

HOUSING NEEDS ASSESSMENT

Lacey, Olympia, and Tumwater

September 2020

Thurston Regional Planning Council



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CONTENTS

Executive Summary	1
Chapter 1. Introduction	3
Report Organization	4
Geography	4
Sources of Data	5
Chapter 2. Population Characteristics	7
Estimates and Forecast	7
Age	9
Race and Ethnicity	10
Disability	11
Poverty	13
Chapter 3. Household Characteristics	15
Household Size and Composition	15
Group Quarters	20
Ownership and Tenancy	22
Income	24
Chapter 4. Unique Housing Needs	28
Seniors	28
Military Personnel and Veterans	31
People Experiencing Homelessness	32
College Students	34
Chapter 5. Housing Supply	36
Trends and Projections	36
Building Types and Density	37
Unit Size	39
Market Conditions	42
Subsidized Housing Units	46
Chapter 6. Local Workforce Characteristics	48
Estimates and Forecast	48
Wages and Self-Sufficiency	50
Unemployment	52
Commuting	53
Chapter 7. Gap Analysis	56
Housing Affordability	57
Housing Size	61
Substandard Housing	62
Other Needs	63

Experiencing Homelessness 63

Chapter 8. Land Capacity Analysis 66

 Residential Capacity 67

 Unique Housing Needs..... 68

Appendix A. Development Trends by Zoning District 69

 Lacey 70

 Olympia 71

 Tumwater..... 72

Appendix B. Household Income Forecast..... 73

 Introduction 73

 What Factors Affect Income? 73

 Income Forecast Methodology 80

 Results..... 83

Appendix C. Detailed Source Information 87

LIST OF FIGURES

Figure 1-1. Jurisdictions in this plan	5
Figure 2-1. Thurston County population, 1980-2045	7
Figure 2-2. Population in cities including their unincorporated urban growth areas, 2010-2045	8
Figure 2-3. Age of Thurston County population, 2020 and 2045	9
Figure 2-4. Racial and ethnic diversity in Thurston County, 2014-2018 average	10
Figure 2-5. Disability status in Thurston County by age, 2014-2018 average	12
Figure 2-6. Disability by age, 2014-2018 average	12
Figure 2-7. Poverty rates, 2014-2018 average.....	14
Figure 3-1. Average household size in Thurston County, 1960-2018	15
Figure 3-2. Thurston County households by type, 1970-2018.....	17
Figure 3-3. Households by type, 2014-2018 average	18
Figure 3-4. Households with children, 2014-2018 average	19
Figure 3-5. Household size in Lacey, Olympia, and Tumwater combined, 2014-2018 average	19
Figure 3-6. Thurston County household size by race and ethnicity, 2010.....	20
Figure 3-7. Population in group quarters in Lacey, Olympia, and Tumwater by facility type, 2010	20
Figure 3-8. Population in group quarters in Lacey, Olympia, and Tumwater, 1980-2045.....	21
Figure 3-9. Owner occupied households by census tract, 2014-2018 average	22
Figure 3-10. Ownership and tenancy, 2014-2018 average.....	23
Figure 3-11. Household size by tenure in Lacey, Olympia, and Tumwater combined, 2014-2018 average	23
Figure 3-12. Tenure by race and ethnicity in Lacey, Olympia, and Tumwater combined, 2014-2018 average.....	24
Figure 3-13. Median family and household incomes, 2014-2018 average.....	24
Figure 3-14. Percent of households by income, 2014-2018 average	25
Figure 3-15. Median household income by census tract, 2014-2018 average.....	26
Figure 3-16. Household income in Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average.....	27
Figure 4-1. Thurston County senior population, 2020.....	29
Figure 4-2. Thurston County senior population, 2045.....	29
Figure 4-3. Percent of population 65 or older by census tract, 2014-2018 average	29
Figure 4-4. Senior households in Thurston County by tenure, 1980-2018.....	30
Figure 4-5. Senior households in Thurston County by type of dwelling, 2014-2018 average	30
Figure 4-6. Adult family homes in Thurston County offering specialized care, 2020	31
Figure 4-7. Homelessness in Thurston County, 2015-2019	32
Figure 4-8. Where the homeless shelter in Thurston County, 2019.....	32
Figure 4-9. Chronic homelessness in the Thurston County homeless, 2019	33
Figure 4-10. Age of those experiencing homelessness in Thurston County, 2019	33
Figure 4-11. Disability among those experiencing homelessness in Thurston County, 2019	34
Figure 4-12. Types of disabilities among those experiencing homelessness, 2019	34
Figure 4-13. Household type for college students, 2014-2018 average.....	35
Figure 4-14. Residents enrolled in college, 2014-2018 average.....	35

Figure 5-1. Estimated and projected housing units in Lacey, Olympia, Tumwater, and their UGAs, 2010-2045	36
Figure 5-2. Occupied housing units in Lacey, Olympia, and Tumwater combined by building type and tenancy, 2014-2018 average	37
Figure 5-3. Housing types permitted in Lacey, Olympia, and Tumwater, 2000-2019	38
Figure 5-4. Density of new residential development, 2000-2019	38
Figure 5-5. Occupied housing units in Lacey, Olympia, and Tumwater combined by number of bedrooms and tenancy, 2014-2018 average.....	39
Figure 5-6. Housing units built in Lacey, Olympia, and Tumwater combined by number of bedrooms, 1980-2019	40
Figure 5-7. Average number of bedrooms in housing units by decade.....	40
Figure 5-8. Home size in Lacey, Olympia, and Tumwater combined, 1980-2019	41
Figure 5-9. Average home size by decade	42
Figure 5-10. Average housing unit sale price in Thurston County, 2018	42
Figure 5-11. Housing units sold in Thurston County, 2018.....	42
Figure 5-12. Median home sale price in July, 2010-2020	43
Figure 5-13. Thurston County Homeownership Affordability Index, 1995-2020	44
Figure 5-14. Median home sale price (adjusted for inflation), 2006-2019.....	44
Figure 5-15. Average rent in Thurston County (inflation-adjusted), 2001-2020	45
Figure 5-16. Median gross rent, 2014-2018 average.....	45
Figure 5-17. Apartment vacancy rate in Thurston County, 2018-2020	46
Figure 5-18. Thurston County income limits for receiving federal housing assistance, 2020	46
Figure 5-19. Subsidized housing units in Thurston County by owner, 2020.....	47
Figure 6-1. Thurston County employment, 1980-2045	48
Figure 6-2. Thurston County total employment by industry, 2017	49
Figure 6-3. Thurston County average wage, 2002-2019 (adjusted for inflation)	51
Figure 6-4. Median earnings, 2014-2018 average	51
Figure 6-5. Annual average unemployment for Thurston County, 1990-2019	52
Figure 6-6. Place of work for residents of Lacey, Olympia, Tumwater, and Thurston County, 2014-2018	53
Figure 6-7. Commutes from Thurston County (outbound), 2002-2017	54
Figure 6-8. Commutes to Thurston County (inbound), 2002-2017	54
Figure 7-1. Cost burdened households in Thurston County, 2012-2016 average	57
Figure 7-2. Cost burdened households by jurisdiction, 2012-2016 average	58
Figure 7-3. Current and projected 25-year housing need	60
Figure 7-4. Household size in Lacey, Olympia, and Tumwater by tenure, 2014-2018 average	61
Figure 7-5. Number of bedrooms in Lacey, Olympia, and Tumwater dwelling units by tenure, 2014-2018 average.....	61
Figure 7-6. Household size in Lacey, Olympia, and Tumwater, 2014-2018 average	61
Figure 7-7. Number of bedrooms in Lacey, Olympia, and Tumwater dwelling units, 2014-2018 average	61
Figure 7-8. Plumbing facilities in occupied Thurston County dwelling units, 2014-2018 average	62
Figure 7-9. Kitchen facilities in occupied Thurston County dwelling units, 2014-2018 average	62
Figure 7-10. Thurston County households leaving a housing program to a permanent housing situation, 2015-2019	64
Figure 8-1. Developable land	68

LIST OF TABLES

Table 2-1. Population, 2020	8
Table 2-2. Age of Population, 2014-2018 average.....	9
Table 2-3. Age of Thurston County population as a percent of total, 2020-2045	10
Table 2-4. Racial and Ethnic Diversity in Lacey, Olympia, and Tumwater, 2000 and 2014-2018 average .	11
Table 2-5. Types of disability in the Thurston County population, 2014-2018 average.....	11
Table 2-6. Disability by age, 2014-2018 average	13
Table 3-1. Average household size, 2014-2018 average	16
Table 3-2. Average household size by race and ethnicity, 2010.....	16
Table 3-3. Households by type, 2014-2018 average.....	17
Table 3-4. Households with children, 2014-2018 average	18
Table 3-5. Household size by location, 2014-2018 average	19
Table 3-6. Types of group quarters.....	21
Table 3-7. Households by income, 2014-2018 average.....	25
Table 3-8. Household Income in Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average.....	27
Table 4-1. Thurston County senior population, 2020-2045.....	28
Table 4-2. Adult family and nursing homes in Thurston County, 2020	30
Table 4-3. Military personnel and veterans, 2014-2018 average	31
Table 4-4. Race and ethnicity of those experiencing homelessness in Thurston County, 2019.....	34
Table 4-5. Poverty rate for Thurston County college students, 2014-2018 average.....	35
Table 5-1. Occupied housing units by building type, 2014-2018 average	37
Table 5-2. Occupied housing units by number of bedrooms, 2014-2018 average.....	39
Table 5-3. Housing units built in Lacey, Olympia, and Tumwater combined by number of bedrooms, 1980-2019	40
Table 5-4. Housing units in Lacey, Olympia, and Tumwater combined by home size and decade	41
Table 6-1. Thurston County covered employment and wages, 2019.....	50
Table 6-2. Wages (per adult) needed for self-sufficiency, 2020	52
Table 6-3. Unemployment rate, 2014-2018 average.....	53
Table 6-4. Average wage earnings by county of residence and county of work, 2014-2018 average	55
Table 7-1. Cost burdened households by jurisdiction, 2012-2016 average	57
Table 7-2. Maximum rent and housing costs at various income levels, 2020	59
Table 7-3. Number of households by income range, 2045 projection	59
Table 8-1. Residential capacity by generalized zoning district, 2017	67
Table 8-2. Residential capacity by type of developable parcel, 2020.....	67

Executive Summary

Today, Thurston County is home to more than 294,000 people. By 2045, this is expected to grow to more than 380,000 people, and 64 percent will live in Lacey, Olympia, and Tumwater or their respective unincorporated urban growth areas. This housing needs assessment is intended to provide an inventory of the current housing stock, household characteristics, the population's housing needs, and any gaps in housing availability.

A Growing (Older) Population

In the next 25 years, the Washington Office of Financial Management forecasts the county's population will grow to more than 380,000 people, and the overall population is aging. Today, 18 percent of the population is 65 or older, and 20 percent of seniors are 80 or older. By 2045, nearly one in four residents will be 65 or older – and 38 percent of seniors will be 80 or older. This has ramifications for housing affordability for the region's population as well as the types of housing needed to meet their needs.

Do I Rent or Do I Buy?

More than 83,000 housing units are found in Lacey, Olympia, Tumwater, and their unincorporated urban growth areas. Thurston Regional Planning Council (TRPC) projects 34,000 new units will need to be built

COVID-19 Pandemic and the Housing Needs Assessment

In response to the outbreak of the COVID-19 pandemic, Governor Inslee issued a series of proclamations and declarations aimed at reducing the spread of the virus in Washington State, including requiring all non-essential workers to stay home and stay healthy and extending a moratorium on evictions to protect renters. As a result, significant changes in the Lacey, Olympia, and Tumwater area occurred, affecting businesses and residents alike. Much of the data and statistics used in this assessment were established prior to the outbreak. The estimates, forecasts, and gap analysis do not take into account the radical impacts in employment and housing that continues to occur in the Thurston Region as of the writing of this report.

The cities of Lacey, Olympia, and Tumwater will continue to monitor the impact of the pandemic on housing in the coming months.

to accommodate the region's growing population. Half of all occupied housing units in Lacey, Olympia, and Tumwater are rented, and the other half are owned by an occupant of the unit. However, the smaller the household income, the fewer options there are for home ownership – a key factor for many households in building wealth. Housing units with two or fewer bedrooms are typically rented, and renters are more likely to be cost burdened, meaning they spend more than 30 percent of their income on rent and other housing expenses.

Smaller Households, Larger Homes

Over the last forty years, the average household in Thurston County has gotten smaller – about 2.5 people per household in 2014-2018. During the same period of time, homes have gotten bigger. In the 1980s, more than half of all houses built were less than 1,500 square feet. In the 2010s, only 11 percent were less than 1,500 square feet.

Higher Wages – and Higher Rents and Mortgages

According to the U.S. Bureau of Economic Analysis, Thurston County is home to more than 148,000 jobs. TRPC estimates this will grow to about 200,000 by 2045. Employment Security Department figures indicate wages have generally increased over the last 17 years when adjusted for inflation – about 0.6 percent per year. However, so has the cost of housing – whether you rent or own. Between 2001 and 2018, average rents increased about 1.7 percent per year while the average sale price for a home increased by about 4.1 percent per year. Today, Thurston County is not considered affordable for first-time home buyers, although it is still more affordable than either King or Pierce counties.

All Things Not Being Equal

About one in four Thurston County residents is a person of color – those who are Hispanic or Latino of any race and those who are any race other than white alone. Those who are Hispanic or Latino, Asian, Black, and multiracial are the largest minority populations in Thurston County. People of color generally have more people in their household, are less likely to own their own home, have a smaller household income, and are more likely to experience homelessness than their white, non-Hispanic counterparts.

The Challenge: Meeting the Greatest Need

More than 6,000 households in Lacey, Olympia, and Tumwater are extremely low income – earning less than 30 percent of the area median family income. By 2045, another 3,000 households are expected to fall into this category. There are approximately 1,857 units available at below-market rents – far fewer than the 6,000 plus households with extremely low income, who are those most at risk of becoming homeless – and there are at least 800 people experiencing homelessness today, according to the 2019 Point in Time Count. Both subsidized and permanent supportive housing are needed to support these vulnerable populations.

Chapter 1.

Introduction

In 2019, the Washington State Legislature passed HB 1923, aimed at encouraging cities planning under the state Growth Management Act to take actions to increase residential building capacity. These actions include developing a housing action plan “...to encourage construction of additional affordable and market rate housing in a greater variety of housing types and at prices that are accessible to a greater variety of incomes, including strategies aimed at the for-profit single-family home market” (RCW 36.70A.600).

In recognition of the cross-jurisdiction need for affordable housing, the cities of Lacey, Olympia, and Tumwater choose to collaborate with Thurston Regional Planning Council to develop a regional Housing Action Plan. Funding was provided by the Department of Commerce. The project includes four components:

- A regional housing needs assessment
- A household income forecast to identify future housing needs
- A survey of landlords and rental property owners to better understand housing costs
- A Housing Action Plan – to be adopted by the cities – identifying a list of actions for the cities to implement to encourage development of a housing stock adequate and affordable for current and future residents

This report – the Housing Needs Assessment – is intended to provide an inventory of the current housing stock, household and workforce characteristics, the population’s housing needs, and any gaps in housing availability. This information will be used to develop actions for the final Housing Action Plan. The Household Income Forecast, used in the gap analysis, is included in Appendix B.

Report Organization

The Housing Needs Assessment covers the following topics:

Community Profile Chapter 2: Population Characteristics Chapter 3: Household Characteristics Chapter 4: Unique Housing Needs	Workforce Profile Chapter 6: Local Workforce Characteristics
Housing Inventory Chapter 5: Housing Supply	Needs Assessment Chapter 7: Gap Analysis Chapter 8: Land Supply

Chapters 2 through 4 – the Community Profile – provide an overview of residents of the cities of Lacey, Olympia, and Tumwater, their demographics, households types and housing choices. It also includes a summary of groups with special housing needs, such as people who experience homelessness, seniors, veterans and military personnel, and students.

Chapter 5 – The Housing Inventory – articulates the state of the region’s current housing stock, including the types of housing, size of units and number of bedrooms, and the cost of housing.

Chapter 6 – the Workforce Profile – discusses employment and wage-earning opportunities in the region, as well as unemployment. It also includes information on the minimum income needed to afford households’ basic needs.

Chapters 7 and 8 – the Needs Assessment – look at the region’s current and future housing needs and the availability of land to accommodate new housing.

Geography

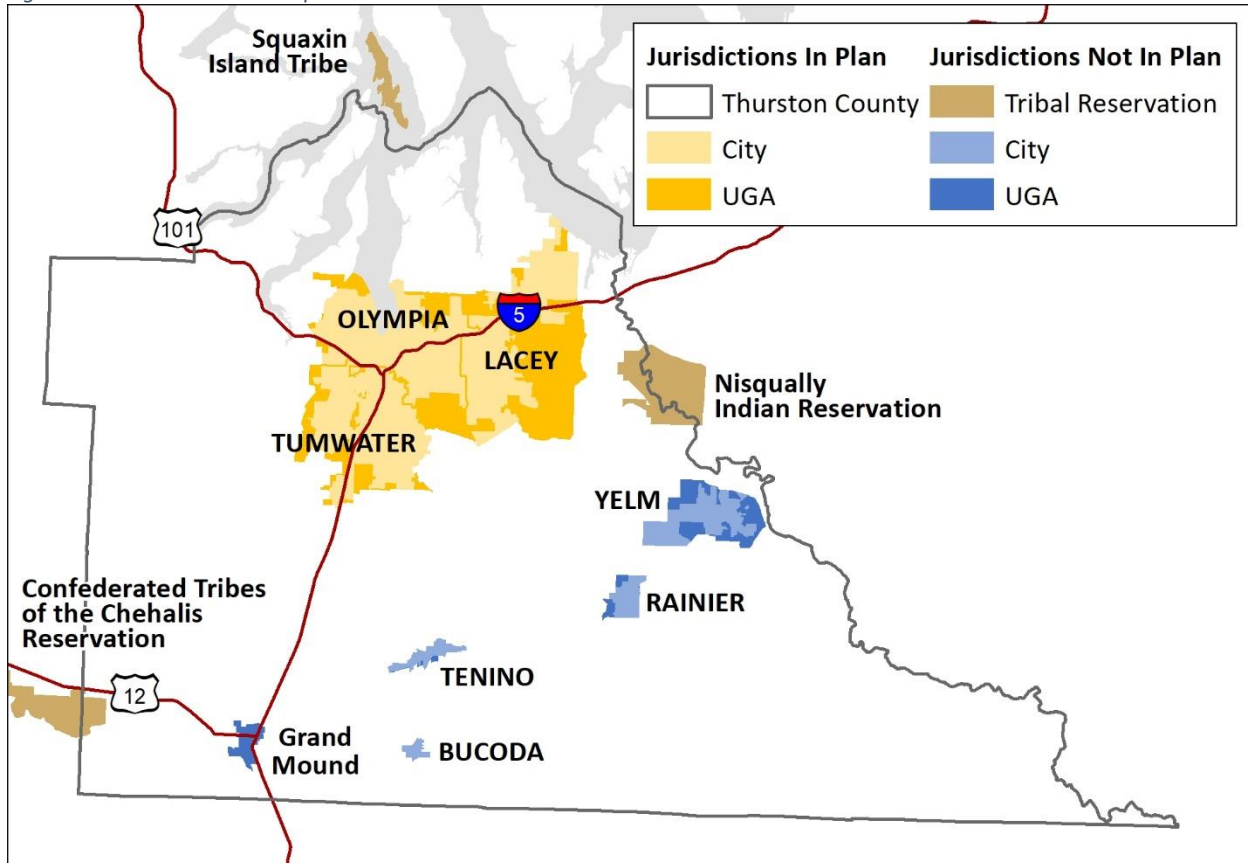
This assessment explores data for the cities of Lacey, Olympia, and Tumwater. For some tables and figures, data for the three cities are combined (“Cities Combined”) to enhance readability. City-level data, if available, can be acquired using the source information provided in Appendix C.

When data for the unincorporated urban growth areas is available, it is included with the city data (“Cities plus UGAs”).

When key data are not available at the city level, countywide data are presented (“Thurston County”). Thurston County data include data for all seven incorporated cities and towns in Thurston County, unincorporated areas, and tribal reservations within the county border.

Figure 1-1 shows jurisdictions within Thurston County, differentiating the areas addressed in this plan and those that are not.

Figure 1-1. Jurisdictions in this plan



Sources of Data

This assessment combines data from a range of sources. Key sources include:

- **U.S. Census Bureau:** The 2010 Census and 2014-2018 American Community Survey provide key data on population, households, and housing characteristics.
- **Washington Center for Real Estate Research (WCRER):** Based in the University of Washington's College of Built Environments, WCRER's quarterly Housing Market Report and Apartment Market Survey supply timely data on housing costs and vacancy rates.
- **Thurston County Assessor's Office:** Property assessment data furnish useful information on housing types, sizes, and other characteristics at the parcel level.
- **Washington Office of Financial Management (OFM):** OFM provides population forecasts for Washington counties and annual population estimates for cities and counties.
- **Thurston Regional Planning Council (TRPC):** TRPC contributes annual population, housing, and employment estimates for cities, UGAs, and other geographies, as well as 25-year projections.
- **Northwest Multiple Listing Service:** The Northwest Multiple Listing Service specifies annual data on the number, types, and cost of real estate transactions across Thurston County

- **U.S. Department of Housing and Urban Development (HUD):** HUD's Consolidated Housing Action Strategy (CHAS) data provided information on cost burden and other housing challenges faced by low-income residents.

Additional sources were included as needed.

Appendix C presents sources for the figures and tables presented in this assessment. Since many of the data are updated on an annual basis, the appendix also includes information on how to access the most recent data.

Many of the data shown in this report are based on surveys. All survey data contain a margin of error – a measure of uncertainty around an estimate. The American Community Survey publishes margins of error with their tables. While not included in the figures and tables in this report, they can be accessed using the source information in Appendix C.

Several tables and figures show dollar values (costs, incomes, etc.) over time. These have been adjusted for inflation using the implicit price deflator for Washington State provided by the Washington State Economic and Revenue Forecast Council.

Chapter 2.

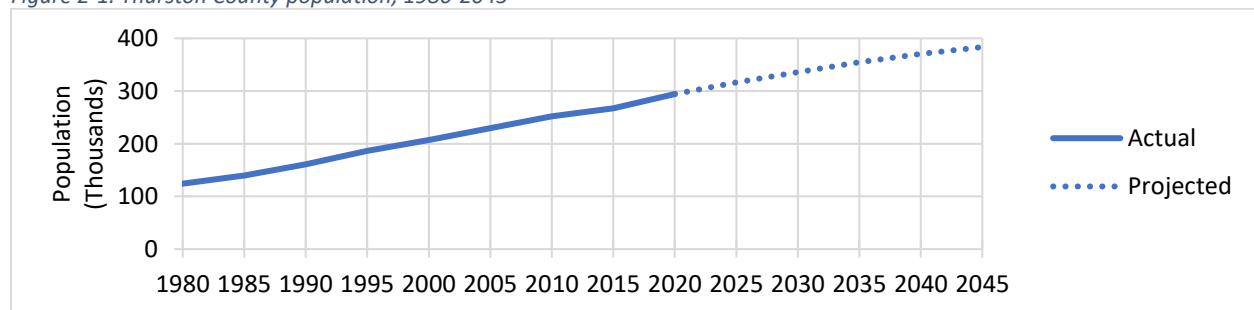
Population Characteristics

This chapter of the housing needs assessment investigates population estimates and forecasts. It also explores demographic information such as age, race and ethnicity, and disability status of the population.

Estimates and Forecast

The Washington Office of Financial Management estimates Thurston County's 2020 population is 294,300. Figure 2-1 shows the change in Thurston County's population since 1980. Between 1980 and 2020, Thurston County's population more than doubled, growing 137 percent over 40 years. For the same period of time, the average annual rate of population change was 2.2 percent. Over the next 25 years, Thurston County's population is anticipated to grow by another 89,200 people at a rate of 1.1 percent per year on average – to about 383,500 people.

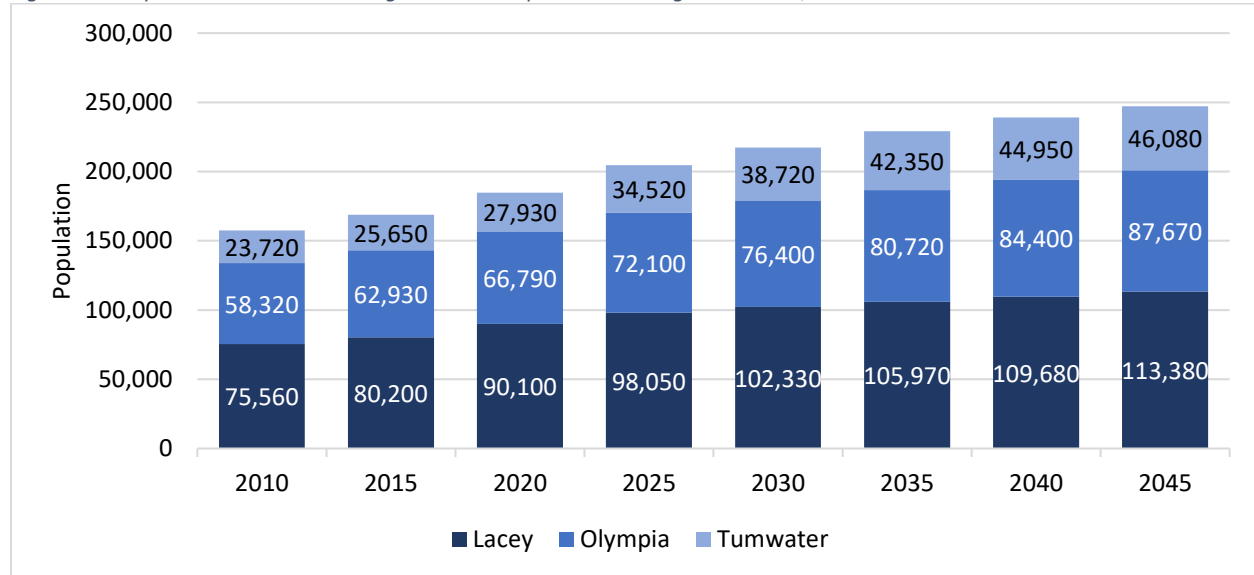
Figure 2-1. Thurston County population, 1980-2045



Source: Washington Office of Financial Management

In 2020, approximately 184,820 people in Thurston County live in in the combined areas of Lacey, Olympia, Tumwater, and their respective unincorporated urban growth areas (UGAs) – representing 64 percent of Thurston County’s population (Figure 2-2).

Figure 2-2. Population in cities including their unincorporated urban growth areas, 2010-2045



Source: Thurston Regional Planning Council

Table 2-1 shows the total population for the cities in 2020 and their respective unincorporated urban growth areas (UGAs). Lacey’s estimated population was 52,910, slightly less than that of Olympia. However, when looking at Lacey’s population and including future annexation areas in the city’s urban growth area, Lacey has 90,100 people – 35 percent more than Olympia. Tumwater’s population is less than half that of Lacey and Olympia, even when including their respective UGAs.

Table 2-1. Population, 2020

Population	Lacey	Olympia	Tumwater	Cities Combined
City	52,910	54,150	24,600	131,660
Unincorporated UGA	37,190	12,640	3,330	53,160
Total	90,100	66,790	27,930	184,820

Source: Thurston Regional Planning Council

Age

Table 2-2 shows the age of Thurston County’s population, both in terms of count and percent of population. Approximately one in two Thurston County residents are under the age of 40; one in three is between the ages of 40 and 64. Only about one in six people are 65 or older. Olympia residents skew slightly older than the other communities, with a median age of 38.3. Lacey’s population is the youngest, with a median age of 35.3.

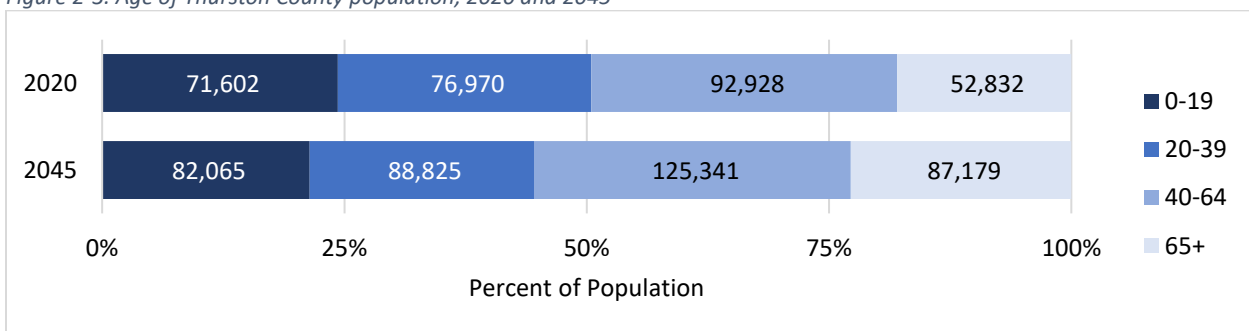
Table 2-2. Age of Population, 2014-2018 average

Age Cohort	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
<i>Count of Population</i>					
0-19	12,381	10,105	5,274	27,760	65,788
20-39	14,903	16,598	7,140	38,641	75,426
40-64	12,826	15,415	6,946	35,187	88,856
65+	7,742	8,718	3,140	19,600	44,614
TOTAL	47,852	50,836	22,500	121,188	274,684
<i>Percent of Population</i>					
0-19	26%	20%	23%	23%	24%
20-39	31%	33%	32%	32%	27%
40-64	27%	30%	31%	29%	32%
65+	16%	17%	14%	16%	16%
TOTAL	100%	100%	100%	100%	100%
<i>Median Age</i>	35.3	38.3	36.7	n/a	39.0

Source: U.S. Census Bureau American Community Survey

Figure 2-3 and Table 2-3 (next page) show the distribution of the population based on age, comparing 2020 to 2045. The portion of Thurston County’s population under the age of 40 is projected to shrink over the next 25 years. The portion of the population between age 40 and 64 is projected to remain relatively constant, while the portion 65 and older will grow.

Figure 2-3. Age of Thurston County population, 2020 and 2045



Source: Washington Office of Financial Management

Table 2-3. Age of Thurston County population as a percent of total, 2020-2045

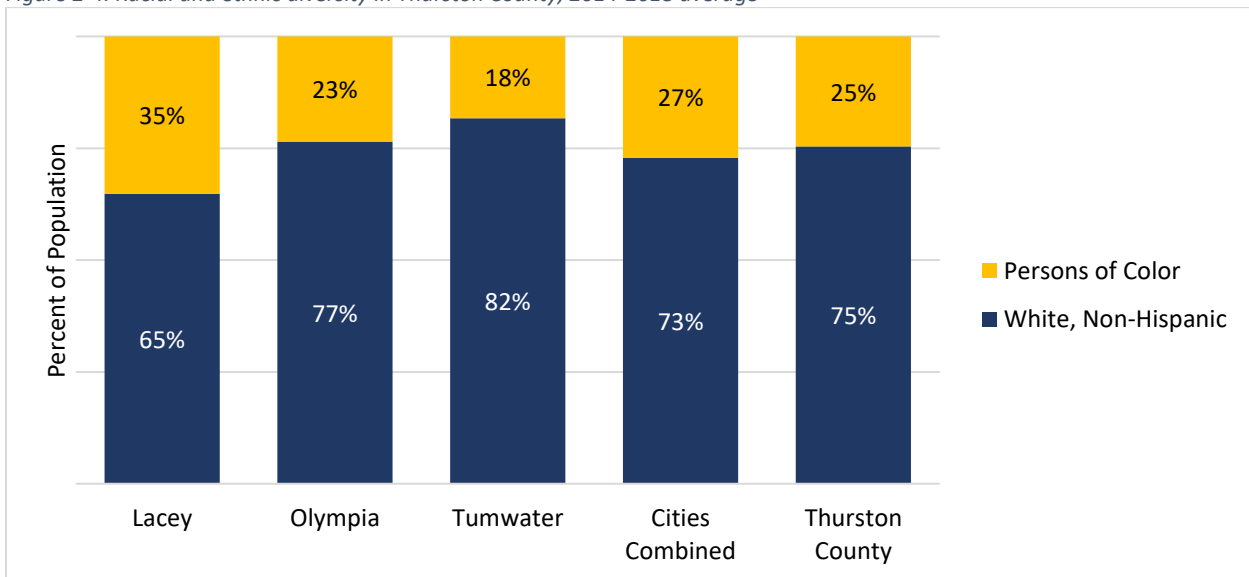
Age Cohort	2020	2025	2030	2035	2040	2045
0-19	24%	24%	23%	22%	22%	21%
20-39	26%	25%	24%	24%	23%	23%
40-64	32%	31%	32%	32%	33%	33%
65+	18%	20%	21%	22%	22%	23%
TOTAL	100%	100%	100%	100%	100%	100%

Source: Washington Office of Financial Management

Race and Ethnicity

About one in four Thurston County residents is a person of color (Figure 2-4). For the purposes of this report, persons of color include those who identify as Hispanic or Latino of any race and persons who identify as any race other than white alone. Of the three communities, Lacey is the most diverse while Tumwater is the least diverse.

Figure 2-4. Racial and ethnic diversity in Thurston County, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Those who are Hispanic or Latino of any race represent the largest minority population (9 percent) (Table 2-4). For persons who are not Hispanic or Latino, those who are Asian (7 percent), Black (4 percent), and identified themselves as multiracial (5 percent) are also significant minority populations in the three-city area. Thurston County is becoming more diverse. Between 2000 and 2014-2018, the percent of the population identifying as a person of color increased from 19 to 27 percent.

Table 2-4. Racial and Ethnic Diversity in Lacey, Olympia, and Tumwater, 2000 and 2014-2018 average

Race and Ethnicity	2000		2014-2018	
	Count	Percent	Count	Percent
White, Non-Hispanic	69,857	81%	88,289	73%
Asian, Non-Hispanic	5,330	6%	8,892	7%
Black, Non-Hispanic	2,394	3%	4,397	4%
Native American, Non-Hispanic	1,038	1%	1,216	1%
Native Hawaiian/Pacific Islander, Non-Hispanic	480	1%	1,108	1%
Other Race, Non-Hispanic	252	<1%	2,466	<1%
Multiracial, Non-Hispanic	2,863	3%	6,083	5%
Hispanic of Any Race	4,224	5%	11,061	9%
TOTAL	86,438	100%	121,188	100%

Source: U.S. Census Bureau American Community Survey

Disability

Approximately 15 percent of Thurston County's population lives with a disability. Measuring disability is a complex concept, and there are many ways to look at what it means to live, work, or play with a disability. Data concerning disability status in this report comes from the U.S. Census Bureau's American Community Survey (ACS) and is limited to the civilian noninstitutionalized population. The ACS measures disability based on whether a person experiences a functional limitation in at least one of six different areas: hearing, vision, cognition, ambulation, self-care, and independent living. Each of these areas has implications for the type of housing needed by that individual. Of the six functional limitations, the most common reported in Thurston County are ambulatory (6.7 percent) and independent living (5.3 percent) (Table 2-5).

Table 2-5. Types of disability in the Thurston County population, 2014-2018 average

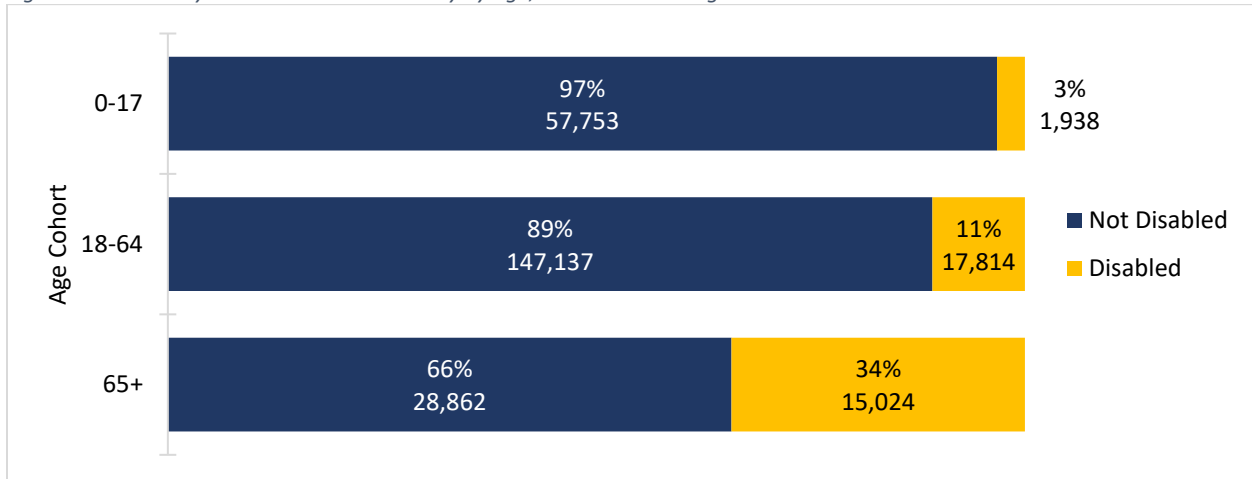
Type of Disability	Count	Percent
Hearing	11,509	4.3%
Vision	6,111	2.3%
Cognitive	12,040	4.8%
Ambulatory	16,991	6.7%
Self-care	5,915	2.3%
Independent living	10,991	5.3%

Note: A person may have more than one type of disability.

Source: U.S. Census Bureau American Community Survey

Figure 2-5 looks at disability status for the entire Thurston County population, breaking it into three age cohorts: children age 0 to 17, adults age 18 to 64, and adults age 65 and older. Only three percent of children and 11 percent of adults age 18-64 have a disability while 34 percent of adults 65 and older have at least one disability.

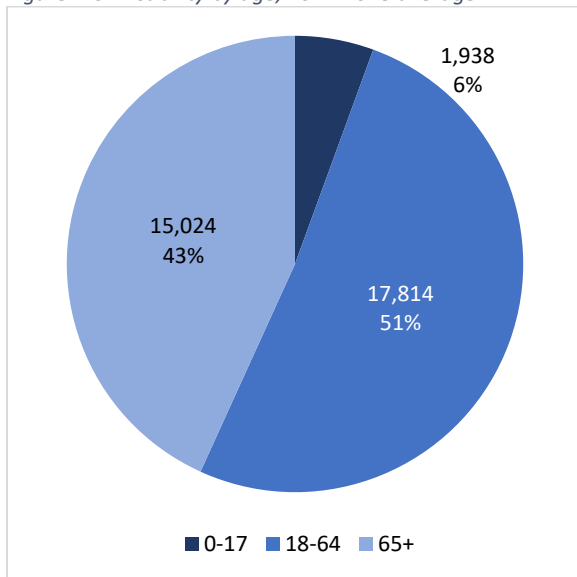
Figure 2-5. Disability status in Thurston County by age, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Figure 2-6 and Table 2-6 (next page) look at only those with disabilities. More than 15,000 seniors make up 43 percent of people with disabilities, and 43 percent of people with disabilities in Thurston County live in Lacey, Olympia, and Tumwater.

Figure 2-6. Disability by age, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Table 2-6. Disability by age, 2014-2018 average

Age Cohort	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
0-17	367	240	124	731	1,938
18-64	2,837	3,534	1,258	7,629	17,814
65+	2,632	2,898	1,088	6,618	15,024
TOTAL	5,836	6,672	2,470	14,978	34,776

Source: U.S. Census Bureau American Community Survey

Poverty

Approximately 15,139 people in Lacey, Olympia, and Tumwater combined live in poverty, and more than half live in Olympia (Table 2-7). Of the three cities, Olympia has the highest poverty rate, at 16.7 percent (Figure 2-7, next page). While poverty rates for Lacey, Tumwater, and Thurston County have all fallen since the Great Recession, Olympia's poverty rate has actually increased. Tumwater has the lowest poverty rate at 9.6 percent. A significant demographic of those living in poverty in Olympia are college and university students. According to a 2013 Census Bureau report, when college students – specifically those living off campus and not with their families – are excluded, the poverty rate decreases. For 2009-2011, Olympia's poverty rate decreased from 16.5 percent to 13.2 percent while Lacey's poverty rate decreased from 10.8 percent to 10.5 percent¹. No information was available for Tumwater.

