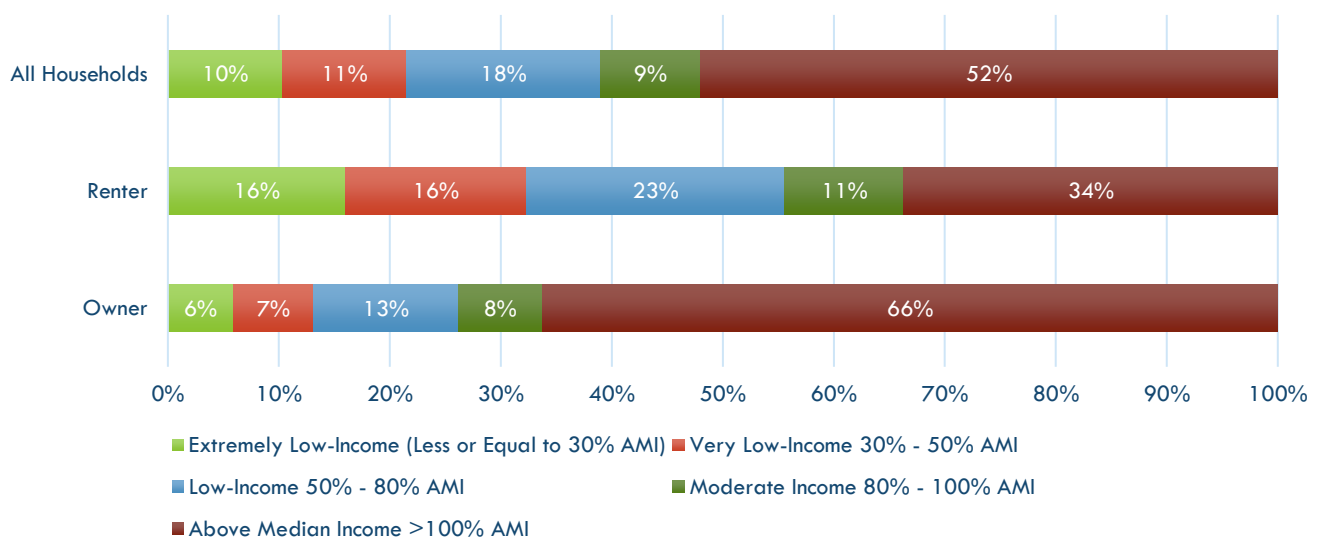
Table 1. Household Income Categories Associated with Area Median Income for a Family of Four in Tumwater, 2024.

Household Income Category	Percent of Area Median Income	Equivalent Household Income for a Family of Four	Typical Jobs that May Fall in this Income Category
Extremely Low-Income	0-30% AMI	Less than \$35,000	Farm Workers, Fast Food Workers, Fixed Incomes
Very Low-Income	30-50% AMI	\$35,000 to \$58,350	Childcare, Administrative Assistants, Landscaping
Low-Income	50-80% AMI	\$58,350 to \$93,350	Veterinary Technicians, Construction Workers, Truck Drivers, Social Workers
Moderate-Income	80-100% AMI	\$93,350 to \$116,688	Nurses, Plumbers
Moderate-Income	100-120% AMI	\$116,688 to \$140,025	Analysts, Teachers
Upper Income	>120% AMI	More than \$140,025	Lawyers, Managers

Source: Income Limits, U.S. Department of Housing and Urban Development, 2025.

It takes more income to support a large family than a person living alone. For example, in 2025, a one-person household with a \$63,350 income falls in the 80 percent Thurston County area median income. A five-person household with an income of \$63,050 is in the 50 percent area median income. Figure 1 shows how the various area median income groups in Tumwater break down by percentage of households. Twenty-one percent of households in Tumwater fall into the Extremely Low Income or Very Low-Income categories and 52 percent are above median income.

Figure 1. Proportion of Households by Area Median Income & Tenure in Tumwater, 2021.



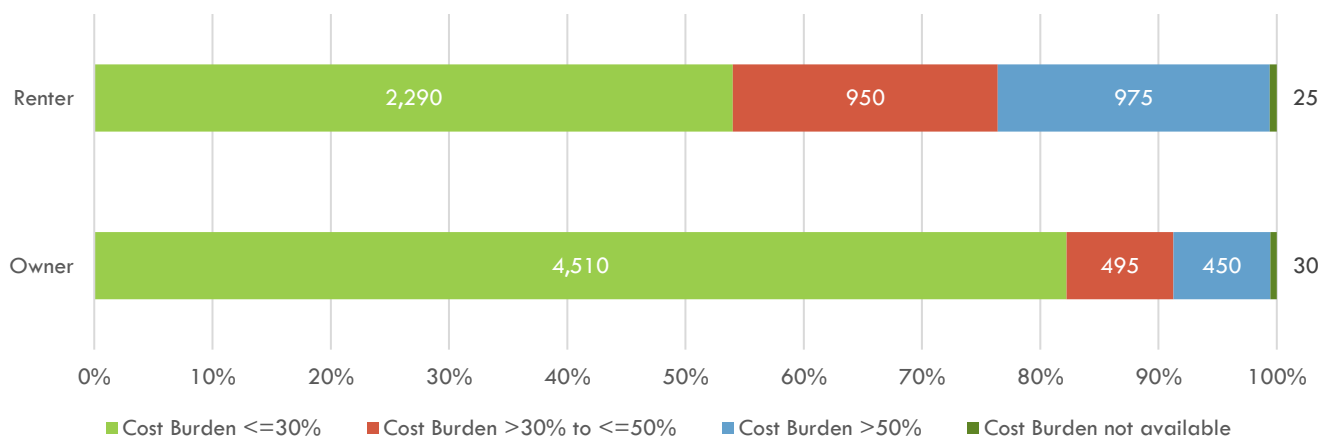
Source: U.S. Department of Housing and Urban Development Affordability Strategy (CHAS), 2021.

Note: AMI is area median income.

Housing cost burden is an important indicator of housing affordability. A household is cost-burdened if it spends more than 30 percent of its income on housing costs. Figure 2 shows that at least 45 percent

of renter households were cost burdened. This is much higher than the 17 percent of owner households. Current trends indicate that this will continue to increase in the near future.

Figure 2. Housing Cost Burden By Area Median Income in Tumwater, 2021.

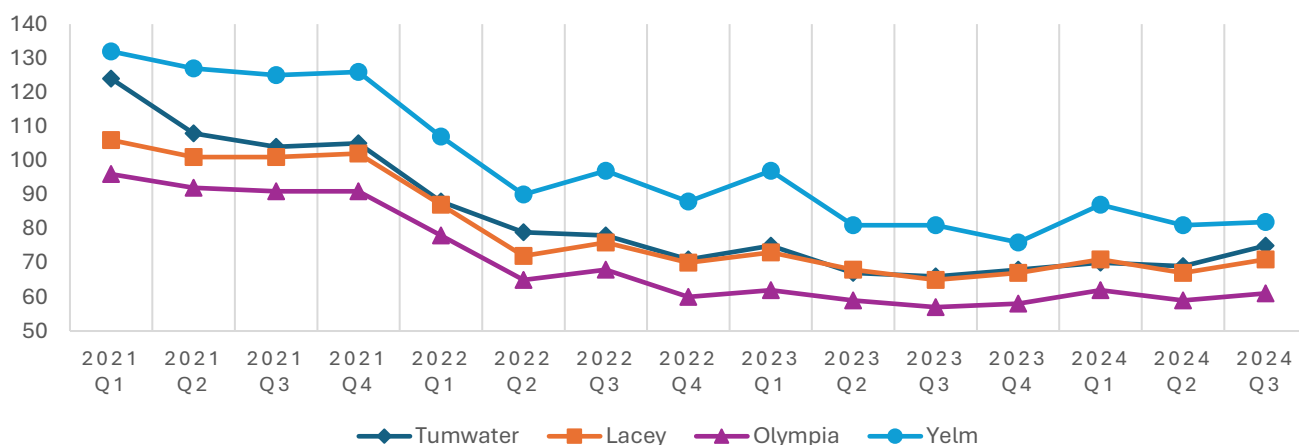


Source: U.S. Department of Housing and Urban Development Affordability Strategy (CHAS), 2021.