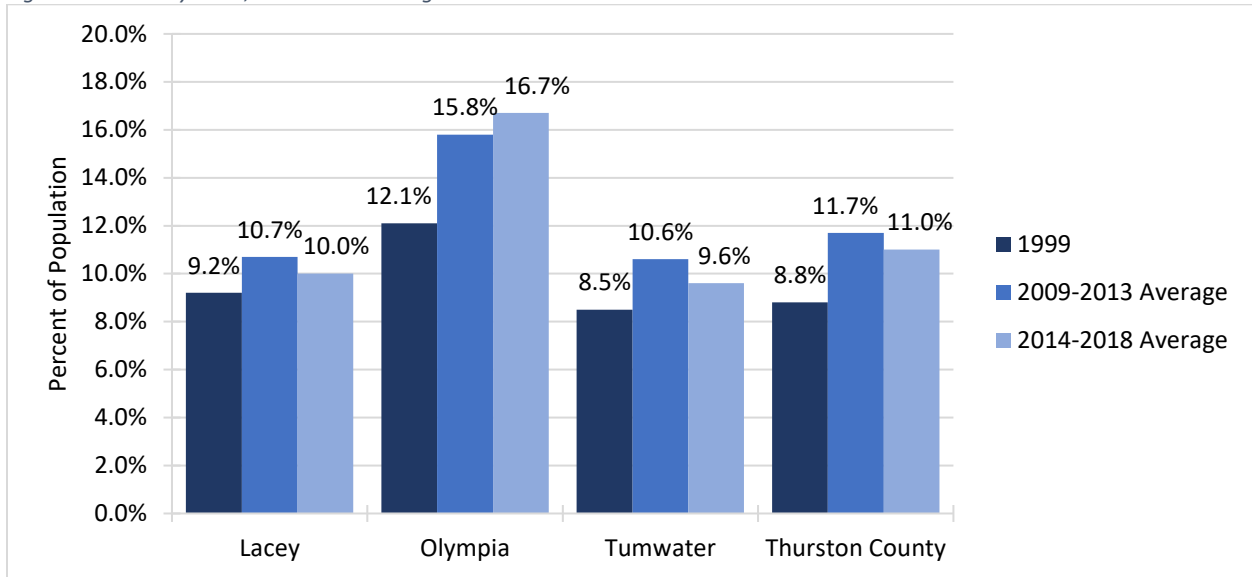
Table 2-7. People living in poverty, 2014-2018 average

	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
1999	2,798	4,982	1,060	8,840	17,992
2009-2013 Average	4,574	7,330	1,881	13,785	29,545
2014-2018 Average	4,675	8,300	2,164	15,139	29,718

Source: U.S. Census Bureau American Community Survey

¹ Bishaw, Alemayehu 2013 "Examining the Effect of Off-Campus College Students on Poverty Rates" (https://www.census.gov/content/dam/Census/library/working-papers/2013/acs/2013_Bishaw_01.pdf).

Figure 2-7. Poverty rates, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Chapter 3.

Household Characteristics

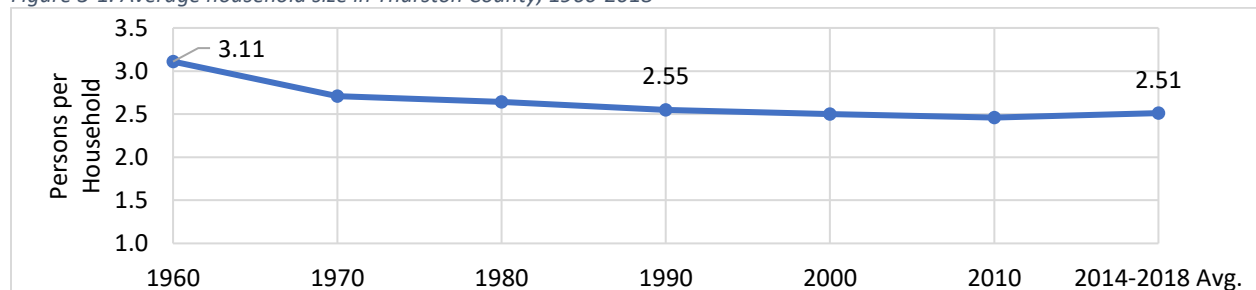
“Households” are groups of people living together in a single home. Members of households can be related (“family households”) or unrelated (“non-family households”). Thurston County is home to more than 100,000 households with nearly half in Lacey, Olympia, and Tumwater.

This chapter of the housing needs assessment looks at household characteristics, including household size and composition, homeownership and tenancy, and household income. It also includes a discussion of people who live in group quarters.

Household Size and Composition

Household size has generally fallen – from a high of 3.11 persons per household in 1960 to just 2.51 in 2018 (Figure 3-1). For the last thirty years, average household size has remained at or close to 2.5 persons per household.

Figure 3-1. Average household size in Thurston County, 1960-2018



Source: U.S. Census Bureau 1960 through 2010 Decennial Census, American Community Survey

Slight variations in average household size exist between Lacey, Olympia, and Tumwater (Table 3-1). Olympia has the smallest households with just 2.21 persons per household while Lacey has the largest (2.50). Household size also varies by race and ethnicity (Table 3-2). Households headed by a person of color are, on average, larger than those headed by a person who is white and not Hispanic.

Table 3-1. Average household size, 2014-2018 average

Jurisdiction	Persons per Household
Lacey	2.50
Olympia	2.21
Tumwater	2.39
Thurston County	2.51

Source: U.S. Census Bureau American Community Survey

Table 3-2. Average household size by race and ethnicity, 2010

Householder Race and Ethnicity	Persons per Household
White, Non-Hispanic	2.38
Person of Color	2.91

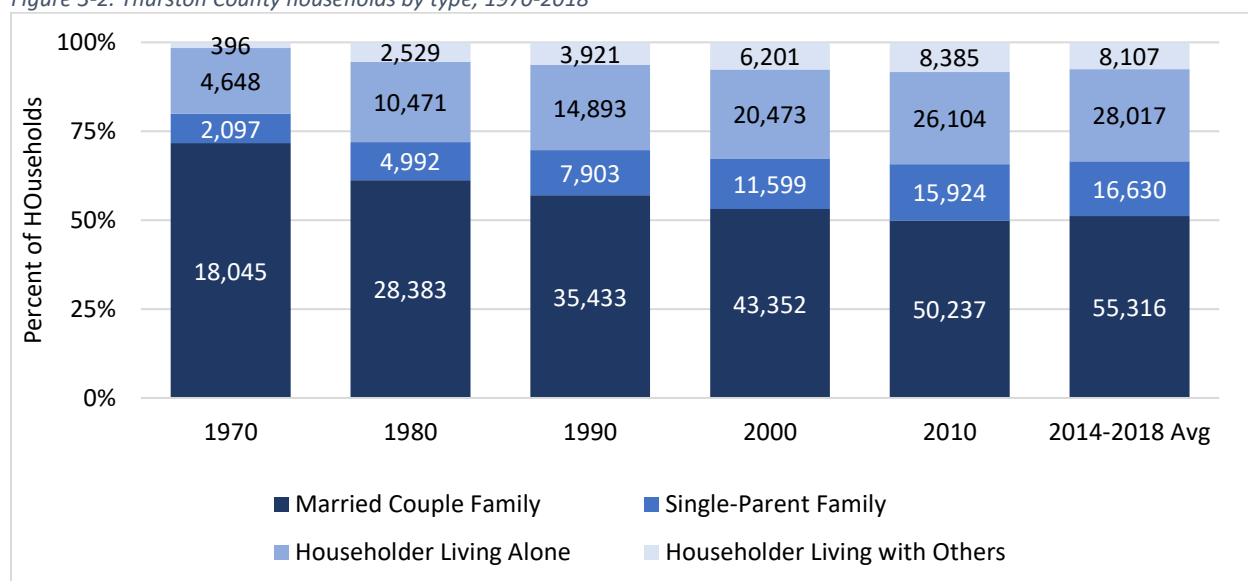
Source: U.S. Census Bureau American Community Survey

What is a Householder?

According to the U.S. Census Bureau's American Community Survey, one person in each household is designated as the householder. In most cases, this is the person or one of the people in whose name the home is owned, being bought, or rented and who is listed on line one of the survey questionnaire. If there is no such person in the household, any adult household member 15 years old and over could be designated as the householder.

Figure 3-2 shows the types of households found in Thurston County since 1970. Household types include married couple families, single-parent families, persons living alone, and unrelated persons living together. A family consists of two or more people living in the same household who are related by birth, marriage, or adoption. All people in a household who are related to the householder are regarded as members of the family. “Householder living with others” indicates two or more unrelated people living together. The makeup of individual households has changed over the last 50 years. In 1970, only 20 percent of households were nonfamily households (householders living alone or with others they are not related to) compared to 33 percent for the 2014-2018 average.

Figure 3-2. Thurston County households by type, 1970-2018



Source: U.S. Census Bureau

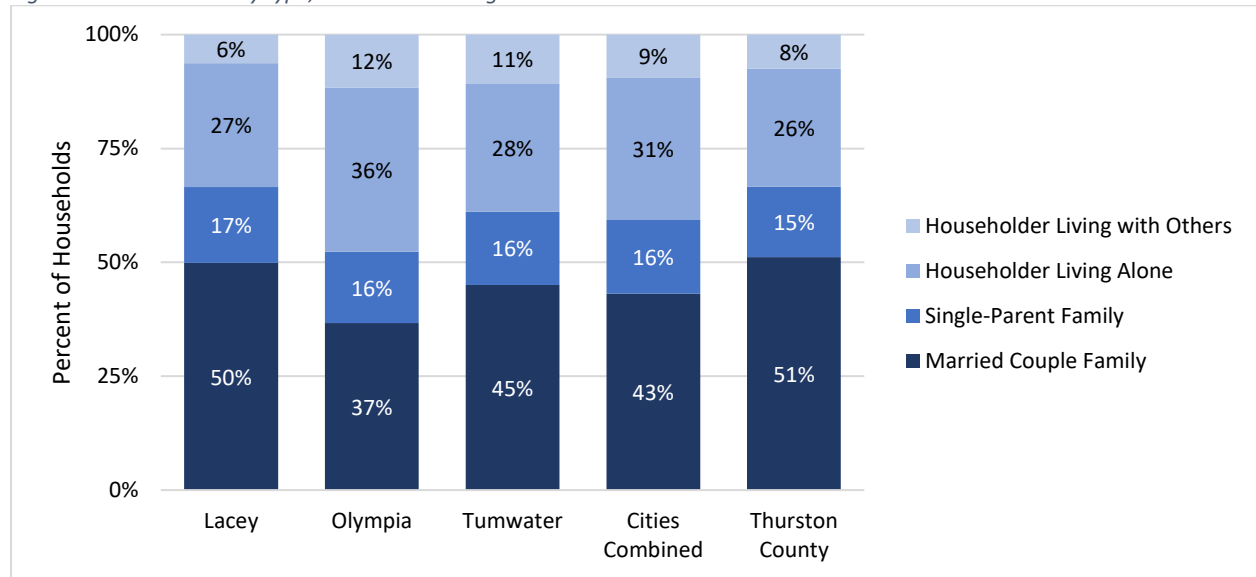
Table 3-3 and Figure 3-3 (next page) show the types of households found in Lacey, Olympia, Tumwater, the three cities combined, and Thurston County. Half of all Lacey households are married couple families compared to only 37 percent of households in Olympia. Householders living alone make up 36 percent of households in Olympia, but only 27 percent in Lacey and 28 percent in Tumwater. Measured as a percentage, Lacey has half as many householders living with others (six percent) than either Tumwater (11 percent) or Olympia (12 percent).

Table 3-3. Households by type, 2014-2018 average

Household Type	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
Married Couple Family	9,331	8,196	4,203	21,730	55,316
Single-Parent Family	3,125	3,507	1,507	8,139	16,630
Householder Living Alone	5,084	8,055	2,613	15,752	28,017
Householder Living with Others	1,171	2,593	1,013	4,777	8,107
TOTAL	18,711	22,351	9,336	50,398	108,070

Source: U.S. Census Bureau American Community Survey

Figure 3-3. Households by type, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Nonfamily households are more likely to be found in Olympia than either Lacey or Tumwater. Table 3-4 and Figure 3-4 (next page) look at households with children. Only 24 percent (5,410) of Olympia households include children, compared to 30 percent (2,814) for Tumwater and 32 percent (6,036) for Lacey. Olympia is also less likely to have family households without children than either Lacey or Tumwater.

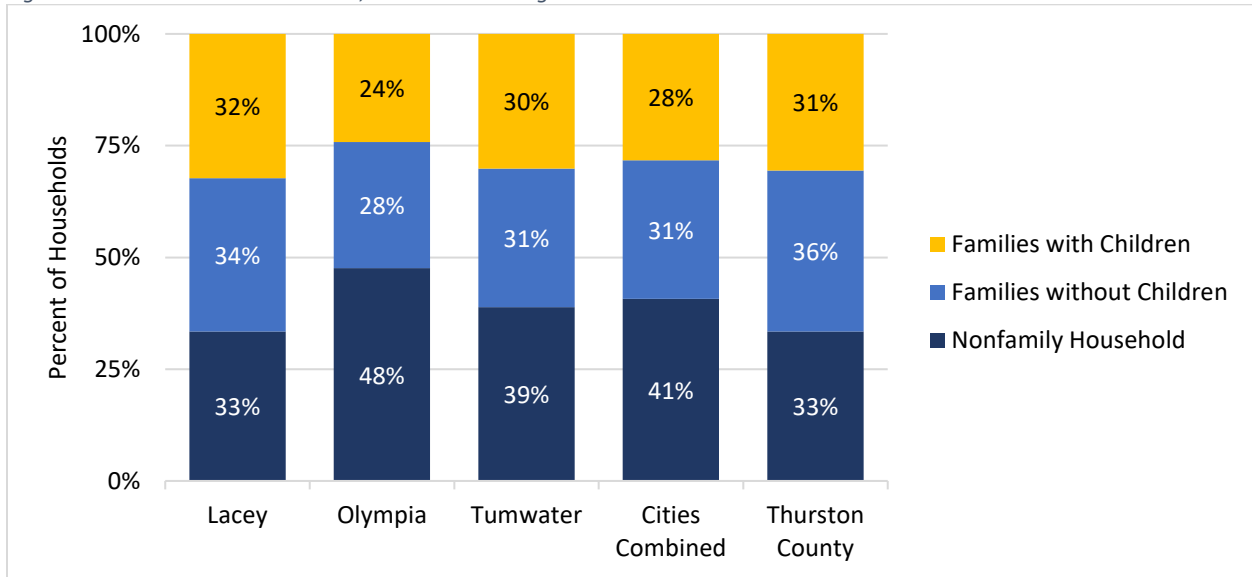
Table 3-4. Households with children, 2014-2018 average

Household Type	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
Family Households with Children	6,036	5,410	2,814	14,260	33,011
Family Households without Children	6,420	6,293	2,896	15,609	38,935
Nonfamily Households	6,255	10,648	3,626	20,529	36,124
TOTAL	18,711	22,351	9,336	50,398	108,070

NOTE: Some nonfamily households may contain children, such as a foster child living with a single adult. It is not clear how many children reside with one or more persons they are not related to.

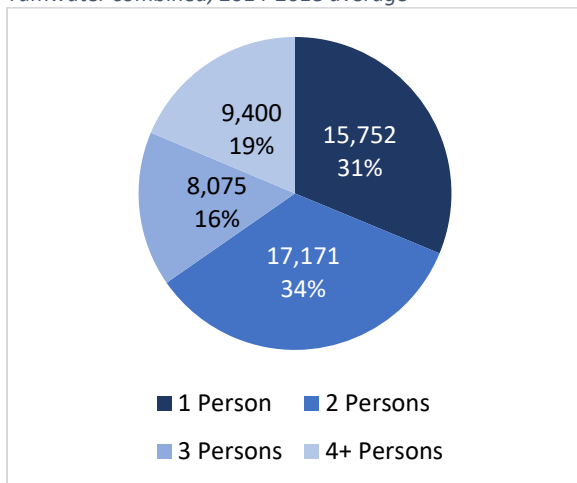
Source: U.S. Census Bureau American Community Survey

Figure 3-4. Households with children, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Figure 3-5. Household size in Lacey, Olympia, and Tumwater combined, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Of the total households in Lacey, Olympia, and Tumwater, 65 percent (32,923) have only one or two people (Figure 3-5). Olympia has more one-person households (8,055) than Lacey and Tumwater combined (5,084 and 2,613 respectively) while Lacey has the most households (4,257) with four or more people (Table 3-5).

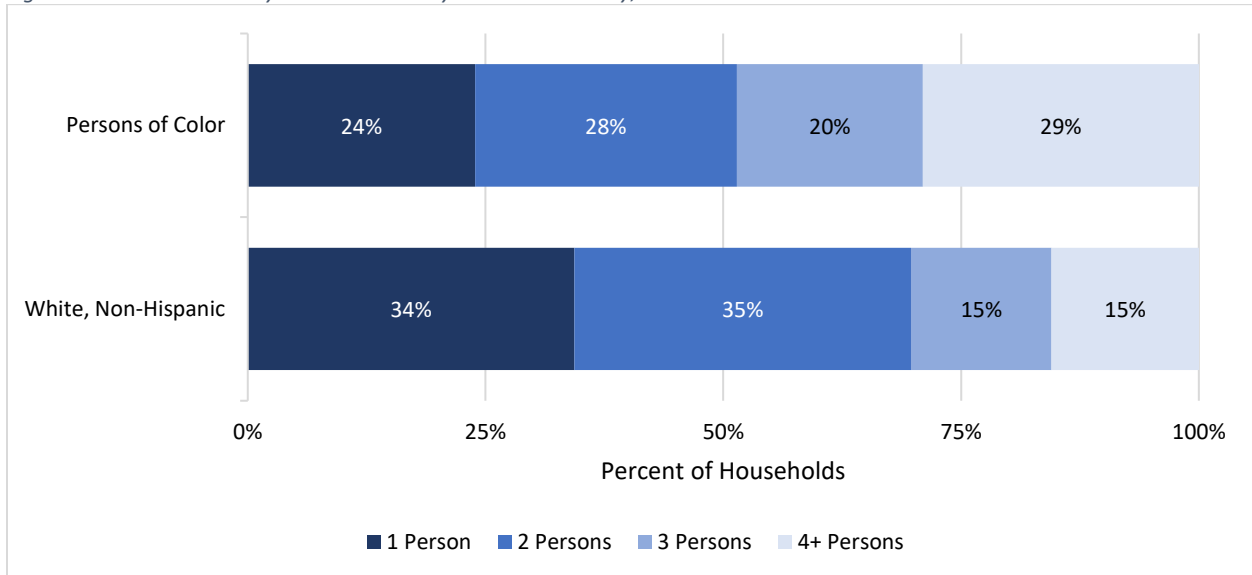
Table 3-5. Household size by location, 2014-2018 average

Persons per Household	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
1 Person	5,084	8,055	2,613	15,752	28,017
2 Persons	6,227	7,522	3,422	17,171	39,147
3 Persons	3,143	3,343	1,589	8,075	17,563
4+ Persons	4,257	3,431	1,712	9,400	23,343
All Households	18,711	22,351	9,336	50,398	108,070

Source: U.S. Census Bureau American Community Survey

Taking into consideration the householder’s race (Figure 3-6), people of color in Thurston County are less likely to live in one- or two-person households than people who are white and not Hispanic. Forty-nine percent of households headed by a person of color contain three or more people compared to 30 percent for households headed by a person who is white and not Hispanic.

Figure 3-6. Thurston County household size by race and ethnicity, 2010



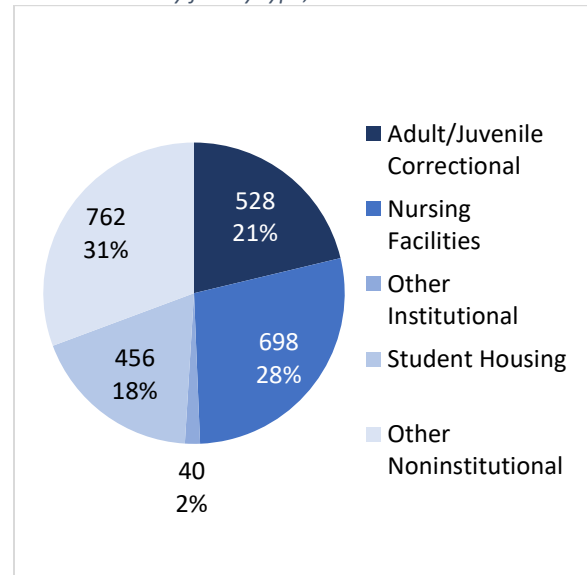
Source: U.S. Census Bureau American Community Survey

Group Quarters

In 2010, 2,484 Lacey, Olympia, and Tumwater residents lived in an institutional or noninstitutional group quarters setting (Figures 3-7 and 3-8, next page). This includes nursing facilities, adult group homes, homeless shelters, rehabilitation centers, and other types of group quarters (Table 3-6, next page). The remaining group quarters population is split between correctional facilities and college student dormitories.

The group quarters population is expected to increase by 1,700 people – 69 percent – between 2010 and 2045. Most of this increase is likely to be driven by nursing facilities, adult family homes, and other care facilities for an aging population.

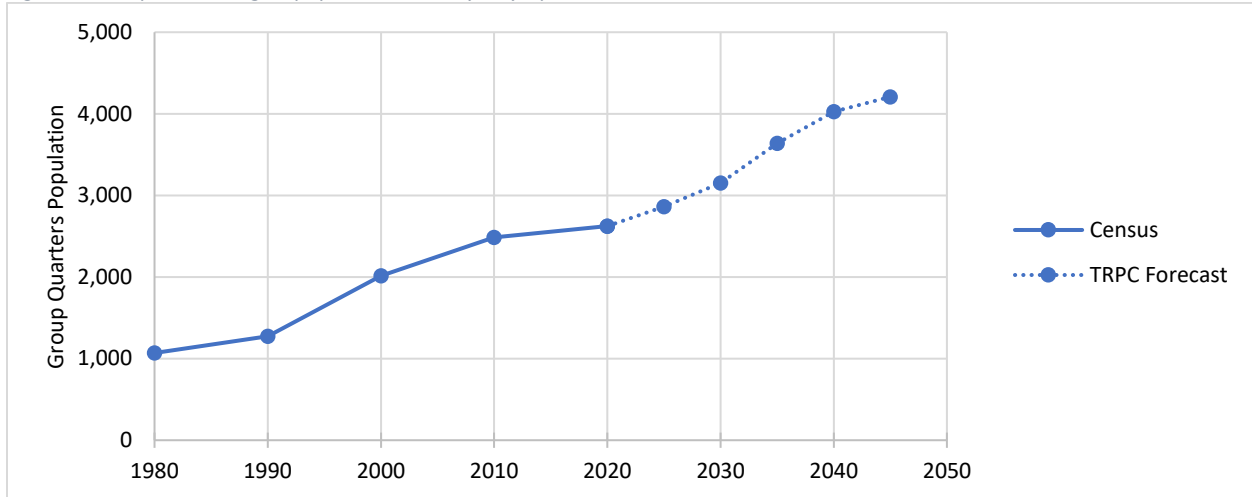
Figure 3-7. Population in group quarters in Lacey, Olympia, and Tumwater by facility type, 2010



Source: U.S. Census Bureau

The population experiencing homelessness is poorly reflected in these numbers. See Chapter 4 for more information on characteristics of the population experiencing homelessness.

Figure 3-8. Population in group quarters in Lacey, Olympia, and Tumwater, 1980-2045



Source: University of Minnesota IPUMS NHGIS, Thurston Regional Planning Council

Table 3-6. Types of group quarters

<p>Institutional Group Quarters</p> <p>Correctional Facilities for Adults</p> <ul style="list-style-type: none"> Federal Detention Centers Federal and State Prisons Local Jails and Other Municipal Confinement Facilities Correctional Residential Facilities Military Disciplinary Barracks and Jails <p>Juvenile Facilities</p> <ul style="list-style-type: none"> Group Homes for Juveniles Residential Treatment Centers for Juveniles Correctional Facilities Intended for Juveniles <p>Nursing Facilities/Skilled-Nursing Facilities</p> <p>Other Institutional Facilities</p> <ul style="list-style-type: none"> Mental (Psychiatric) Hospitals and Psychiatric Units in Other Hospitals Hospitals with Patients Who Have No Usual Home Elsewhere In-Patient Hospice Facilities Military Treatment Facilities with Assigned Patients Residential Schools for People with Disabilities 	<p>Non-Institutional Group Quarters</p> <p>College/University Student Housing</p> <p>Military Quarters</p> <ul style="list-style-type: none"> Military Quarters Military Ships <p>Other Non-Institutional Group Quarters</p> <ul style="list-style-type: none"> Emergency and Transitional Shelters (With Sleeping Facilities) for People Experiencing Homelessness Domestic Violence Shelters Soup Kitchens Regularly Scheduled Mobile Food Vans Targeted Non-Sheltered Outdoor Locations Group Homes Intended for Adults Residential Treatment Centers for Adults Maritime/Merchant Vessels Worker’s Group Living Quarters and Job Corps Centers Religious Group Quarters Living Quarters for Victims of Natural Disaster
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Source: U.S. Census Bureau 2010 Decennial Census

Ownership and Tenancy

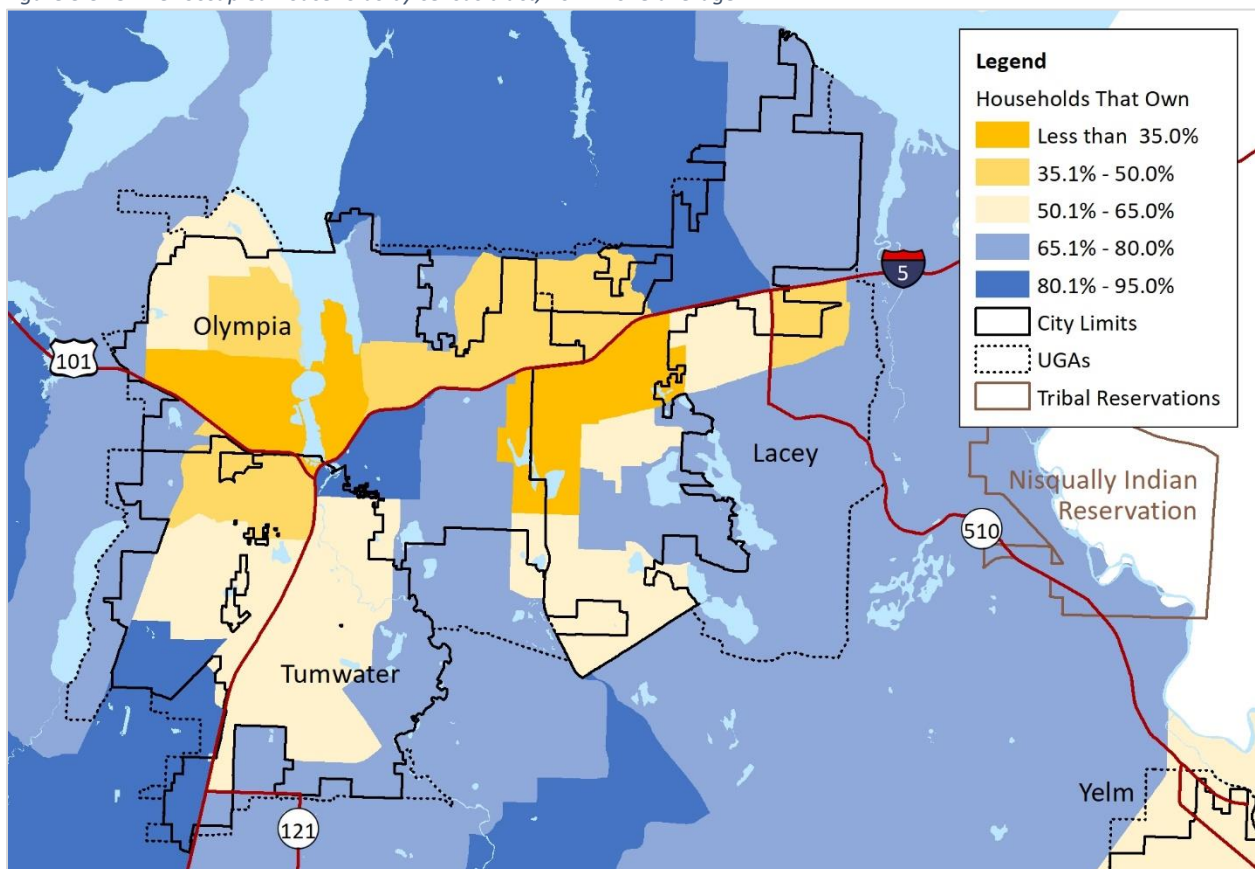
Homeownership can help a household build equity and move out of poverty, providing long-term stability. Renting offers households flexibility – whether for military personnel who may be posted in the region only for a few years, someone re-entering society after having been incarcerated, a person

with developmental disabilities that has limited income opportunities, or a senior who no longer wants the maintenance responsibilities that come with home ownership.

Census Tracts
Census tracts are small, relatively permanent statistical subdivisions of a county, the primary purpose of which is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people.

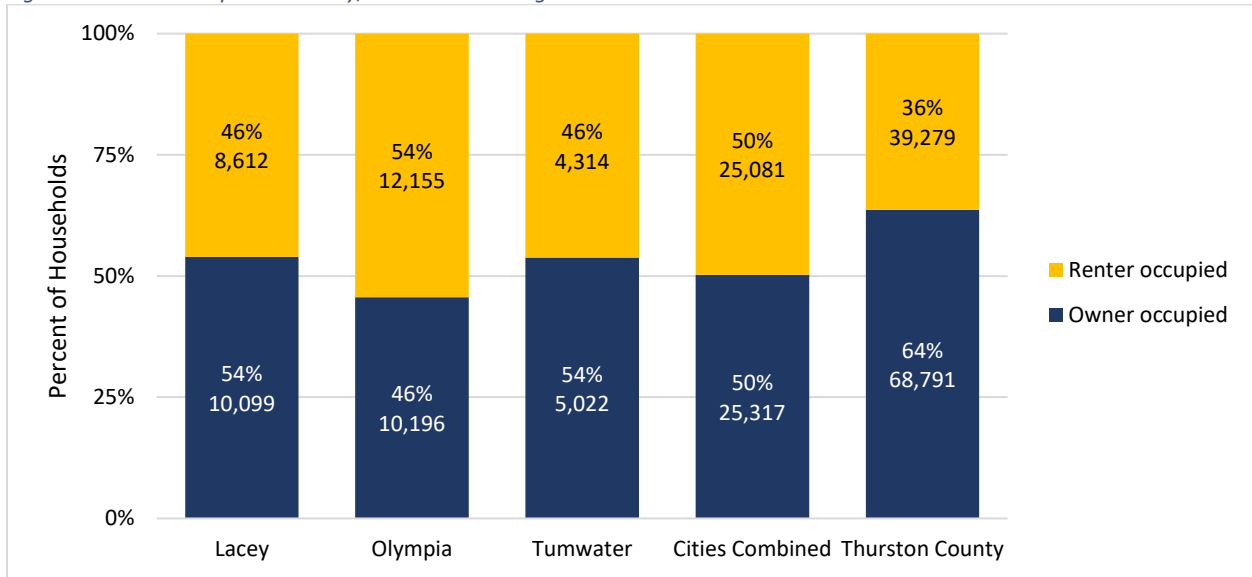
Figure 3-9 shows where households own their housing unit at the census tract level. Half of all occupied dwelling units in Lacey, Olympia, and Tumwater combined are owned by a member of the household (Figure 3-10, next page) compared to Thurston County where 64 percent are owner-occupied. Ownership varies among the three communities: in Olympia, 54 percent are renter occupied compared to 46 percent in Lacey and Tumwater.

Figure 3-9. Owner occupied households by census tract, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

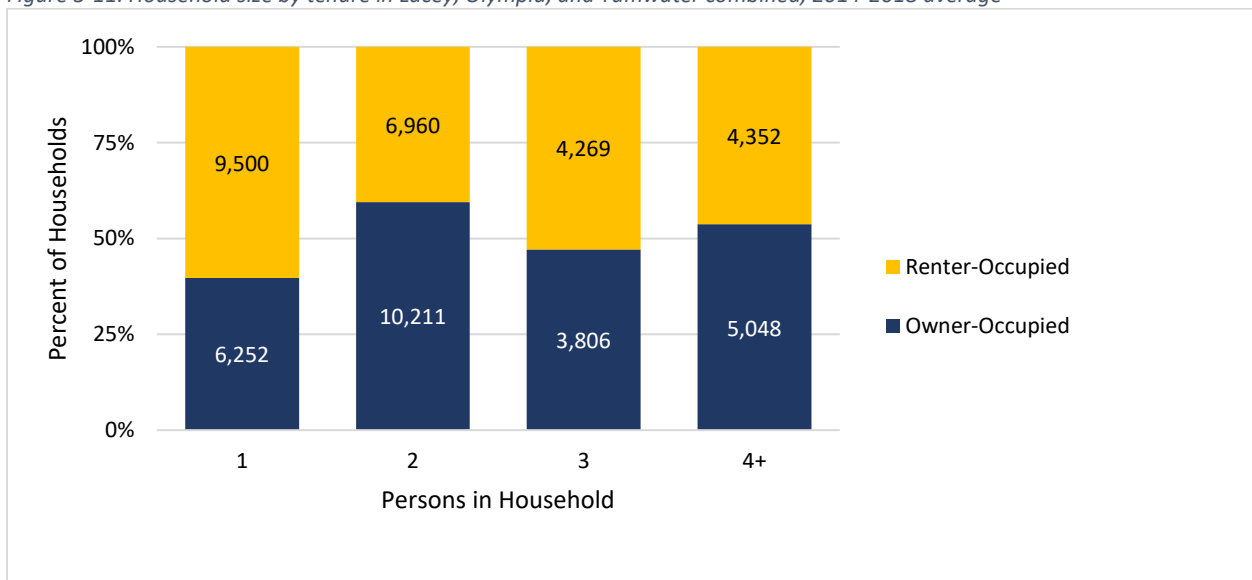
Figure 3-10. Ownership and tenancy, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Most one- and three-person households in Lacey, Olympia, and Tumwater are renter-occupied while most households with two people or households with four or more people are owner-occupied (Figure 3-11).

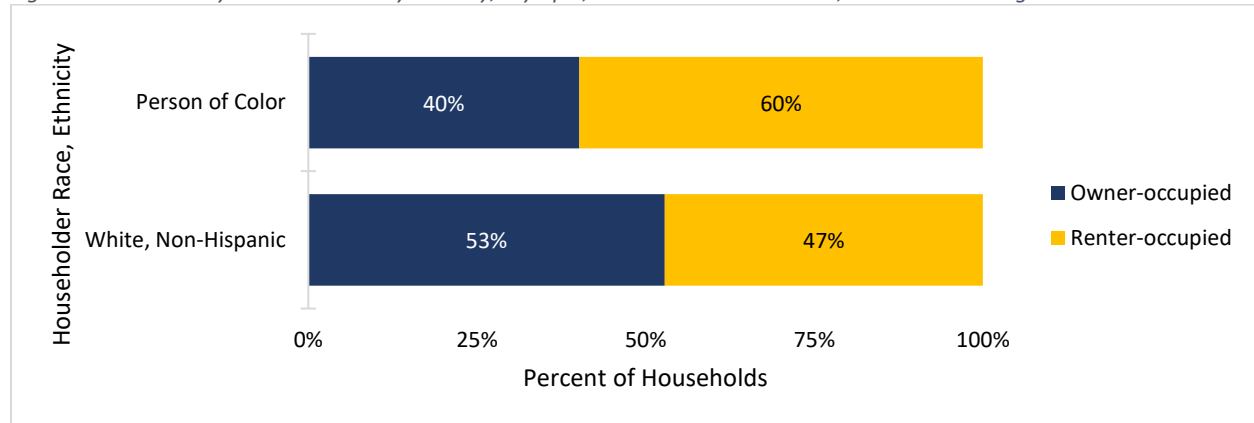
Figure 3-11. Household size by tenure in Lacey, Olympia, and Tumwater combined, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Tenure also changes based on the race and ethnicity of the householder (Figure 3-12). Forty percent of householders who are people of color own their home compared to 53 percent for householders who are white and not Hispanic.

Figure 3-12. Tenure by race and ethnicity in Lacey, Olympia, and Tumwater combined, 2014-2018 average



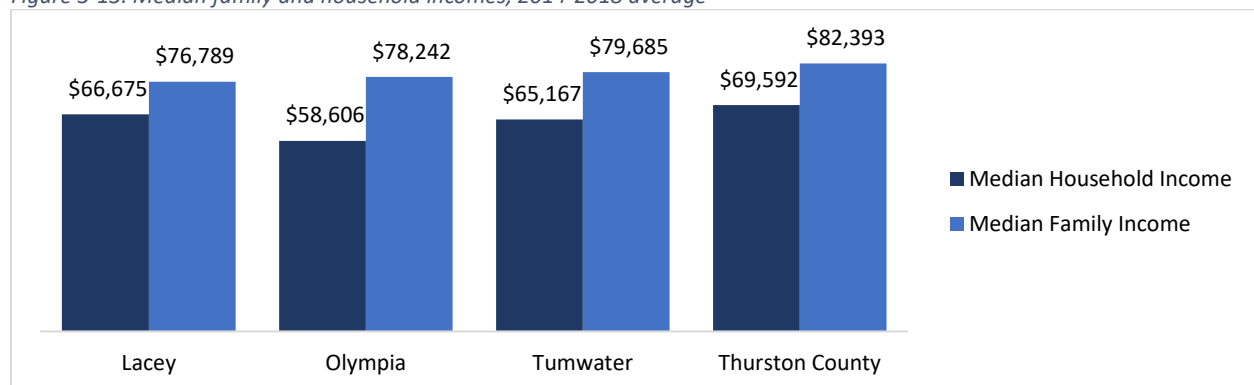
Source: U.S. Census Bureau American Community Survey

Income

A household’s income includes wage and self-proprietor earnings, earnings from interest and rental property, social security and retirement income, and other forms of public assistance for all members of the household. Median household income is commonly used to compare incomes for different populations or areas. Half of households earn more and half earn less than the median household income. Median household income is based on the total number of households including those with no income. This is typically lower than the median family income (Figure 3-13). Family households tend to be larger (at least two people) and have more income earners. Olympia has the lowest median household income (\$58,606) while Lacey has the highest (\$66,675).

HUD Area Median Family Income
 This section generally looks at household income. For a discussion of housing needs by HUD income levels (30, 50, 80, 100, and 120 percent of the area median family income) see Chapter 7, Gap Analysis.

Figure 3-13. Median family and household incomes, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

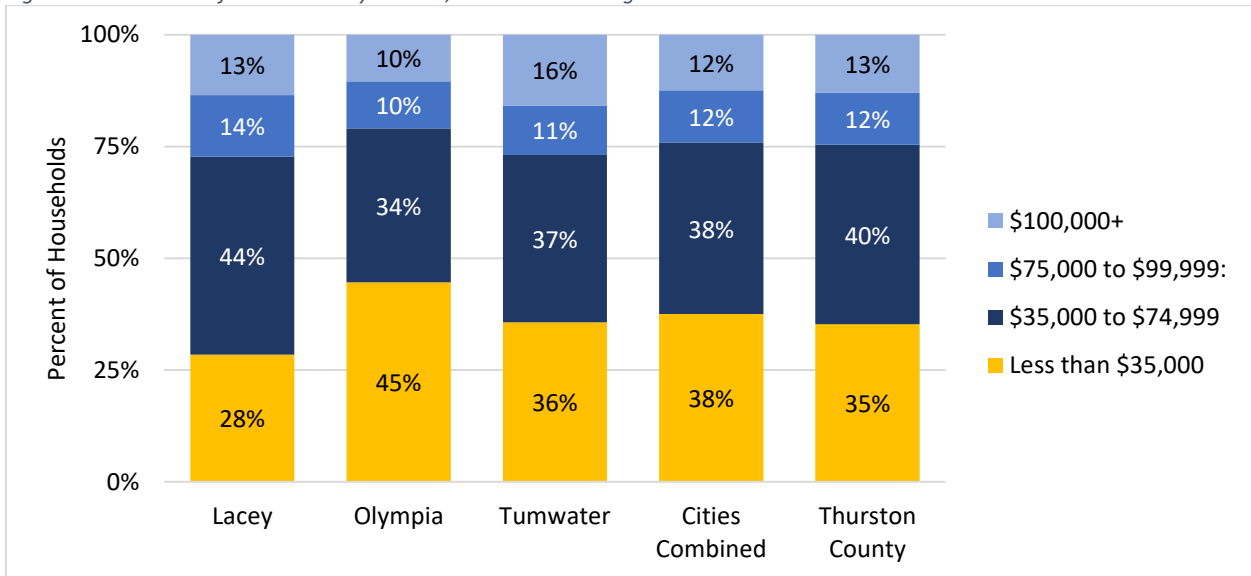
Table 3-7 and Figure 3-14 examine the actual income of households across the jurisdictions. In Olympia, 45 percent (5,420) of all households have an annual income of less than \$35,000. Twenty-seven percent of households in both Lacey and Tumwater have an annual income of \$75,000 or more compared to 20 percent in Olympia.