Severely cost-burdened households spend more than half of their income on housing costs and are most likely to be housing insecure and are more at risk of displacement or homelessness if housing costs rise. In Tumwater, almost 15 percent of all households were severely cost-burdened as of 2021. Nearly a quarter of all renter households were severely cost burdened.

Housing affordability indexes for both housing buyers and renters are another way to understand the scope of the affordability issue. The Runstad Center for Real Estate Research at the University of Washington maintains the Housing Affordability Index. Figure 3 shows the index measuring the overall ability of a middle-income family to carry the mortgage payments on a median price home. When the index is 100 there is a balance between the family's ability to pay and the cost. Higher indexes indicate housing is more affordable. Affordability for all home buyers has been declining for cities in Thurston County at approximately the same rate since 2010.

Figure 3. Median Home Buyers Housing Affordability Index, Thurston County Cities, 2021-24.

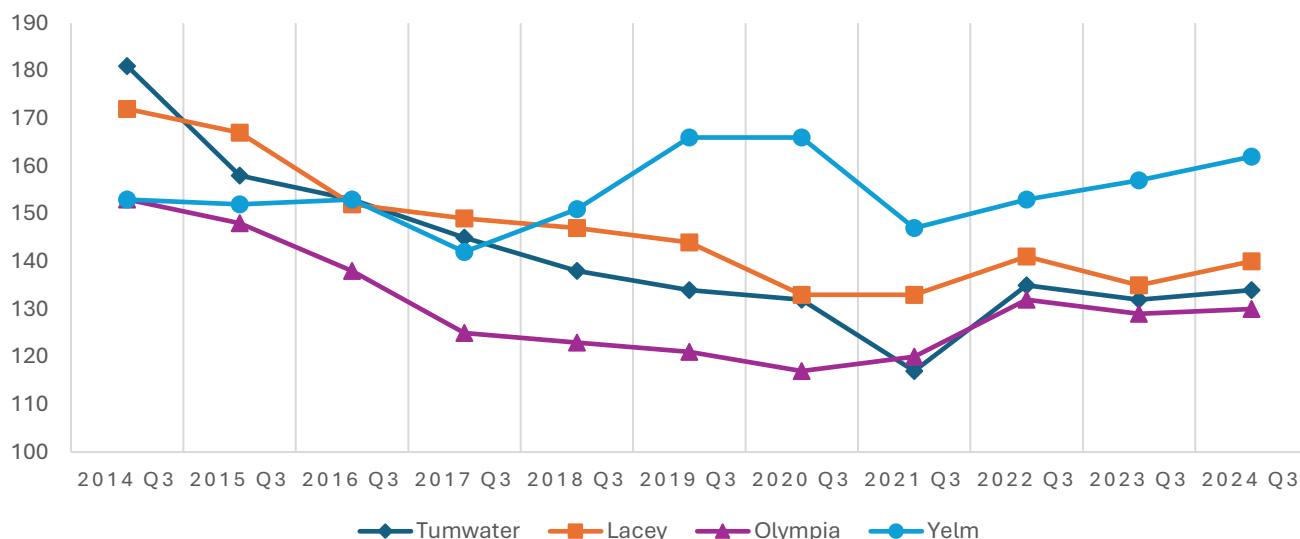


Source: Washington Center for Real Estate Research, 2024, Median Home Buyers Housing Affordability Index Data, 2024.

Note: Data was not available for all quarters.

Figure 4 shows the overall ability of a median income renter to pay rent on a median price rental housing unit. When the index is 100 there is a balance between the family's ability to pay and the cost. Higher indexes indicate housing is more affordable. Affordability is lower for those households with a lower area median income.

Figure 4. Median Renters Housing Affordability Index, Thurston County Cities, 2014-24.



Source: Washington Center for Real Estate Research, Median Renters Housing Affordability Index, 2024. Third Quarter Data, 2014-24.

B. Supply and Need

HB 1220 (Chapter 254, Laws of 2021) allowed Thurston County jurisdictions to determine the housing need they planned for as part of the 2025 Comprehensive Update process. The jurisdictions agreed to the following guidelines for the housing allocation:

- The process should be multijurisdictional and collaborative.
- The need for each jurisdiction should sum up to the countywide need.
- The Thurston Regional Planning Council would accept the jurisdiction's recommended housing allocation.

Based on that process, the Thurston Regional Planning Council forecasted that Tumwater and its urban growth area will need to add **9,192 net new housing units** between 2020 and 2045 in Tumwater and its urban growth area.

Table 2 shows the 2020 housing supply of Tumwater and its associated urban growth area, and the expected 2020-2045 housing need based on the State's allocation to the Thurston County and subsequent process through the Thurston Regional Planning Council to allocate housing needs across all the jurisdictions in the County.

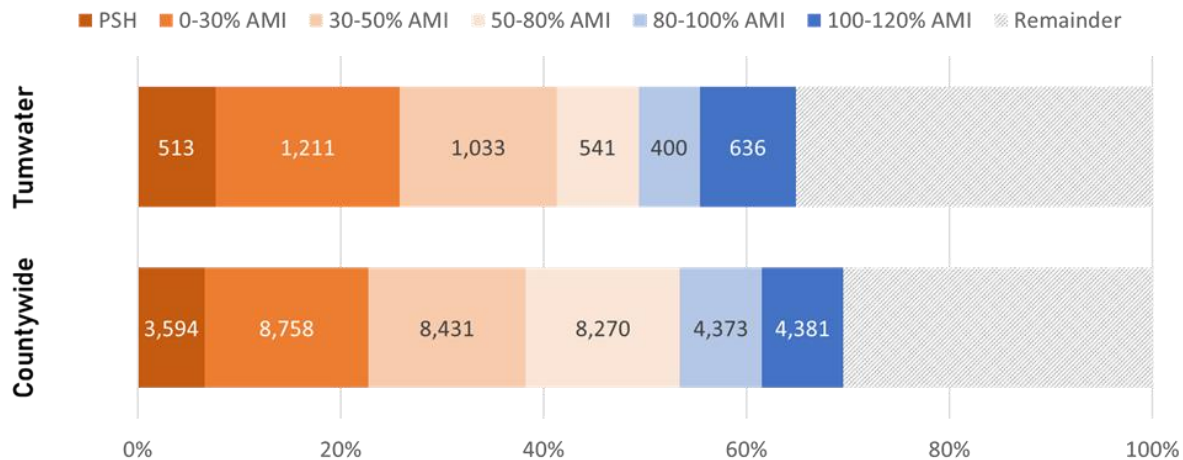
Table 2. Allocation of Projected Tumwater Housing Needs, 2020-45.

	Housing Units Available in 2020	Projected Housing Units Needed in 2045	2020-45 Projected Housing Need
City	11,064	17,740	6,676
Urban Growth Area	1,210	3,726	2,516
Total	12,274	21,466	9,192

Source: Thurston Regional Planning Council, Planning for and Accommodating Housing Needs in Thurston County, 2025.

Figure 5 shows the 2045 housing allocation by area median income for both Tumwater and countywide. The Tumwater housing allocation was used to guide the update of the Housing and Land Use Elements.

Figure 5. 2045 Housing Allocation by Area Median Income (AMI).



Note: PSH is permanently supported housing and AMI is area median income.

C. Anticipated Future Housing Needs

Figure 6 shows the relationship in Tumwater and its urban growth area between area median income, the housing allocation for each of the income groups, the housing types most affordable for the income groups, and housing tenure.

This information informs the density ranges and the permitted types of residential uses in land use designations and zone districts in the Land Use Element and Tumwater's development regulations.

Figure 6. 2045 Housing Unit Allocation by AMI.

0-30% AMI	31-50% AMI	51-80% AMI	81-120% AMI	Above 120% AMI
1,724 units 26% of total	1,033 units 15% of total	541 units 8% of total	1,036 units 16% of total	2,342 units 35% of total
Rental: Public support needed in all markets	Rental: Public support needed in most markets	Rental: Incentives needed in many markets Home Ownership: Subsidy or incentives needed in many markets	Rental or Home Ownership: Incentives or zoning flexibility needed in some markets	Market Rent and Home Ownership

D. Land Capacity Analysis

The land capacity analysis compared the allocated housing need allocated to Tumwater and its urban growth area to its capacity for new housing.

A summary of the difference between the allocated housing need and the capacity for potential number of new dwelling units that could be built on a parcel based on zoning, development regulations, development trends, and market factors is shown in Table 3.

A positive number indicates that there is a surplus in Tumwater's capacity for new housing units, which is sufficient capacity to accommodate the allocated housing need for a given income level while a negative number indicates that there is a deficit, which is insufficient capacity.

Table 3. Summary of Housing Surplus or Deficit in Tumwater.

Aggregate Housing		Capacity		Need Surplus / Deficit	
0-80% AMI	80-120% AMI	0-80% AMI	80-120% AMI	0-80% AMI	80-120% AMI
5,694	1,937	5,729	3,692	35	1,755

Source: Thurston Regional Planning Council, Planning for and Accommodating Housing Needs in Thurston County, 2025.

Note: 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.

The State Department of Commerce's housing element guidance recommended that jurisdictions assign a density category to each of their zone districts based on the density and types of housing allowed. In the land capacity analysis, the Thurston County Regional Planning Council used the example zone categories and the typical housing types from Commerce's guidance that are shown in Table 4. These zone categories are used in Table 5.

Table 4. Categories for Classifying Zone Districts by Housing Types Allowed

Zone Category	Typical Housing Types Allowed
Low Density	Detached single-family homes
Moderate Density	Townhomes, duplexes, triplexes, or quadplexes
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

Source: Thurston Regional Planning Council, Planning for and Accommodating Housing Needs in Thurston County, Implementing the Housing Affordability Requirements of HB 1220, April 2025.

Notes: Adapted from the State Department of Commerce's guidance. Manufactured homes are not listed as a housing type because by law they should be allowed in all zones that permit residential uses. 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.

While the land capacity analysis found no deficits in the Tumwater and its urban growth areas in the ability for Tumwater's current land use designations to accommodate future housing demand, in looking at the detailed findings shown in Table 5 under the "Surplus or Deficit" columns the margin between aggregate housing need and the total capacity to accommodate the housing needs for those less than 80 percent area median income was very small.

Table 5. Details of Housing Surplus or Deficit in Tumwater.

Income Level	Zone Categories Serving These Needs	Housing Need	Aggregate Housing Need	Total Capacity	Surplus or Deficit
0-30% PSH	Low-rise Multifamily Mid-rise Multifamily ADUs	723	5,694	5,729	35
0-30% Other		1,736			
30-50%		1,309			
50-80%		1,926			
80-100%	Moderate Density	1,140	1,937	3,692	1,755
100-120%		798			
Emergency Housing (beds)		184	184	2,842	2,658

Source: Thurston Regional Planning Council, Planning for and Accommodating Housing Needs in Thurston County, 2025.

Note: A positive number indicates that there is a surplus, which is sufficient capacity to accommodate the allocated housing need for a given income level while a negative number indicates that there is a deficit, which is insufficient capacity. PSH is permanently supported housing and ADU is accessory dwelling unit.

Given this small margin, the uncertainty around the amount of developable land that will be available without the Endangered Species Act restrictions, and the limited zoning categories that could

accommodate housing for this category, under the Land Use Element residential densities have been increased and the range of potential uses allowed have been expanded.

HB 1220 (Chapter 254, Laws of 2021) does not require jurisdictions to plan for or accommodate housing for high-income households; so, data for that income range is excluded.

2. Growth Management Act – Housing Goal

The state Growth Management Act (Chapter 36.70A Revised Code of Washington (RCW)) requires that Tumwater demonstrate that each Element in its Comprehensive Plan addresses the relevant fifteen planning goals contained within the Act. The fifteen goals guide the development and adoption of Tumwater's Comprehensive Plan and development regulations.

The following is a summary of how the updated Housing Element meets the housing goal of the Growth Management Act, which was updated in 2022 by the state legislature.

4. **Housing.** *Plan for and accommodate housing affordable to all economic segments of the population of this state, promote a variety of residential densities and housing types, and encourage preservation of existing housing stock.*

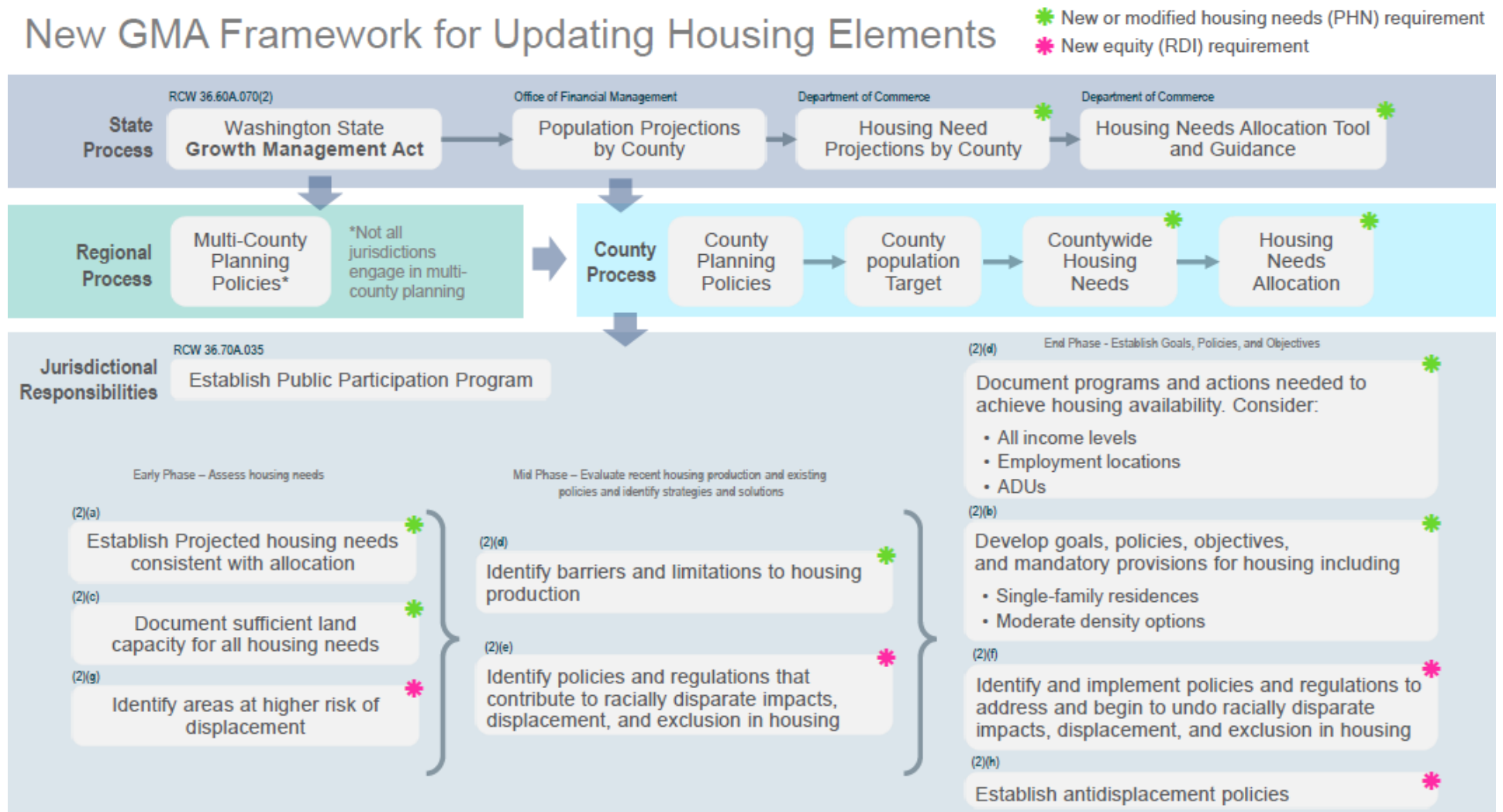
How affordable housing will be accommodated for residents of all incomes of Tumwater is specifically set forth in the Housing Element. The Housing Element works with the Land Use Element to allocate sufficient land to ensure an adequate supply of buildable land for housing serving all incomes.