Table 3-7. Households by income, 2014-2018 average

Household Income	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
Less than \$35,000	2,452	5,420	1,539	9,411	13,833
\$35,000 to \$74,999	3,816	4,189	1,614	9,619	15,778
\$75,000 to \$99,999:	1,184	1,275	478	2,937	4,578
\$100,000 or more	1,160	1,271	683	3,114	5,090
TOTAL Households	8,612	12,155	4,314	25,081	39,279

Source: U.S. Census Bureau American Community Survey

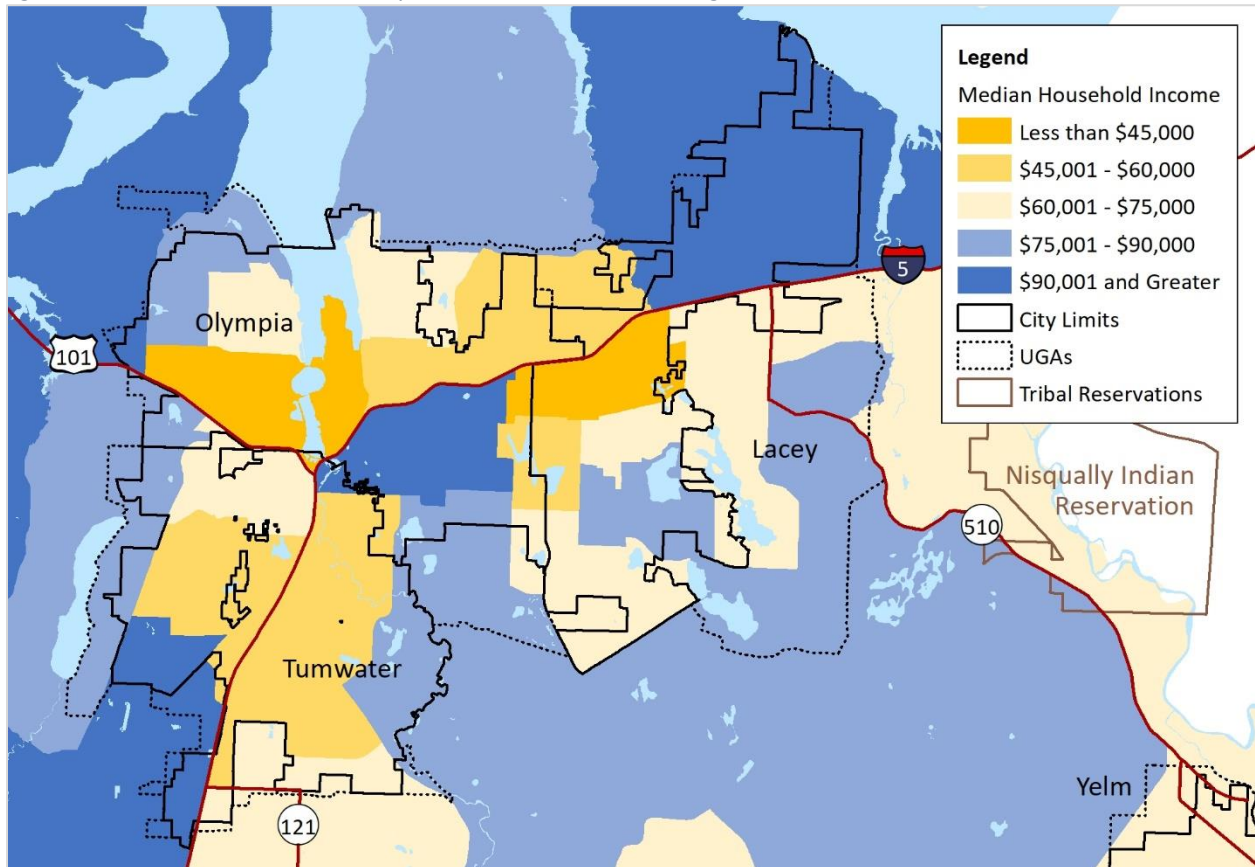
Figure 3-14. Percent of households by income, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Figure 3-15 shows median household income by census tract.

Figure 3-15. Median household income by census tract, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Table 3-8 and Figure 3-16 (next page) examine household income based on the race and ethnicity of the householder. Households headed by a person of color are frequently more likely to have an income less than \$35,000 than a white, non-Hispanic householder. In Lacey, Olympia, and Tumwater, 69 percent of households headed by a person who is Black or African American have a household income less than \$35,000 compared to just 25 percent of white, non-Hispanic households.

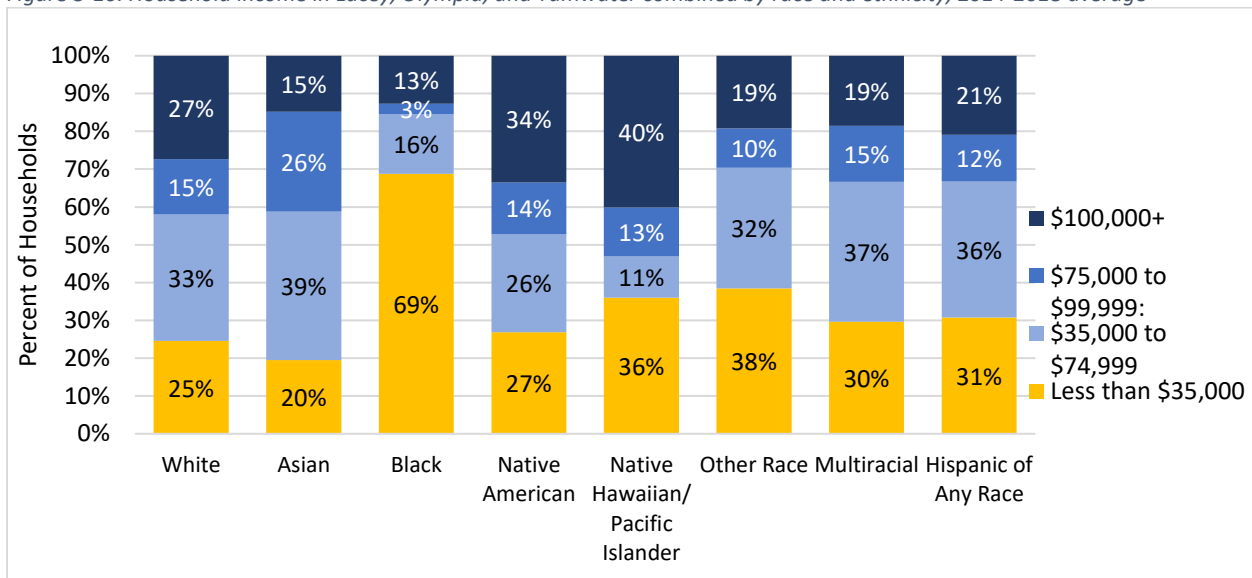
Table 3-8. Household Income in Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average

Household Income	White	Asian	Black	Native American	Native Hawaiian/ Pacific Islander	Other Race	Multiracial	Hispanic of Any Race
Less than \$35,000	18,505	511	608	1,164	260	420	1,069	2,003
\$35,000 to \$74,999	28,438	1,032	368	1,436	248	311	1,330	2,104
\$75,000 to \$99,999	14,016	702	129	663	51	213	579	951
\$100,000 or more	27,326	611	287	1,734	247	213	884	1,368
TOTAL Households	88,285	2,856	1,392	4,997	806	1,157	3,862	6,426

NOTE: In the table above, persons who are Latino or Hispanic are only represented in "Hispanic of Any Race."

Source: U.S. Census Bureau American Community Survey

Figure 3-16. Household income in Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average



NOTE: In the figure above, persons who are Latino or Hispanic are only represented in "Hispanic of Any Race."

Source: U.S. Census Bureau American Community Survey

Chapter 4.

Unique Housing Needs

This chapter looks at the unique needs for housing for people who are elderly, those experiencing homelessness, veterans and military personnel, and college students.

Seniors

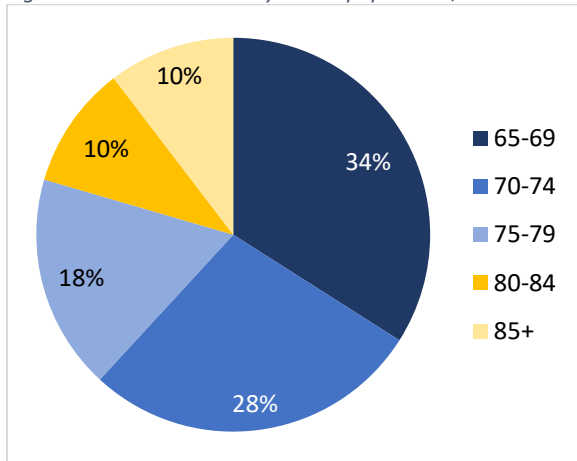
Approximately 52,800 seniors (age 65 or older) live in Thurston County in 2020, making up 18 percent of the total population. The senior population is forecasted to grow to 87,200 by 2045 and comprise 23 percent of the total population. In addition, the senior population will skew older in 2045 than it does today. Table 4-1 and Figures 4-1 and 4-2 (next page) show the breakdown of Thurston County's senior population today and forecasted for 2045. The proportion of seniors who are between the ages of 65 and 74 will shrink over the next 25 years while those who are 80 and older will grow. The growth in the number of older seniors has implications for the types of care and housing needed, including assisted living facilities, nursing homes, and adult family homes.

Table 4-1. Thurston County senior population, 2020-2045

Age Cohort	2020	2025	2030	2035	2040	2045
65-69	17,967	18,497	18,354	17,889	18,459	20,541
70-74	14,707	17,098	17,571	17,518	17,118	17,613
75-79	9,336	13,300	15,478	15,974	16,015	15,667
80-84	5,338	7,823	11,211	13,150	13,624	13,723
85+	5,484	6,452	8,897	12,849	16,823	19,635
TOTAL	52,832	63,170	71,511	77,380	82,039	87,179

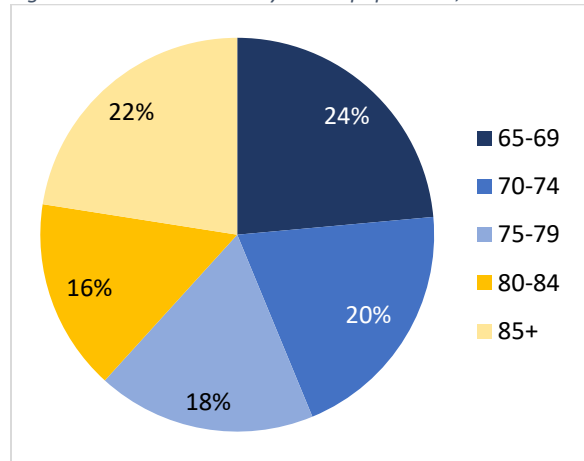
Source: Washington Office of Financial Management

Figure 4-1. Thurston County senior population, 2020



Source: Washington Office of Financial Management

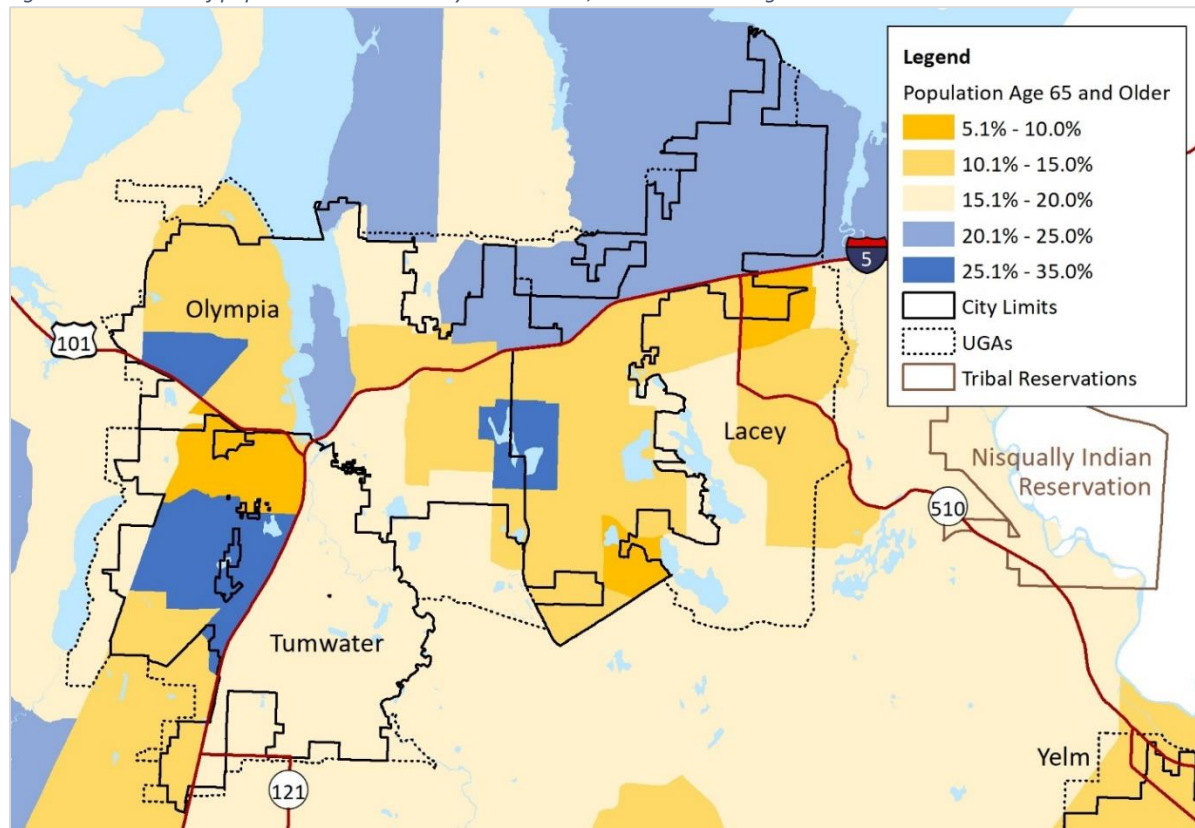
Figure 4-2. Thurston County senior population, 2045



Source: Washington Office of Financial Management

Figure 4-3 shows where the senior population lives based on census tracts. The census tracts near the Capital Medical Center in West Olympia, the Littlerock/Trosper Road area of Tumwater, and the Chambers Lake area in Lacey. There are also higher concentrations of seniors living in Lacey north of the freeway.

Figure 4-3. Percent of population 65 or older by census tract, 2014-2018 average

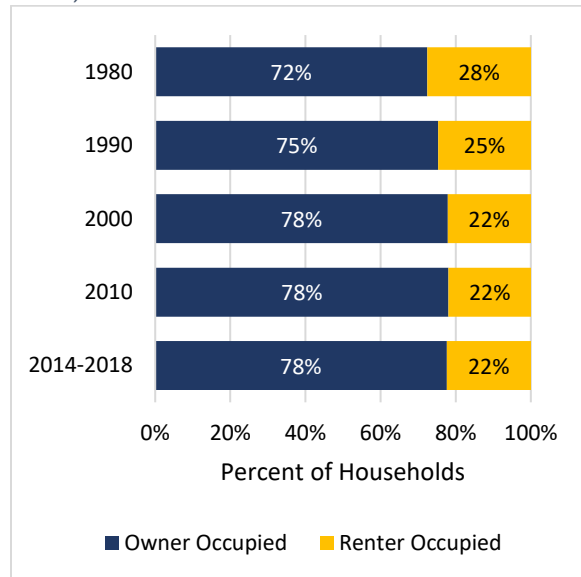


Source: U.S. Census Bureau American Community Survey

Since 2000, about 22 percent of the noninstitutionalized senior population in Thurston County rents their housing unit while 78 percent own it (Figure 4-4). While the percent of seniors renting has remained stable, the total number has increased. There are several apartment complexes and assisted living facilities in Lacey, Olympia in Tumwater targeted to people age 55 and older.

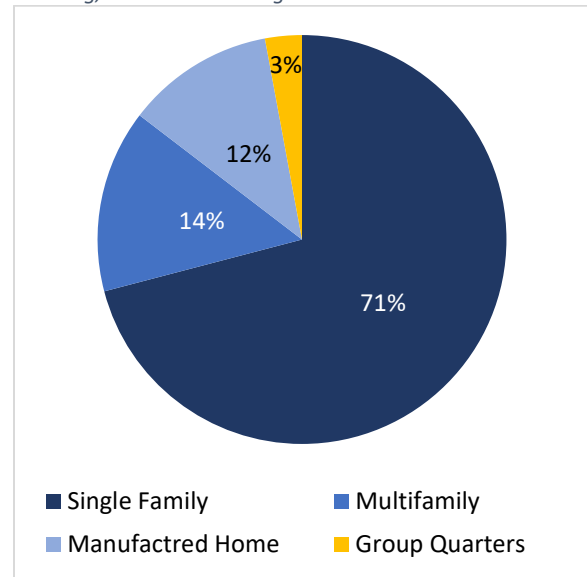
About 12 percent of seniors countywide live in manufactured housing or mobile homes (Figure 4-5) compared to nine percent for the county population as a whole. There are several manufactured home communities in Lacey, Olympia in Tumwater targeted to people age 55 and older.

Figure 4-4. Senior households in Thurston County by tenure, 1980-2018



Source: U.S. Census Bureau

Figure 4-5. Senior households in Thurston County by type of dwelling, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

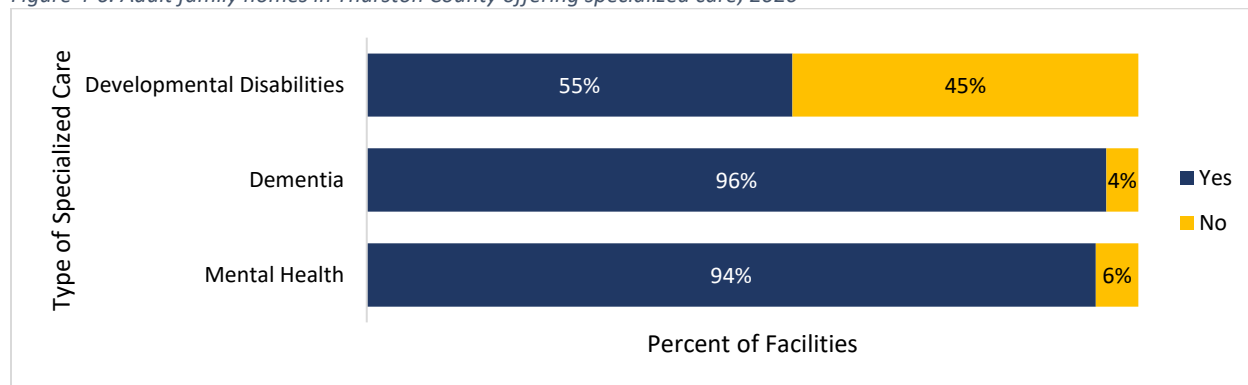
As of July 2, 2020, Thurston County is home to seven nursing home facilities with a total client capacity of 790 and 145 adult family homes with a total client capacity of 794 (Table 4-2). Some adult family homes offer specialized care for those with dementia, mental health issues, and developmental disabilities (Figure 4-6, next page). Specialized care is defined under state law, which sets standards a provider must meet to be classified as delivering such care.

Table 4-2. Adult family and nursing homes in Thurston County, 2020

Facility Statistics	Adult Family Homes	Nursing Homes
Total Facilities:	145	7
Total Beds:	794	790
Average Beds per Facility:	5.5	112.9

Source: Washington State Dept. of Social and Health Services

Figure 4-6. Adult family homes in Thurston County offering specialized care, 2020



Source: Washington State Dept. of Social and Health Services

Military Personnel and Veterans

The proximity of Joint Base Lewis-McChord (JBLM) to Thurston County impacts the number of military personnel and veterans who live in the region. Approximately 13,475 military personnel and veterans live in Lacey, Olympia, and Tumwater (Table 4-3). Service members who live off base are eligible to receive a basic housing allowance, ranging between \$1,386 and \$2,622 per month in 2020. The allowance varies based on the service member’s location, rank, and the number of military dependents in their household. The basic housing allowance can be used for rental costs or a mortgage.

Forthcoming Military Housing Studies
 There are two military-related housing studies anticipated to be released in 2020:

- *Housing Market Study by JBLM*
- *Off-Base Housing Study for Service Members by South Sound Military Communities Partnership*

These studies should provide clearer data on the housing needs of service members and their impact on the local housing market.

Table 4-3. Military personnel and veterans, 2014-2018 average

	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
Veterans	5,858	3,646	1,968	11,472	28,992
Military Personnel	1,388	280	335	2,003	3,900
TOTAL	7,246	3,926	2,303	13,475	32,892

Source: U.S. Census Bureau American Community Survey

People Experiencing Homelessness

Thurston County conducts a census of those experiencing homelessness each year at a single point in time. Between 2015 and 2019, those experiencing homelessness grew from 476 to 800 people – a 68 percent increase (Figure 4-7) during the same period. The number of people who are unsheltered – sleeping outside, in a tent, car, or other place not meant for human habitation – increased from 34 percent of those experiencing homelessness in 2015 to 49 percent in 2019.

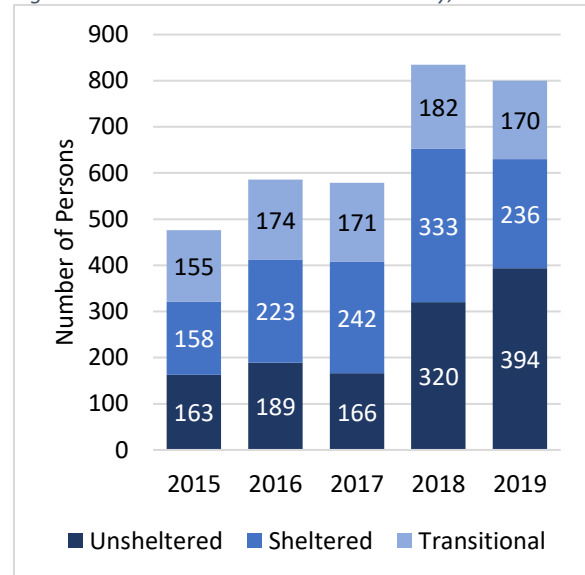
Figure 4-8 examines where those who experience homelessness shelter and includes two more categories of people who are housing insecure: those living in a jail or medical institution that will be released to a homeless situation and those who are temporarily staying with friends or family. When taking into consideration these additional populations whose housing may be tenuous, an additional 344 people could be considered to experience homelessness.

About 34 percent of those experiencing homelessness are unsheltered. Another 21 percent can be found in shelters and 15 percent in transitional housing. Thirty percent are incarcerated, in a medical institution, or are temporarily staying with friends or family.

Counting Those Experiencing Homelessness

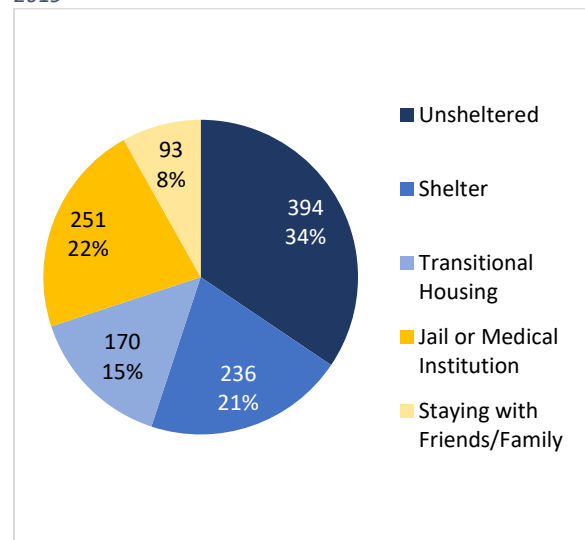
Not everyone experiencing homelessness can be found or chooses to participate in the annual Point-in-Time census. Counting those staying in shelters or an institution is easier than counting those living in a tent, in a car, or another unsheltered location. According to the Thurston County Homeless Crisis Response Plan, there are likely 800-1,000 unsheltered people countywide – 2-3 times as many unsheltered people as reported in the 2019 point-in-time census.

Figure 4-7. Homelessness in Thurston County, 2015-2019



Source: Thurston County Public Health and Social Services

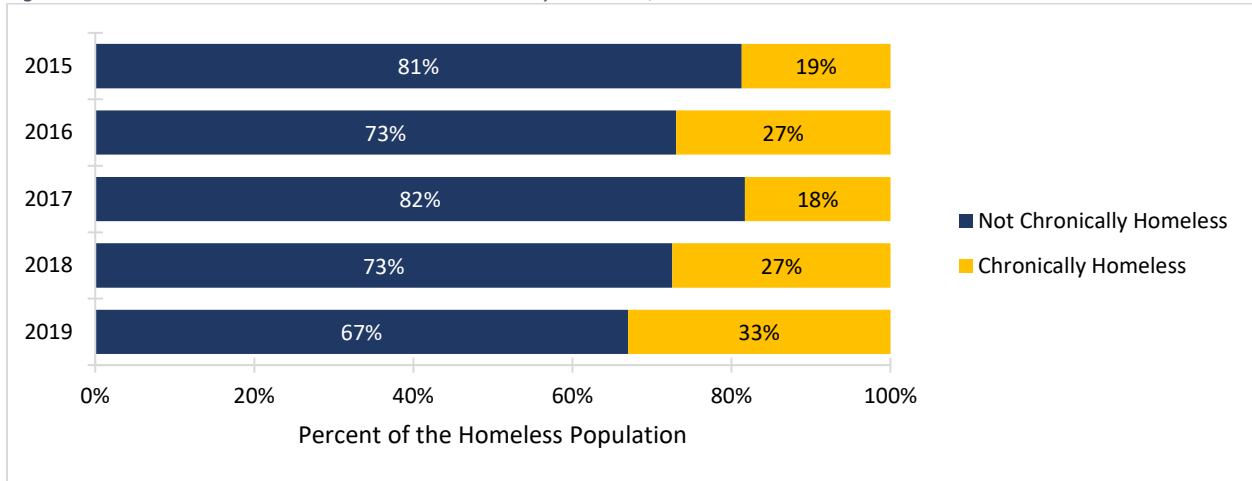
Figure 4-8. Where the homeless shelter in Thurston County, 2019



Source: Thurston County Public Health and Social Services

In 2019, 33 percent of people experiencing homelessness were considered chronically homeless (Figure 4-9). To be chronically homeless means a person has a disability and has also either been homeless for more than one year or has been homeless at least four times in the last three years.

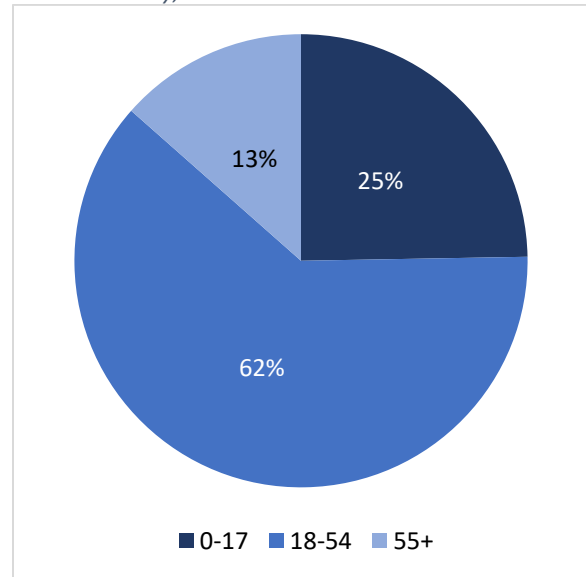
Figure 4-9. Chronic homelessness in the Thurston County homeless, 2019



Source: Thurston County Public Health and Social Services

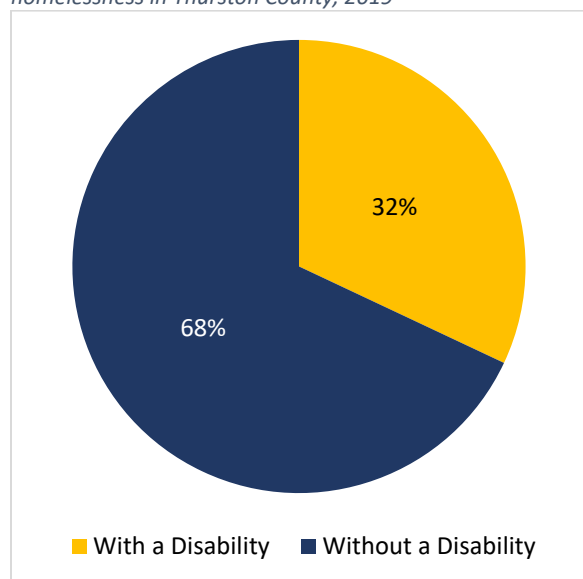
Thurston County reports that between July 2018 and June 2019, 1,886 households (2,345 people total) received assistance through a housing program. Housing programs include emergency shelter placement, rapid re-housing and homeless prevention assistance, transitional housing placement, or a permanent housing placement with or without supportive services. Of those that received assistance through a housing program, one in four was a minor (Figure 4-10), but the majority were single adults without children. Nearly one in three had some kind of disability (Figure 4-11, next page) with mental health issues and substance use being the most common types of reported (Figure 4-12, next page).

Figure 4-10. Age of those experiencing homelessness in Thurston County, 2019



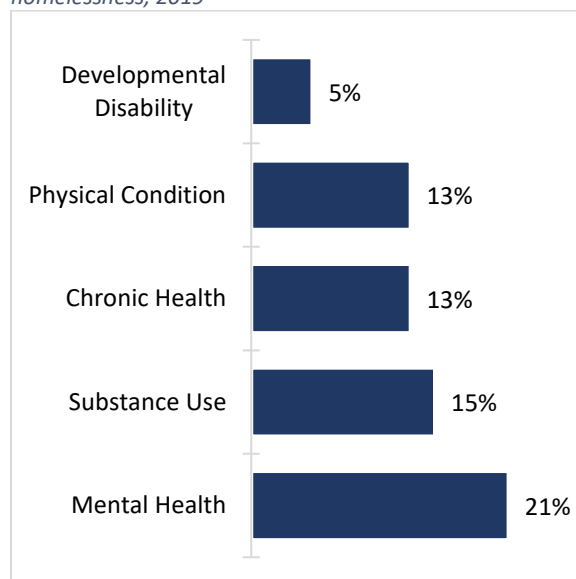
Source: Thurston County Public Health and Social Services

Figure 4-11. Disability among those experiencing homelessness in Thurston County, 2019



Source: Thurston County Public Health and Social Services

Figure 4-12. Types of disabilities among those experiencing homelessness, 2019



NOTE: A person can report more than one disability.
Source: Thurston County Public Health and Social Services

People of color are disproportionately represented in housing assistance programs (Table 4-4).

Table 4-4. Race and ethnicity of those experiencing homelessness in Thurston County, 2019

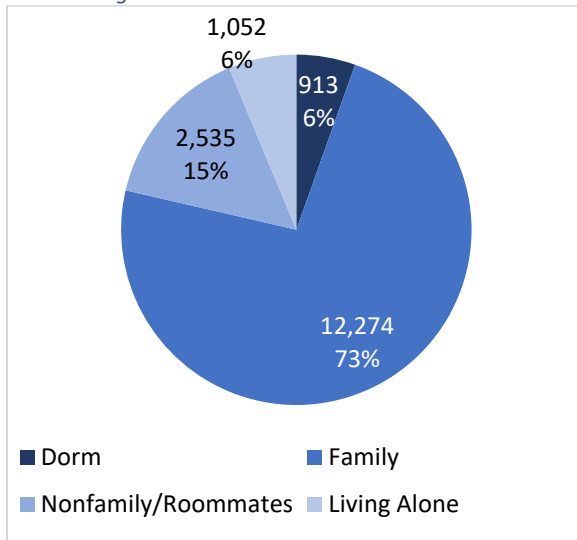
Race and Ethnicity	Population Experiencing Homelessness	Thurston County Population
White, Non-Hispanic	63%	73%
Asian, Non-Hispanic	1%	7%
Black, Non-Hispanic	10%	4%
Native American, Non-Hispanic	3%	1%
Native Hawaiian/Pacific Islander, Non-Hispanic	3%	1%
Multiracial, Non-Hispanic	9%	5%
Hispanic of Any Race	11%	9%
TOTAL	100%	100%

NOTE: Data does not include individuals who did not report their race and ethnicity. Such persons account for 16 percent of all individuals served by housing programs in Thurston County.
Source: Thurston County Public Health and Social Services

College Students

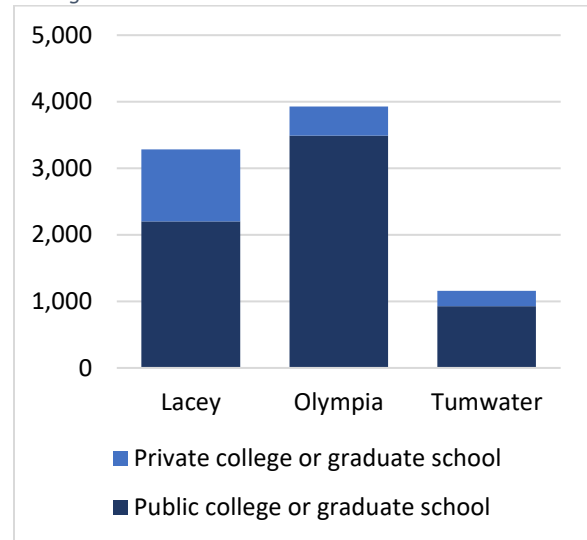
Approximately 16,800 Thurston County residents are currently enrolled in a college or university. Only a small percent of students (about 6 percent) live in a dormitory or other group quarters setting (Figure 4-13). Over 12,000 students – nearly three quarters – live in a family household (i.e. with another relative). The remainder live in non-family households, either alone (6 percent) or with one or more unrelated persons (15 percent). Most college students live in Olympia and Lacey (Figure 4-14).

Figure 4-13. Household type for college students, 2014-2018 average



Source: U.S. Census Bureau American Community Survey PUMS

Figure 4-14. Residents enrolled in college, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

About 2,600 college students in Thurston County live below the poverty level (Table 4-5). This is especially true for students living in non-family households; more than 40 percent live below the poverty line. Countywide, only five percent of the population live in poverty. While many students living on their own may still receive support from a parent or guardian – a form of income not included in poverty calculations – this still underscores the need for affordable housing for students living off campus.

Table 4-5. Poverty rate for Thurston County college students, 2014-2018 average.

Household Type	Total Households	Households in Poverty	Poverty Rate
Dorm or Other Group Quarter	913	35	4%
Family	12,274	1,114	9%
Non-family 2+ Person	2,535	1,032	41%
Living Alone	1,052	417	40%
TOTAL	16,774	2,598	100%

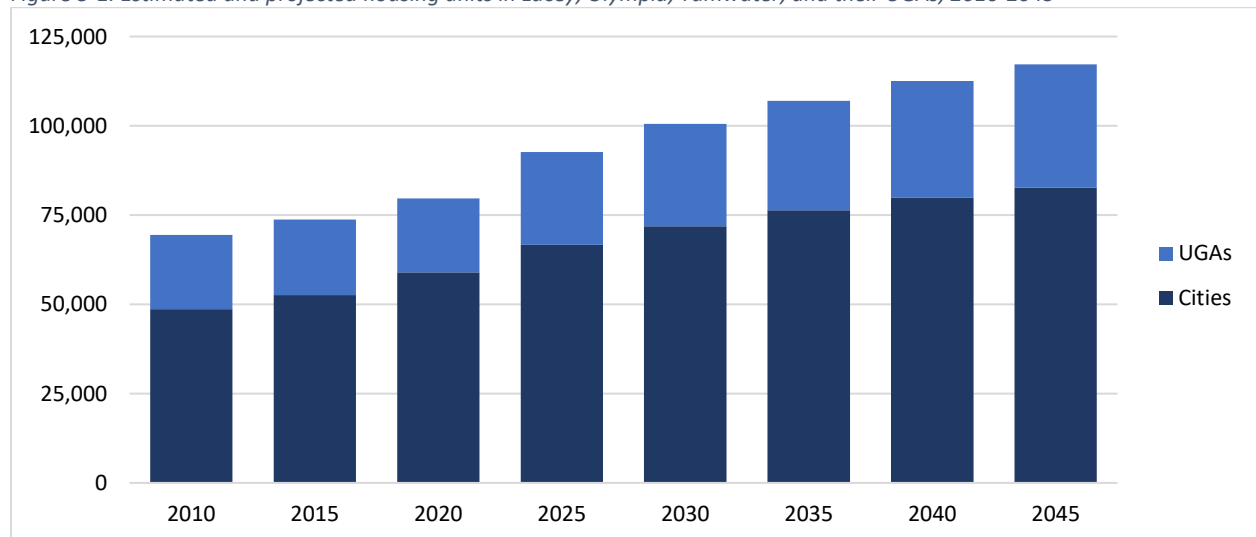
Source: U.S. Census Bureau American Community Survey

Chapter 5. Housing Supply

Trends and Projections

Lacey, Olympia, and Tumwater, and their unincorporated urban areas have a combined housing inventory of 83,200 dwelling units (Figure 5-1). This is about two-thirds of Thurston County’s housing stock. Between 2020 and 2045, Thurston Regional Planning Council (TRPC) projects 34,000 new units will be built to accommodate the region’s growing population.

Figure 5-1. Estimated and projected housing units in Lacey, Olympia, Tumwater, and their UGAs, 2010-2045



Source: Thurston Regional Planning Council

Building Types and Density

The Lacey, Olympia, and Tumwater urban area is generally suburban in nature. Most dwellings units – 64 percent – are detached single family or townhouse (single-family attached) units (Table 5-1). TRPC projects that the single-family units will continue to be the primary housing type over the next 25 years, although multifamily units will make up an increasing share of new housing.

Roughly half of Lacey, Olympia, and Tumwater households rent. About 60 percent of renters are in multifamily units (duplex, triplexes, and apartments) with the remainder in single-family or manufactured homes. Single family dwellings, townhouses, and manufactured and mobile homes are predominantly owner-occupied while buildings with two or more units are almost exclusively rented (Figure 5-2).

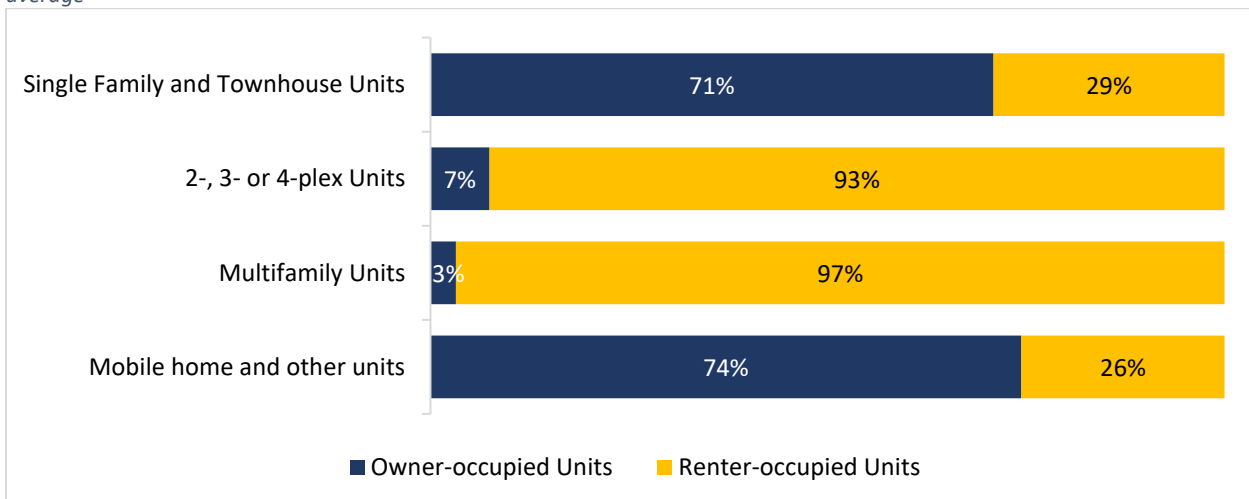
Manufactured homes make up a small percentage of Lacey, Olympia, and Tumwater’s housing stock but are an important form of housing for many seniors and low-income households. TRPC estimates that about 75 percent of manufactured homes are in manufactured home communities where 10 or more units are on the same property. Since they do not own the land the manufacture home is sited on, many unit owners are vulnerable to displacement should the landowner decide to sell the property.