All residential and commercial land use designations will provide a variety of housing types at varying intensities. Each Neighborhood subarea will also contain a sufficient variety of housing types to ensure housing needs can be met for all segments of Tumwater's population for the next 20 years. The 2021 Tumwater Housing Action Plan informed the update of the Land Use and Housing Elements. The goals, policies, and actions of the current Housing Element are found in Appendix B of this staff report.

Figure 7 shows the new Growth Management framework for updating Housing Elements.

In addition to the state requirements in WAC 365-196-410, Tumwater will address new state legislation regarding accessory dwelling units and conversion of existing commercial or office uses to residential uses. State required Development Code amendments required as part of the update will be addressed at the Planning Commission's July 8, 2025, work session.

Figure 7. New GMA Framework for Updating Housing Elements.



Source: State Department of Commerce.

3. Racially Disparate Impacts

As part of the Comprehensive Plan update, Tumwater has done the following:

1. Identified local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.
2. Identified and started to implement policies and regulations to address and begin to undo racially disparate impacts, displacement, and exclusion in housing caused by local policies, plans, and actions.

The State Department of Commerce released the final version of the *Racially Disparate Impacts Guidance* April 2023. The Guidance offers recommendations on how Tumwater's Housing Element might be updated to address new Growth Management Act requirements regarding racially disparate impacts, displacement, exclusion, and displacement risk.

Addressing the new Housing Element requirements warrants recognition that Tumwater's current housing is the product of many forces including policy, regulations, macroeconomic changes, lending practices, cost of development, and individual preference.

Land use and related policies contribute to Tumwater's housing conditions as they can impact who has access to "areas of opportunity" in our communities, including access to healthy environments, safety, recreational opportunities, education, jobs, nutrition, and other basic needs. Land use decisions also shape the cost to produce housing, by defining the types and sizes of homes that can be built. These constraints affect the affordability and accessibility of housing for different households, and more specifically, determining if and where households can live within a community, based on their income.

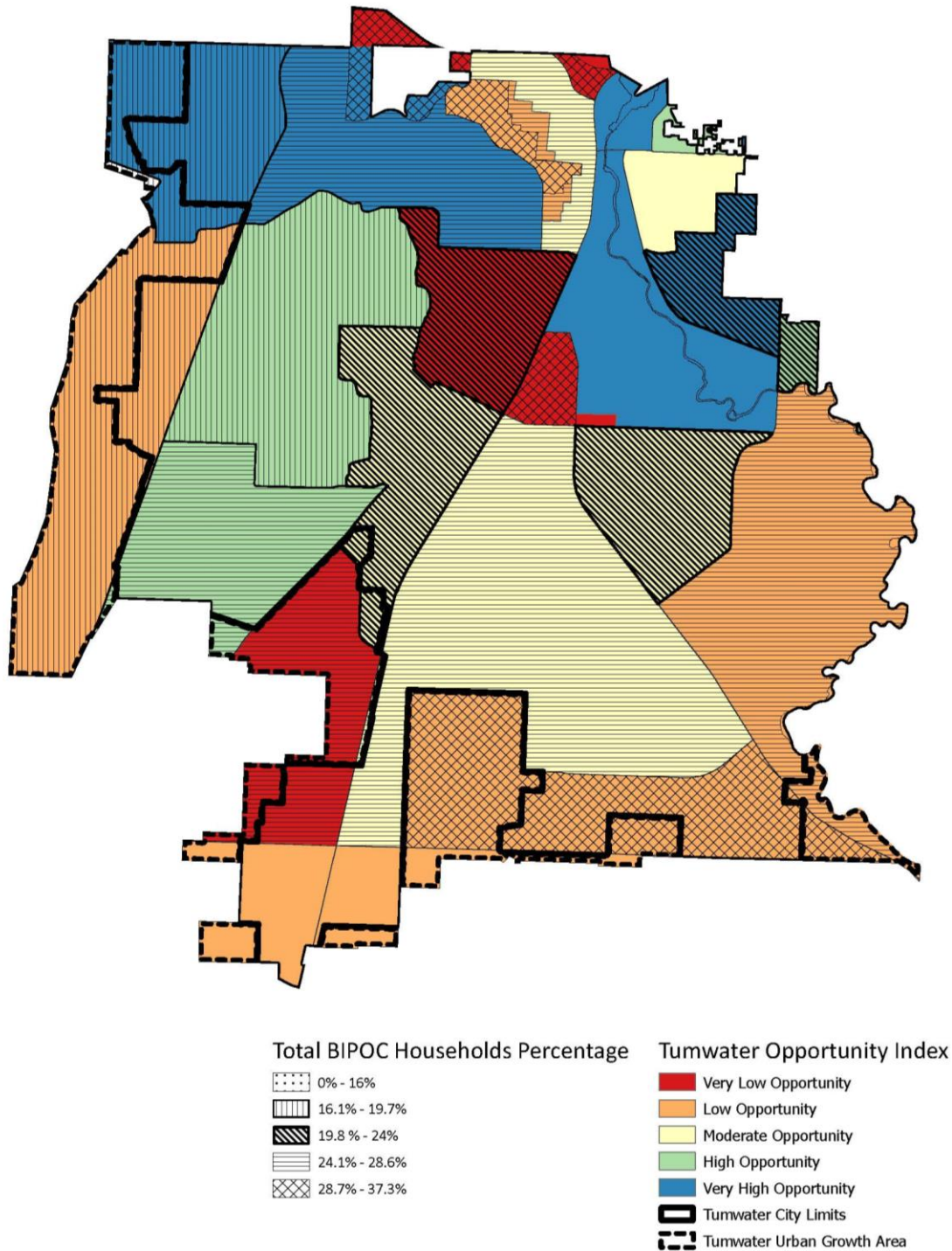
Increasing housing supply and opportunity, specifically at prices affordable to Black, Indigenous, and People of Color (BIPOC) households, is one approach to reduce equity-related effects that discriminatory practices have created. Examples of these effects include:

- Past practices like redlining and restrictive covenants have denied many minorities and low-income households the opportunity to share in wealth building offered by homeownership, resulting in lasting racial and economic inequities seen today.
- Homeownership is out of reach of many minorities and low-income households, making these households particularly vulnerable to housing insecurity and displacement caused by rising rents.
- Higher poverty rates in certain minority neighborhoods have contributed to disinvestment of capital, businesses, and services from these neighborhoods.
- Compared to wealthier neighborhoods, residents in lower income and minority neighborhoods are often less engaged and less represented in local government processes and decisions that directly affect their neighborhoods and quality of life.