Table 5-1. Occupied housing units by building type, 2014-2018 average

Building Type	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
Single Family and Townhouse Units	13,288	13,025	6,105	32,418	78,390
2-, 3- or 4-plex Units	1,795	2,174	676	4,645	6,561
Multifamily Units	2,735	6,493	1,906	11,134	13,277
Mobile home and other units	893	659	649	2,201	9,842
Total Occupied Units	18,711	22,351	9,336	50,398	108,070

Source: U.S. Census Bureau American Community Survey

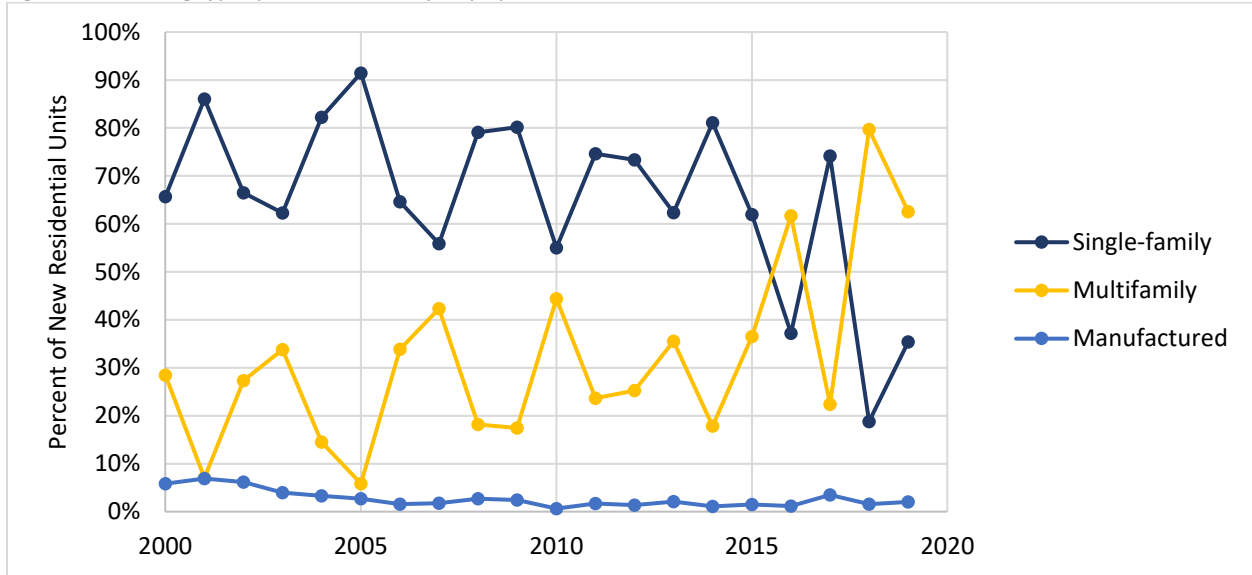
Figure 5-2. Occupied housing units in Lacey, Olympia, and Tumwater combined by building type and tenancy, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

There has been a general trend towards development in zones that allow higher densities of development over the past 20 years (see Appendix A for more information). Multifamily unit construction has increased from about 30 percent of new units in 2000 to over 60 percent in 2019 (Figure 5-3). In addition to the increasing number of multifamily units being constructed, changes to zoning to allow more homes per acre and more infill and redevelopment projects have led to an overall increase in housing densities across the three cities and their urban growth areas (UGAs) (Figure 5-4).

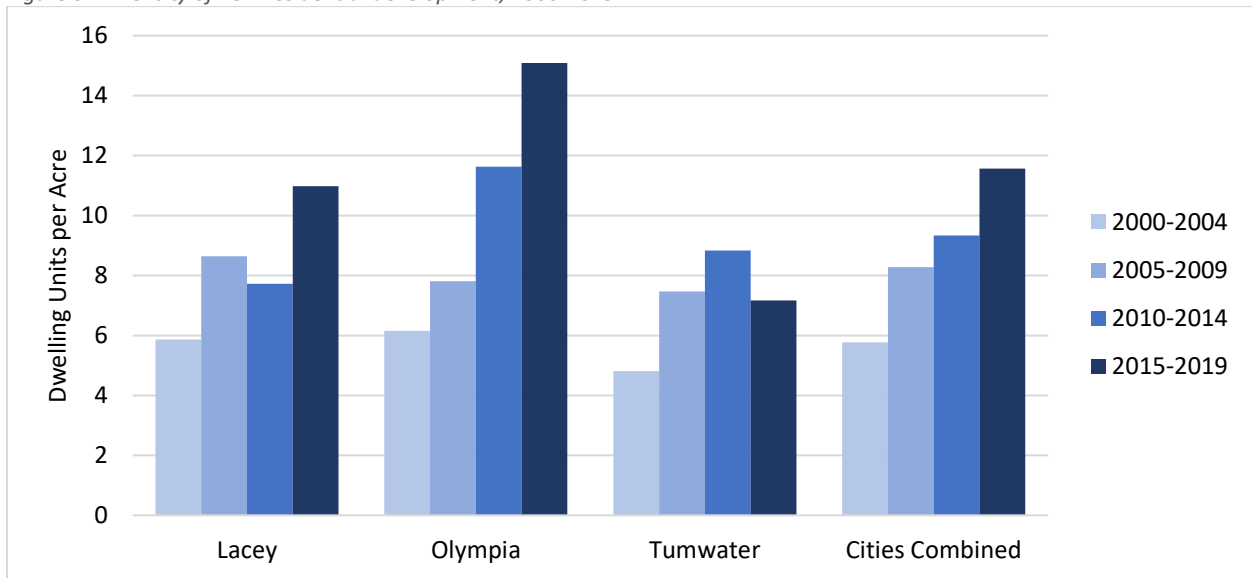
Figure 5-3. Housing types permitted in Lacey, Olympia, and Tumwater, 2000-2019



NOTE: Multifamily includes townhomes and condominiums.

Source: Thurston Regional Planning Council

Figure 5-4. Density of new residential development, 2000-2019



Source: Thurston Regional Planning Council

Unit Size

Bedrooms

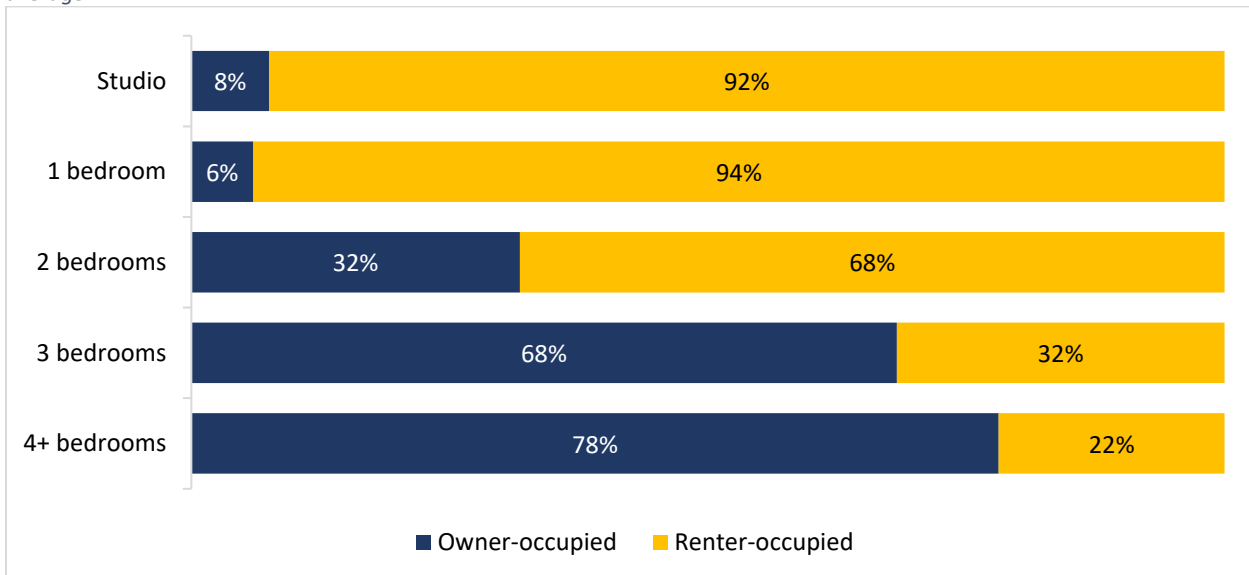
About 39 percent (19,465) of the housing stock in Lacey, Olympia, and Tumwater consists of three-bedroom units (Table 5-2). About 30 percent (15,031) is two-bedroom units. Nearly all studio and one bedroom units are rented as are most two bedroom units (Figure 5-5).

Table 5-2. Occupied housing units by number of bedrooms, 2014-2018 average

	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
Studio	241	907	154	1,302	1,915
1 bedroom	1,547	3,301	1,053	5,901	9,024
2 bedrooms	5,348	7,206	2,477	15,031	25,912
3 bedrooms	8,201	7,402	3,862	19,465	50,232
4+ bedrooms	3,374	3,535	1,790	8,699	20,987
TOTAL	18,711	22,351	9,336	50,398	108,070

Source: U.S. Census Bureau American Community Survey

Figure 5-5. Occupied housing units in Lacey, Olympia, and Tumwater combined by number of bedrooms and tenancy, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

The Thurston County Assessor’s Office provides data on the number of bedrooms for single-family, duplex, triplex, and fourplex units (Table 5-3). Since the 1980s, the percent of two-bedroom or smaller units has declined slightly, and the average number of bedrooms per dwelling unit increased over the same time period (Figures 5-6 and 5-7).

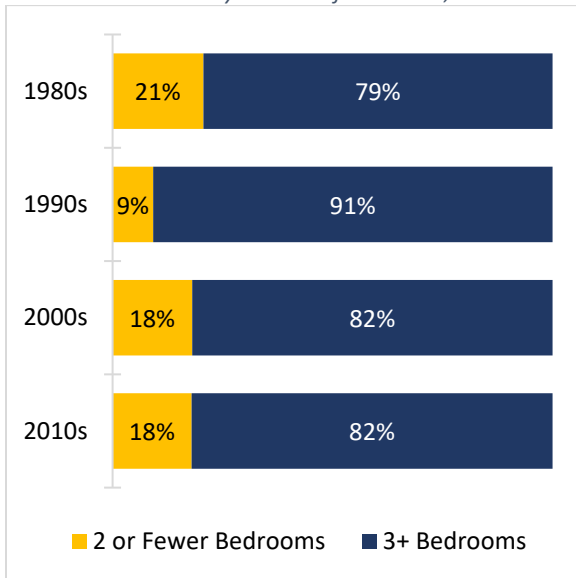
Table 5-3. Housing units built in Lacey, Olympia, and Tumwater combined by number of bedrooms, 1980-2019

Decade	One or Fewer Bedroom	Two Bedrooms	Three Bedrooms	Four or More Bedrooms	TOTAL Units
1980s	280	1,097	4,718	585	6,680
1990s	215	648	7,206	1,279	9,348
2000s	285	1,629	5,520	3,151	10,585
2010s	234	797	2,357	2,352	5,740

NOTE: Data excludes manufactured homes and apartments with five or more units.

Source: Thurston County Assessor’s Office

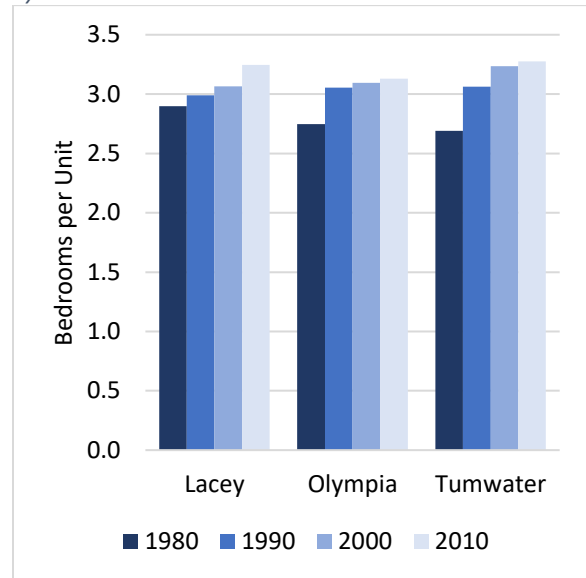
Figure 5-6. Housing units built in Lacey, Olympia, and Tumwater combined by number of bedrooms, 1980-2019



NOTE: Data excludes manufactured homes and apartments with five or more units.

Source: Thurston County Assessor’s Office

Figure 5-7. Average number of bedrooms in housing units by decade



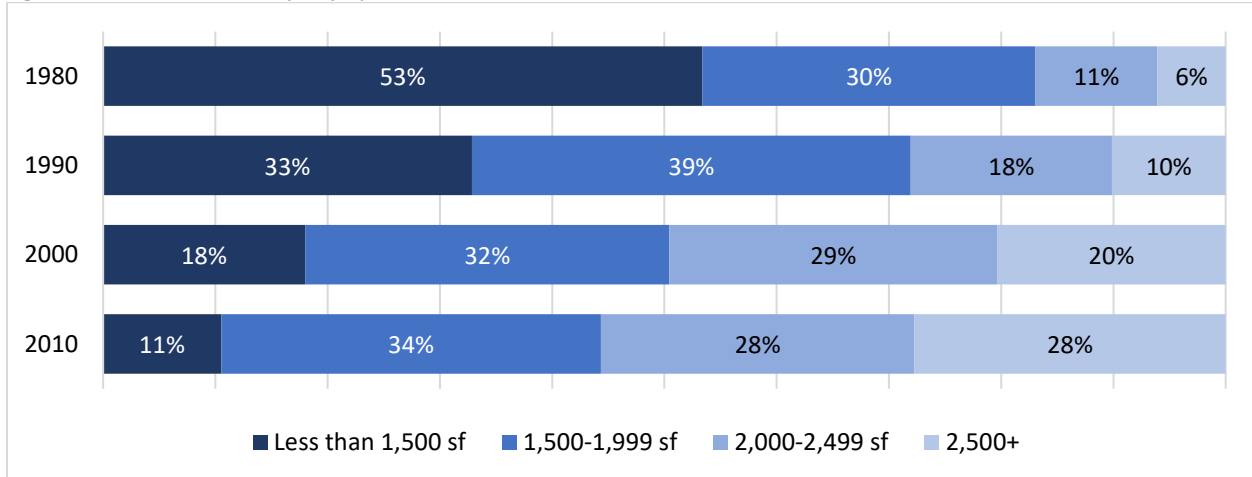
NOTE: Data excludes manufactured homes and apartments with five or more units.

Source: Thurston County Assessor’s Office

Square Footage

In the 1980s, more than half of all homes constructed were less than 1,500 square feet in size (Figure 5-8 and Table 5-4). In the 2010s, this dropped to just 11 percent of the total dwelling units built that decade. The total number of homes with 2,000 square feet or more have increased from just 17 percent in the 1980s to 56 percent during the 2010s. Over the last four decades, the average home size in Lacey has grown the most – from 1,475 square feet in the 1980s to 2,211 in the 2010s (Figure 5-9, next page). Tumwater saw a slight decrease in home size between the 2000s and the 2010s, but average home size remains more than 2,000 square feet.

Figure 5-8. Home size in Lacey, Olympia, and Tumwater combined, 1980-2019



NOTE: Data excludes manufactured homes and apartments with five or more units.

Source: Thurston County Assessor’s Office

According to the University of Washington’s Washington Center for Real Estate Research (WCER), the average size of a one bedroom apartment is 678 square feet while a two bedroom apartment is 859 square feet in 2020. The average apartment size is less than half that of single-family, duplex, triplex, or fourplex units.

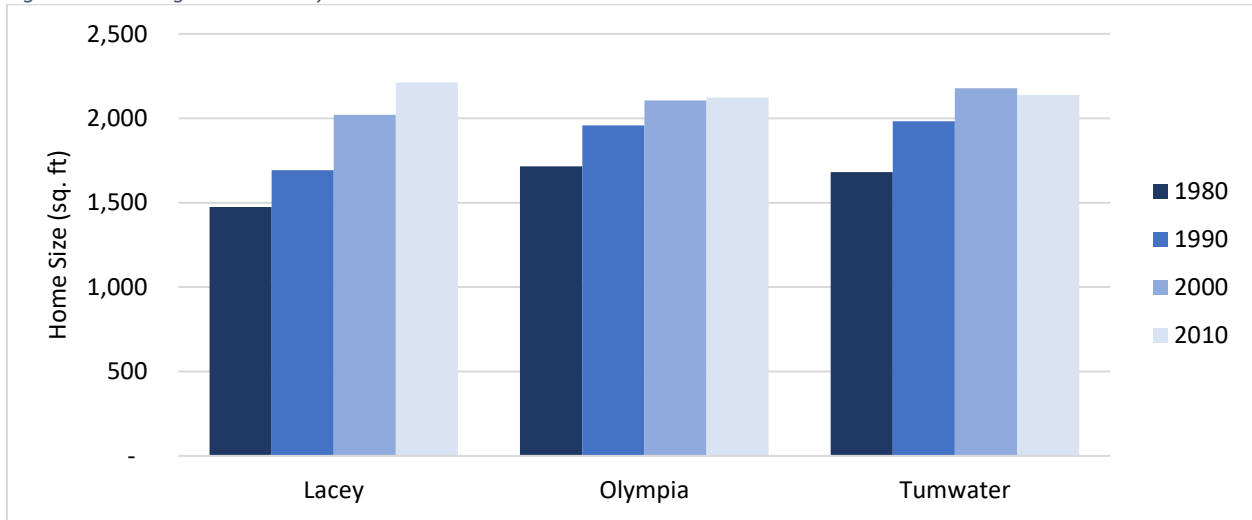
Table 5-4. Housing units in Lacey, Olympia, and Tumwater combined by home size and decade

Unit Size (square feet)	1980s	1990s	2000s	2010s
Less than 1,500	3,566	3,072	1,905	604
1,500-1,999	1,983	3,654	3,436	1,942
2,000-2,499	725	1,675	3,090	1,602
2,500 or more	406	947	2,154	1,592
TOTAL Units	6,680	9,348	10,585	5,740

NOTE: Data excludes manufactured homes and apartments with five or more units.

Source: Thurston County Assessor’s Office

Figure 5-9. Average home size by decade



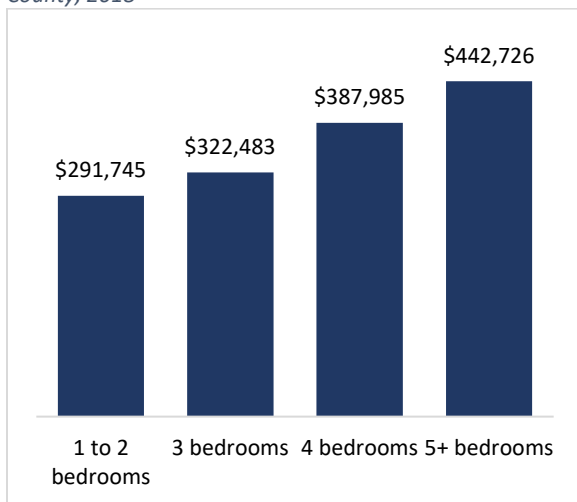
NOTE: Data excludes manufactured homes and apartments with five or more units.
 Source: Thurston County Assessor’s Office

Market Conditions

Home Values and Affordability

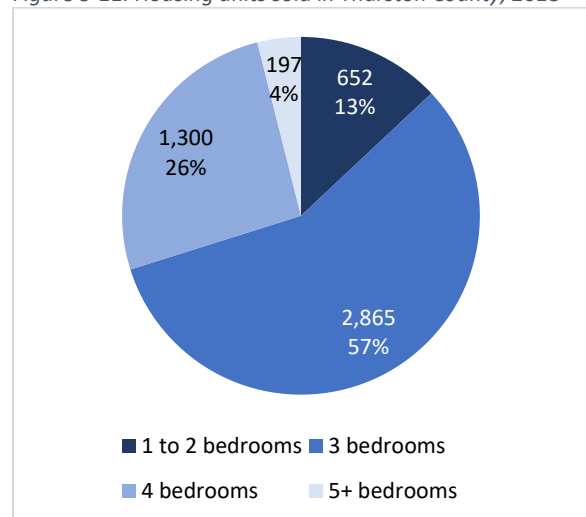
The Northwest Multiple Listing Service (NWMLS) reports that the average home sale price in Thurston County was \$340,200 in 2018, with prices ranging from \$291,700 for a two-bedroom home to \$442,700 for a home with five or more bedrooms (Figure 5-10). Zillow – which also tracks home sale prices – estimates that sale prices have continued to increase, by about 8 percent per year – since 2018. Only 13 percent of the housing units sold in Thurston County in 2018 were one- or two-bedroom units (Figure 5-11).

Figure 5-10. Average housing unit sale price in Thurston County, 2018



Source: Northwest Multiple Listing Service

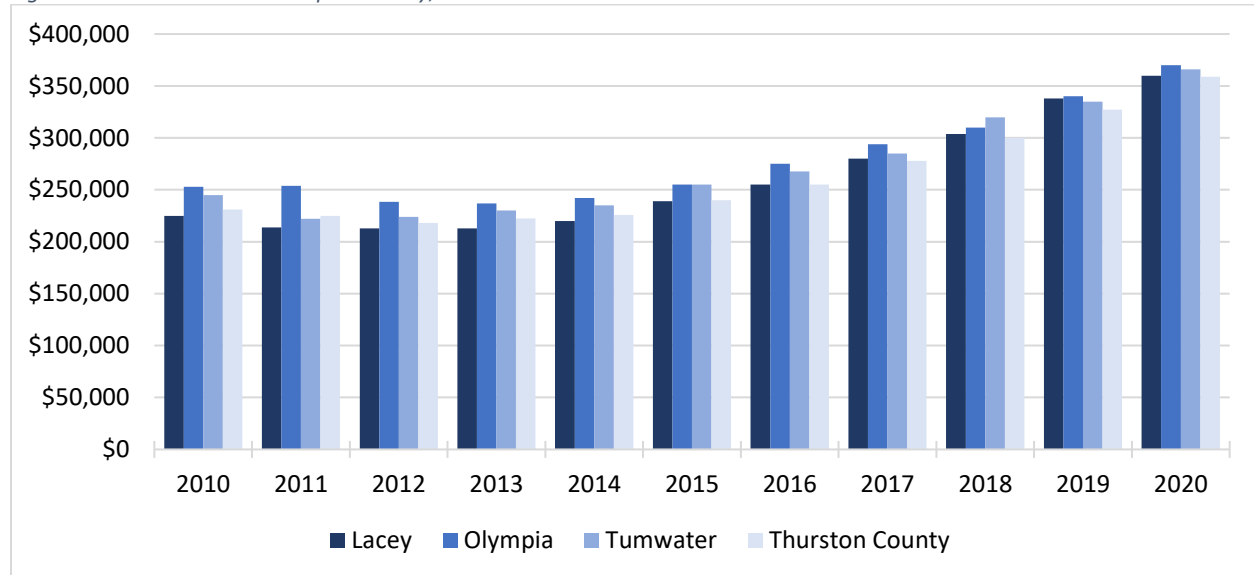
Figure 5-11. Housing units sold in Thurston County, 2018



Source: Northwest Multiple Listing Service

The median home sale price in Thurston County has been on an upward trajectory (Figure 5-12). As of July 2020, Thurston County's median home sale price was \$359,000. Median home sale prices were highest in Olympia followed by Tumwater. Both exceeded the county average, by 7.9 percent and 2.1 percent respectively. Home sale prices in Tumwater are about 2.6 percent below the county average. Adjusted for inflation, the average home sale price has more than doubled since 1990, increasing about 2.8 percent per year.

Figure 5-12. Median home sale price in July, 2010-2020

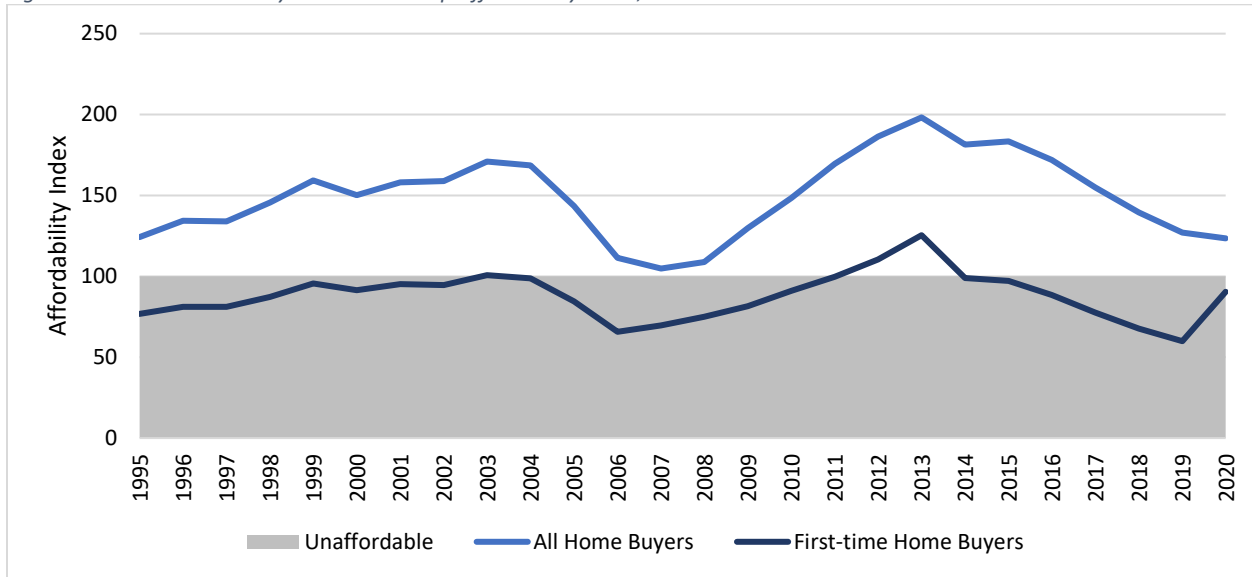


NOTE: Figures are for July of each year and are not adjusted for inflation. Location of sale is based on the address entered by the listing agent. Location of homes sold may not be within the actual city limits.

Source: Northwest Multiple Listing Service

Increasing home prices have affected housing affordability. The Washington Center for Real Estate Research's (WCRER) Homeownership Affordability Index tracks the ability for a household earning the median income to afford a median-priced home. WCRER also tracks the index of first-time home buyers, assuming a lower income (70 percent of the median), lower home price (85 percent of the median), and lower down payment (10 percent). For most of the past 20 years, Thurston County's housing has been considered affordable overall, but not for first-time home buyers (Figure 5-13, next page).

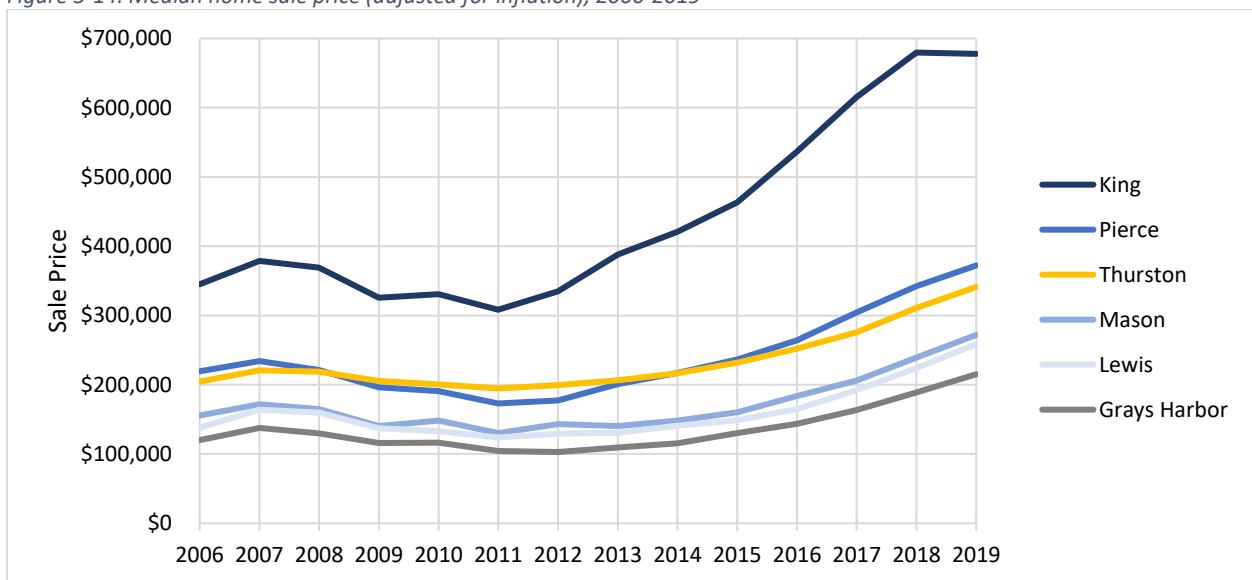
Figure 5-13. Thurston County Homeownership Affordability Index, 1995-2020



Source: University of Washington

Figure 5-14 shows inflation-adjusted home sale prices for Thurston and adjacent counties since 2006. Historically, home sale prices in Thurston County have been very close to those in Pierce County. Since 2014 that trend has shifted, with prices in Pierce rising slightly faster than Thurston. Home prices in both counties are highly influenced by the Seattle housing market. The dramatic increase in prices in King County (up 120 percent since 2011) forces Seattle workers to look for more affordable housing further south. This increased pressure in Tacoma’s housing market subsequently affects demand further south in Thurston County.

Figure 5-14. Median home sale price (adjusted for inflation), 2006-2019

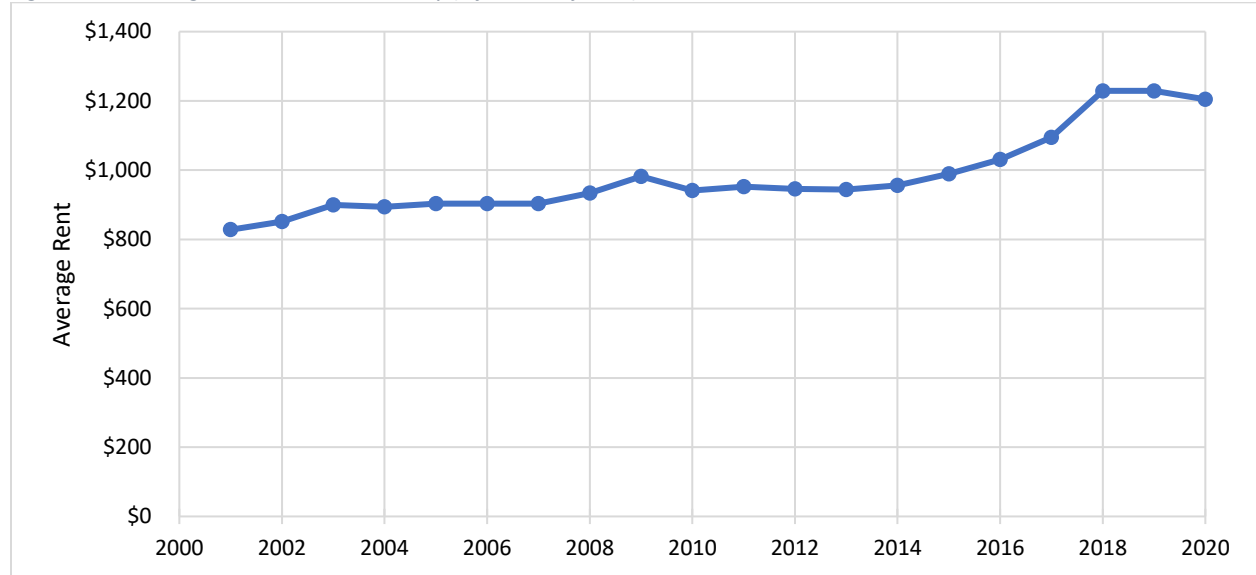


Source: University of Washington

Rents and Apartment Vacancy Rates

In 2020, the average apartment rent in Thurston County is \$1,124 for a one-bedroom unit and \$1,212 for a two-bedroom unit. Like home prices, rents have been increasing faster than inflation (Figure 5-15). Since 2001, average rents increased by over \$370 in constant 2020 dollars, about 2.0 percent per year. Unlike housing prices, rents did not decrease significantly during the great recession.

Figure 5-15. Average rent in Thurston County (inflation-adjusted), 2001-2020



NOTE: Due to a change in methodology, 2018-2020 data is not directly comparable to data from previous years.
 Source: University of Washington

Figure 5-16 examines the median gross rent. Gross rent is the contract rent plus the estimated average monthly cost of utilities and fuels if paid by the renter (or paid for the renter by someone else). Lacey has the highest median gross rent while Olympia had the lowest.

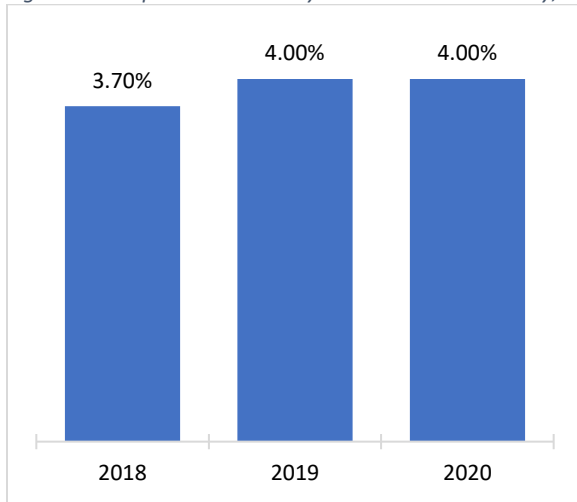
A healthy rental market has about a five percent vacancy rate, with lower vacancy rates indicating a shortage of housing. A five percent vacancy rate allows people options to move as needed and allows for a healthy level of competition. The average vacancy rate for apartments in Thurston County is 4 percent indicating there is unmet demand (Figure 5-17, next page). Vacancy rates are lower (3.2 percent) for one-unit apartments.

Figure 5-16. Median gross rent, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Figure 5-17. Apartment vacancy rate in Thurston County, 2018-2020

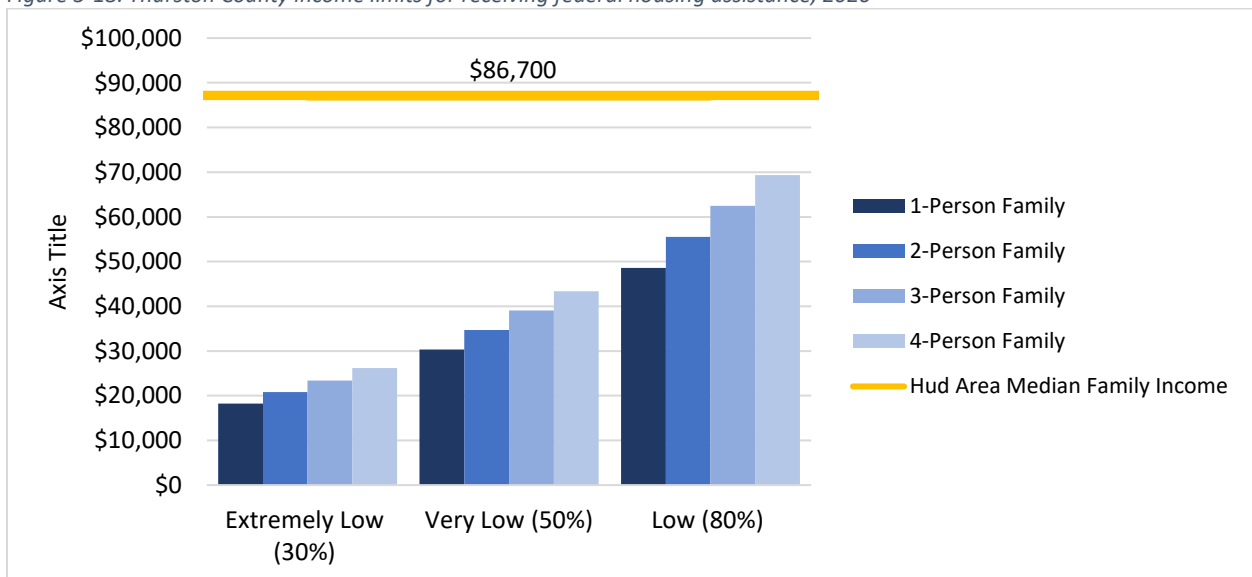


Source: University of Washington

Subsidized Housing Units

Subsidized housing is a critical resource for the lowest income households. The Department of Housing and Urban Development (HUD) sets income limits that determine eligibility for assisted housing programs including: Public Housing; Section 8 project-based; Section 8 Housing Choice Voucher; Section 202 housing for the elderly; and Section 811 housing for persons with disabilities programs. HUD develops income limits based on median family income estimates and fair market rent area definitions for each metropolitan area, parts of some metropolitan areas, and each non-metropolitan county. In 2020, Thurston County’s area median family income is \$86,700, meaning a family of four with extremely low income – has an income less than \$30,000 (Figure 5-18).

Figure 5-18. Thurston County income limits for receiving federal housing assistance, 2020

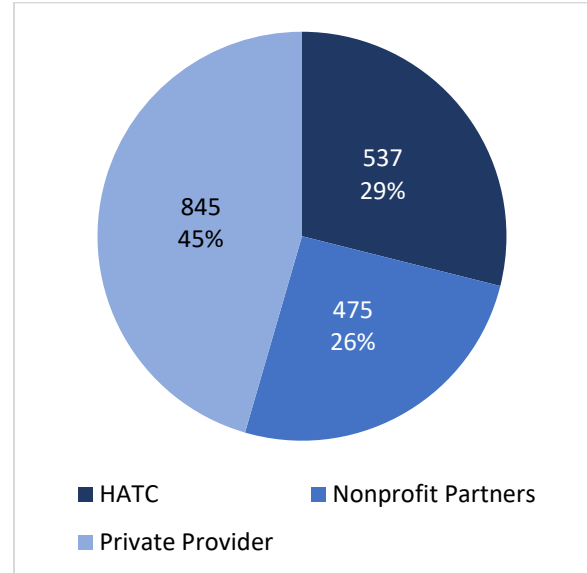


Source: U.S. Dept. of Housing and Urban Development

Currently, the Housing Authority of Thurston County (HATC) assists 1,989 households with rental assistance vouchers. The number of households HATC assists is limited by two factors: the number of rental assistance vouchers and funding. HATC currently has 2,045 rental assistance vouchers but cannot use them all due to limited federal funding. This is because rents rise faster than incomes, and it costs more to support the average household. According to HATC, the average monthly subsidy cost per housing unit is more than \$650. About 75 percent of voucher holders are either elderly or disabled, and more than 85 percent have an income of 30 percent or less of the area median family income.

Due to the high demand for housing assistance, HATC operates a waiting list. The list was last opened in January 2020 to new listees; prior to this, the list last opened in 2015. In Thurston County, there are approximately 1,857 units available at below-market rents. Nearly half of all units are supplied by a private provider (Figure 5-19). Washington State provides incentives – in the form of tax breaks or loans – for developers to include low-income housing in their projects. Unlike HATC housing, these units may be converted to market-rate housing after the incentives expire, typically after 20-30 years.

Figure 5-19. Subsidized housing units in Thurston County by owner, 2020



Source: Housing Authority of Thurston County

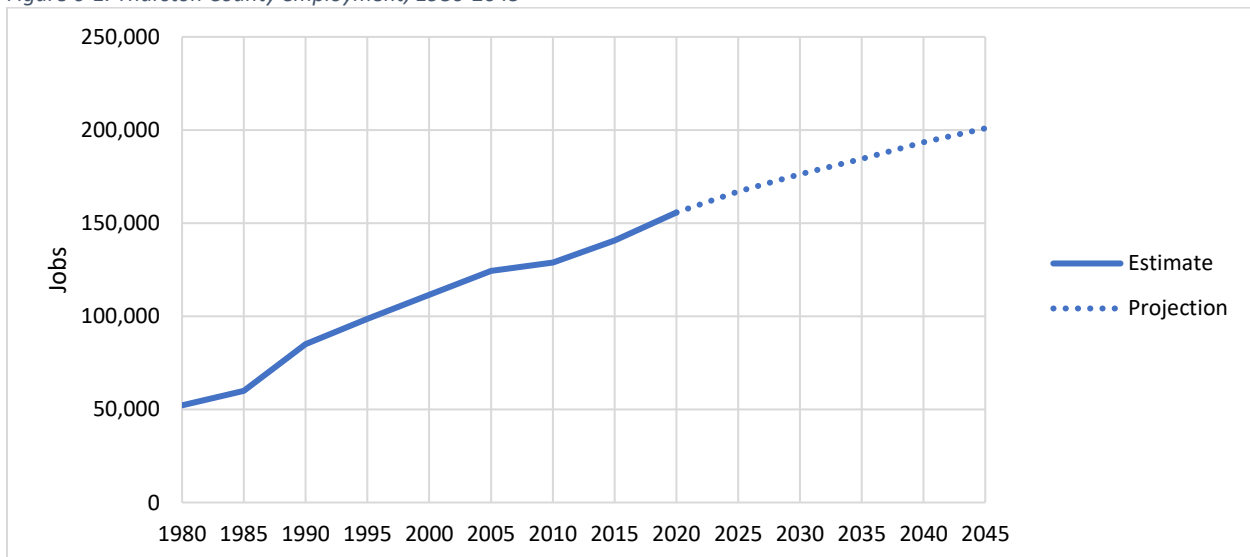
Chapter 6.

Local Workforce Characteristics

Estimates and Forecast

Total 2017 employment in Thurston County was 148,700 jobs (Figure 6-1). Eighty-two percent of jobs – 121,800 – are located in Lacey, Olympia, and Tumwater and their unincorporated urban growth areas. By 2045, total employment is projected to increase 1.1 percent per year.

Figure 6-1. Thurston County employment, 1980-2045

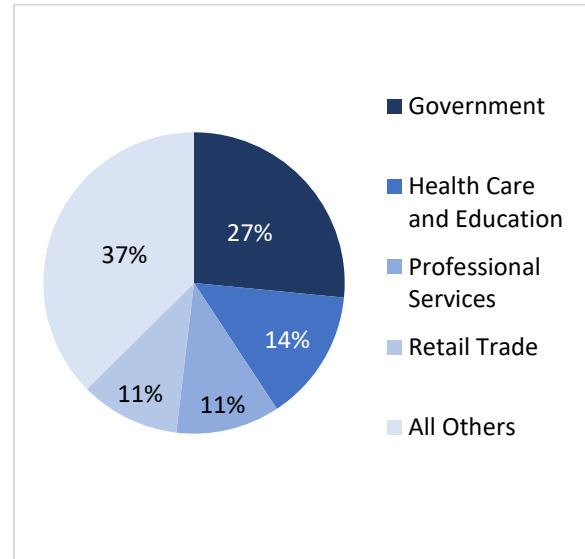


Source: U.S. Bureau of Economic Analysis, Thurston Regional Planning Council

Government employment, including federal, state, local, and public education, makes up over a quarter of Thurston County's employment (Figure 6-2). The next largest industries are health care and education, professional services, and retail trade. The remaining industries make up just one third of county employment.

Employment industry varies by jurisdiction. Lacey has the largest number of transportation and warehousing employees, Olympia has a greater number and proportion of health care workers, and Tumwater has the most manufacturing and wholesale trade employees. While Olympia has the most state employees, state employment as a proportion of total employment is greatest in Tumwater.

Figure 6-2. Thurston County total employment by industry, 2017



Source: U.S. Census Bureau Economic Analysis

Wages and Self-Sufficiency

Wages vary considerably by employment industry. Average wages for employees affected by state and federal unemployment insurance laws were \$54,500 in 2019 (Table 6-1). Government – Thurston County’s largest employment industry – paid out over \$2.5 billion in wages, about \$66,212 per employee. Some of the lowest paying industries include retail trade, accommodation and food services, and arts, entertainment, and recreation. Overall, wages are highest in Tumwater, followed by Lacey and Olympia.

Covered Employment

Covered employment measures all employed persons covered under the Unemployment Insurance Act. The measure accounts for approximately 75% of the total employment in Thurston County, and includes both part-time and temporary positions. Job categories not measured in the count include self-employed workers, proprietors, CEOs, military, and other non-insured workers. If a worker holds more than one job, each position is reported separately.

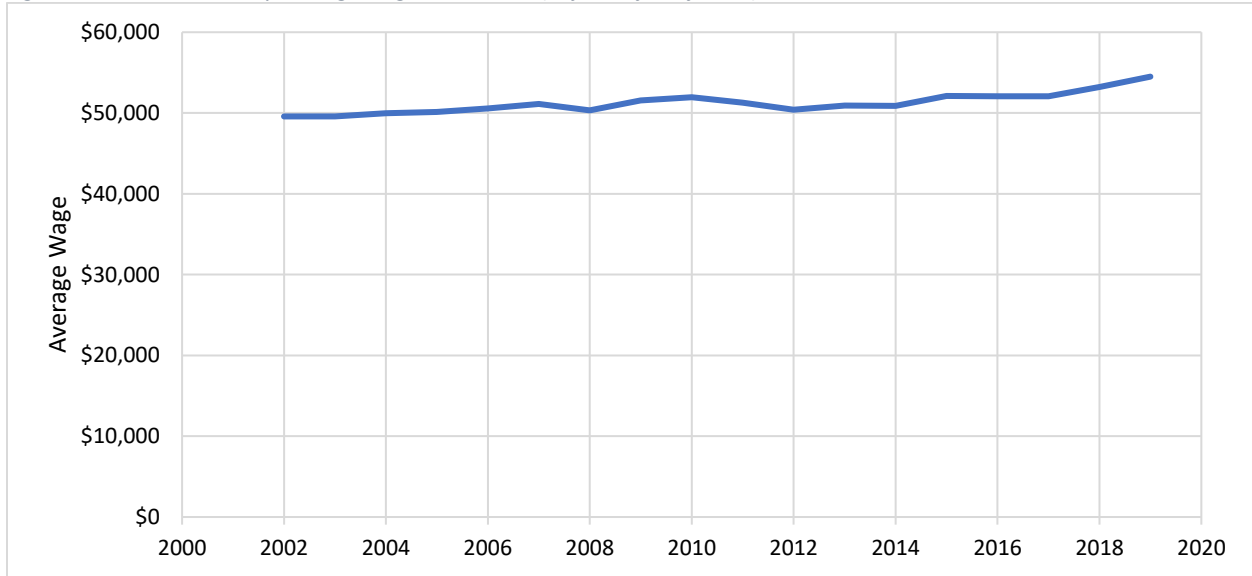
Table 6-1. Thurston County covered employment and wages, 2019

NAICS Industry Category	Total Wages Paid	Covered Employment	Covered Wage
Government	\$2,562,598,405	38,703	\$66,212
Healthcare and social assistance	\$856,430,847	15,655	\$54,707
Retail trade	\$430,509,161	12,663	\$33,997
Construction	\$397,748,304	6,184	\$64,319
Professional and technical services	\$365,230,721	4,829	\$75,633
Accommodation and food services	\$205,407,281	9,341	\$21,990
Administrative and waste services	\$259,394,779	6,288	\$41,252
Finance and insurance	\$190,168,264	2,504	\$75,946
Information	\$156,197,850	1,685	\$92,699
Management of companies and enterprises	\$70,055,637	915	\$76,564
Utilities	\$21,670,912	196	\$110,566
Other 9 Industries	\$932,341,966	19,341	\$48,205
Total	\$6,447,754,127	118,304	\$54,502

Source: Employment Security Department

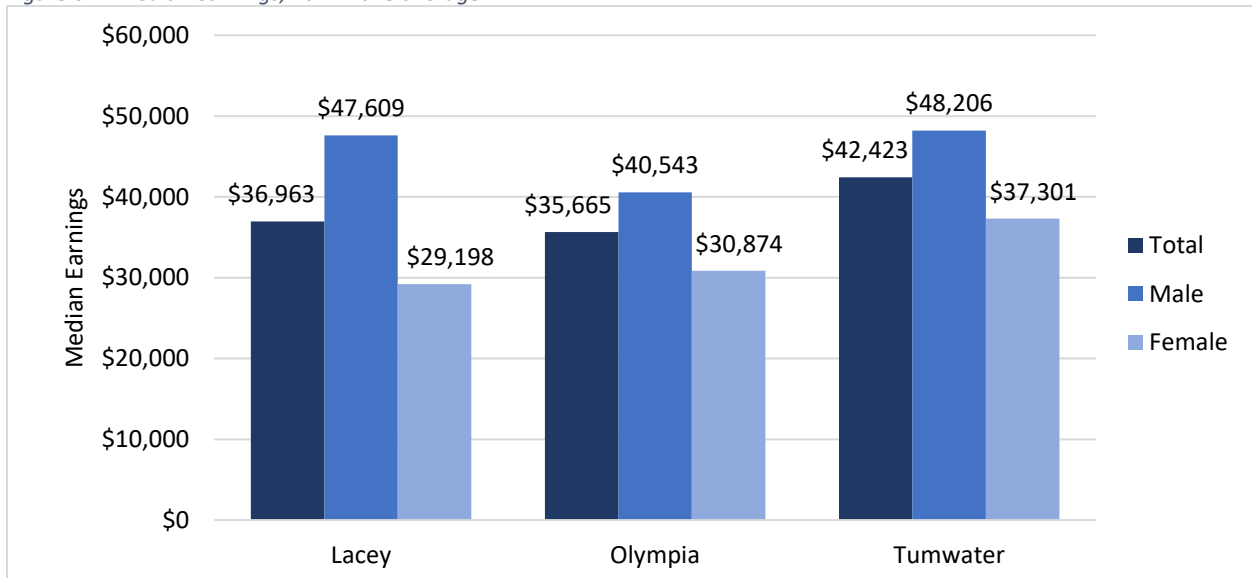
When adjusted for inflation, wages have risen 9.9 percent over the past 17 years (about 0.6 percent per year) (Figure 6-3). Median earnings are highest for people living in Tumwater (Figure 6-4).

Figure 6-3. Thurston County average wage, 2002-2019 (adjusted for inflation)



Source: Employment Security Department

Figure 6-4. Median earnings, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

The University of Washington publishes a “Self-Sufficiency Standard,” defined as the amount of income necessary to meet basic needs (including taxes) without public subsidies (e.g., public housing, food

stamps, Medicaid, or child care) and without private/informal assistance (e.g., free babysitting by a relative or friend, food provided by churches or local food banks, or shared housing).

The 2020 standard estimated that a four-person household (two adults and two children) would need to earn between \$40,000 and \$73,000 per year, depending on the age of the children (Table 6-2). For comparison, a household with one worker each in retail trade and accommodation or food services would earn \$56,000, on average.

Table 6-2. Wages (per adult) needed for self-sufficiency, 2020

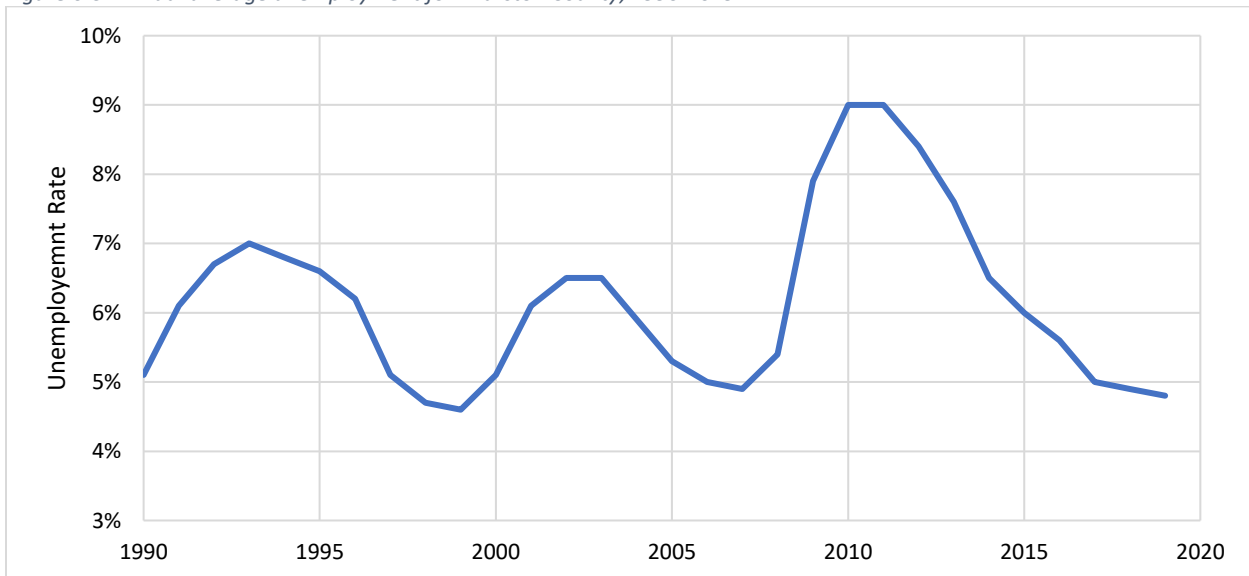
Household Composition	Hourly	Monthly	Annual	Monthly Housing Cost
One Adult, No Children	\$12.06	\$2,122	\$25,466	\$960
One Adult, One Child	\$15.35-\$23.09	\$2,702-\$4,064	\$32,430-\$48,762	\$1,171
One Adult, Two Children	\$15.23-\$30.84	\$2,680-\$5,428	\$32,159-\$65,141	\$1,171
Two Adults, No Children	\$8.85	\$3,115	\$37,381	\$960
Two Adults, One Child	\$9.80-\$13.53	\$3,450-\$4,761	\$51,406-\$57,135	\$1,171
Two Adults, Two Children	\$9.68-\$17.33	\$3,407-\$6,100	\$40,882-\$73,206	\$1,171

NOTE: Caring for infants and young children requires more income than caring for school-aged children and teenagers.
 Source: University of Washington

Unemployment

Preliminary estimates for April 2020 estimated unemployment in Thurston County at 15.9 percent, the highest rate recorded by the Bureau of Labor Statistics since 1990. Prior to the COVID-19 pandemic, unemployment rates had been declining from their previous high of 9.0 percent in 2010 and 2011 during the Great Recession (Figure 6-5).

Figure 6-5. Annual average unemployment for Thurston County, 1990-2019



Source: U.S. Bureau of Labor Statistics

Estimates from the American Community Survey show that unemployment for residents of Lacey, Olympia, and Tumwater are 0.5 percent less than Thurston County as a whole, with Tumwater residents having the lowest rate (Table 6-3).

Table 6-3. Unemployment rate, 2014-2018 average

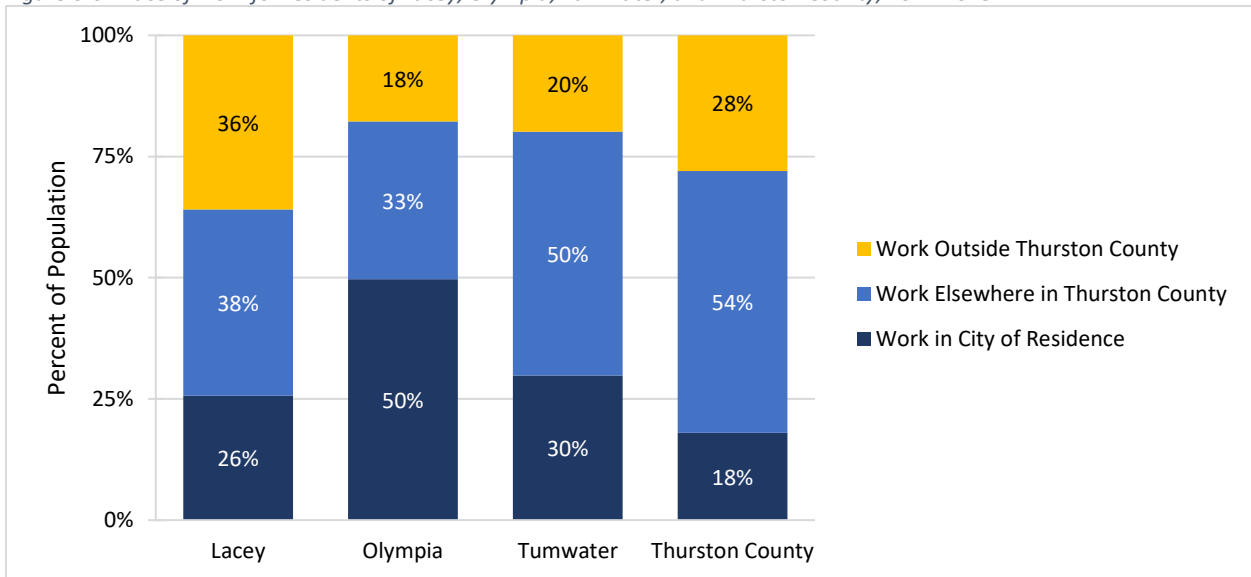
Unemployment Rate	
Lacey	6.8%
Olympia	6.3%
Tumwater	5.8%
Cities Combined	6.4%
Thurston County	6.9%

Source: U.S. Census Bureau American Community Survey

Commuting

Approximately 28 percent of Thurston County residents commute out of county for work. At 36 percent, Lacey has the highest proportion of its workforce commuting out of Thurston County (Figure 6-6). Olympia has the highest percentage of residents who live and work in the same city – 50 percent.

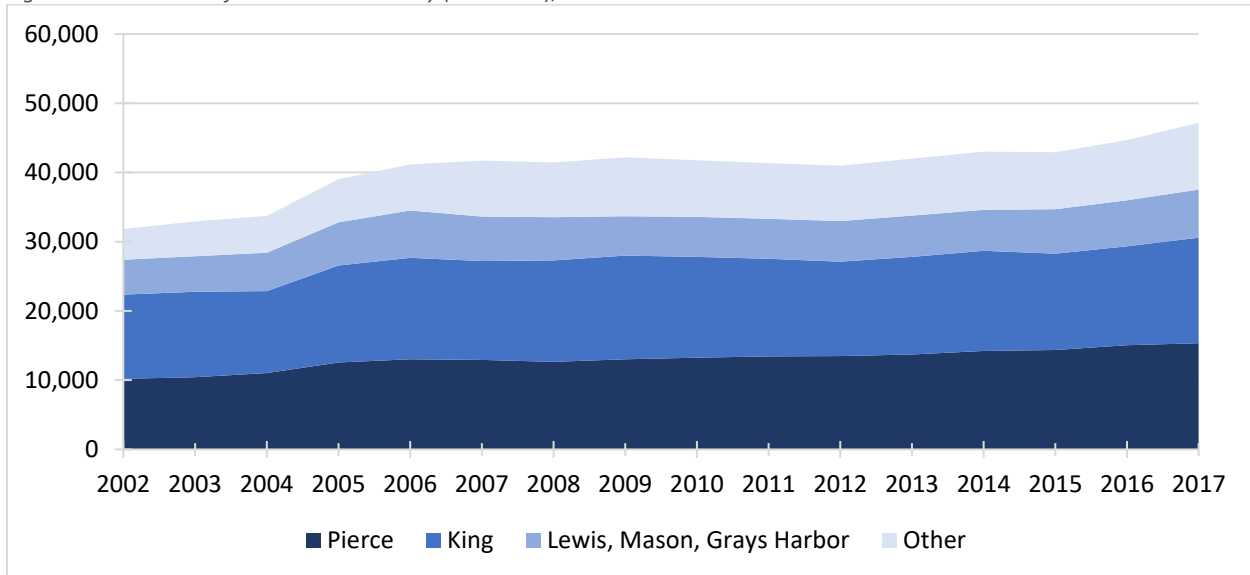
Figure 6-6. Place of work for residents of Lacey, Olympia, Tumwater, and Thurston County, 2014-2018



Source: U.S. Census Bureau American Community Survey

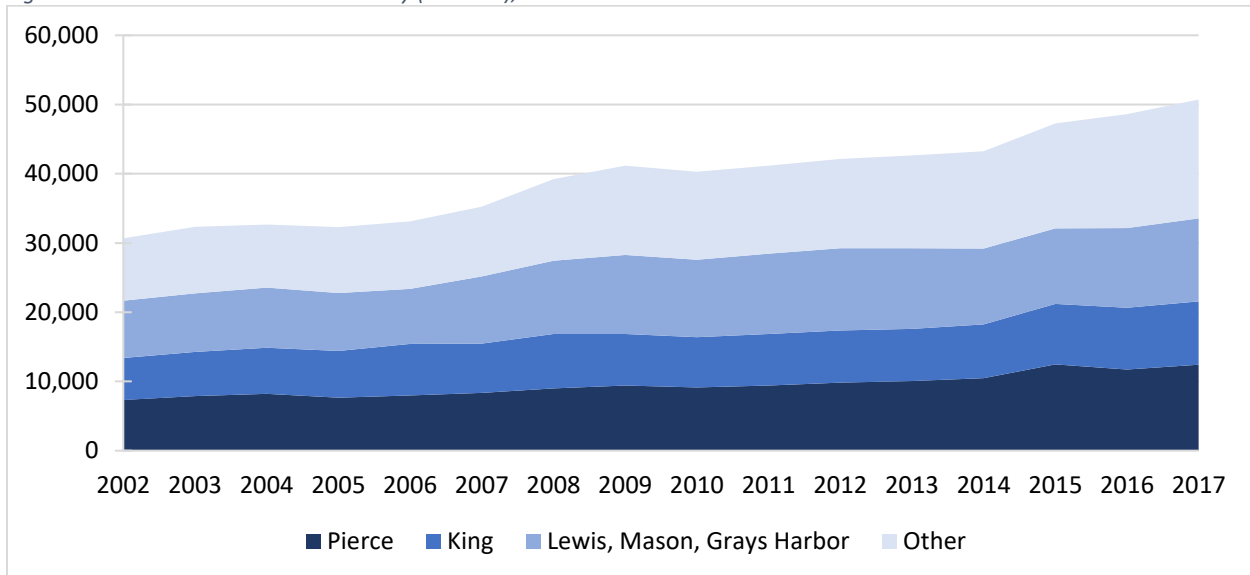
The number of both inbound and outbound commutes increased steadily between 2002 and 2017. Outbound commutes increased by 15,000 while inbound commutes increased by 20,000 during this time (Figures 6-7 and 6-8). In 2017, Pierce County was both the largest destination for outbound commuters (13.8 percent) and the largest source of inbound commuters (10.9 percent). King County matched Pierce County as a significant destination for outbound commuters (13.8 percent) but is a less significant source of inbound commuters (8.0 percent).

Figure 6-7. Commutes from Thurston County (outbound), 2002-2017



Source: U.S. Census Bureau LODES

Figure 6-8. Commutes to Thurston County (inbound), 2002-2017



Source: U.S. Census Bureau LODES

People typically commute out of county for higher wage jobs. Average earnings for Thurston County residents who work in county were about \$46,200 in 2014-2018 compared to \$56,800 for commuters to Pierce County, and \$63,600 for commuters to King County (Table 6-4).

Table 6-4. Average wage earnings by county of residence and county of work, 2014-2018 average

County of Residence	County of Work	Average Earnings
<i>Outbound Commuters</i>		
Thurston	Pierce	\$56,800
Thurston	King	\$63,600
<i>Inbound Commuters</i>		
Pierce	Thurston	\$51,300
King	Thurston	\$69,900
<i>Non-Commuters</i>		
Thurston	Thurston	\$46,200
Pierce	Pierce	\$45,700
King	King	\$71,000

Source: U.S. Census Bureau American Community Survey PUMS

Chapter 7.

Gap Analysis

The gap analysis evaluates the alignment between Lacey, Olympia, and Tumwater’s housing inventory and the housing needs of the three cities’ residents. The gap analysis helps planners identify the amount and the type of housing needed over the next 25 years to ensure residents will have access to affordable housing.

A household’s current housing may not meet their needs for several reasons, including:

- **Affordability.** The household may not be able to afford the unit. This could result from a lack of more affordable housing options or a change in income or employment.
- **Housing Size:** The dwelling may be too small (overcrowding) or too large for the household’s current needs.
- **Substandard Housing.** The unit may lack key plumbing or kitchen facilities to make it fit for habitation.
- **Other Needs:** The household may be looking for a unit that better suits their needs, such as one with lower maintenance costs, ADA accessibility, or one that allows them to build equity.
- **Experiencing Homelessness:** The household may currently lack housing.

This chapter examines some of these factors and provides estimates of the number of households whose housing does not meet their needs for one reason or another. This information can then be used to identify actions to reduce the gap between housing needed and available housing when developing the Housing Action Plan.

Housing Affordability

This section provides an estimate on the number of households that cannot afford their current housing and an estimate of future housing needs for different affordability price points.

Current Housing Affordability Needs

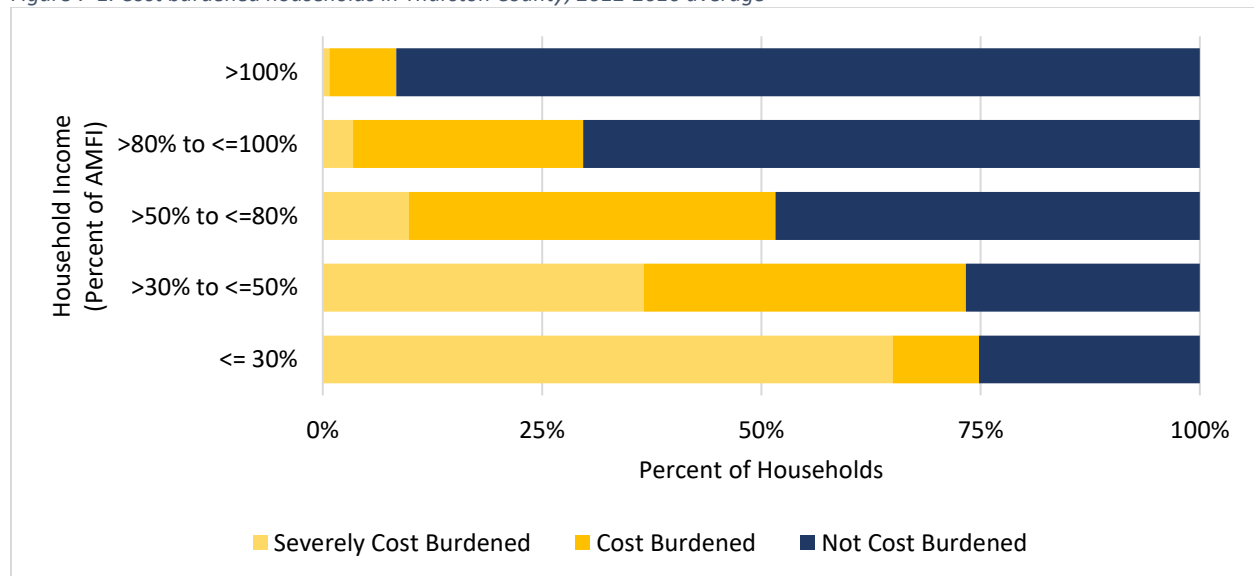
Over 34,650 Thurston County households are cost burdened, meaning they spend more than 30 percent of their income on rent, mortgage payments, and other housing expenses (Table 7-1 and Figure 7-1). Of these, 13,900 are severely cost burdened, spending more than half of their income on housing expense. The percent of households that are cost burdened increases as income declines.

Table 7-1. Cost burdened households by jurisdiction, 2012-2016 average

Percent of Area Median Family Income	Lacey	Olympia	Tumwater	Cities Combined	Thurston County
<=30%	1,375	2,375	1,030	4,780	9,025
>30% to <=50%	1,290	2,185	685	4,160	7,180
>50% to <= 80%	2,135	1,955	620	4,710	8,970
>80% to <= 100%	760	475	1,910	3,145	5,055
More than 100%	735	615	460	1,810	4,420
Total Households	6,295	7,605	4,705	18,605	34,650

Source: U.S. Dept. of Housing and Urban Development

Figure 7-1. Cost burdened households in Thurston County, 2012-2016 average

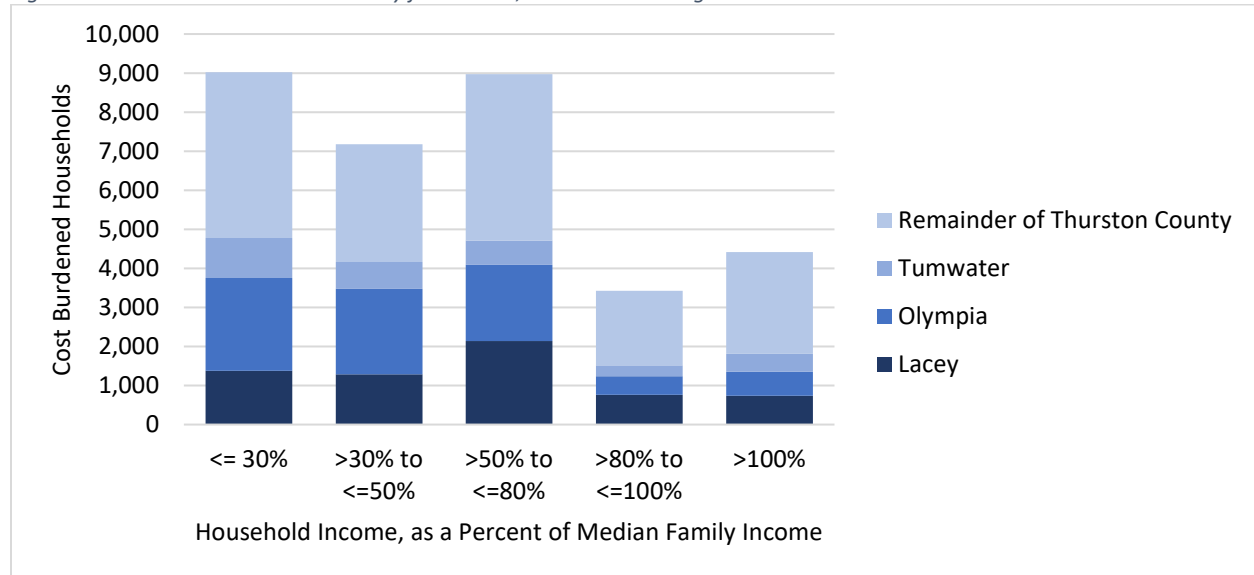


Source: U.S. Dept. of Housing and Urban Development

Note: AMFI is the area median family income

While some households may opt to spend more than 30 percent of their income on housing expenses, most – especially at lower income brackets – do so because there is not enough affordable housing available. This makes the number of cost-burdened households a good indicator of the current gap between the supply and demand for housing at a given price point. Figure 7-2 shows the estimated affordable housing needed at five income brackets based on the current number of cost burdened households.

Figure 7-2. Cost burdened households by jurisdiction, 2012-2016 average



Source: U.S. Dept. of Housing and Urban Development

Table 7-2 (next page) shows the estimated maximum housing costs that households at three income levels could afford, assuming no more than 30 percent of their income is spent on housing. For example, a 4-person household earning \$43,350 annually – 50 percent of the median family household income in 2020 – could afford \$1,100 a month for rent or a monthly mortgage payment on a \$300,000 home (assuming a 30-year 3.5 APR mortgage with 20 percent down payment). However, these costs do not account for other housing-related expenses such as utilities, property taxes, and insurance. For many low-income households, a down payment is not possible and interest rates are higher due to little or poor credit. For those able to qualify for a home loan despite these circumstances, private mortgage insurance may be required, adding further to the monthly housing cost. To overcome some of these barriers, the Washington State Housing Finance Commission (WSHFC) offers several programs that assist low income households with down payments. Between 1983 and 2019, down payment assistance through WSHFC served 3,018 households.

Table 7-2. Maximum rent and housing costs at various income levels, 2020

HUD Income Limit for a:	Yearly Income	Hourly Wage (Full Time)**	Monthly Rent or Mortgage Payment	Home Value 20% Down	Home Value 10% Down
2-Person Family					
Extremely Low Income (30%)	\$20,800	\$10.00	\$500	\$140,000	\$130,000
Very Low Income (50%)	\$34,700	\$16.70	\$900	\$240,000	\$210,000
Low Income (80%)	\$55,500	\$26.70	\$1,400	\$390,000	\$340,000
4-Person Family					
Extremely Low Income (30%)	\$26,200	\$12.60	\$700	\$180,000	\$160,000
Very Low Income (50%)	\$43,350	\$20.80	\$1,100	\$300,000	\$270,000
Low Income (80%)	\$69,350	\$33.30	\$1,700	\$480,000	\$430,000

NOTE: *For 2020, HUD income limits are based on a median family income of \$86,700 for Thurston County. Assumes 3.5 percent fixed interest rate over a 30-year mortgage. Costs do not account for other housing-related expenses such as utilities, property taxes, and insurance.

**Assumes one household member works full time at 40 hours per week.

Source: Thurston Regional Planning Council

Future Housing Affordability Need

Thurston Regional Planning Council (TRPC) used data on population growth, employment growth, and changing wages and demographics to develop 2045 projections of the number of households in five income brackets.

Table 7-3 looks at the projected number of households at five income brackets from TRPC's Household Income Forecast and the change from the 2012-2016 average. TRPC projects that there will be 66,100 low, very low, or extremely low-income households (those earning less than 80 percent of the median family income) in Thurston County in 2045. This is an increase of more than 26,000 from the 2012-2016 average. The number of extremely low income households – those earning less than 30 percent of the median family income – will increase by over 6,000 units.

Table 7-3. Number of households by income range, 2045 projection

Household Income*	2045				Increase from 2012/2016			
	Lacey	Olympia	Tumwater	Thurston County	Lacey	Olympia	Tumwater	Thurston County
<= 30%	2,200	5,200	1,900	17,800	500	1,900	700	5,700
30% - 50%	3,000	5,200	1,700	17,800	1,100	2,500	800	8,000
50% - 80%	5,500	6,500	2,800	30,100	1,900	3,000	1,400	12,700
80% - 100%	3,500	3,600	2,000	20,700	1,300	1,700	1,000	9,200
>100%	11,400	15,700	8,100	78,000	2,700	5,800	3,200	25,300
TOTAL	25,600	36,200	16,500	164,400	7,600	14,900	7,200	60,900

NOTE: *Household income as a percent of the area median family income. Excludes people experiencing homelessness and other group quarters populations. Estimates are only for current city limits and do not include unincorporated UGAs.

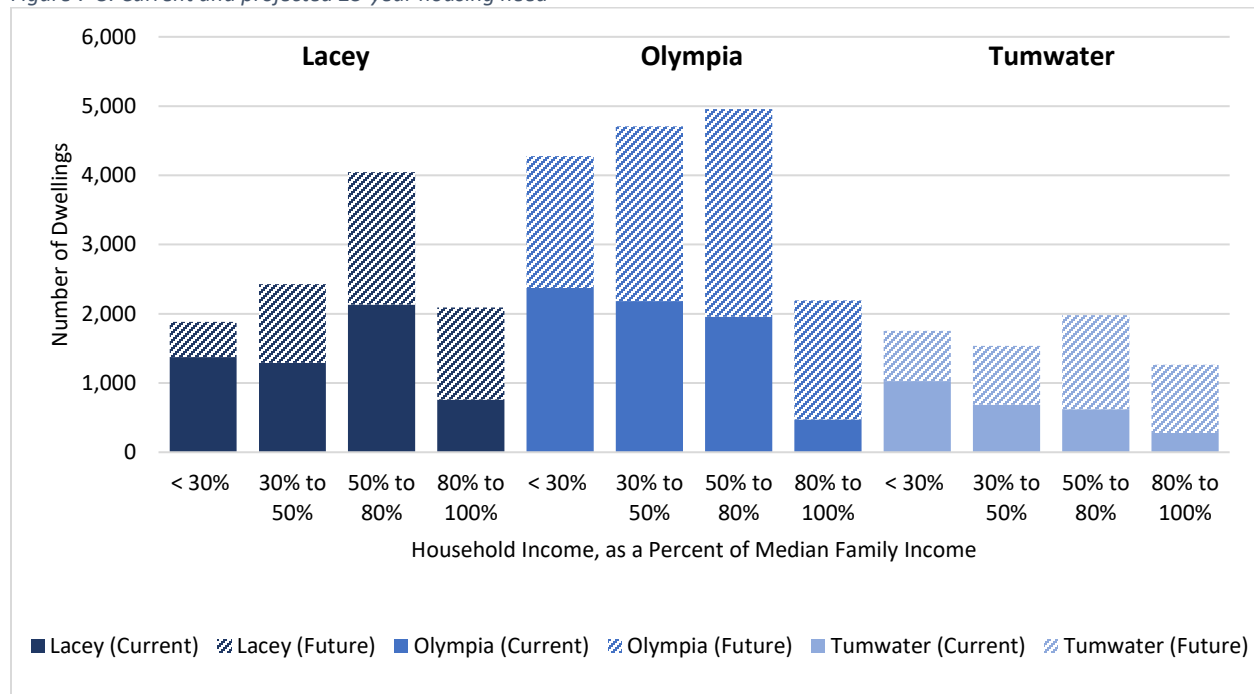
Source: Thurston Regional Planning Council

Combined Affordability Needs

Figure 7-3 shows the combined current and projected housing need at the four lowest income brackets over the next 25 years. The solid bars show the current number of households who cannot afford their housing, while the hashed bars show the projected growth in households in each income group. Estimates are for current city limits only. Additional need should be considered for the unincorporated UGAs.

While the housing need is identified for each jurisdiction, it is important that affordable housing addresses the need at a regional scale. Projections for housing needs for the five income groups are based on current distributions. When planning for new affordable housing, other factors should also be considered such as the cost of transportation, access to public transportation, and proximity to social services and medical facilities.

Figure 7-3. Current and projected 25-year housing need



Source: U.S. Dept. of Housing and Urban Development, Thurston Regional Planning Council

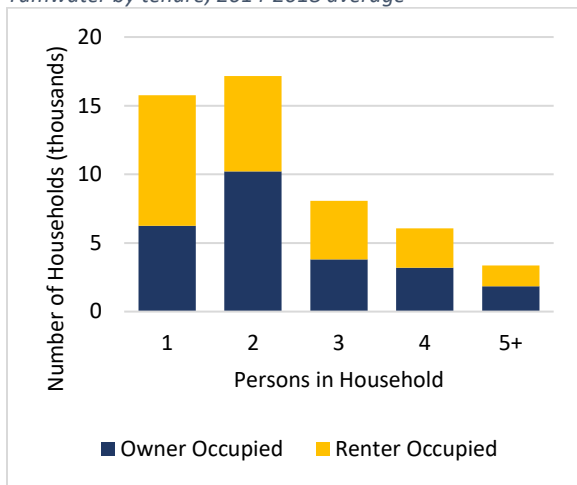
Strategies needed to decrease the housing gap will depend on a household’s income, and constructing new units is not the only way to meet the housing need identified in Figure 7-3 above. Housing vouchers and other forms of subsidized housing can make the current housing stock affordable for lower-income households. Actions that reduce the cost of utilities – such as energy efficiency upgrades – can also reduce housing costs. When lower income households find housing that better meets their budgets and needs, more units are freed up that higher income households can afford. Finally, as the current housing stock ages, it becomes more affordable and depreciates in value compared to new construction. This is known as “filtering.”

While the forthcoming Housing Action Plan will identify the best actions to take for each housing type and household income, it will also be important to track the number of cost burdened households over time. This will help to evaluate whether the three cities’ housing stock is moving closer into alignment with residents’ needs.

Housing Size

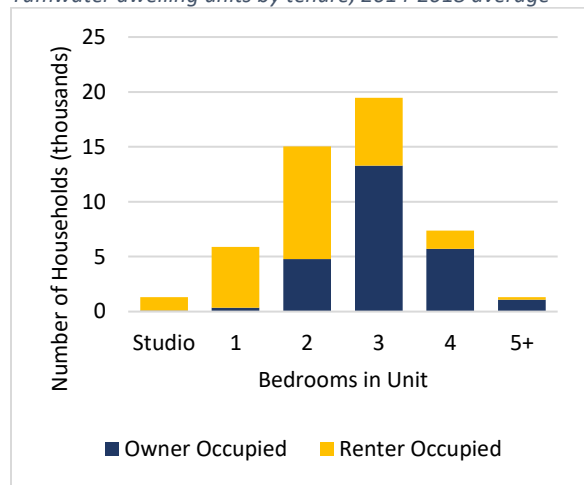
Another way to evaluate whether Lacey, Olympia, and Tumwater’s housing inventory is meeting residents’ needs is to compare household size to home size (Figures 7-4 through 7-7).

Figure 7-4. Household size in Lacey, Olympia, and Tumwater by tenure, 2014-2018 average



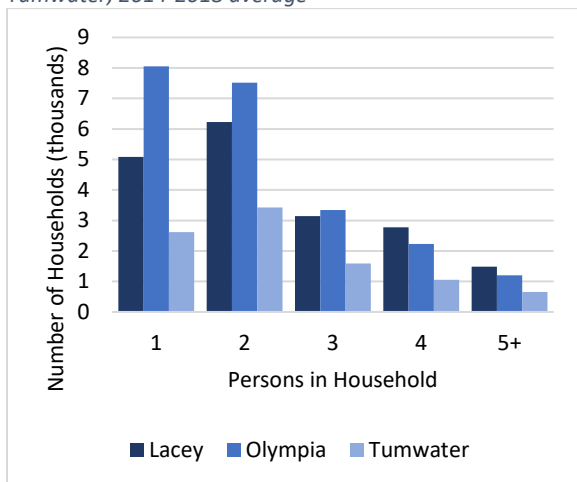
Source: U.S. Census Bureau American Community Survey

Figure 7-5. Number of bedrooms in Lacey, Olympia, and Tumwater dwelling units by tenure, 2014-2018 average



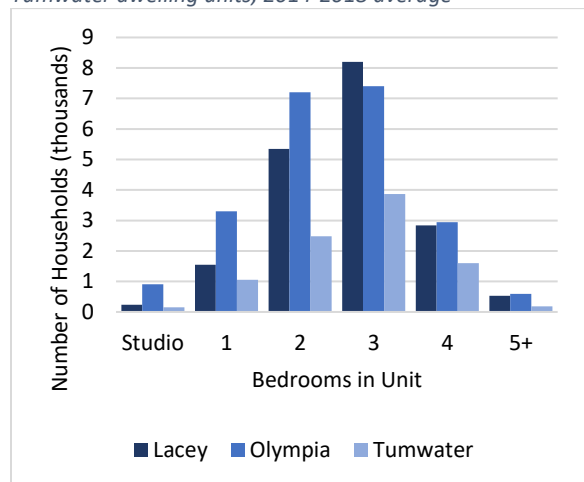
Source: U.S. Census Bureau American Community Survey

Figure 7-6. Household size in Lacey, Olympia, and Tumwater, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Figure 7-7. Number of bedrooms in Lacey, Olympia, and Tumwater dwelling units, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

While no standard measure exists that defines overcrowding in housing, one common measure is the number of people per room. In 2014-2018, only about 1.7 percent of Lacey, Olympia, and Tumwater's households had more than one person per room. This suggests that few households struggle to find housing that is large enough for their household's size.

Households may be struggling to find more affordable, smaller units. There are 32,900 one- or two-person households in Lacey, Olympia, and Tumwater. However, only 22,200 housing units have two or fewer bedrooms. The problem is more pronounced for one person households, with only 7,200 units for 15,800 households.

Most units with two or fewer bedrooms are rental units, limiting opportunities for those interested in home ownership.