As part of the update, Tumwater has reviewed its history of racially disparate impacts, exclusion, and displacement, and identified actions to begin to undo patterns of racial segregation and exclusion in land use policy making. This review is summarized in Chapter 4 of Part 2 of the Housing Element.

Figure 8 combines the percentage of Tumwater's Black, Indigenous, and People of Color Households with an income below poverty level with the Tumwater Opportunity Index.

Figure 8. Percentage of Black, Indigenous, and People of Color Households by Census Block Groups & the Tumwater Opportunity Index.



Most directly, land use decisions shape the cost to produce housing, and thus the affordability and accessibility of housing for different households. Tumwater's review and updates to housing

policies and regulations seek to provide equitable opportunity for safe and healthy housing for all members of the community.

4. Displacement Risk

As part of its Comprehensive Plan update, Tumwater has done the following:

1. Identified areas that may be at higher risk of displacement from market forces that occur with changes to zoning development regulations and capital investments; and
2. Established anti-displacement policies, with consideration given to the preservation of historical and cultural communities as well as investments in low, very low, extremely low, and moderate-income housing; equitable development initiatives; inclusionary zoning; community planning requirements; tenant protections; land disposition policies; and consideration of land that may be used for affordable housing.

Displacement happens when a household is forced to move from its community due to things beyond their control. The Washington State Department of Commerce defines three types of displacement:

- **Economic Displacement:** Residents must move because of rising rent, property tax, or other costs.
- **Cultural Displacement:** Residents must move because their cultural community has left.
- **Physical Displacement:** Residents must move because of eviction, foreclosure, natural disasters, or poor housing quality.

A. State Requirements

The Growth Management Act requires Tumwater to assess displacement risk and to establish policies and regulations to mitigate displacement risk. A household is considered displaced if its place of residence is disrupted due to forces outside of its control and it is unable to find suitable replacement housing in the neighborhood.

Displacement risk analysis should inform land use policymaking to encourage redevelopment and reinvestment in existing neighborhoods while ensuring that existing neighborhood residents share in benefits of that redevelopment and reinvestment.

While a data-driven displacement risk analysis such as this demonstrates where there is an increased risk of displacement, community engagement with neighborhood representatives to confirm that the data analysis adequately reflects local experience is important.

B. Displacement Risk Analysis

The Housing Displacement Risk Analysis for the Cities of Lacey, Olympia, Tumwater, and Yelm analyzed the housing displacement risks in Tumwater. The report is found in Appendix E of Part 2 of the Housing Element.

The report analyzed historical policies, current trends, and community dynamics to arrive at actions that Tumwater can take to enhance housing security and promote equitable living conditions. The development of the analysis was informed by engagement with community stakeholders.

The Housing Displacement Risk Analysis focused on three areas in Tumwater:

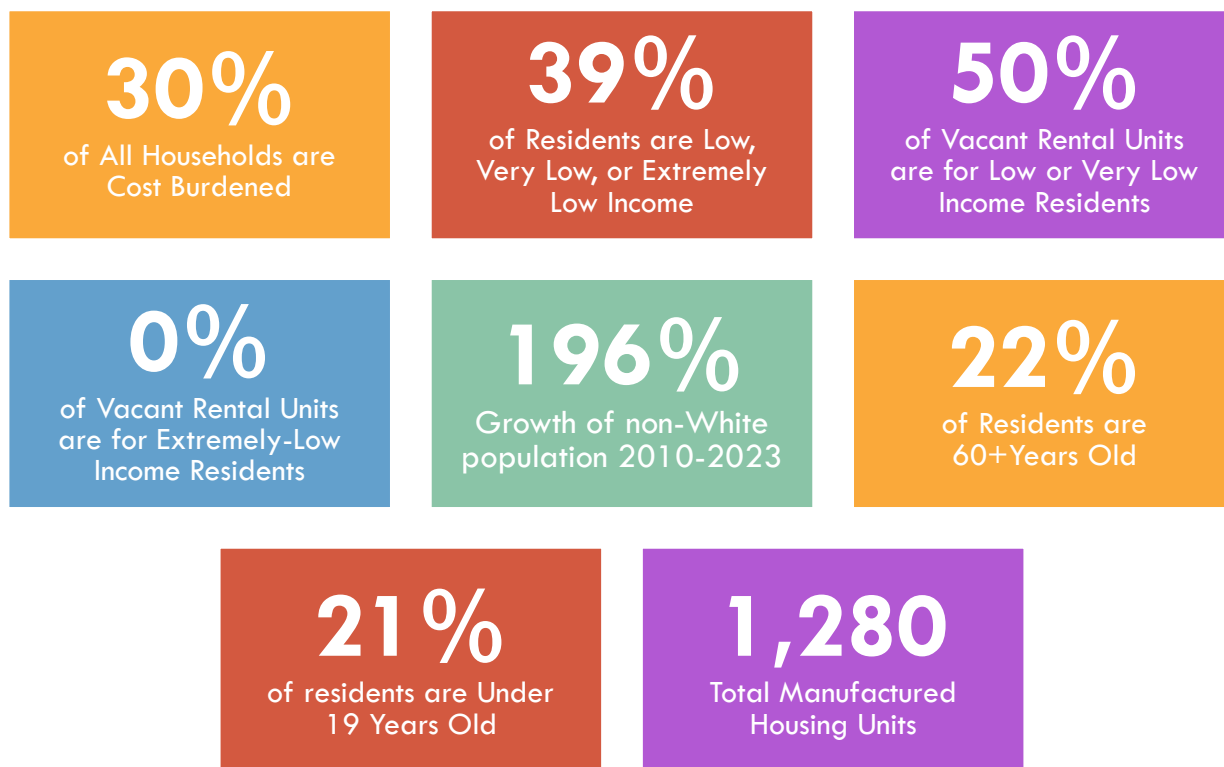
1. Describing the populations at risk of housing displacement.
2. Evaluating the housing displacement risk metrics.
3. Outlining risk reduction policy avenues.

Economic displacement was the most prominent displacement risk identified in the report in Tumwater.

C. Tumwater Populations at Risk

Tumwater has experienced a significant growth in population diversity accompanied by an increase in income variability where four in ten residents are low, very low, or extremely low-income. Figure 9 shows some of the demographic information related to that analysis.

Figure 9. Areas of Housing Displacement Risk in Tumwater.



Source: Housing Displacement Risk Analysis for the Cities of Lacey, Olympia, Tumwater, and Yelm, 2025.