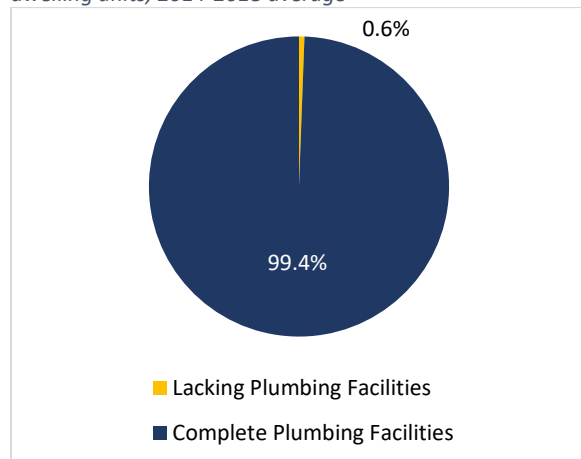
Substandard Housing

Substandard housing lacks basic facilities needed to make it habitable. The American Community Survey asks respondents whether they have basic plumbing and kitchen facilities. A dwelling unit is considered to have complete plumbing and kitchen facilities if it has:

- For plumbing facilities
 - Hot and cold running water
 - Bathtub or shower
- For kitchen facilities
 - Sink with a faucet
 - Stove or range
 - Refrigerator

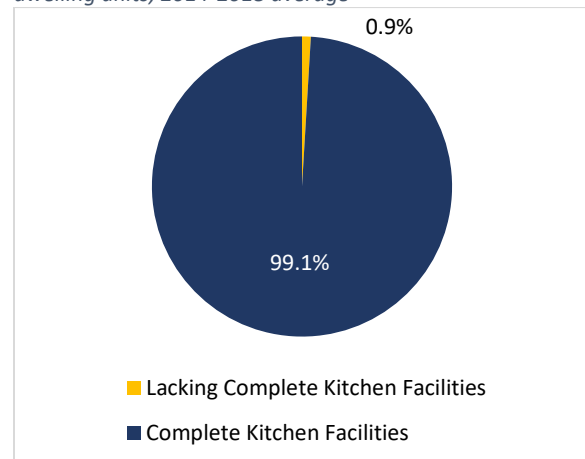
Lack of basic plumbing and kitchen facilities is a small problem in Lacey, Olympia, and Tumwater (Figures 7-8 and 7-9). About 290 occupied units (0.6 percent) lack at least one of the basic plumbing facilities while 480 (0.9 percent) lack at least one of the basic kitchen facilities.

Figure 7-8. Plumbing facilities in occupied Thurston County dwelling units, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Figure 7-9. Kitchen facilities in occupied Thurston County dwelling units, 2014-2018 average



Source: U.S. Census Bureau American Community Survey

Data are limited on other types of substandard housing in Thurston County. Some known concerns include:

- Indoor air quality, including exposure to mold
- Peeling paint and lead exposure
- Mice, rats, and other vermin
- Maintenance issues, including electrical, plumbing, and heating

Mold is of particular concern in western Washington. Many options for mitigating mold – including weatherization – have co-benefits in increasing efficiency and reducing heating costs.

Other Needs

For many households, housing may not meet their needs, even if it is affordable and up to building standards. These needs are difficult to quantify but important to consider. Some issues include:

- **ADA Accessibility:** Limited information is available on the number of accessible dwellings units in Thurston County. Ensuring that some percent of new housing is accessible and current housing is upgraded will help house an aging population.
- **Building Wealth:** While many households prefer the flexibility renting offers, homeownership is a means of building a household's wealth. Affordable housing opportunities for low-income households – who are disproportionately persons of color – can help reduce the wealth gap between disadvantaged populations.
- **Transportation Costs:** Many households may be unable to find affordable housing near their place of work. Living farther away from job opportunities may decrease housing costs but it also increases transportation costs. This has implications for time dedicated to commuting, the presence of congestion, and the amount of vehicle emissions.

Experiencing Homelessness

At least 800 individuals experienced homelessness in 2019 (Chapter 4). Thurston County's 2019-2024 Homeless Crisis Response Plan identified approximately 1,692 households without a permanent housing solution. According to the office of the Superintendent of Public Instruction, more than 1,700 students in Thurston County schools experienced homelessness at some point during the 2018-2019 school year. Because of the difficulties in counting the population experiencing homelessness, these numbers are believed to be an undercount of the total population.

Finding adequate housing solutions for those who do not have a home requires both short- and long-term strategies. The 2019-2024 Thurston County Homeless Crisis Response Plan identifies short-term actions that are needed to address homelessness (such as emergency shelters) but makes it clear that the ultimate goal is to find permanent housing solutions.

Thurston County’s ability to address homelessness in both the short- and long-term is hindered by a lack of emergency sheltering options and the availability of permanent supportive and affordable housing units. Provided affordable housing is available, most people experiencing homelessness can be assisted through rapid re-housing, which provides those who are newly homeless or on the verge of homelessness with quick resources such as money to pay a security deposit or first month’s rent. However, some have higher needs related to physical, mental health or developmental disabilities. In such cases, permanent supportive housing may be required to prevent such individuals from becoming homeless in the first place or exit a homeless situation.

Over the last five years, between 20 and 30 percent of households served by a housing program left such assistance for a permanent housing situation (a rental unit, home ownership, or permanent tenure with friends or family) (Figure 7-4). This means that 70 to 80 percent of households served by housing programs do not have permanent housing by the time they leave a housing program. Factors that affect this include low rental unit vacancy rates, increasing rent costs, and limited supportive housing programs.

Permanent Supportive Housing

According to the 2019-2024 Homeless Crisis Response Plan, permanent supportive housing is vulnerability based, non-coercive, non-judgmental, low-barrier, permanent housing for chronically homeless and permanently disabled individuals and families.

Supportive services including but not limited to holistic health and medical, mental health, substance use, enrichment programs and case management are available on site for people who wish to engage in services or coordinated closely to reduce all possible barriers to residents accessing services once they are ready.

As a costly intervention, permanent supportive housing must be targeted to the people who are most likely to die if they are left on the streets using an objective, standardized assessment tool and placed through a coordinated entry system. An ideal candidate for permanent supportive housing is a household or individual experiencing chronic homelessness, permanent physical, mental health or substance use related disability, chronic illness and high rates of interaction with law enforcement and emergency rooms.

Figure 7-10. Thurston County households leaving a housing program to a permanent housing situation, 2015-2019



Source: Thurston County Public Health and Social Services

Because not everyone is counted in the Point-in-Time Census and the dynamic variables in the homeless experience, it is difficult to pinpoint exactly how many people experience homelessness in Thurston County. These factors, in addition to the economic impacts of the COVID-19 pandemic, it is also difficult to forecast how many people will experience homelessness in the future. Regardless, it is clear there are two critical housing gaps that require focus in order address homelessness in Thurston County:

- Permanent supportive housing for those who need services in order to maintain their housing.
- Affordable housing for households that make 30 percent or less of the area median family income, who are those most likely to be cost burdened or severely cost burdened by their housing, and thus at greater risk of becoming homeless.

Chapter 8.

Land Capacity Analysis

Thurston County is one of seven Washington Counties affected by the review and evaluation provision of the Growth Management Act (GMA). This provision requires counties to periodically review their growth to ensure that development is in line with the GMA's land use goals, and that there is sufficient land to accommodate 20 years' worth of projected growth. This review – known as the “Buildable Lands Report” – is due three years prior to city and county Comprehensive Plan updates. Ensuring that the zoning and size of the urban areas is appropriate for the projected growth helps keep new development affordable.

Thurston Regional Planning Council (TRPC) is responsible for the Buildable Lands Program in Thurston County. As part of the program, TRPC maintains an inventory of developable land. For each parcel in the county, the inventory estimates the number of new dwellings that could be built on the property, taking into account:

- Current land use, including any existing development
- The parcel's zoning and average densities achieved for each zone
- Environmental constraints, such as wetlands or steep slopes.

The most recent inventory was completed in 2019. Documentation is available at <https://www.trpc.org/236>. The inventory will be used to develop the next Buildable Lands Report, expected in 2021.

Appendix A shows estimates of developable land and residential capacity by zoning designation.

Residential Capacity

TRPC's land supply model estimates sufficient capacity in the Lacey, Olympia, and Tumwater urban areas for about 40,000 new dwelling units in 2020, with about one third of the capacity in each urban area (Table 8-1). Capacity is split among a range of zoning types: about 41 percent in primarily multifamily zones; 26 percent in mixed single-family/multifamily zones; and 33 percent in primarily single-family zones.

Having capacity in a range of zoning types is important since different household types tend to gravitate towards different housing and ownership types.

Table 8-1. Residential capacity by generalized zoning district, 2017

Density Category	Lacey	Olympia	Tumwater	TOTAL
Commercial, Mixed Use, and High Density Multifamily	3,500	7,100	1,800	12,400
Moderate Density Multifamily	2,000	300	1,700	4,000
Mixed Residential and Planned Communities	6,600	1,700	2,300	10,500
Medium Density	2,200	5,000	4,600	11,800
Low Density and Sensitive	0	1,000	500	1,600
TOTAL	14,400	15,100	10,800	40,300

Source: Thurston Regional Planning Council

Table 8-2 describes the amount of residential development capacity by the type of developable parcel. About 600 units are on lots that have been recently permitted or subdivided and will be constructed over the next few months. A number of projects are in the development pipeline or part of master planned communities. These projects represent about 9,100 units that will most likely be built over the next few years. The remaining capacity is on parcels with no plans for development. These include vacant parcels (about 13,100 units), subdividable parcels with at least one existing dwelling (13,800 units), and redevelopable parcels (about 3,700 units). These parcels will most likely develop over the next few decades.

Table 8-2. Residential capacity by type of developable parcel, 2020

Capacity Type	Lacey	Olympia	Tumwater	TOTAL
Recently Permitted or Subdivision Lots	400	100	100	600
Planned Projects and Master Planned Communities	4,200	1,900	3,000	9,100
Vacant Single Lots	100	400	100	600
Vacant Subdividable Lands	3,600	5,800	3,100	12,500
Partially Used, Subdividable Lands	4,900	4,500	4,300	13,800
Redevelopment	1,100	2,400	300	3,700
TOTAL	14,400	15,100	10,800	40,300

Source: Thurston Regional Planning Council

Since some types of capacity are more likely to develop than others, it is important to have development potential on parcels of all types. Too much capacity on parcels that are more expensive (such as redevelopment parcels) or slow to enter the market (partially used, subdividable parcels) could constrict the supply of housing.

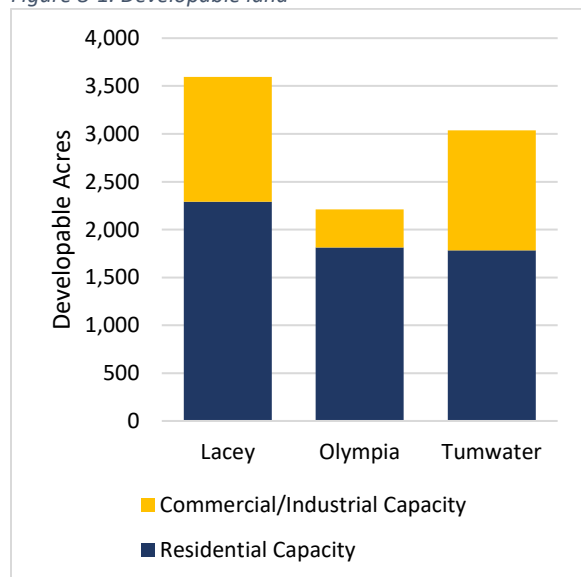
Unique Housing Needs

Apart from single-family, multifamily, and manufactured homes, Lacey, Olympia, and Tumwater’s zoning regulations permit – either outright or conditionally – a range of unique housing needs important for specific populations. These include:

- Housing for those experiencing homelessness including shelters, emergency housing, transitional housing, and permanent supportive housing
- Facilities for people with medical needs such as nursing homes, adult family homes, and mental health facilities
- Correctional and rehabilitation facilities

Lacey, Olympia, Tumwater, and their unincorporated urban growth areas contain about 8,800 acres of developable land, plus additional land suitable for infill or redevelopment (Figure 8-1). About a third is suitable for commercial or industrial development with the remainder residential. Based on this assessment, the region should have sufficient land capacity for future housing needs for populations with unique needs.

Figure 8-1. Developable land



Source: Thurston Regional Planning Council

Appendix A.

Development Trends by Zoning District

The following tables include a summary of permit trends and development capacity for zoning districts in Lacey, Olympia, Tumwater, and their unincorporated Urban Growth Areas (UGAs).

Permit trend data come from Thurston Regional Planning Council's (TRPC) building permit database. TRPC compiles permits for new dwelling units annually from data provided by city, town, county, and tribal reservation building departments. For larger subdivision and mixed-use projects, data are entered as permits are issued, which will occur after the project is approved.

Data on buildable land and residential capacity come from TRPC Population and Employment Forecast work program. Using average densities based on recent development trend in each zone, TRPC estimates the buildable area on each parcel plus the number of dwelling units that the parcel could likely accommodate, should the parcel develop. Estimates take into account any existing development, wetlands and other critical areas, and probability of redevelopment. Data support the Buildable Lands Report for Thurston County. Documentation is available at www.trpc.org/236.

Lacey

Zone	Location	Permitting Trends					Buildable Land (Acres)		Residential Capacity (Number of Units) on:	
		1995-1999	2000-2004	2005-2009	2010-2014	2015-2019	Res.	Comm.	Vacant Land	Redev. Land
Aquatic	City	0	0	1	0	0	0	0	0	0
Central Business District 4	City	56	62	0	1	0	1	10	13	46
Central Business District 5	City	0	1	156	0	244	0	7	304	71
Community Office District	City	0	150	296	0	0	2	44	46	0
General Commercial	City	0	2	0	0	0	0	30	0	0
High Density Residential	City	20	167	500	202	834	66	0	1,156	0
High Density Residential	UGA	1	182	0	1	277	88	0	852	0
Lacey Historic Neighborhood	City	9	3	3	1	1	16	2	29	0
Low Density Residential (LD 0-4)	City	637	227	522	282	131	230	2	770	0
Low Density Residential (LD 0-4)	UGA	254	296	121	54	160	362	5	1,669	0
Low Density Residential (LD 3-6)	City	802	290	1,442	424	145	45	0	265	0
Low Density Residential (LD 3-6)	UGA	359	597	222	159	286	561	7	3,520	0
McAllister Geologically Sensitive Area	UGA	61	111	126	72	36	516	24	2,824	0
Mixed Use High Density Corridor	City	190	7	1	1	589	17	19	551	117
Mixed Use High Density Corridor	UGA	2	164	1	0	257	16	22	322	643
Mixed Use Moderate Density Corridor	City	0	0	0	0	28	8	12	69	4
Mixed Use Moderate Density Corridor	UGA	0	2	59	0	0	7	11	136	58
Moderate Density Residential	City	564	208	939	392	295	111	0	1,024	0
Moderate Density Residential	UGA	98	199	104	14	137	168	0	998	0
Natural	City	1	2	0	0	0	0	0	1	0
Open Space (Institutional)	City	4	5	1	17	36	0	0	64	0
Open Space (Institutional)	UGA	1	0	0	0	0	0	0	0	0
Open Space (Park)	UGA	2	0	0	0	0	0	0	0	0
Shoreline Residential	City	5	3	4	4	3	1	0	4	0
Urban Conservancy	City	1	1	0	0	0	0	0	2	0
Village (Urban) Center	City	0	0	0	10	76	15	12	198	0
Village (Urban) Center	UGA	0	0	95	100	0	0	29	372	0
Woodland District	City	0	0	101	0	0	3	6	135	1,583
TOTAL		3,067	2,679	4,694	1,734	3,535	2,233	242	15,324	2,522

Olympia

Zone	Location	Permitting Trends					Buildable Land (Acres)		Residential Capacity (Number of Units) on:	
		1995-1999	2000-2004	2005-2009	2010-2014	2015-2019	Res.	Comm.	Vacant Land	Redev. Land
Community Oriented Shopping Center	UGA	0	0	28	10	0	3	7	31	0
Downtown Business	City	43		5	58	356	3	9	398	1539
High Density Corridor-4	City	0	0	0	0	166	4	48	572	2931
Manufactured Housing Park	City	2	0	0	0	0	1	0	7	0
Medical Service	City	60	80	24	0	0	8	37	171	100
Mixed Residential (MR-10-18)	City	0	23	11	3	4	19	0	129	0
Neighborhood Retail	City	0	0	1	0	0	0	2	1	2
Neighborhood Retail	UGA	0	0	0	0	2	0	2	7	2
Neighborhood Village	City	0	0	9	149	257	33	7	446	0
Planned Unit Development	City	1	2	64	36	0	1	1	14	103
Professional Office/Residential Multifamily	City	260	2	80	400	1	28	46	611	386
Residential (R 1/5)	City	5	0	1	0	0	6	0	5	0
Residential (R 1/5)	UGA	11	3	30	11	3	33	0	28	0
Residential (R-4)	City	1	5	0	0	0	9	0	16	0
Residential (R-4)	UGA	72	19	25	25	12	71	5	136	0
Residential (R-4-8)	City	573	395	231	117	94	737	22	3,882	0
Residential (R-4-8)	UGA	289	349	186	100	35	293	4	1,395	0
Residential (R-6-12)	City	142	118	142	147	24	154	4	1,053	0
Residential (R-6-12)	UGA	16	87		48	86	9	0	97	0
Residential Low Impact	City	7	130	294	179	205	131	3	509	0
Residential Low Impact	UGA	105	299	2	1	2	46	2	129	0
Residential Mixed Use	City	0	29	0	0	0	0	1	23	0
Residential Multifamily (RM-18)	City	45	16	18	138	37	59	2	919	0
Residential Multifamily (RM-18)	UGA	0	0	198	0	0	10	0	174	0
Residential Multifamily (RM-24)	City	89	1	30	580	126	50	0	984	0
Single-Family Residential (Chambers Basin)	City	0	2	1	0	1	68	0	285	0
Urban Residential	City	4	32		0		2	3	184	0
Urban Village	City	2	0	62	130	238	25	10	366	0
Urban Waterfront	City	284	0	12	0	116	4	14	572	343
Urban Waterfront - Housing	City	0	0	0	0	140	2	1	301	380
TOTAL		2,011	1,592	1,454	2,132	1,905	1,809	230	13,445	5,786

Tumwater

Zone	Location	Permitting Trends					Buildable Land (Acres)		Residential Capacity (Number of Units) on	
		1995-1999	2000-2004	2005-2009	2010-2014	2015-2019	Res.	Comm.	Vacant Land	Redev. Land
Airport Related Industry	City	1	0	0	0	0	0	9	0	0
Brewery District	City	1	2	0	0	0	2	12	632	49
Capitol Boulevard Community	City	0	0	1	7	0	3	7	401	507
Commercial Development	UGA	1	0	0	1	0	0	12	0	1
General Commercial	City	5	3	3	3	2	6	138	124	43
Greenbelt	UGA	0	1	0	0	0	0	0	0	0
Light Industrial	City	5	4	2	1	0	0	664	0	0
Light Industrial	UGA	11	7	3	2	4	0	212	0	0
Manufactured Home Park	City	42	21	22	7	10	6	0	44	0
Mixed Use	City	2	0	0	40	0	5	35	65	26
Multifamily High Density Residential	City	0	0	229	0	322	14	0	544	0
Multifamily Medium Density Residential	City	2	131	152	134	165	128	10	1,018	0
Multifamily Medium Density Residential	UGA	21	20	10	3	11	72	11	599	0
Neighborhood Commercial	UGA	1	0	0	0	0	0	2	0	0
Open Space	City	2	2	1	0	0	0	0	0	0
Open Space	UGA			2	0	0	0	0	0	0
Residential/Sensitive Resource	City	31	52	66	14	11	113	0	369	0
Residential/Sensitive Resource	UGA	4	3	0	0	2	48	0	124	0
Single-Family Low Density Residential	City	319	205	292	216	215	530	2	2,736	0
Single-Family Low Density Residential	UGA	54	29	10	2	12	419	18	1,985	0
Single-Family Medium Density Residential	City	150	383	237	409	127	341	25	1,841	0
Single-Family Medium Density Residential	UGA	10	3	1	1	2	97	0	446	0
Town Center Multifamily Residential	City	2	0	0	0	0	1	1	11	33
TOTAL		664	866	1,031	840	883	1,785	1,158	10,939	659

Appendix B.

Household Income Forecast

Introduction

In 2019, the state Department of Commerce awarded a grant to the cities of Lacey, Olympia, and Tumwater to develop a Housing Action Plan. The plan includes four components:

- A Regional Housing Needs Assessment, with an inventory of the current housing stock, household characteristics, the population’s housing needs, and any gaps in housing availability.
- A household income forecast to identify future housing needs
- A survey of landlords and rental property owners to better understand housing costs
- A Housing Action Plan—to be adopted by the cities—which provides a list of actions for the cities to implement to promote the development of a housing stock that meets the needs of current and future residents

This report documents the methodology and results of the household income forecast, which provides jurisdictions with a projection of the number of households in different income brackets. This information can be used to identify actions that encourage development of housing over the next 25 years that is adequate and affordable to households of all incomes.

Preparation of the household income forecast occurred during the COVID-19 pandemic. The pandemic resulted in high levels of unemployment and reduced wages for many residents of Thurston County. The baseline forecast uses pre-pandemic sources of data and assumes a full recovery. However, given the uncertainty around the long-term impacts of the pandemic, five scenarios were also prepared to look at alternative growth projections.

What Factors Affect Income?

Household income is complex and influenced by a number of factors. The household income forecast focuses on four factors.

<p>Total Employment by Industry Employment affects the number of wage earners in a county.</p>	<p>Wages by Industry Wages affect how much individuals earn, and the amount of income they contribute to the households.</p>
<p>Commuting The number of commuters impacts how much income is moved between counties.</p>	<p>Population and Age The number of people in each age bracket reflects the size of the labor force versus the number of people too young to work or who have retired.</p>

These factors are discussed in more detail below.

Sources of Data

Numerous data sources of data are available on population, age, employment, wages, and commuting. These include:

- Washington State Office of Financial Management (OFM): Population estimates and projections by age for counties. Statewide employment projections.
- Thurston Regional Planning Council (TRPC): Employment projections for Thurston County.
- Washington State Employment Security Department (ESD): Average annual employment counts and wages by industry.
- U.S. Bureau of Economic Analysis (BEA)
- U.S. Census Bureau American Community Survey (ACS): Estimates of population, age, employment, and earnings by county.
- Census Transportation Planning Products (CTPP): County-to-county commute flows using a special tabulation of American Community Survey Data.

TRPC used these sources were to develop 25-year projections for population, age, employment, wages, and commuting that were input into the housing income forecast. The following sections explore some of those topics and how they relate to income and wages.

Employment by Industry

TRPC projects that employment in Thurston County will add over 60,000 new jobs between 2015 and 2045, a growth rate of about 1.4 percent per year. This is slightly faster than the state Office of Financial Management's projections for Washington State (Table 1).

The two fastest growing industries are projected to be educational services, health care and social assistance; and professional and business services. Both are projected to increase by about 1.6 percent per year. Finance and insurance, and real estate and rental leasing is expected to be a close third at 1.4 percent per year.

The industries seeing the largest growth in terms of total numbers are also the largest industries: educational services, and health care and social assistance; public administration and government employment; and professional and business services.

Fastest Growing Industries in Thurston County (projected)

- Educational services, and health care and social assistance
- Professional and business services
- Finance and insurance, and real estate and rental and leasing

Largest Industries in Thurston County

- Educational services, and health care and social assistance
- Public administration (government)
- Professional and business services

Table 1: Total Employment Estimates and Projections

NAICS	Industry	Thurston County			Washington State		
		2015	2045	Rate	2015	2045	Rate
11,21	Agriculture, forestry, fishing and hunting, and mining	3,321	3,700	0.4%	209,500	257,800	0.8%
22,48-49	Transportation and warehousing, and utilities	3,053	4,000	0.9%	100,900	115,600	0.5%
23	Construction	6,334	8,600	1.0%	173,300	219,800	1.0%
31-33	Manufacturing	4,152	5,100	0.7%	291,900	299,300	0.1%
42	Wholesale trade	3,857	5,300	1.1%	132,000	143,100	0.3%
44-45	Retail trade	15,555	22,100	1.2%	355,000	463,900	1.1%
51	Information	1,344	1,600	0.6%	114,400	157,000	1.3%
52-53	Finance and insurance, and real estate and rental and leasing	10,028	15,300	1.4%	147,700	161,400	0.4%
54-56	Professional and business services	15,951	25,400	1.6%	389,700	620,400	1.9%
61-62	Educational services, and health care and social assistance	19,375	31,100	1.6%	448,500	630,400	1.4%
71-72	Arts, entertainment, recreation, accommodation, and food services	11,982	17,600	1.3%	310,100	409,500	1.1%
81	Other services, except public administration	8,183	12,100	1.3%	115,000	120,800	0.2%
	Government / Public administration	37,640	49,000	0.9%	562,000	778,700	1.3%
	Total	140,775	200,900	1.2%	3,350,000	4,377,700	1.1%

Sources: OFM; TRPC Forecast

Wages

Wages make up about 71 percent of total income for Thurston County households. For lower-income households specifically, Social Security, Supplemental Social Security, and other forms of public assistance can make up over 30 percent of a household's income. Figure 1 shows sources of income by household income level.

Average wage earnings for employed Thurston County residents are \$54,500 (Table 2). Average wages vary widely by industry, from a high of \$110,600 for the utility industry to a low of \$20,700 for arts, entertainment, and recreation. Nominal wages (wages not adjusted for inflation) increased 2.4 percent per year between 2001 and 2018. This is in line with inflation (Table 3). For many industries, wage increases can vary widely on a year-to-year basis making projections of future wages difficult.

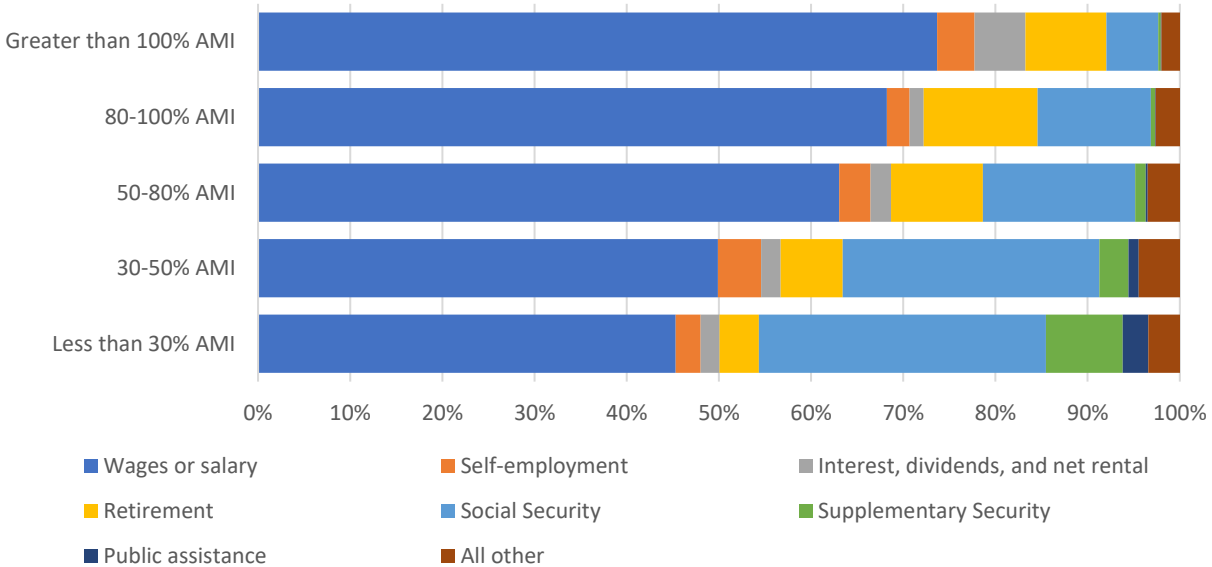
Thurston County Industries with the Highest Wages

- Utilities
- Information
- Management of companies and enterprises

Table 2: 2019 Average Wage Earnings by Industry for Covered Employment

NAICS	Industry subsectors	Thurston County	Washington State	Percent Difference
11	Agriculture, forestry, fishing, and hunting	\$39,800	\$33,700	18%
21	Mining	56,100	74,900	-25%
22	Utilities	110,600	105,300	5%
23	Construction	64,300	67,800	-5%
31-33	Manufacturing	58,500	81,300	-28%
42	Wholesale trade	73,600	82,400	-11%
44-45	Retail trade	34,000	62,300	-45%
48-49	Transportation & warehousing	45,900	64,700	-29%
51	Information	92,700	207,000	-55%
52	Finance and insurance	75,900	101,000	-25%
53	Real estate, rental and leasing	43,000	58,400	-26%
54	Professional, scientific, and technical services	75,600	104,000	-27%
55	Management of companies and enterprises	76,600	123,400	-38%
56	Administrative and waste management services	41,300	53,100	-22%
61	Educational services	33,800	40,200	-16%
62	Healthcare and social assistance	54,700	54,700	0%
71	Arts, entertainment, and recreation	20,700	33,200	-38%
72	Accommodation and food services	22,000	25,300	-13%
81	Other services (except public administration)	46,000	42,600	8%
	Government	66,200	66,900	-1%
	Total	\$54,500	\$69,600	-22%

Source: ESD Quarterly Census of Employment and Wages (2019 Annual Average)

Figure 1: Sources of Income in Thurston County by Household Income Bracket

Source: 2014-2018 ACS PUMS. AMI is the Area Median Family Income.

Table 3: Average Annual Increase in Wages (2001-2018)

NAICS	Industry	Average	Minimum	Maximum
11, 21	Agriculture, forestry, fishing and hunting, and mining	6.5%	-14.7%	63.7%
22, 48-49	Transportation and warehousing, and utilities	-0.8%	-11.4%	5.9%
23	Construction	2.3%	-9.7%	31.9%
31-33	Manufacturing	2.3%	-3.5%	8.6%
42	Wholesale trade	2.7%	-22.0%	40.9%
44-45	Retail trade	1.1%	-11.6%	5.4%
51	Information	2.4%	-23.4%	24.3%
52-53	Finance and insurance, and real estate, rental and leasing	1.4%	-12.6%	29.3%
54	Professional, scientific, and management, and administrative and waste management services	3.3%	-4.5%	8.7%
61-62	Educational services, and health care and social asst.	2.6%	-6.7%	5.8%
71-72	Arts, entertainment, and recreation, and accommodations and food services	3.4%	-3.1%	10.2%
81	Other services except public administration	3.0%	-3.4%	8.6%
	Government / Public administration	3.0%	0.0%	7.8%
	All Wages	2.4%	0.1%	4.4%
	Inflation	2.3%	0.3%	4.2%

Source: BEA tables CAEMP25 and CAINC5; Consumer Price Index for Seattle-Tacoma-Bremerton Metropolitan Statistical Area

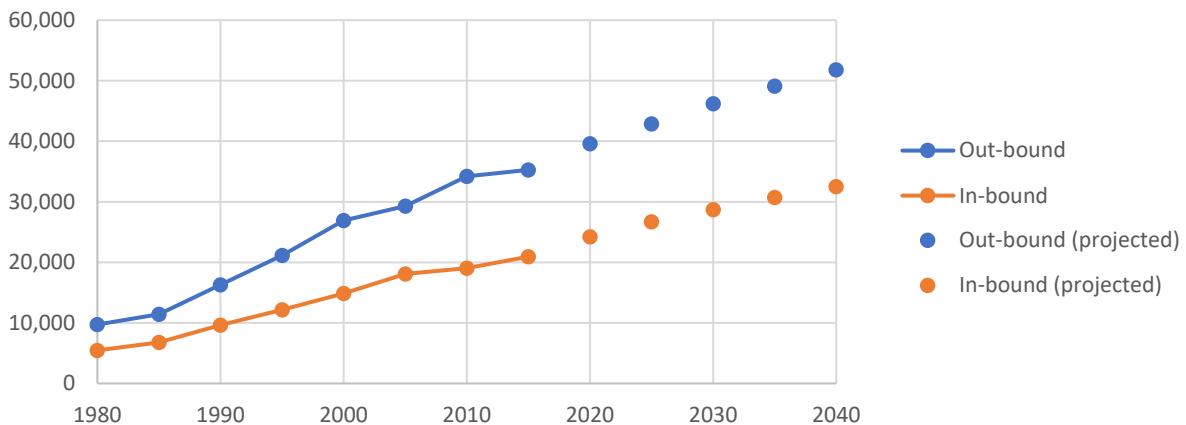
Commuting

TRPC projects that between 2020 and 2045, the number of commuters to or from Thurston County will increase by about 40 percent. Out-bound commuters will continue to make up about 60 percent of all county-to-county commuters (Figure 2).

The ratio of outbound commuters to inbound commuters affects how much income is brought into the County. More people leave Thurston County than commute to it for work which brings income to our communities.

People tend to commute out of county for higher-wage jobs. Most out-of-county commuters have higher incomes than those who live and work in the same county (Table 4). Average wage earnings for Thurston County residents who work within the County is about \$46,200. When outbound commuters are included, the average increases to \$49,500.

Figure 2: Commute Forecast



Source: TRPC Population and Employment Forecast (2018 Update)

Table 4: Average Wage Earnings by Place of Residence and Place of Work

Place of Residence	Place of Work						Total
	Thurston County	Pierce County	Southwest WA	Olympic Peninsula	Northwest WA	Eastern WA	
Thurston County	46,200	56,800	56,500	56,700	62,900	–	49,500
Pierce County	51,300	45,700	–	60,500	60,200	–	49,800
Southwest WA	41,100	–	43,400	–	64,500	43,000	43,500
Olympic Peninsula	46,800	48,000	–	42,500	84,500	–	46,000
Northwest WA	–	55,200	–	54,300	64,800	–	64,600
Eastern WA	–	–	49,400	–	71,000	43,100	43,400
Total	46,700	47,300	43,700	43,600	64,700	43,200	55,500

Source: 2014-2018 ACS PUMS.

Note: Excludes out of state commutes and county pairs with fewer than 100 records

Age

Age affects income in a number of ways, including:

- The number of people in the labor force (generally age 18 through 65)
- Length of employment, amount of job experience, and compensation
- Type of employment and industry

Increase in Working-Age Population
(Age 20-64)

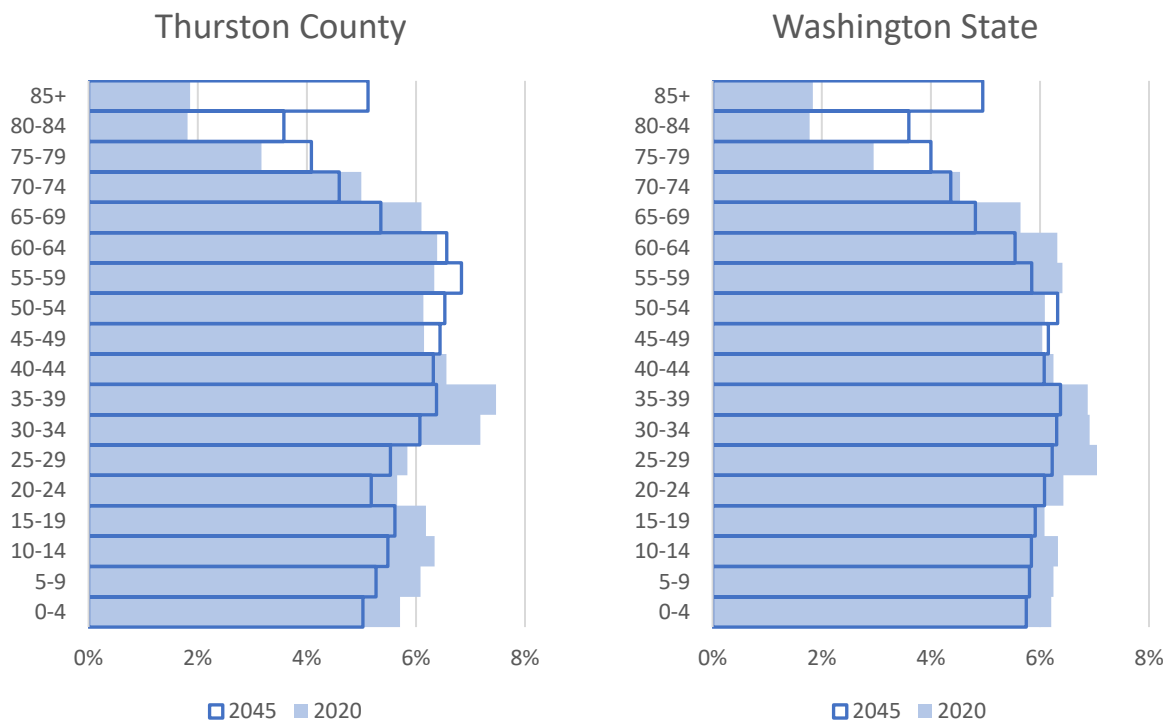
+ 44,300

2020-2045

Thurston County’s working age population is projected to increase by over 44,300 people over the next 25 years (Figure 3). Thurston County however, like most counties in Washington State, has an aging population. The population age 65 and older is expected to increase by over 65 percent between 2020 and 2045. The main source of income for this group is retirement savings and Social Security, not wages.

As the baby-boomer population retires, many higher-wage jobs this will open up for the younger age cohorts. This is particularly true for state employment, which has an older workforce compared to the county average.

Figure 3: Percent of Population in Five-Year Age Cohorts



Source: OFM Growth Management Act County Projections (2017)

Income Forecast Methodology

TRPC modified microdata available from the U.S. Census Bureau to simulate a theoretical 2045 population. This population could then be used to calculate the future median family income and number of households in defined income brackets.

American Community Survey

The U.S. Census Bureau's American Community Survey (ACS) is an ongoing survey that collects data on all the drivers of income—place of work and residence, age, wages, and employment industry. Data are released on a yearly basis and are available as one-year or five-year averages, depending on the population for the geography of interest.

Public Use Microdata Sample

The Public Use Microdata Sample (PUMS) is a unique subset of ACS data. The Census Bureau releases the complete survey responses for about 5 percent of the population. Data are only available for unique geographies with at least 100,000 people – called Public Use Microdata Areas (PUMAs). The sample is chosen so that it is representative of the population as a whole, without identifying a single individual. Additional modifications are made to preserve the confidentiality of individuals' responses. Each record is given a weight that identifies the estimated number of people it represents in the overall population.

The advantage of the PUMS data is that they allow for summarization in ways that are not available through the standard pretabulated ACS tables. This gives researchers more flexibility in the types of analyses they can perform.

Modifying the PUMS Weights

For the income forecast, the weights were adjusted to represent a projected 2045 population. Weights were adjusted to control for two factors:

- Total population by six geographic regions (Thurston County, Pierce County, Northwest Washington, Southwest Washington, Olympic Peninsula, and Eastern Washington) and five age brackets. Population estimates for 2045 came from the Office of Financial Management's 2017 Growth Management Act supplemental projections.
- Total 2045 employment by 13 industry categories for Thurston County and the remainder of Washington State, plus the unemployed population. Statewide projections came from the Office of Financial Management. Thurston County projections came from TRPC's Population and Employment Forecast.

Since growth rates are different for each industry, population in each county, and population in each age group, iterative proportional fitting was used to ensure the expanded population matched the totals (marginals) in each county, age, and employment industry category.

“Stretching” the 2014-2018 ACS PUMS data to fit a 2045 population and workforce provides a conservative estimate of that population. It assumes no major changes in wage distribution of employment industries, employment industry chosen by different age groups, or commute patterns, for example.

Table 5 shows the percent change in population for each of the county, age, and industry groups between the 2014-2018 American Community Survey data and 2045 projections.

Iterative Proportional Fitting

Iterative Proportional Fitting — also known as IPF — is a statistical procedure used to estimate the values of a **crosstab table** when only the **marginal totals** are known.

In the example below, the total number of people in each age group and employment industry is known. However, the number of people in age group employed in each industry is not known. What if the number of people age 30-45 who work in retail is needed? IPF can be used to estimate the missing data.

Job Industry	Age <30	Age 30-45	Age 45-60	Total
Services	?	?	?	52
Retail	?	?	?	28
Construction	?	?	?	11
Resources	?	?	?	9
Total	31	37	32	100

IPF Example. The totals for each row and column are known, but not the individual cells.

The accuracy of the procedure can be improved by “seeding” the table, for example, with survey data. Through an iterative process, the initial seed values are refined until they equal the known totals for each row and column.

For the income forecast, the population growth in 30 place of residence/age group categories are the columns, and the rows are the employment growth in 27 employment industry/place of work categories. 2014-2018 PUMS data are used as the seed.

Table 5: Population Expansion Factors

Place of Residence	Place of Work	Age	Employment Industry NAICS Code													Not Employed
			11-21	22, 48-49	23	31-33	42	44-45	51	52-53	54-56	61-62	71-72	81	92	
Thurston	Thurston	0-19	20%	-	51%	35%	50%	56%	25%	58%	68%	69%	66%	59%	40%	23%
Thurston	Thurston	20-34	-7%	9%	16%	4%	15%	20%	-3%	22%	30%	30%	28%	23%	8%	-5%
Thurston	Thurston	35-49	12%	31%	40%	26%	39%	45%	16%	47%	56%	57%	54%	48%	30%	14%
Thurston	Thurston	50-64	17%	37%	46%	31%	45%	51%	21%	53%	62%	63%	60%	54%	35%	19%
Thurston	Thurston	65+	81%	112%	126%	103%	-	134%	88%	138%	152%	153%	148%	139%	109%	85%
Thurston	Other	0-19	31%	22%	38%	11%	16%	42%	-	13%	71%	48%	45%	9%	51%	-
Thurston	Other	20-34	1%	-6%	7%	-15%	-10%	10%	15%	-13%	32%	14%	12%	-16%	16%	-
Thurston	Other	35-49	21%	13%	28%	3%	8%	32%	39%	5%	59%	38%	35%	2%	40%	-
Thurston	Other	50-64	26%	18%	34%	7%	12%	38%	45%	10%	66%	43%	40%	6%	46%	-
Thurston	Other	65+	96%	83%	107%	66%	74%	114%	124%	70%	157%	122%	118%	64%	126%	-
Other	Thurston	0-19	21%	-	-	-	-	54%	-	-	61%	-	64%	52%	40%	-
Other	Thurston	20-34	2%	20%	22%	11%	28%	27%	1%	24%	39%	39%	34%	34%	14%	-
Other	Thurston	35-49	18%	28%	37%	24%	34%	42%	13%	43%	52%	54%	51%	50%	29%	-
Other	Thurston	50-64	6%	25%	25%	16%	27%	39%	15%	42%	49%	47%	48%	46%	18%	-
Other	Thurston	65+	51%	-	144%	107%	147%	147%	-	162%	152%	143%	144%	-	115%	-

Note: Table shows the percent increase in that group's population between 2014-2018 and 2045. Employment Industry NAICS codes are shown in Table 2. "Other" includes five regions (Pierce County, Northwest Washington, Southwest Washington, Olympic Peninsula, and Eastern Washington) aggregated here for simplicity.

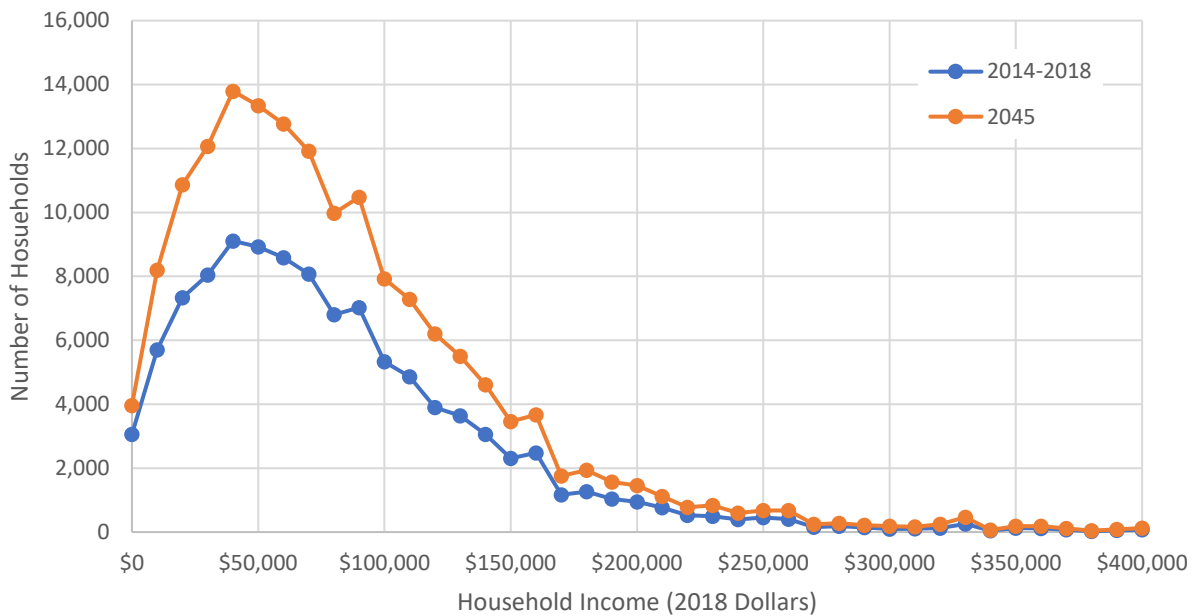
Results

Median Family Income

Median family income is the threshold at which half of family households earn more and half of family households earn less. Without accounting for inflation, median family income is projected to increase 1.3 percent, from \$82,400 to \$83,400 in real 2018 dollars. This change is well within the margin of error, suggesting that future households' income will not differ significantly from now.

From the projected 2045 median family income, new income thresholds can be calculated. These values, which vary by household size, are shown in Table 6.

Figure 4: Projected Income Distribution (All Households)



Source: U.S. Census Bureau 2014-2018 ACS; TRPC Income Forecast

Table 6: Income Limits in Real 2018 Dollars

		1-person		2-Person		4-Person	
		2014-18	2045	2014-18	2045	2014-18	2045
Extremely Low Inc.	30% AMFI	\$17,300	\$17,500	\$19,800	\$20,000	\$24,700	\$25,000
Very Low Income	50% AMFI	\$28,800	\$29,200	\$33,000	\$33,400	\$41,200	\$41,700
Low Income	80% AMFI	\$46,100	\$46,700	\$52,700	\$53,400	\$65,900	\$66,700
Median Income	100% AMFI	\$57,700	\$58,400	\$65,900	\$66,700	\$82,400	\$83,400
	120% AMFI	\$69,200	\$70,100	\$79,100	\$80,100	\$98,900	\$100,100

Note: AMFI is the Area Median Family Household Income. 2045 income limits are shown in real 2018 dollars. Nominal values will be higher due to inflation. Documentation on how HUD calculates income limits, including for household sizes not show here, is available at www.huduser.gov/portal/datasets/il.html.

Countywide Income Forecast

With the projected median family income, the number of households in different income brackets can be calculated. By 2045, an additional 22,300 low-income households are expected, including 11,600 very low-income households, and 5,400 extremely low-income households (Table 7).

Table 7: Households by Income Bracket

Income Group	# Households			% Households	
	2014-2018	2045	Change	2014-2018	2045
Less than 30% AMI	12,400	17,800	5,400	11.5%	10.8%
30 to 50% AMI	11,600	17,800	6,200	10.7%	10.8%
50 to 80% AMI	19,400	30,100	10,700	18.0%	18.3%
80 to 100% AMI	13,700	20,700	7,000	12.6%	12.6%
100% to 120% AMI	10,500	15,800	5,300	9.7%	9.6%
Greater than 120% AMI	40,500	62,200	21,700	37.5%	37.9%
Total	108,100	164,400	56,300	100.0%	100.0%

Note: AMI is the Area Median Household Income

Since there is considerable uncertainty in what the future holds, especially given the ongoing COVID-19 pandemic, TRPC looked at five alternative scenarios:

- **COVID-19:** 10 percent reduction in retail trade employment. 15 percent reduction in leisure and hospitality employment. 5 percent reduction in all other service employment
- **New and Emerging Industries:** 5 percent increase in manufacturing. 10 percent increase in manufacturing wages
- **Decrease in Public Assistance:** 10 percent decrease in public assistance (Social Security, Supplemental Social Security, and other Public Assistance)
- **Increased Government Wages:** Government wages increased 10 percent over inflation
- **Minimum Wage:** 25 percent increase in wage earnings if hourly wage is less than \$12/hour

The scenarios are included not to describe scenarios that are likely or expected, but to better understand how sensitive the forecast methodology is to possible changes and the relative importance of different inputs.

Changes to median family income were within the margin of error of current estimates. However, the scenarios do show the importance of programs targeting the lowest-income households. Increasing the minimum wage showed the greatest reduction in the number of very low-income households (those earning less than 50 percent of the median). A 10 percent decrease in public assistance programs (including Social Security, Supplemental Social Security, and other forms of public assistance) saw the largest increase in the number of very low-income households.

Table 8 shows a summary of the scenario results.

Table 8: Change in Income and Cost-Burdened Households for Scenarios

	Change in Median Household Income	Change in Number of Extremely Low and Very Low-Income Households*	
		Number	Percent
COVID-19	- 0.7%	+ 400	+ 1.1%
New and Emerging Industries	+ 0.2%	- 200	- 0.6%
Decrease in Public Assistance	- 1.2%	+ 500	+ 1.4%
Increased Government Wages	+ 1.4%	+ 200	+ 0.6%
Minimum Wage	+ 0.3%	- 900	- 2.5%

Note: *Households earning less than 50 percent of the household median income
Change in cost burdened households may be due in part due to a change in income thresholds.

City/UGA Income Forecast

The Dept. of Housing and Urban Development receives a custom data tabulation of ACS data from the U.S. Census Bureau. This dataset — known as the Comprehensive Housing Affordability Strategy (CHAS) data — are intended to demonstrate the extent of housing problems and housing needs in communities, particularly for low income households. CHAS data include city-level estimates of households for the income brackets used in the Thurston County housing income forecast.

Since the income forecast showed only small changes in the overall distribution of households by income, it was assumed that there would also be little change at the city level from the CHAS estimates. Numbers were adjusted so that the totals for each jurisdiction match TRPC's 2045 housing forecast.

Table 9 shows the current number of households in the five income brackets (2012-2016 average) compared to the projected number of households in 2045.

Table 9: Current and Projected Income Distributions by Jurisdiction

2012-2016 CHAS	Lacey	Olympia	Tumwater	Remainder	Thurston
Less than 30% AMFI	1,690	3,300	1,175	5,900	12,065
30 to 50% AMFI	1,860	2,680	850	4,400	9,790
50 to 80% AMFI	3,590	3,500	1,440	8,850	17,380
80 to 100% AMFI	2,170	1,880	1,015	6,470	11,535
Greater than 100%	8,695	9,920	4,865	29,220	52,700
Total	18,010	21,275	9,340	54,845	103,470
2045 Projection	Lacey	Olympia	Tumwater	Remainder	Thurston
Less than 30% AMFI	2,200	5,200	1,900	8,500	17,800
30 to 50% AMFI	3,000	5,200	1,700	7,900	17,800
50 to 80% AMFI	5,500	6,500	2,800	15,300	30,100
80 to 100% AMFI	3,500	3,600	2,000	11,600	20,700
Greater than 100%	11,400	15,700	8,100	42,800	78,000
Total	25,600	36,200	16,500	86,100	164,400
2012-2016 to 2045 Change	Lacey	Olympia	Tumwater	Remainder	Thurston
Less than 30% AMFI	500	1,900	700	2,600	5,700
30 to 50% AMFI	1,100	2,500	800	3,500	8,000
50 to 80% AMFI	1,900	3,000	1,400	6,400	12,700
80 to 100% AMFI	1,300	1,700	1,000	5,100	9,200
Greater than 100%	2,700	5,800	3,200	13,600	25,300
Total	7,600	14,900	7,200	31,300	60,900

Note: AMFI is the area median family income. HUD combines the 100-120% and 120%+ AMFI categories in the CHAS dataset.

Appendix C.

Detailed Source Information

Chapter 2. Population Characteristics

Figures

- **Figure 2-1. Thurston County population, 1980-2045**
Washington Office of Financial Management
2017 Growth Management Act county projections
<https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>
- **Figure 2-2. Population in cities including their unincorporated urban growth areas, 2010-2045**
Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Table 3
<https://www.trpc.org/480/Population-Housing-Employment-Data>
- **Figure 2-3. Age of Thurston County population, 2020 and 2045**
Washington Office of Financial Management
2017 Growth Management Act county projections
<https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>
- **Figure 2-4. Racial and ethnic diversity in Thurston County, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B03002
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B03002>
- **Figure 2-5. Disability status in Thurston County by age, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B03002
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18101>
- **Figure 2-6. Disability by age, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B03002
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18101>

Tables

- **Table 2-1. Population, 2020**
Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Table 3
<https://www.trpc.org/480/Population-Housing-Employment-Data>

- Table 2-2. Age of Population, 2014-2018 average**
 U.S. Census Bureau American Community Survey Tables B01001 and B01002
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B01001>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B01002>
- Table 2-3. Age of Thurston County population as a percent of total, 2020-2045**
 Washington Office of Financial Management
 2017 Growth Management Act county projections
<https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>
- Table 2-4. Racial and Ethnic Diversity in Lacey, Olympia, and Tumwater, 2000 and 2014-2018 average**
 U.S. Census Bureau American Community Survey Table B03002
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B03002>
- Table 2-5. Types of disability in the Thurston County population, 2014-2018 average**
 U.S. Census Bureau American Community Survey Tables B18102 to B18107
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18102>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18103>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18104>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18105>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18106>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18107>
- Table 2-6. Disability by age, 2014-2018 average**
 U.S. Census Bureau American Community Survey Table B18101
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B18101>

Chapter 3. Household Characteristics

Figures

- Figure 3-1. Average household size in Thurston County, 1960-2018**
 U.S. Census Bureau 1960 through 2010 Decennial Census Table H12
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.H12>
 U.S. Census Bureau American Community Survey Table B25010
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25010>
- Figure 3-2. Thurston County households by type, 1970-2018**
 Historical: University of Minnesota IPUMS NHGIS
 Current: U.S. Census Bureau American Community Survey Table B11001
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11001>
- Figure 3-3. Households by type, 2014-2018 average**
 U.S. Census Bureau American Community Survey Table B11001
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11001>

- **Figure 3-4 Households with children, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B11001 and B11004
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11001>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11004>
- **Figure 3-5. Household size in Lacey, Olympia, and Tumwater combined, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25009
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25009>
- **Figure 3-6. Thurston County household size by race and ethnicity, 2010**
U.S. Census Bureau 2010 Decennial Census Tables P28 and P28I
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P28>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P28I>
- **Figure 3-7. Population in group quarters in Lacey, Olympia, and Tumwater by facility type, 2010**
U.S. Census Bureau 2010 Decennial Census: Table P42
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P42>
- **Figure 3-8. Population in group quarters in Lacey, Olympia, and Tumwater, 1980-2045**
Historical: University of Minnesota IPUMS NHGIS
Table: AU9 Persons in Group Quarters by Group Quarters Type
<https://data2.nhgis.org/main>
Projections: Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Special Query/Unpublished
- **Figure 3-9. Owner occupied households by census tract, 2014-2018**
U.S. Census Bureau American Community Survey Table B25003
<https://data.census.gov/cedsci/table?g=0500000US53067.140000&tid=ACSDT5Y2018.B25003>
- **Figure 3-10. Ownership and tenancy, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25003
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25003>
- **Figure 3-11. Household size by tenure in Lacey, Olympia, and Tumwater combined, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25009
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25009>
- **Figure 3-12. Tenure by race and ethnicity in Lacey, Olympia, and Tumwater combined, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B25003 and B25003I
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25003>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25003I>
- **Figure 3-13. Median family and household incomes, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B19013 and B19113
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19013>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19113>

- **Figure 3-14. Percent of households by income, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B19001
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001>
- **Figure 3-15. Median household income by census tract, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B19013
<https://data.census.gov/cedsci/table?g=0500000US53067.140000&tid=ACSDT5Y2018.B19013>
- **Figure 3-16. Household income in Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B19001A to B19001I
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001A>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001B>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001C>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001D>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001E>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001F>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001G>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001H>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B19001I>

Tables

- **Table 3-1. Average household size, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25010
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25010>
- **Table 3-2. Average household size by race and ethnicity, 2010**
U.S. Census Bureau 2010 Decennial Census Tables P16, P16I, P18, P18I
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P16>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P16I>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P18>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P18I>
- **Table 3-3. Households by type, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B11001
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11001>
- **Table 3-4. Households with children, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B11001 and B11004
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11001>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B11004>
- **Table 3-5. Household size by location, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25009
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25009>

- **Table 3-6. Types of group quarters**
U.S. Census Bureau 2010 Decennial Census Tables P28, P28I
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=DECENNIALS12010.P16>
- **Table 3-7. Households by income, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B19001
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001>
- **Table 3 8. Household Income in Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B19001A to B19001I
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001A>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001B>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001C>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001D>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001E>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001F>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001G>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001H>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B19001I>

Chapter 4. Unique Housing Needs

Figures

- **Figure 4-1. Thurston County senior population, 2020**
Washington Office of Financial Management
2017 Growth Management Act county projections
<https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>
- **Figure 4-2. Thurston County senior population, 2045**
Washington Office of Financial Management
2017 Growth Management Act county projections
<https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>
- **Figure 4-3. Percent of population 65 or older by census tract, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B01001
<https://data.census.gov/cedsci/table?g=0500000US53067.140000&tid=ACS5Y2018.B01001>
- **Figure 4-4. Senior households in Thurston County by tenure, 1980-2018**
U.S. Census Bureau American Community Survey Table B25007
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACS5Y2018.B25007>

- **Figure 4-5. Senior households in Thurston County by type of dwelling, 2014-2018 average**
U.S. Census Bureau American Community Survey
2014-2018 PUMS Data: Special Query/Unpublished
- **Figure 4-6. Adult family homes in Thurston County offering specialized care, 2020**
Washington State Department of Social and Health Services
<https://fortress.wa.gov/dshs/adsaapps/lookup/AFHAdvLookup.aspx>
- **Figure 4-7. Homelessness in Thurston County, 2015-2019**
Thurston County Public Health and Social Services
Point-In-Time Homeless Census Reports for Thurston County
<https://www.co.thurston.wa.us/health/sscp/reports.html>
- **Figure 4-8. Where the homeless shelter in Thurston County, 2019**
Thurston County Public Health and Social Services
Point-In-Time Homeless Census Reports for Thurston County
<https://www.co.thurston.wa.us/health/sscp/reports.html>
- **Figure 4-9. Chronic homelessness in the Thurston County homeless, 2019**
Thurston County Public Health and Social Services
Point-In-Time Homeless Census Reports for Thurston County
<https://www.co.thurston.wa.us/health/sscp/reports.html>
- **Figure 4 10. Age of those experiencing homelessness in Thurston County, 2019**
Thurston County Public Health and Social Services
2019 Thurston County Homeless Housing Summary
- **Figure 4 11. Disability among those experiencing homelessness in Thurston County, 2019**
Thurston County Public Health and Social Services
2019 Thurston County Homeless Housing Summary
- **Figure 4 12. Types of disabilities among those experiencing homelessness, 2019**
Thurston County Public Health and Social Services
2019 Thurston County Homeless Housing Summary
- **Figure 4-13. Household type for college students, 2014-2018 average**
U.S. Census Bureau American Community Survey
2014-2018 PUMS Data: Special Query/Unpublished
- **Figure 4-14. Residents enrolled in college, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B14004
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B14004>

Tables

- **Figure 4-1. Thurston County senior population, 2020-2045**
Washington Office of Financial Management
2017 Growth Management Act county projections

<https://ofm.wa.gov/washington-data-research/population-demographics/population-forecasts-and-projections/growth-management-act-county-projections>

- **Table 4-2. Adult family and nursing homes in Thurston County, 2020**
Washington State Department of Social and Health Services
<https://fortress.wa.gov/dshs/adsaapps/lookup/AFHAdvLookup.aspx>
- **Table 4-3. Military personnel and veterans, 2014-2018 average**
U.S. Census Bureau American Community Survey Tables B21001 and B23025
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B21001>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B23025>
- **Table 4-4. Race and ethnicity of those experiencing homelessness in Thurston County, 2019**
Thurston County Public Health and Social Services
Homeless Management Information System: Special Query/Unpublished
- **Table 4-5. Poverty rate for Thurston County college students, 2014-2018 average**
U.S. Census Bureau American Community Survey
2014-2018 PUMS Data: Special Query/Unpublished

Chapter 5. Housing Supply

Figures

- **Figure 5-1. Estimated and projected housing units in Lacey, Olympia, Tumwater, and their UGAs, 2010-2045**
Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Table 4
<https://www.trpc.org/480/Population-Housing-Employment-Data>
- **Figure 5-2. Occupied housing units in Lacey, Olympia, and Tumwater combined by building type and tenure, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25032
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25032>
- **Figure 5-3. Housing types permitted in Lacey, Olympia, and Tumwater, 2000-2019**
Thurston Regional Planning Council: Annual Population Estimates Work Program
<https://www.trpc.org/480/Population-Housing-Employment-Data> (Table 6)
- **Figure 5-4. Density of new residential development, 2000-2019**
Thurston Regional Planning Council: Buildable Lands Work Program
Special Query/Unpublished
- **Figure 5-5. Occupied housing units in Lacey, Olympia, and Tumwater combined by number of bedrooms and tenancy, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25042
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25042>

- **Figure 5-6. Housing units built in Lacey, Olympia, and Tumwater combined by number of bedrooms, 1980-2019**
Thurston County Assessor Office: Assessor’s Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.
- **Figure 5-7. Average number of bedrooms in housing units by decade**
Thurston County Assessor: Assessor’s Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.
- **Figure 5-8. Home size in Lacey, Olympia, and Tumwater combined, 1980-2019**
Thurston County Assessor: Assessor’s Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.
- **Figure 5-9. Average home size by decade**
Thurston County Assessor’s Office: Assessor’s Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.
- **Figure 5-10. Average housing unit sale price in Thurston County, 2018**
Northwest Multiple Listing Service
Special query provided for Thurston Regional Planning Council
<https://www.trpc.org/455/Thurston-County-Home-Sales>
- **Figure 5-11. Housing units sold in Thurston County, 2018**
Northwest Multiple Listing Service
Special query provided for Thurston Regional Planning Council
<https://www.trpc.org/455/Thurston-County-Home-Sales>
- **Figure 5-12. Median home sale price in July, 2010-2020**
Northwest Multiple Listing Service
Special query provided for Thurston Regional Planning Council by Mark Kitabayashi
- **Figure 5-13. Thurston County Homeownership Affordability Index, 1995-2020**
University of Washington
Washington Center for Real Estate Research: Housing Market Report
<http://wcrer.be.uw.edu/archived-reports/>
- **Figure 5-14. Median home sale price (adjusted for inflation), 2006-2019**
University of Washington
Washington Center for Real Estate Research: Housing Market Report
<http://wcrer.be.uw.edu/archived-reports/>
- **Figure 5-15. Average rent in Thurston County (inflation-adjusted), 2001-2020**
University of Washington

Washington Center for Real Estate Research: Apartment Market Survey

<http://wcrer.be.uw.edu/archived-reports/>

- **Figure 5-16. Median gross rent, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25064
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25064>
- **Figure 5-17. Apartment vacancy rate in Thurston County, 2018-2020**
University of Washington
Washington Center for Real Estate Research: Housing Market Snapshot
<http://wcrer.be.uw.edu/archived-reports/>
- **Figure 5-18. Thurston County income limits for receiving federal housing assistance, 2020**
U.S. Dept. of Housing and Urban Development
<https://www.huduser.gov/portal/datasets/il.html> (See Data/Income Limits)
- **Figure 5-19. Subsidized housing units in Thurston County by owner, 2020**
Housing Authority of Thurston County
Data provided for Thurston Regional Planning Council by Craig Chance

Tables

- **Table 5-1. Occupied housing units by building type, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25024
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25024>
- **Table 5-2. Occupied housing units by number of bedrooms, 2014-2018 average**
Thurston County Assessor: Assessor's Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.
- **Table 5-3. Housing units built in Lacey, Olympia, and Tumwater combined by number of bedrooms, 1980-2019**
Thurston County Assessor: Assessor's Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.
- **Table 5-4. Housing units in Lacey, Olympia, and Tumwater combined by home size and decade**
Thurston County Assessor: Assessor's Property Table Extended (6/12/2020)
Special Query/Unpublished
Note: Excludes manufactured homes and apartments with five or more units.

Chapter 6. Local Workforce Characteristics

Figures

- **Figure 6-1. Thurston County employment, 1980-2045**
 Historical: U.S. Bureau of Economic Analysis Table CAEMP25
<https://apps.bea.gov/iTable/iTable.cfm?reqid=70&step=1&isuri=1>
 Projections: Thurston Regional Planning Council
 Population and Employment Forecast (2018 Update): Table 1
<https://www.trpc.org/480/Population-Housing-Employment-Data>
- **Figure 6-2. Thurston County total employment by industry, 2017**
 U.S. Bureau of Economic Analysis Table CAEMP25
<https://apps.bea.gov/iTable/iTable.cfm?reqid=70&step=1&isuri=1>
- **Figure 6-3. Thurston County average wage, 2002-2019 (adjusted for inflation)**
 Employment Security Department Quarterly Census of Employment and Wages (QCEW)
<https://esd.wa.gov/labormarketinfo/covered-employment>
- **Figure 6-4. Median earnings, 2014-2018 average**
 Employment Security Department Quarterly Census of Employment and Wages (QCEW)
<https://esd.wa.gov/labormarketinfo/covered-employment>
- **Figure 6-5. Annual average unemployment for Thurston County**
 U.S. Bureau of Labor Statistics: Local Area Unemployment Statistics
<https://data.bls.gov/cgi-bin/dsrv?la>
- **Figure 6-6. Place of work for residents of Lacey, Olympia, Tumwater, and Thurston County, 2014-2018**
 U.S. Census Bureau American Community Survey Tables B08007 and B08008
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B08007>
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B08008>
- **Figure 6-7. Commutes from Thurston County (outbound), 2002-2017**
 U.S. Census Bureau LEHD Origin-Destination Employment Statistics (LODES7)
<https://lehd.ces.census.gov/data/>
- **Figure 6-8. Commutes to Thurston County (inbound), 2002-2017**
 U.S. Census Bureau LEHD Origin-Destination Employment Statistics (LODES7)
<https://lehd.ces.census.gov/data/>

Tables

- **Table 6-1. Thurston County covered employment and wages, 2019**
 Employment Security Department Quarterly Census of Employment and Wages (QCEW)
<https://esd.wa.gov/labormarketinfo/covered-employment>
- **Table 6-2. Wages (per adult) needed for self-sufficiency, 2020**
 University of Washington Self-Sufficiency Standard
<http://www.selfsufficiencystandard.org/Washington>

- **Table 6-3. Unemployment rate, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B23025
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B23025>
- **Table 6-4. Average wage earnings by county of residence and county of work, 2014-2018 average**
U.S. Census Bureau American Community Survey
2014-2018 PUMS Data: Special Query/Unpublished

Chapter 7. Gap Analysis

Figures

- **Figure 7-1. Cost burdened households in Thurston County, 2012-2016 average**
U.S. Dept. of Housing and Urban Development: CHAS Data
<https://www.huduser.gov/portal/datasets/cp.html>
- **Figure 7-2. Cost burdened households by jurisdiction, 2012-2016 average**
U.S. Dept. of Housing and Urban Development: CHAS Data
<https://www.huduser.gov/portal/datasets/cp.html>
- **Figure 7-3. Current and projected 25-year housing need**
Current Need: U.S. Dept. of Housing and Urban Development: CHAS Data
<https://www.huduser.gov/portal/datasets/cp.html>
Projected Need: Thurston Regional Planning Council: Housing Income Forecast (Appendix B of this report)
- **Figure 7-4. Household size in Lacey, Olympia, and Tumwater by tenure, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25009
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25009>
- **Figure 7-5. Number of bedrooms in Lacey, Olympia, and Tumwater dwelling units by tenure, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25042
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25042>
- **Figure 7-6. Household size in Lacey, Olympia, and Tumwater dwelling units, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25009
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25009>
- **Figure 7-7. Number of bedrooms in Lacey, Olympia, and Tumwater dwelling units, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25042
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25042>
- **Figure 7-8. Plumbing facilities in occupied Thurston County dwelling units, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25049
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25049>

- **Figure 7-9. Kitchen facilities in occupied Thurston County dwelling units, 2014-2018 average**
U.S. Census Bureau American Community Survey Table B25053
<https://data.census.gov/cedsci/table?g=0500000US53067&tid=ACSDT5Y2018.B25053>
- **Figure 7-10. Thurston County households leaving a housing program to a permanent housing situation, 2015-2019**
Thurston County Public Health and Social Services
2019 Thurston County Homeless Housing Summary

Tables

- **Table 7-1. Cost burdened households by jurisdiction, 2012-2016 average**
U.S. Dept. of Housing and Urban Development: CHAS Data
<https://www.huduser.gov/portal/datasets/cp.html>
- **Table 7-2. Maximum rent and housing costs at various income levels, 2020**
Income limits for extremely low, very low, and low-income households are the U.S. Dept. of Housing and Urban Development's FY2020 Income Limits for four-person households. (<https://www.huduser.gov/portal/datasets/il.html>). The remaining fields were calculated using the following assumptions:
 - Hourly Wage: Assumes one person working a 40-hour work week for 52 weeks a year
 - Monthly Rent: 30 percent of yearly income divided by twelve
 - Home Value 20 percent down: Value of a home with a monthly mortgage payment equal to 30 percent of yearly income divided by twelve, assuming a 20 percent down payment and 3.5 percent fixed interest rate over 30 years.
 - Home Value 10 percent down: Value of a home with a monthly mortgage payment equal to 30 percent of yearly income divided by twelve, assuming a 10 percent down payment and 3.5 percent fixed interest rate over 30 years.
- **Table 7-3. Number of households by income range, 2045 projection**
Thurston Regional Planning Council: Housing Income Forecast (Appendix B of this report)

Chapter 8. Land Capacity Analysis

Figures

- **Figure 8-1. Developable land**
Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Special Query/Unpublished

Tables

- **Table 8-1. Residential capacity by generalized zoning district, 2017**
Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Special Query/Unpublished

- **Table 8-2. Residential capacity by type of developable parcel, 2017**
Thurston Regional Planning Council
Population and Employment Forecast (2018 Update): Special Query/Unpublished



Planning for and Accommodating Housing Needs in Thurston County

Implementing the Housing Affordability Requirements of HB 1220
April 2025

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THURSTON REGIONAL PLANNING COUNCIL is a 23-member intergovernmental board made up of local governmental jurisdictions within Thurston County, plus the Confederated Tribes of the Chehalis Reservation and the Nisqually Indian Tribe. The Council was established in 1967 under RCW 36.70.060, which authorized creation of regional planning councils.

TRPC’s mission is to “Provide visionary, collaborative leadership on regional plans, policies, and issues for the benefit of all Thurston region residents.” To support this mission, we:

- Support **regional transportation** planning consistent with state and federal funding requirements.
- Address **growth management, environmental quality**, and other topics determined by the Council.
- **Assemble and analyze data** that support local and regional decision making
- Act as a “**convener**”, build regional **consensus** on issues through information and citizen involvement.
- Build **intergovernmental consensus** on regional plans, policies, and issues, and advocate local implementation.

2025 Membership

Government Jurisdiction	Name of Representative
Town of Bucoda	Miriam Gordon
City of Lacey	Robin Vazquez, Chair
City of Olympia	Dani Madrone
City of Rainier	Dennis McVey
City of Tenino	John O'Callahan
City of Tumwater	Eileen Swarthout, Secretary
City of Yelm	Joe DePinto
Thurston County	Carolina Mejia
Intercity Transit	Robert Vanderpool
LOTT Clean Water Alliance	Carolyn Cox, Vice Chair
Port of Olympia	Amy Evans Harding
PUD No. 1 of Thurston County	Chris Stearns
Olympia School District	Hilary Seidel
North Thurston Public Schools	Esperanza Badillo-Diiorio
Tumwater School District	Mel Murray
Confederated Tribes of the Chehalis Reservation	Amy Loudermilk
Nisqually Indian Tribe	Mike Mason

Associate Members

Thurston County Economic Development Council	Michael Cade
Lacey Fire District #3	Liberty Hetzler
Puget Sound Regional Council	Josh Brown
Timberland Regional Library	Cheryl Heywood
The Evergreen State College	William Ward
Thurston Conservation District	Marianne Tompkins and Doug Rushton

Executive Director

Marc Daily

Project Partners

City of Lacey	Vanessa Dolbee, Community and Economic Development Director Ryan Andrews, Planning Manager
City of Olympia	Leonard Bauer, Community Planning and Development Director Tim Smith, Interim Community Planning and Development Director Casey Schaufler, Associate Planner
City of Tenino	Cristina Haworth, SCJ Alliance Dan Penrose, SCJ Alliance
City of Tumwater	Brad Medrud, Long Range Planning Manager Mike Matlock, Community Development Director
City of Yelm	Gary Cooper, Planning and Building Manager
Thurston County	Ashley Arai, Interim Community Planning and Economic Development Director

Thurston Regional Planning Council Staff

Allison Osterberg, Planning Manager
Michael Ambrogi, Senior Planner

This project was funded by an interlocal agreement between TRPC and the project partner jurisdictions.

CONTENTS

- Executive Summary 1**
- Introduction 5**
- Housing Need Allocations..... 7**
 - Countywide Housing Needs..... 7
 - Baseline Housing Supply 9
 - Preferred Allocation Method..... 10
- Land Capacity Analysis..... 13**
 - Summarize Land Capacity by Zone..... 13
 - Categorize Zones by Allowed Housing Types and Density Category 16
 - Relate Zone Categories to Potential Income Levels and Housing Types..... 16
 - Summarize Capacity by Zone Category 18
 - Compare Allocated Housing Need to Capacity..... 19
 - Emergency Housing 20
- References 27**
- Appendixes 29**
 - Appendix I: Housing Need Allocation Method..... 29
 - Appendix II: Estimated Capacity and Density Category by Zone 31

Revision Notes

The April 2025 revision of this report added data for the Town of Bucoda and a land capacity analysis for emergency housing.

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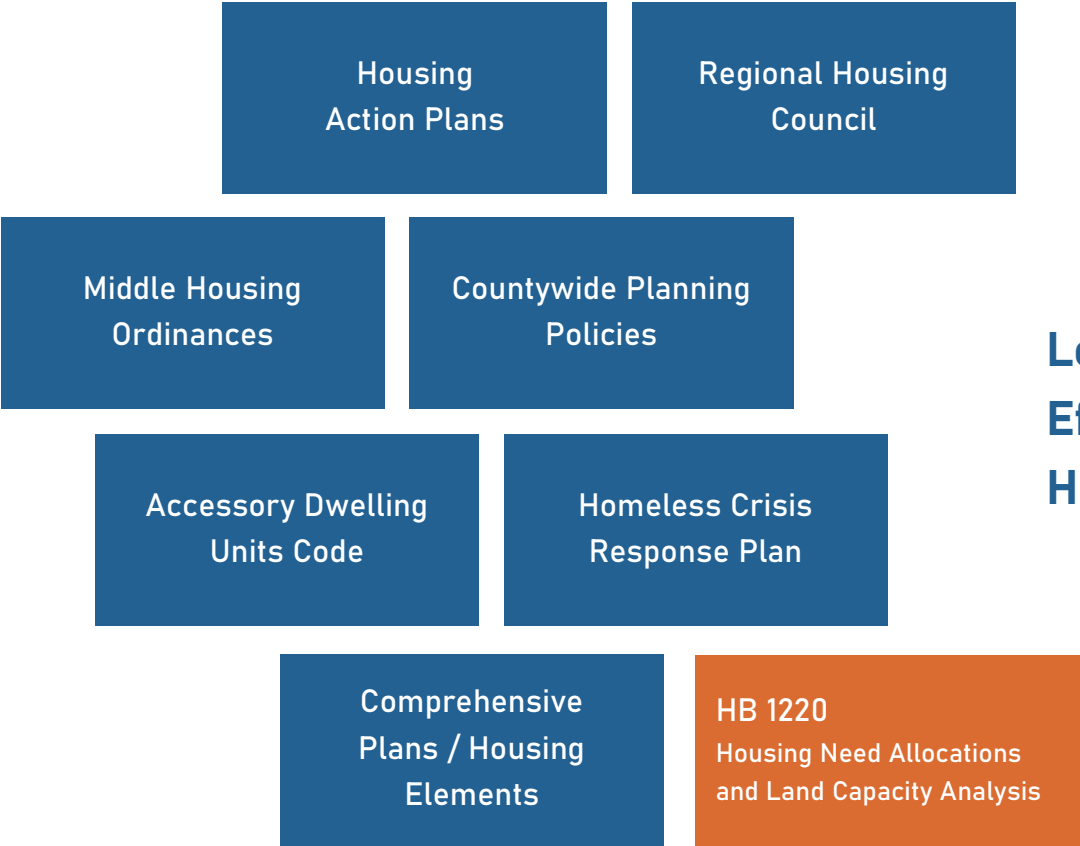
EXECUTIVE SUMMARY

New GMA Requirements

House Bill 1220 — passed by the state legislature in 2021— added new requirements to the Growth Management Act for jurisdictions to “**plan for and accommodate housing affordable to all economic segments of the population of this state.**” Thurston County and the cities of Lacey, Olympia, Tenino, Tumwater, and Yelm contracted with Thurston Regional Planning Council (TRPC) to facilitate a process and provide data analysis support to implement this law.

The Thurston region has a long history of planning for affordable housing and much has been done at both the local and regional level. HB 1220 addresses just a small piece of the affordable housing problem — whether land, and how it is zoned, is a barrier to new affordable housing.

HB 1220 requires jurisdictions to ensure zoning is not a barrier to affordable housing. On its own, the law will not lead to more affordable housing.

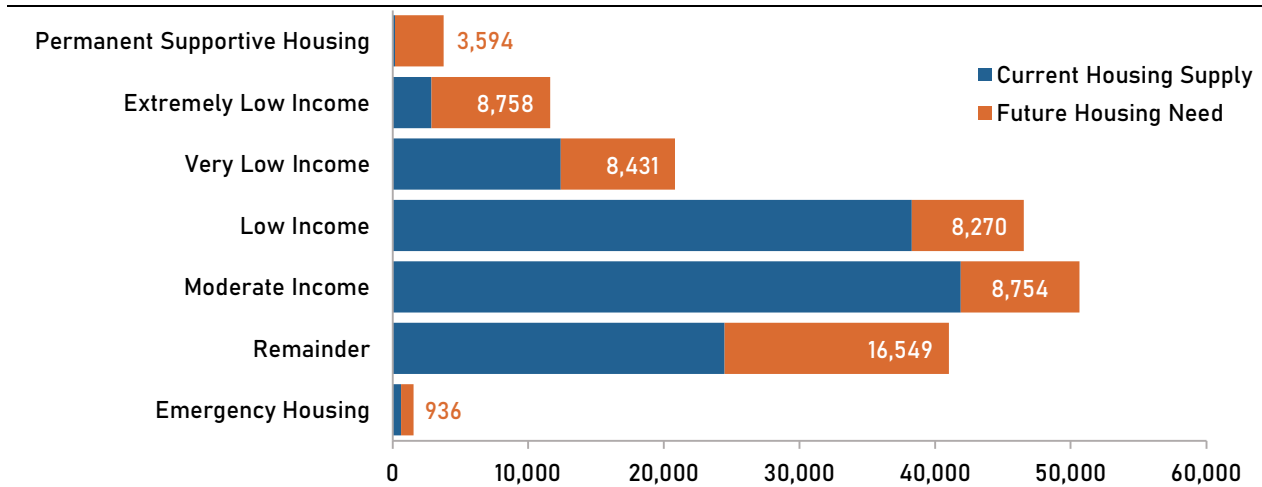


Local and Regional Efforts to Address Housing Affordability

A Growing Need for Affordable Housing

Data from TRPC and the state Dept. of Commerce identify a need for 54,356 new housing units to accommodate our region’s growing population. To address the current housing affordability crisis — and to ensure future residents can afford housing — **29,053 additional units will need to be affordable to low-income households**. An additional 936 emergency housing units and beds are needed for the population experiencing homelessness.

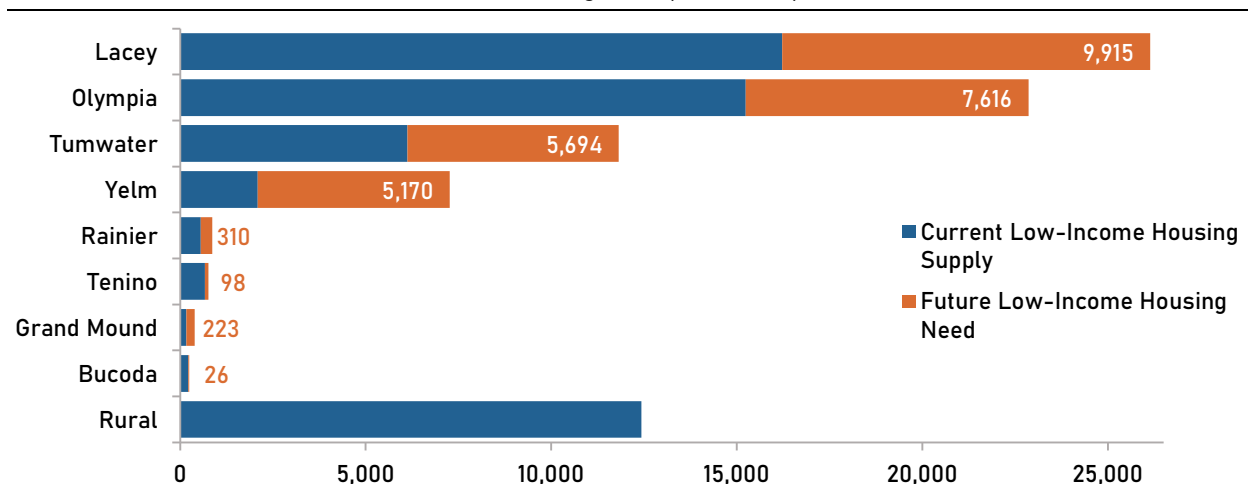
Figure 1
Countywide Housing Need by Income



Where Should Affordable Housing Go?