D. Policies to Reduce Housing Displacement

The Housing Displacement Risk Analysis identified the following policy avenues to reduce housing displacement risk in the Housing Element:

- A Community Land Trust style program for mobile home communities.
- A Tumwater program to support private, local, small-scale ownership of mobile home communities. This builds on the Tumwater's mobile home housing stock and helps to preserve existing affordable stock.
- Increased staffing capacity to process accessory dwelling units quickly and reduce costs under Tumwater's control.

The following additional policy areas will be considered in the Housing Element to address displacement:

- Increasing homeownership opportunities for BIPOC communities to promote equity and help generational wealth.

5. Housing Action Plan

The City Council adopted the Tumwater Housing Action Plan in 2021. The Plan is intended to inform Tumwater's Comprehensive Plan policies and development regulations and to guide implementation strategies to help Tumwater meet its housing needs and strategic objectives.



Source: State Department of Commerce and BERK.

The Plan built on the affordable housing work Tumwater had started in 2018. It was the next step in the process of identifying actions to increase the amount of affordable housing in

Tumwater. The Plan consolidated all affordable housing action items into one document that Tumwater uses to support the development of more affordable housing in Tumwater.

Many of the actions from the Housing Action Plan have been used as implementation actions in the update of the Housing Element.

6. Housing Element Structure

A. Part 1 of the Housing Element

Part 1 – Goals, Policies, and Implementation Actions of the Housing Element is structured similarly to the Part 1 of the Lands for Public Purposes and Utilities Elements. The intent of separating the goals, policies, and draft implementation actions from the technical information for each element is to make it easier for policymakers and the community to use the document.

Chapter 1 Introduction

Chapter 1 provides a short background to the purpose of the Housing Element and an explanation of how to read the Element.

Chapter 2 Growth Management Act – Element Goals

Chapter 2 discusses the Housing Element's connection to the land use goals of the state Growth Management Act.

Chapter 3 County-Wide Planning Policies

Chapter 3 discusses the Housing Element's connection to the Thurston County-Wide Planning Policies.

Chapter 4 Element Goals and Policies

Chapter 4 presents each of the Housing Element's goals and policies in detail with an explanation the importance of each goal, what Tumwater department is responsible for implementation, and timeline for those actions. Comments are provided that discuss the source of each of the goals and policies.

The Housing Element's goals and policies are the policy basis for the draft implementation actions in the Element and those future actions that will be developed over the next 20 years which will be the foundation for Tumwater's annual work programs to address public services and facilities for development.

Appendix A Draft Implementation Actions

Appendix A contains the draft implementation actions, which are intended to be a source of annual work program items that serve to implement the goals and policies of the Housing Element.

The annual work programs will further refine the draft implementation actions prior to their being put into practice. It is expected that draft implementation actions will be further amended, added, or subtracted as needed over the course of the 20 year

Comprehensive Plan as new opportunities arise to meet the intent of the Element's goals and policies.

B. Part 2 of the Housing Element

Part 2 – Technical Information of the Housing Element consists of the following chapters.

Chapter 1 – Introduction

Provides background information on the Housing Element including a guide to how to read the Part 2 of the Element, a demographic summary, sources of data, and a definition of affordable housing.

Chapter 2 – Housing Needs Assessment

Provides a summary of Tumwater's existing housing conditions using data from the U.S. Census and other federal, state, and regional sources to provide information on housing supply and demand to establish Tumwater's overall housing needs.

This chapter also includes a summary of Tumwater's 2045 projected housing need in the form of unit targets by income level, as established by Thurston County and its cities in cooperation with the Thurston Regional Planning Council. In addition, it provides a summary of Tumwater's housing inventory and a discussion of housing affordability, production, and investment.

Chapter 3 – Land Capacity Analysis

Provides a summary of Tumwater's zoned capacity in relation to its 2045 housing unit targets.

Chapter 4 – Racially Disparate Impacts, Exclusion, and Displacement

Provides a detailed assessment of socioeconomic data to identify potential racial housing disparities and risk of displacement and exclusion, as well as an evaluation of current housing policies to identify policies and regulations that may begin to undo these impacts.

Chapter 5 – Housing Provisions

Provides a discussion of existing and future housing provisions that are intended to try to reduce the cost of producing more housing.

Appendices

The appendices include the following:

- **Appendix A:** Summary of Foundational Documents.
- **Appendix B:** Housing Needs Assessment: Lacey, Olympia, and Tumwater (September 2020).
- **Appendix C:** Planning for and Accommodating Housing Needs in Thurston County: Implementing the Housing Affordability Requirements of HC 1220 (April 2025).
- **Appendix D:** City of Tumwater Housing Action Plan (September 2021).

- **Appendix E:** Housing Displacement Risk Analysis for the Cities of Lacey, Olympia, Tumwater, and Yelm (May 2025).
- **Appendix F:** Housing Displacement Risk Analysis for the Cities of Lacey, Olympia, Tumwater, and Yelm: Technical Appendix – Policy Evaluation Matrix (May 2025).
- **Appendix G:** State Department of Commerce Adequate Provisions Checklists.
- **Appendix H:** Additional Housing Data.

C. Link to Current Housing Element

<https://www.ci.tumwater.wa.us/departments/community-development-department/tumwater-comprehensive-plan>

7. Housing Goals, Policies, and Implementation Actions Review

A. Introduction

Housing Element review to date has included:

- Initial Planning Commission review of the current adopted version the Housing Element – August 2023.
- A presentation of the new state Housing Element update requirements to the Planning Commission by Laura Hodgson, a senior housing planner with Growth Management Services at the State Department of Commerce in September 2023.
- A joint City Council and Planning Commission middle housing tour of Tumwater on April 9, 2024.
- Further discussion of Housing Element with the Planning Commission in April 2024.
- Staff discussions with housing stakeholders in April and May 2024.
- Community housing open houses in person in June 2024 and online into the fall of 2024.
- Initial discussion of Housing Element goals, policies, and implementation actions with the Planning Commission in August 2024.
- Further staff discussions with housing stakeholders in October 2024.
- A discussion of the housing allocation and land capacity analysis with the Planning Commission and General Government Committee in September and October 2024.
- A joint work session with the City Council and Planning Commission in December 2024.
- A General Government Committee briefing on March 18, 2025, to discuss an initial draft of Part 1 – Goals, Policies, and Implementation Actions of the Housing Element.
- A Planning Commission work session on March 25, 2025, to discuss an initial draft of Part 1 – Goals, Policies, and Implementation Actions of the Housing Element.

- A Planning Commission work session on May 27, 2025, to start discussing the complete draft of Part 1 – Goals, Policies, and Implementation Actions and Part 2 – Technical Information of the Housing Element.

B. Goals, Policies, and Implementation Actions

Goals and policies describe how Tumwater proposes to address identified needs. Goals are statements of desired outcomes or intended achievements. Policies are specific statements that guide actions and provide a framework for future decision-making. Actions are specific implementations of goals and policies.

Example from the draft Housing Element:

GOAL H-1: Increase the supply and variety of housing for every income and age group.

Policy

H-1.1 Strive for equity and opportunities for housing regardless of age, race, color, national origin, ancestry, sex, sexual orientation, familial status, marital status, ethnic background, source of income use of federal housing assistance, disability, veteran status, protected classes, or other arbitrary factors.

Draft Implementation Action

H-1.1.1 Consider Tumwater programs to offset the displacement of community members by new housing development while not resulting in unnecessary barriers to housing production.


How key terms are used in goals, policies, and actions:

- “Shall” means implementation of the policy is mandatory and imparts a higher degree of substantive direction than “should”.
- “Should” means implementation of the policy is expected but its completion is not mandatory.
- “May” means the actions described in the policy are either advisable or are allowed.
- “Ensure” means actions described in the policy are guaranteed.
- “Must” means implementation of the policy is an obligation.
- “Require” means implementation of the policy is compulsory.
- “Support” means to advocate for implementation of the policy.
- “Promote” means to help bring about implementation of the policy.
- “Encourage” means to foster or help implementation of the policy.
- “Consider” means to take into account.
- “Coordinate” means to bring into a common action, movement, or condition.
- “Implement” means to carry out or accomplish.

- “Integrate” means to form, coordinate, or blend into a functioning or unified whole.
- “Make” means to enact or establish.
- “Engage” means to do or take part in something.

C. Policy Strength Continuum

When developing goals and policies, it is important to understand the policy strength continuum. The Puget Sound Regional Council developed the following example.

Passive	Policy Strength	Active 
Statements of Inclination Conveys intent, but establishes no target or definition of success	Statements of Principle Describes clear targets or conditions of success	Statements of Impact Go further, describing specific situations where protecting critical areas is a priority
Example The City shall encourage more affordable housing.	Example Tumwater shall endeavor to designate zoning for multifamily housing.	Example Work with the development community and local agencies to create an affordable housing project for those with less than 80% Area Median Income based on framework established by the Tumwater Housing Action Plan.

For an example of how policies can be written to be more active and how implementation strategies can be established for policies, include identifying who will be responsible for implementing the policy and the timeframes to do so.

D. Next Steps in the Review Process

Staff is taking comments on the Housing Element from stakeholders, Planning Commission, and the City Council in the spring of 2025.

In the summer and early fall of 2025, staff will be completing all of the elements of the Comprehensive Plan, completing SEPA review and initial state review, and preparing the Comprehensive Plan update ordinance.

The expected public review schedule for the ordinance will be:

- October 28, 2025 – Planning Commission Comprehensive Plan update ordinance briefing

- November 10, 2025 – Joint City Council-Planning Commission Comprehensive Plan update ordinance work session
- November 24, 2025 – Planning Commission Comprehensive Plan update ordinance work session
- December 9, 2025 – Planning Commission Comprehensive Plan update ordinance public hearing
- January 13, 2026 – Joint City Council – Planning Commission Comprehensive Plan update ordinance work session
- January 27, 2026 – City Council Comprehensive Plan update ordinance work session
- February 18, 2026 – City Council Comprehensive Plan update ordinance consideration

Appendix A. Resources and Guidance

1. City of Tumwater

[2025 Comprehensive Plan Update | City of Tumwater, WA](#) contains links to guidance material and information about the update.

2. State Department of Commerce

A) General Guidance

The State Department of Commerce has provided guidance specific to the periodic update on their Periodic Update webpage.

<https://www.commerce.wa.gov/serving-communities/growth-management/periodic-update/>

www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics

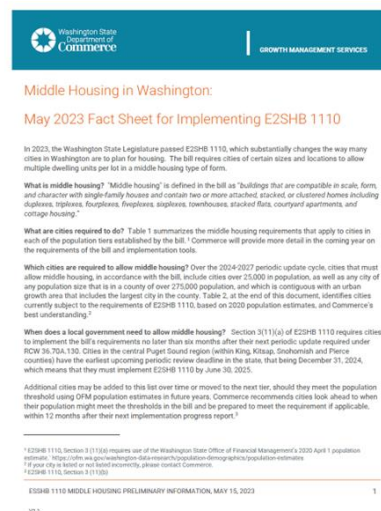
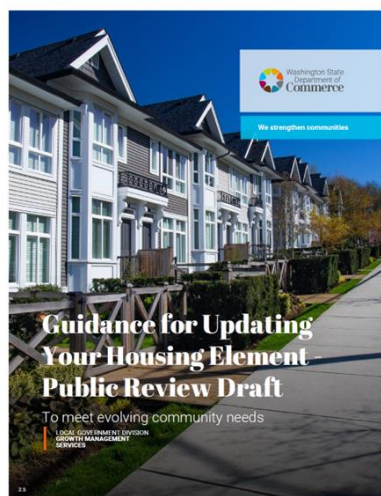
The State Department of Commerce has prepared a general webinar on the periodic update process.

[Periodic Update Workshop Kickoff](#)

B) Housing Guidance

The State Department of Commerce's Growth Management Act Housing Element webpage contains guidance on planning for housing under the Growth Management Act, including the new requirements established by House Bill 1220 (2021).

[Updating GMA Housing Elements - Washington State Department of Commerce](#)



The State Department of Commerce has prepared a number of webinars on how to address the new requirements.

[Guidance and Data for Updating Housing Elements: Implementing HB 1220](#)

[Guidance and Data for Updating Housing Elements: Land Capacity Analysis and Adequate Provisions](#)

[Updating your Housing Element: Racially Disparate Impacts Training](#)

[Talking Race for Planners Toolkit](#)

The State Department of Commerce maintains an Affordable Housing Planning Resource webpage containing a number of useful resources related to housing issues.

[Affordable Housing Planning Resources](#)

The State Department of Commerce recently released several materials related to missing middle housing and accessory dwelling units.

[Planning for Middle Housing](#)

3. Municipal Research Services Center

The Municipal Research Services Center has a Comprehensive Planning webpage.

<https://mrsc.org/getdoc/d7964de5-4821-4c4d-8284-488ec30f8605/Comprehensive-Planning.aspx>

And prepared held a webinar on updating a Housing Element

[MRSC Webinar on Housing Elements](#)

Appendix B. Current Housing Goals, Policies, and Actions

The Housing Element contains goals, policies, and actions meant to set forth a direction for how housing will be provided and maintained in Tumwater based on its 20-year community vision. The goals, policies, and actions ensure coordination with the other Comprehensive Plan Elements, Sustainable Thurston, and County-Wide Planning Policies.

The current Housing Elements goals, policies, and actions, found in Section 5.1 of the Housing Element include the following.

GOAL H-1: To conserve and improve the existing city housing stock and quality of life of neighborhoods.

<u>Policy</u>	<u>Action</u>
H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.
	H-1.1.1 Create a formal maintenance and rehabilitation program beyond the current City code enforcement procedures to support Policy H-1.1 in coordination with the City's work with the Regional Housing Council.
H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.
H-1.3	Promote the quality of life of existing communities and implementation of community housing goals through the preparation of comprehensive plans and the development review process.
H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.
H-1.5	Encourage and facilitate economic development as an important part of provision of housing by providing jobs.
	H-1.5.1 Continue implementation of economic development efforts to provide jobs in Tumwater.

GOAL H-2: To provide a sufficient number of single family dwelling units, multi-family dwelling units, manufactured homes, and group housing to provide an affordable selection of housing to each economic segment of the Tumwater population.

<u>Policy</u>	<u>Action</u>
H-2.1	Provide sufficient, suitably zoned land for development of all housing types to accommodate the future needs for each type of housing, including single-family detached dwellings, accessory dwelling units, townhouses, duplexes, triplexes, fourplexes, multi-family dwellings, cottage housing, senior housing, roominghouses, group housing, and manufactured homes in manufactured home parks and on single lots.

H-2.2 Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.

H-2.2.1 Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned land.

GOAL H-3: To provide adequate, affordable housing for residents of all income groups, including sufficient housing affordable to low and moderate-income groups.

Policy

Action

H-3.1 Encourage the development of innovative plans, codes, standards, and procedures in order to take advantage of new private and public sector approaches to housing provision.

H-3.1.1 The Zoning Code allows manufactured homes on single-family lots in all residential zones. It is the intent of the Housing Element to promote the designation of a sufficient supply of land for traditional mobile/manufactured home parks and to recognize that modular/manufactured housing on single family lots and in manufactured home parks is a viable form of housing construction.

H-3.1.2 Increase code enforcement efforts and build public private partnerships to encourage renovations of unfit structures for use as transitional or affordable housing.

H-3.2 Encourage provision of adequate building sites through appropriate land use planning and zoning codes, infrastructure supply, and overall regulatory climate.

H-3.3 Tumwater should assume its "fair share" of housing for low and moderate income groups, in cooperation with other jurisdictions in Thurston County.

H-3.3.1 Monitor land supply, census data, and housing policies to ensure Tumwater accommodates its fair share of housing for low and moderate income groups.

H-3.3.2 Work with Tumwater School District, Housing Authority, and other agencies and organizations to pursue grant funding and implement transitional housing strategies for families with children.

H-3.3.3 Establish a multi-family tax exemption program that gives financial incentive for developers to create multi-family structures in target areas and to set aside a percentage of units as low-income housing.

H-3.4 Tumwater should work with the other jurisdictions in Thurston County as part of the Regional Housing Council to share decision making responsibilities related to homelessness and affordable housing in Thurston County to allow for collaboration in expanding affordable housing options and sharing the planning for, identification

of, and resource allocation to activities and programs intended to support individuals experiencing homelessness in Thurston County.

GOAL H-4: **To provide adequate opportunities for housing for all persons regardless of age, race, color, national origin, ancestry, sex, sexual orientation, familial status, marital status, ethnic background, source of income use of federal housing assistance, or other arbitrary factors.**

<u>Policy</u>	<u>Action</u>
H-4.1	Support the inclusion of living opportunities for families with children throughout the city.
H-4.2	Support and encourage a variety of housing types and price ranges through appropriate policies and regulations.
H-4.2.1	Continue the requirement for reasonable maximum lot sizes in order to create smaller lots that are more affordable and that allow a more efficient use of City services.
H-4.2.2	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.

GOAL H-5: **To supply sufficient, safe, suitable housing sites and housing supply to meet projected future housing needs for Tumwater over the next 20 years.**

<u>Policy</u>	<u>Action</u>
H-5.1	Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.
H-5.1.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned vacant land. (2.1.1)
H-5.1.2	Continue joint planning with Thurston County to plan for future growth in Tumwater.
H-5.2	Lands not suitable for development due to site constraints such as wetlands, steep slopes, geologically hazardous areas, etc., should be identified and considered when determining sufficient land for new housing in accordance with Tumwater's Conservation Plan.
H-5.3	Encourage construction practices, which exceed minimum standards. Tumwater will support the use of alternative building designs and methods that exceed the minimum standards set by Tumwater.

GOAL H-6: To promote a selection of housing that is decent, safe, and sound, in close proximity to jobs and daily activities, and varies by location, type, design, and price.

<u>Policy</u>	<u>Action</u>
H-6.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.
H-6.2	Provide for a dynamic mix of residential land uses and zones in order to create a diverse mix of sites available for different housing types.
H-6.2.1	Continue to monitor the available land supply, census data, and City policies to ensure a diverse mix of land for residential housing stock.
H-6.2.2	Continue to implement innovative design techniques, such as zero lot line developments, architectural design standards, alley houses, and attached single-family housing. Zero lot line developments are residential real estate in which the structure comes up to or very near to the edge of the property. Zero-lot-line houses are built very close to the property line in order to create more usable space.
H-6.3	Support increasing housing opportunities along urban corridors and centers.
H-6.4	Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.
H-6.4.1	Continue to involve Intercity Transit in Tumwater's development review process.
H-6.5	Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.
H-6.6	Increase the variety of housing types outside of corridors and centers of appropriate intensities with supporting design guidelines to meet the needs of a changing population.

GOAL H-7: To ensure that housing is compatible in quality, design, and density with surrounding land uses, traffic patterns, public facilities, and environmentally sensitive areas.

<u>Policy</u>	<u>Action</u>
H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.
H-7.1.1	Continue to implement design standards for multi-family and attached single-family dwellings in order to ensure compatibility with existing neighborhoods.
H-7.2	Assure housing will be well maintained and safe.

- H-7.3 Enhance the appearance of and maintain public spaces in residential areas.
H-7.4 Promote community involvement to achieve neighborhood improvement.

GOAL H-8: To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.

<u>Policy</u>	<u>Action</u>
H-8.1	Support the stability of established residential neighborhoods.
H-8.2	Assure housing will be well maintained and safe.
	H-8.2.1 Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.
H-8.3	Enhance the appearance of and maintain public spaces in residential areas.
H-8.4	Promote community involvement to achieve neighborhood improvement.
	H-8.4.1 Encourage neighborhood meetings to discuss community issues as situations and concerns arise.
H-8.5	Encourage home ownership for Tumwater residents.

GOAL H-9: To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.

<u>Policy</u>	<u>Action</u>
H-9.1	Require housing to meet the needs of those with special housing requirements without creating a concentration of such housing in any one area.
H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.
H-9.3	Support and plan for assisted housing opportunities using federal, state, or local aid.
H-9.4	Encourage and support social and health service organizations, which offer support programs for those with special needs, particularly those programs that help people remain in the community.
H-9.5	Encourage alternative housing strategies for homeless youth, which may include Host Homes.

GOAL H-10: To provide housing that is compatible and harmonious with existing neighborhood character through use of innovative designs that enhance the appearance and quality of Tumwater's neighborhoods.

<u>Policy</u>	<u>Action</u>
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H-10.1 Encourage innovation and variety in housing design and development. Tumwater will support efforts to build housing with unique individual character, which avoids monotonous neighborhood appearance.

H-10.2 Multi-family residential housing should be subject to design criteria that relate to density, structure bulk, size and design, landscaping, and neighborhood compatibility.

H-10.2.1 Continue to implement multi-family housing design standards.

GOAL H-11: To provide housing to accommodate Tumwater's housing needs in the urban growth area and make the most efficient use of infrastructure and services.

<u>Policy</u>	<u>Action</u>
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H-11.1	Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.
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H-11.2	Reference utility plans and the impact of housing decisions on capital improvements planning.
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H-11.3	Encourage the construction of affordable housing, including cottage housing and accessory dwelling units, within a half mile or twenty minute walk of an urban center, corridor or neighborhood center with access to goods and services to provide access to daily household needs.
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GOAL H-12: To encourage urban growth within the city limits with gradual phasing outward from the urban core.

<u>Policy</u>	<u>Action</u>
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H-12.1	Encourage the construction of housing on vacant property within the city and the redevelopment of underdeveloped property within residential areas to minimize urban sprawl and associated public service costs.
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H-12.1.1	Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.
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H-12.1.2	Continue to support high-density zoning within specific areas of the city that have the infrastructure and services to support high-density housing.
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H-12.1.3	Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.
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H-12.1.4	Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.
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GOAL H-13: Ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing.

<u>Policy</u>	<u>Action</u>
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|--------|--|
| H-13.1 | Maintain the manufactured home park district zoning in appropriate areas in order to prevent conversion of affordable housing to other uses without replacement.

H-13.1.1 Encourage manufactured housing park district zoning to locate near transit services. |
| H-13.2 | When locating zones and designations for manufactured home parks, carefully consider the risks from natural hazards, such as flooding and liquefaction, and the impacts of those hazards on the future residents of those manufactured home parks, Tumwater's emergency responders, and the city as a whole. |