HB 1220 gives jurisdictions discretion to decide how much low-income housing each jurisdiction should plan for, as long as the countywide need is addressed. The project partners recommended TRPC accept an allocation that met the three values they identified: **fair, clear, and cooperative**.

Figure 2
Low-Income Housing Need (0-80% AMI) Allocated to Each Jurisdiction and its UGA

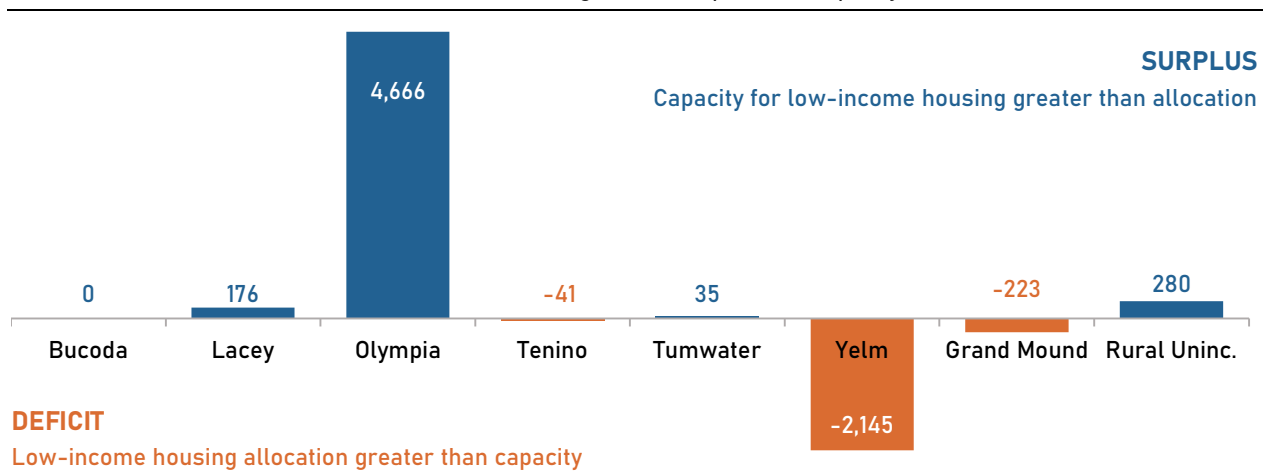


Thurston County's urban areas generally allow a wide range of housing types that can accommodate affordable housing, including accessory dwellings, duplexes, triplexes, manufactured homes, and apartments.

Is Land the Barrier?

The project included a land capacity analysis that compared the low-income housing need allocated to each jurisdiction to the amount of buildable land in zones that can accommodate low-income housing types. **For most jurisdictions, land — and how it is zoned — is not the barrier to accommodating low-income housing.** Deficits were only found in three jurisdictions: Tenino, Yelm, and the Grand Mound UGA.

Figure 3
Low-Income Housing Need Compared to Capacity for Jurisdictions and Their UGAS



Findings and Next Steps

The land capacity analysis found that:

- The Bucoda, Lacey, Olympia, and Tumwater urban areas, and the rural unincorporated County have sufficient capacity to accommodate future low-income housing needs, as allocated regionally.
- The Tenino, Yelm, and Grand Mound urban areas have deficits in capacity to accommodate future low-income housing needs, as allocated regionally. These jurisdictions will need to include strategies in their comprehensive plan update that will eliminate these deficits.
- All jurisdictions have sufficient capacity to accommodate future needs for emergency housing.

While HB 1220 requires jurisdictions to ensure zoning is not a barrier to affordable housing, on its own, the law will not lead to more affordable housing. All jurisdictions will need to identify policies, programs, and funding gaps to achieve the region's affordable housing goals in the housing elements of their comprehensive plans. Jurisdictions will also need to implement the other requirements of HB 1220 not discussed in this report, including addressing policies with racially disparate impacts and establishing anti-displacement policies.

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INTRODUCTION

In 2021, the Washington State Legislature passed HB 1220 which requires cities, towns, and counties to “plan for and accommodate” future housing affordable to a range of incomes and to document the projected housing need each jurisdiction is planning for in the housing element of its comprehensive plan. 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 (Table 1). Jurisdictions must also show that there is sufficient land available to accommodate the housing need identified.

The state Dept. of Commerce (Commerce) provided guidance for jurisdictions to implement HB 1220¹. The guidance recommends that jurisdictions work collaboratively to implement the law. In that spirit, Thurston County and the cities of Lacey, Olympia, Tenino, Tumwater, and Yelm (the “project partners”) contracted with Thurston Regional Planning Council (TRPC) to facilitate a process among the project partners and provide the necessary data analysis. The city of Rainier and town of Bucoda were also invited to participate.

The project was completed in two phases. In Phase 1, the project partners reviewed options for allocating the countywide housing need to jurisdictions. In Phase 2, TRPC completed a land capacity analysis identifying any zoning constraints to accommodating those allocations.

HB 1220 also established requirements for jurisdictions to identify local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing and identify and implement policies and regulations to undo them; and identify areas at higher risk of displacement and establish anti-displacement policies. These requirements are being addressed by the jurisdictions in a separate process and are not included in this report.

Table 1: Housing Types Called out in HB 1220, and Thurston County Income Thresholds

Housing Type	Percent of Thurston Area Median Income*	Equivalent 2023 Household Income*
Extremely Low Income	Less than 30%	Less than \$30,750
Very Low Income	30 to 50%	\$30,750 to \$51,250
Low Income	50 to 80%	\$51,250 to \$82,000
Moderate Income	80 to 120%	\$82,000 to \$102,500
Permanent supportive housing	Subsidized, leased housing with no limit on length of stay that prioritizes people who need comprehensive support services to retain tenancy and utilizes admissions practices designed to use lower barriers to entry than would be typical for other subsidized or unsubsidized rental housing, especially related to rental history, criminal history, and personal behaviors.	
Emergency housing	Temporary indoor accommodations for individuals or families who are homeless or at imminent risk of becoming homeless that is intended to address the basic health, food, clothing, and personal hygiene needs of individuals or families. Emergency housing may or may not require occupants to enter into a lease or an occupancy agreement.	
Emergency shelter	Facilities that provide a temporary shelter for individuals or families who are currently homeless. Emergency shelter may not require occupants to enter into a lease or an occupancy agreement. Emergency shelter facilities may include day and warming centers that do not provide overnight accommodations.	

Note: Housing types are defined in [RCW 36.70A.030](#). *Income thresholds are based on HUD estimates for a family of four.

Income Ranges

HB 1220 uses information from the U.S. Department of Housing and Urban Development (HUD) to define income levels. While the percent of the area median income (e.g. 30-50% AMI) is used as shorthand for the income ranges in this report, these values refer to a four-person reference household. HUD adjusts income thresholds based on household size.

HOUSING NEED ALLOCATIONS

The first step in implementing HB 1220 is to identify the housing need allocation for each jurisdiction — the number of units apportioned to each jurisdiction to meet the countywide need for moderate, low, very low, and extremely low-income households; and emergency housing, emergency shelters, and permanent supportive housing. While HB 1220 requires Commerce to identify the countywide number of units in each income range, it gives jurisdictions discretion in how that need is allocated to cities, unincorporated urban growth areas (UGAs), and the rural unincorporated County.

Between August and October 2023, TRPC convened a project team that included planning directors and staff from Thurston County and the cities of Lacey, Olympia, Tumwater, and Yelm. This group identified the following shared values to assess different housing need allocation methods and select a preferred approach:

Fair

- Distributes new low-income units across all jurisdictions
- Recognizes the differences among jurisdictions and existing housing distribution
- Recognizes needs of community members – especially people who rely on permanent supportive housing and emergency housing

Clear

- Easy to communicate to public and elected officials
- Tailored to jurisdiction boundaries (including UGAs)
- Uses established methods to limit risk of legal challenges

Cooperative

- Builds on existing structures and processes – including the Regional Housing Council, Comprehensive Plan updates, Countywide Planning Policies
- Supported by all workgroup members

The project partners also agreed that the total number of housing units allocated to each jurisdiction should be consistent with the jurisdiction population, employment, and housing projections adopted by TRPC in September 2019.²

Countywide Housing Needs

HB 1220 builds on existing requirements for jurisdictions to plan for population growth. TRPC's most recent population and employment forecast estimates that 54,356 new housing units will be needed between 2020 and 2045 to support projected population growth (88,707 new people).² Table 2 shows the number of housing units projected for each jurisdiction. These projections were developed consistent with Thurston County's Countywide Planning Policies.

Table 2: TRPC Projected Housing Need by Jurisdiction

		Housing Units		
		2020 Census	2045 TRPC Projection	2020-2045 Projected Need
Bucoda	Town	241	375	134
Lacey	City	23,042	28,196	5,154
	UGA	13,562	22,532	8,970
Olympia	City	25,642	38,286	12,644
	UGA	5,093	6,744	1,651
Rainier	City	850	1,421	571
	UGA	54	77	23
Tenino	City	780	1,299	519
	UGA	5	14	9
Tumwater	City	11,064	17,740	6,676
	UGA	1,210	3,726	2,516
Yelm	City	3,456	10,960	7,504
	UGA	515	659	144
Grand Mound	UGA	424	734	310
Rural Unincorporated		35,500	43,031	7,531
Total		121,438	175,794	54,356

Note: TRPC forecast adopted September 6, 2019, for jurisdiction boundaries as of September 1, 2023. Numbers may not add to total due to rounding.

HB 1220 adds a requirement that jurisdictions plan for a specific number of housing units affordable for moderate, low, very low, and extremely low-income households; and emergency housing, emergency shelters, and permanent supportive housing. Commerce’s Housing for All Planning Tool (HAPT)² provided the estimated housing need for each income range and housing type shown in Table 3. Income ranges are expressed as a percent of the area median income; the equivalent household incomes for the Thurston region in 2023 are shown in Table 3. While HB 1220 does not require jurisdictions to plan for housing affordable to households earning more than 120% of the area median income, this need is included so the number of units can be summed up to the total (identified as “Remainder” in tables).

While cities, towns, and counties have discretion over how this need is allocated among the jurisdictions, the countywide housing need identified by Commerce for each income range cannot be changed.

Table 3: Dept. of Commerce Housing Needs by Income Level for Thurston County

	Estimated Supply (2020)	Total Future Supply (2045)	Net Need (2020-2045)	Estimated Supply (2020)	Total Future Supply (2045)	Net Need (2020-2045)
Housing Units						
0-30% AMI (PSH)	180	3,774	3,594	0.1%	2.1%	6.6%
0-30% AMI (Non-PSH)	2,874	11,632	8,758	2.4%	6.6%	16.1%
30-50% AMI	12,405	20,836	8,431	10.2%	11.9%	15.5%
50-80% AMI	38,285	46,555	8,270	31.5%	26.5%	15.2%
80-100% AMI	26,403	30,776	4,373	21.7%	17.5%	8.0%
100-120% AMI	15,489	19,870	4,381	12.8%	11.3%	8.1%
Remainder	24,476	41,025	16,549	20.2%	23.3%	30.4%
Other	1,327	1,327	0	1.1%	0.8%	0.0%
Total	121,438	175,794	54,356	100.0%	100.0%	100.0%
Emergency Housing (Beds)	626	1,562	936	—	—	—

Note: “AMI” refers to the area median family income, which HUD estimates was \$102,500 in 2023 for Thurston County. Income ranges are expressed relative to the AMI; income ranges are for a family of four. “PSH” is permanent supportive housing. “Other” includes recreational, seasonal, or migrant labor housing. Numbers may not add up to totals due to rounding. Housing types are defined in [RCW 36.70A.030](#).

Baseline Housing Supply

The project partners agreed that it was important to plan for housing in both the incorporated and unincorporated urban growth areas of each jurisdiction. Since the tools provided by Commerce did not provide estimates for UGAs, TRPC revised the baseline housing supply estimates provided by Commerce using the assumptions listed below. In addition, TRPC revised the baseline supply to reflect current (September 1, 2023) jurisdiction boundaries.

- Use TRPC’s parcel-level housing estimates where newly annexed jurisdiction boundaries do not align with 2020 Census blocks.
- The percentage of housing by income range in each UGA is the same as what Commerce estimated in the HAPT tool for its adjacent incorporated area.
- There is no permanent supportive housing or emergency housing in the unincorporated UGA.
- Any permanent supportive housing units where Commerce was unable to determine the jurisdiction (68 units total) were assumed to be in Olympia based on data provided by Olympia staff in the 2023-2027 Thurston-Olympia Consolidated Plan.
- The revised housing supply uses newly released 2020 decennial census data on seasonal and migrant housing instead of American Community Survey (ACS) estimates used in the Commerce HAPT tool. (While HB 1220 does not require jurisdictions to plan for seasonal and migrant housing, these units are removed from the available housing supply.)

HB 1220 only requires housing need allocations for cities, towns, and the unincorporated areas. However, the partners requested housing allocations for the unincorporated UGAs to inform how they plan for housing needs in areas likely to be annexed over the next 20 years. These UGA estimates are for informational purposes only; 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 Table 2.

Preferred Allocation Method

The project partners reviewed several methods for allocating the countywide housing need to jurisdictions. Two methods were developed by Commerce in its HAPT tool. TRPC staff also meet with staff from King, Kitsap, Pierce, and Snohomish Counties to discuss their method. Due to their earlier periodic Comprehensive Plan update deadline, all four counties had made progress implementing HB 1220.

The project partners ultimately preferred a variation of the method used by Snohomish County, because it best achieves the shared values identified on Page 7. The preferred method modifies the Snohomish County method so that no low-income housing or emergency housing is allocated to the rural unincorporated County. The partners developed this modification in response to feedback from Commerce that **residential zoning in rural areas — predominantly large, single-family lots — cannot accommodate the housing types and utilities required for low-income housing, permanent supportive housing, and emergency housing.**

The preferred method:

- Begins with an expectation that each jurisdiction should plan for the same share of the new housing need in each income range, but credits jurisdictions that currently have a higher-than-average share of low-income housing.
- Results in allocations that are positive and consistent with the housing need projected for each jurisdiction (Table 2) and for each income range countywide (Table 3).
- Is consistent with the Countywide Planning Policies and is supported by all project partners.
- Limits allocation of low-income housing to rural areas, in line with Commerce guidance.

The preferred housing need allocation is shown in Table 4; the process for calculating it is described in Appendix I. The housing need allocations were adopted by TRPC on December 6, 2024. These allocations replace numbers provisionally accepted by TRPC on March 1, 2024.

Table 4: 2020-2045 Housing Need Allocations

		Housing Units								Beds
		Total	Income Level (Percent of Area Median Income)							Emergency Housing
			0-30%		30-50%	50-80%	80-100%	100-120%	Remainder	
			PSH	Non-PSH						
Bucoda	Town	134	6	12	0	8	67	20	21	3
Lacey	City	5,154	424	1,086	1,199	515	0	540	1,390	103
	UGA	8,970	684	1,698	1,468	2,841	0	721	1,558	179
	Total	14,124	1,108	2,784	2,667	3,357	0	1,261	2,948	282
Olympia	City	12,644	942	2,339	2,877	590	2,093	1,144	2,660	253
	UGA	1,651	156	278	435	0	235	152	395	33
	Total	14,295	1,098	2,617	3,312	590	2,328	1,296	3,055	286
Rainier	City	571	43	107	0	161	44	103	114	11
	UGA	23	0	0	0	0	0	0	23	0
	Total	594	43	107	0	161	44	103	137	12
Tenino	City	519	33	65	0	0	220	96	105	10
	UGA	9	0	0	0	0	0	0	9	0
	Total	528	33	65	0	0	220	96	114	11
Tumwater	City	6,676	554	1,320	1,002	1,129	806	627	1,238	133
	UGA	2,516	170	415	307	797	333	171	323	50
	Total	9,192	723	1,736	1,309	1,926	1,140	798	1,561	184
Yelm	City	7,504	557	1,373	1,090	2,085	518	757	1,125	150
	UGA	144	10	25	30	0	0	41	38	3
	Total	7,648	567	1,398	1,120	2,085	518	798	1,163	153
Grand Mound	UGA	310	16	40	23	143	57	11	19	6
Rural Unincorporated		7,531	0	0	0	0	0	0	7,531	0
Thurston County		54,356	3,594	8,758	8,431	8,270	4,373	4,381	16,549	936

Adopted by TRPC on December 6, 2024.

Note: Numbers may not add to totals due to rounding. "PSH" refers to permanent supportive housing.

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LAND CAPACITY ANALYSIS

The second step in implementing HB 1220 is a land capacity analysis to identify if there is sufficient capacity — based on zoning and development regulations — to accommodate the identified housing need. Commerce’s guidance for updating housing elements¹ outlines five steps for completing the 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

These steps are described below. The land capacity analysis was completed as part of Phase 2 of the project.

Due to the unique nature of joint planning in Thurston County, the partners requested that the land capacity analysis combine data for cities and their unincorporated urban growth areas. How low-income housing is allocated within unincorporated urban areas will be addressed in the cities’ comprehensive plans and the joint plans the cities have with Thurston County.

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 report⁵.

The capacity estimates for each zone 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 expected to be built between 2040 and 2045
- Development of some master planned communities projected to occur 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 market trends, 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 2019 that serves as the foundation for the housing need allocations and was not included in the scope of work of the current ILA.

Bush Prairie Habitat Conservation Plan. The City of Tumwater and the Port of Olympia are working on a habitat conservation plan (the “Bush Prairie HCP”) to mitigate the impacts of development on four species protected under the Endangered Species Act. TRPC’s adopted forecast includes assumptions that mitigation in the Bush Prairie HCP (and other jurisdiction HCPs) would reduce capacity in the rural unincorporated County. However, the latest draft of the Bush Prairie HCP identifies significant mitigation within Tumwater’s city limits. Therefore, the land capacity analysis reduced capacity in the zones where mitigation is most likely to occur by the factors show in Table 5. The estimated acres removed for mitigation were provided by Tumwater staff.

Table 5. Capacity Reduction Factors for Bush Prairie HCP

Zone	Acres Removed for Mitigation	Total Area (Vacant Parcels)	Reduction Factor
MFH	5	18.7	26.8%
MFM	30	83.1	36.1%
MU	30	27.0	100.0%
SFL	190	354.6	53.6%
SFM	40	227.2	17.6%

Note: Acres removed for mitigation provided by Tumwater staff. Total area is from TRPC’s land capacity model. Reduction only applied to capacity on vacant parcels.

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 6.

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 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 land capacity analysis, Tumwater and Yelm requested revisions to the ADU assumptions in their urban areas based on observed or expected trends. These are shown in Table 6.

Table 6: Estimates of Accessory Dwelling Units by Jurisdiction.

Jurisdiction		Accessory Dwellings		Potential ADU Lots
		Adopted Forecast	For LCA	
Bucoda	City	9	No Change	195
Lacey	City	97	No Change	2,045
	UGA	43	No Change	906
Olympia	City	309	No Change	6,502
	UGA	1	No Change	16
Rainier	City	5	No Change	104
	UGA	0	No Change	0
Tenino	City	19	No Change	395
	UGA	0	No Change	0
Tumwater	City	73	No Change	1,536
	UGA	0	10	0
Yelm	City	9	100	185
	UGA	0	20	2
Grand Mound	UGA	0	No Change	0
Urban Total		565	686	11,886
Rural Total		280	No Change	24,271
Countywide		845	966	36,157

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 7. 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 7: 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 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.

Relate Zone Categories to Potential Income Levels and Housing Types

For the land capacity analysis, housing types are 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 8) for this analysis.

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 8: 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

Capacity for Low-Income Housing in Moderate Density Zones

The project partners noted that in some situations, low-income housing may be built in low or moderate density zones. This could include:

- Housing built by Habitat for Humanity or similar organizations. Table 9 shows the number of recently constructed Habitat for Humanity projects in Thurston County.
- Under HB 1110, cities between 25,000 and 75,000 are required to allow duplexes in residential zones, and quadplexes if at least one unit is affordable to a low-income household.

The land capacity analysis used HB 1110 as a guide for estimating how much capacity in moderate-density zones could accommodate low-income housing. The land capacity model found 1,104 parcels in Lacey, Olympia, and Tumwater — the three jurisdictions affected by the law — with capacity for four or more units. Total capacity on those parcels is 18,697, or 4,674 low-income units assuming one in four is an income-restricted unit (Table 10).

Table 9: Recent or Upcoming Habitat for Humanity Projects

Jurisdiction	Project	Units	Zone	Density Category
Lacey	Deyoe Vista Subdivision	33	MD	Low-rise Multifamily
Tumwater	Tâícn Housing Development	28	MFM	Low-rise Multifamily
Yelm	—	22	R-4	Moderate Density
Olympia	3900 Boulevard Rd	112	RM-18	Low-rise Multifamily
Olympia	Fairview	16	R-4-8	Moderate Density
Olympia	Trinity Court	6	R-4-8	Moderate Density
Olympia	Covenant Court	20	RM-24	Mid-rise Multifamily
Total		237		

Table 10: Parcels with Capacity for Four or More Units in Moderate Density Zones

Jurisdiction		Parcels	Capacity	
			Total	Low-Income
Lacey	City	92	1,540	385
	UGA	334	8,376	2,094
Olympia	City	333	3,144	786
	UGA	114	1,466	366
Tumwater	City	205	3,737	934
	UGA	26	435	109
Total		1,104	18,697	4,674

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 11; detailed capacity by zone is in Appendix II (“Total Capacity” columns).

Table 11: Housing Capacity by Zone Category

	ADUs	Midrise Multifamily	Lowrise Multifamily	Moderate Density		Low Density	Total
	0-80% AMI	0-80% AMI	0-80% AMI	0-80% AMI	80-120% AMI	>120% AMI	
Bucoda	9	0	17	0	210	0	237
Lacey and UGA	140	2,387	5,085	2,479	8,256	50	18,397
Olympia and UGA	310	3,468	7,352	1,152	5,404	1,255	18,941
Tenino and UGA	19	39	0	0	376	211	644
Tumwater and UGA	83	1,455	3,148	1,043	3,692	2,441	11,861
Yelm and UGA	120	0	2,655	0	5,610	745	9,130
Rainier UGA	0	0	0	0	0	108	108
Grand Mound UGA	0	0	0	0	406	0	406
Rural Unincorporated	280	0	0	0	0	17,744	18,024
All Partner Jurisdictions	952	7,349	18,239	4,674	23,744	22,554	77,512

Compare Allocated Housing Need to Capacity

The final step of the land capacity analysis is to compare the allocated housing need allocated to each jurisdiction to the capacity for new housing. A summary of the difference between the allocated housing need and capacity is shown in Table 12; detailed findings are shown in Tables 14 through 22 (“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. HB 1220 does not require jurisdictions to plan for or accommodate housing for high-income households; data for that income range is excluded.

The land capacity analysis found no deficits in the Bucoda, Lacey, Olympia, and Tumwater urban areas. Deficits were found in Tenino, Yelm, and Grand Mound. The project partners agreed that they would identify strategies to eliminate these deficits as part of their periodic Comprehensive Plan updates. All deficits were found in the low-income categories; no deficits were found in the moderate-income range.

No deficits were found in the rural unincorporated County. Per Commerce guidance, the low-density residential zoning in rural areas — predominantly large lots — cannot accommodate the housing types and utilities required for low-income housing, permanent supportive housing, and emergency housing.

Table 12: Summary of Housing Surplus/Deficit by Jurisdiction

Jurisdiction	Aggregate Housing Need		Capacity		Surplus / Deficit	
	0-80% AMI	80-120% AMI	0-80% AMI	80-120% AMI	0-80% AMI	80-120% AMI
Bucoda	26	87	26	210	0	124
Lacey and UGA	9,915	1,261	10,091	8,256	176	6,995
Olympia and UGA	7,616	3,623	12,282	5,404	4,666	1,781
Tenino and UGA	98	316	58	376	-41	60
Tumwater and UGA	5,694	1,937	5,729	3,692	35	1,755
Yelm and UGA	5,170	1,316	3,025	5,860	-2,145	4,545
Rainier UGA	0	0	0	0	0	0
Grand Mound UGA	223	68	0	406	-223	338
Rural Unincorporated	0	0	280	0	280	0

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

Yelm Master Planned Community

Yelm is the community with the largest deficit in the land capacity analysis. However, 60 percent of Yelm’s capacity for future housing — an estimated 5,000 units — is on 1,250 vacant acres zoned Master Planned Community (MPC). The land capacity analysis assumes that 2,000 low-rise multifamily units that could accommodate low-income households, and 3,000 moderate density units that could accommodate moderate-income households. However, exactly how much affordable housing this area could accommodate will depend on the master plan the City approves.

Emergency Housing

In August 2023, Commerce released updated guidance requiring that all jurisdictions complete a land capacity analysis for emergency housing to meet the intent of HB 1220. TRPC used a seven-step selection process to identify potential emergency housing sites consistent with Commerce’s guidance. In this section, “emergency housing” is inclusive of both indoor emergency shelters and indoor emergency housing as referenced in HB 1220; it excludes permanent supportive housing which is addressed in the previous section.

Selection 1

Identify all parcels in zones that allow emergency housing and indoor emergency shelters.

Jurisdiction staff provided a list of zones that allow emergency housing for use in the land capacity analysis (Table 13). By law, emergency housing must be allowed in any zone that allows hotels (RCW 35A.21.430 and 35.21.683). The list of zones is not comprehensive; other zones may allow emergency housing on an emergency or conditional basis, or may allow emergency housing with spacing or intensity restrictions. Trust lands held for the Confederated Tribes of the Chehalis or Nisqually Indian Tribe in were excluded.

Selection 2

From the parcels identified in Selection 1, narrow the search to vacant parcels, hotels, and motels, significantly under-developed or under-utilized parcels, developed parcels with no active business licenses, and those sites that have been declared a nuisance.

For the purposes of the land capacity analysis, only vacant parcels were included. In addition, only the parcel area outside of critical areas or their buffers was included. Vacant parcels were defined as:

- Having an assessor’s use code of ‘91,’ a property type of ‘LND,’ and a property subtype not equal to ‘46’
- Having at least 0.2 acres outside of critical areas or their buffers
- Having an assessed building to land value less than 0.1 and an assessed land value greater than \$100,000 (\$10,000 in Bucoda).

Selection 3

Add any parcels that have pending development permits for emergency housing and remove any parcels that have pending development for uses other than emergency housing.

Staff identified four projects currently under consideration:

- Behavioral Health Resources’ B&B Apartments Phase 1: Replace eight existing units with eight studio and ten one-bedroom units at State Ave site.
- LIHI Maple Court PSH: Transition current Maple Court facility in Lacey into traditional permanent supportive housing with 124 studio units.
- LIHI Franz Anderson PSH: Construct 71 permanent supportive housing studio units on Franz Anderson Rd.

- New Horizon Communities (“Panza”): 30 studio units in tiny home village. Site yet to be determined.

Because the identified projects are adding permanent supportive housing (addressed in the previous sections) or a site has not been identified, the analysis did not add them to the capacity estimates. The analysis did remove any parcels expected to be developed for non-emergency housing purposes using TRPC’s permit and subdivision databases.

Selection 4

Apply any adopted spacing or intensity requirements to the parcels.

The City of Olympia allows emergency housing in some residential zones if it meets spacing requirements. To simplify the analysis, only zones that did not have spacing or intensity limits for emergency housing were included.

Selection 5

Determine how many emergency shelter beds or emergency housing units could be accommodated.

Commerce’s guidance provides two options for determining the amount of emergency housing that could be accommodated on each site: a site-specific analysis and assumed density method. TRPC took the latter approach, using an assumed density of 50 beds per acre for future emergency housing, excluding critical areas and buffers. This assumption was based on the Quince Street Village in Olympia, which has 100 units on 1.4 acres (71 units per acre). In addition, the analysis assumed that no more than 150 units or beds would be built on a single parcel.

Selection 6

Add up the capacity from all available sites identified in Step 5.

Table 13 shows the estimated capacity for emergency housing by zone.

Selection 7

Document the capacity for emergency shelter and emergency housing in the jurisdiction compared to the allocated emergency housing need.

Tables 14 through 22 show the identified capacity for emergency housing compared to the allocated emergency housing need. No deficits were identified.

Table 13: Emergency Housing Capacity by Zone

Jurisdiction	Zone	City/UGA	Parcels	Acres	Emergency Housing Capacity
Bucoda	COM	Town	5	2.7	132
Lacey	CBD 4	City	8	6.7	333
Lacey	CBD 5	City	6	3.3	164
Lacey	CBD 6	City	5	38.4	375
Lacey	CBD 6	UGA	1	4.8	75
Lacey	GC	City	4	6.7	229
Lacey	HPBD-BC	City	18	238.1	1,113
Lacey	HPBD-C	City	14	59.9	884
Lacey	LI-C	City	3	17.6	225
Lacey	MHDC	City	11	16.5	617
Lacey	MHDC	UGA	8	12.7	432
Lacey	WD	City	14	7.5	367
Olympia	CSH	City	1	0.7	36
Olympia	DB	City	16	5.1	248
Olympia	GC	City	12	7.0	343
Olympia	HDC-4	City	41	49.3	1,317
Olympia	UW	City	10	5.7	279
Tenino	C-1	City	1	0.3	16
Tenino	C-3	City	1	0.5	23
Tumwater	CBC	City	6	5.7	211
Tumwater	GC	City	23	103.9	1,395
Tumwater	GC	UGA	4	23.6	300
Tumwater	MU	City	13	12.3	563
Tumwater	MU	UGA	3	3.0	148
Tumwater	TC-MU	City	3	19.6	225
Yelm	C-1	City	28	87.1	1,576
Yelm	C-2	City	3	16.3	225
Yelm	C-3	City	2	9.2	150
Yelm	CBD	City	7	3.2	157
Yelm	I	City	5	16.8	286
Yelm	MPC	City	9	964.3	662
Yelm	R-16	City	6	12.6	362
Yelm	R-4	City	8	43.3	455
Yelm	R-6	City	12	55.5	696
Grand Mound UGA	AC	UGA	20	54.8	1,235

Table 14: Town of Bucoda

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 (Housing Units)	6	26	26	0
0-30% Other		12			
30-50%		0			
50-80%		8			
80-100%	Moderate Density (Housing Units)	67	87	210	124
100-120%		20			
Emergency Housing (Beds)		3	3	132	129

Table 15: Lacey City and UGA

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 (Housing Units)	1,108	9,915	10,091	176
0-30% Other		2,784			
30-50%		2,667			
50-80%		3,357			
80-100%	Moderate Density (Housing Units)	0	1,261	8,256	6,995
100-120%		1,261			
Emergency Housing (Beds)		282	282	4,814	4,532

Table 16: Olympia City and UGA

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 (Housing Units)	1,098	7,616	12,282	4,666
0-30% Other		2,617			
30-50%		3,312			
50-80%		590			
80-100%	Moderate Density (Housing Units)	2,328	3,623	5,404	1,781
100-120%		1,296			
Emergency Housing (Beds)		286	286	2,223	1,937

Table 17: Tenino City and UGA

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 (Housing Units)	33	98	58	-41
0-30% Other		65			
30-50%		0			
50-80%		0			
80-100%	Moderate Density (Housing Units)	220	316	376	60
100-120%		96			
Emergency Housing (Beds)		11	11	39	28

Table 18: Tumwater City and UGA

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 (Housing Units)	723	5,694	5,729	35
0-30% Other		1,736			
30-50%		1,309			
50-80%		1,926			
80-100%	Moderate Density (Housing Units)	1,140	1,937	3,692	1,755
100-120%		798			
Emergency Housing (Beds)		184	184	2,842	2,658

Table 19: Yelm City and UGA

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 (Housing Units)	567	5,170	3,025	-2,145
0-30% Other		1,398			
30-50%		1,120			
50-80%		2,085			
80-100%	Moderate Density (Housing Units)	518	1,316	5,860	4,545
100-120%		798			
Emergency Housing (Beds)		153	153	4,569	4,416

Table 20: Rainier UGA

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 (Housing Units)	0	0	0	0
0-30% Other		0			
30-50%		0			
50-80%		0			
80-100%	Moderate Density (Housing Units)	0	0	0	0
100-120%		0			
Emergency Housing (Beds)		0	0	0	0

Note: Rainier did not participate in the project so data for the city are not available

Table 21: Grand Mound UGA

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 (Housing Units)	16	223	0	-223
0-30% Other		40			
30-50%		23			
50-80%		143			
80-100%	Moderate Density (Housing Units)	57	68	406	338
100-120%		11			
Emergency Housing (Beds)		6	6	1,235	1,229

Table 22: Rural Unincorporated County

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 (Housing Units)	0	0	280	280
0-30% Other		0			
30-50%		0			
50-80%		0			
80-100%	Moderate Density (Housing Units)	0	0	0	0
100-120%		0			
Emergency Housing (Beds)		0	0	0	0

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APPENDIXES

Appendix I: Housing Need Allocation Method

The project partners preferred the method used by Snohomish County to allocate the housing need to jurisdictions best achieved the values the group identified: fair, clear, and cooperative.

The Snohomish County method was modified so that no low-income housing or emergency housing was allocated to the rural unincorporated County. This was in response to feedback from Commerce that residential zoning in rural areas — predominantly large lots — could not accommodate the housing types and utilities required for low-income housing, permanent supportive housing, and emergency housing.

The allocation method follows a four-step process. Examples for the city of Lacey are include.

Step 1: Same-Share Housing Need (HAPT Method A)

Calculate each jurisdiction's 2020-2045 housing need, assuming the same percentage is affordable in every jurisdiction. This is the same as Allocation Method A in Commerce's HAPT tool.

16.1% of the countywide 2020-2045 housing need needs to be affordable to a very low-income household. For the city of Lacey, that would equate to 799 housing units.

Step 2: Theoretical Housing Baseline

Calculate the theoretical 2020 housing supply if every jurisdiction had the same share of housing in each income range.

Currently, 10.3% of housing units in Thurston County are affordable to a very low-income household. If the percentage of housing affordable in each income range was the same in every jurisdiction, Lacey would have 2,371 housing units affordable to a very low-income household.

Step 3: Housing Need Adjustment Factor

Subtract the theoretical 2020 housing supply (Step 2) from the actual 2020 housing supply to get an adjustment factor.

Lacey currently has 1,832 housing units affordable to a very low-income household — less than the theoretical equal-share distribution (Step 2). Lacey's housing need adjustment factor for the very-low-income range is 539 housing units (2,371 minus 1,832).

Step 4: Initial Housing 2020-2045 Need

Add the housing need adjustment (Step 3) to the same-share allocation (Step 1). Set any negative allocations in Step 4 to zero. Set any low- or moderate-income housing (0 to 120% AMI) allocated to the rural unincorporated County to zero.

Lacey's initial housing need is 1,338 housing units (799 plus 539). If this number had been negative, it would be set to zero.

Step 5: Final 2020-2045 Housing Need

Removing the negative allocations results in total housing numbers that are higher than Commerce's estimate of housing need. Step 5 reduces the allocations generated in Step 4 proportionally to match both TRPC's housing unit projections for each jurisdiction and the countywide housing need in each income range identified by Commerce. An iterative process is used — called "Iterative Proportional Fitting" — to ensure that all rows and columns sum to the correct total.

After the negative allocations in Step 4 are set to zero, the total low-income housing allocation for all jurisdictions is 159 units higher than the countywide need. The initial allocations are reduced to match the housing totals (Table 2 and Table 3).

Table 23: Preferred Method Sample Calculation of the Very-Low-Income (30-50% AMI) Housing Need.

Jurisdiction		2020 Housing Supply	Step 1	Step 2	Step 3	Step 4	Step 5
			Equal-Share Housing Need	Theoretical 2020 Supply	Adjustment Factor	Initial Allocation	Final Allocation
Bucoda	Town	120	21	25	-96	Less Than 0	0
Lacey	City	1,832	799	2,371	539	1,338	1,199
	UGA	1,075	1,391	1,391	316	1,707	1,468
Olympia	City	1,782	1,961	2,635	853	2,814	2,877
	UGA	356	256	522	167	423	435
Rainier	City	211	89	88	-123	Less than 0	0
	UGA	13	4	5	-8	0	0
Tenino	City	211	80	81	-130	Less than 0	0
	UGA	1	1	1	-1	0	0
Tumwater	City	1,099	1,036	1,138	39	1,075	1,002
	UGA	120	390	124	4	394	307
Yelm	City	247	1,164	356	109	1,273	1,090
	UGA	37	22	53	16	39	30
Grand Mound	UGA	52	48	43	-9	39	23
Rural		5,249	1,168	3,573	-1,677	Less than 0	0
Total		12,405	8,431	12,405	0	9,103*	8,431

Notes: *Sum of positive values.

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 was 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. Capacity in this table excludes accessory dwelling units.

Zone	Capacity for Future Housing Units	Density Category	Select Housing Types					
			Single-Family	Townhome	2, 3, or 4-Plex	Apartment	ADU	
Bucoda								
COM	Town	9	Low-rise Multifamily				C	C
IND	Town	0	Nonresidential					C
MF	Town	9	Low-rise Multifamily	P	P	P	P	
PU	Town	0	Nonresidential					
RES	Town	210	Moderate Density	P	P	P		P
Lacey								
AG	UGA	11	Low Density	P				P
AQUATC	City	0	Nonresidential					
AQUATC	UGA	0	Nonresidential					
C	City	0	Nonresidential					
CBD 4	City	44	Mid-rise Multifamily	P	P	P	P	P
CBD 5	City	110	Mid-rise Multifamily		P		P	
CBD 6	City	55	Mid-rise Multifamily				P	
CBD 6	UGA	0	Mid-rise Multifamily				P	
CBD 7	City	12	Mid-rise Multifamily				P	
CCD	City	144	Low-rise Multifamily		P		P	
CO	City	227	Mid-rise Multifamily		P		P	
GC	City	0	Nonresidential					
HD	City	1,598	Mid-rise Multifamily		P	P	P	P
HD	UGA	386	Mid-rise Multifamily		P	P	P	P
HPBD-BC	City	68	Mid-rise Multifamily		P		P	
HPBD-C	City	17	Mid-rise Multifamily		P		P	
LD	City	1,666	Moderate Density	P	P	P		P
LD	UGA	4,933	Moderate Density	P	P	P		P
LHN	City	31	Low Density	P				P
LI	City	0	Nonresidential					
LI	UGA	0	Nonresidential					
LI-C	City	0	Nonresidential					
MD	City	1,338	Low-rise Multifamily	P	P	P	P	P
MD	UGA	906	Low-rise Multifamily	P	P	P	P	P

Zone		Capacity for Future Housing Units	Density Category	Select Housing Types				
				Single-Family	Townhome	2, 3, or 4-Plex	Apartment	ADU
ME	UGA	0	Nonresidential					
MGSA	UGA	3,166	Moderate Density	P	P			P
MHDC	City	525	Mid-rise Multifamily		P		P	
MHDC	UGA	710	Mid-rise Multifamily		P		P	
MMDC	City	73	Moderate Density	P	P	P	P	P
MMDC	UGA	172	Moderate Density	P	P	P	P	P
NATURL	City	1	Low Density	P				P
NC	City	0	Nonresidential				P	
NC	UGA	0	Nonresidential				P	
OS-I	City	1	Nonresidential					
OS-I	UGA	0	Nonresidential					
OSI-P	City	0	Nonresidential					
OSI-P	UGA	0	Nonresidential					
OSI-S	City	0	Nonresidential					
OSI-S	UGA	0	Nonresidential					
SHORES	City	3	Low Density	P	P	P		P
SMU	City	0	Nonresidential					
URBCON	City	3	Low Density	P				P
V(U)C	City	178	Moderate Density	P	P	P	P	P
V(U)C	UGA	547	Moderate Density	P	P	P	P	P
WD	City	1,332	Mid-rise Multifamily		P		P	
Olympia								
AS	City	0	Nonresidential					
CAP	City	0	Nonresidential					
COSC	UGA	31	Low-rise Multifamily	P	P	P	P	P
CSH	City	0	Nonresidential	P	P	P	P	P
DB	City	1,442	Mid-rise Multifamily	P	P	P	P	P
GC	City	168	Low-rise Multifamily	P	P	P	P	P
HDC-1	City	3	Moderate Density	P	P	P	P	P
HDC-2	City	4	Moderate Density	P	P	P	P	P
HDC-3	City	37	Moderate Density	P	P		P	P
HDC-4	City	3,019	Mid-rise Multifamily	P	P	P	P	P
I	City	0	Nonresidential					
LI-C	City	0	Nonresidential					
LI-C	UGA	0	Nonresidential					
MHP	City	0	Moderate Density	P	P	P		P
MR-10-18	City	117	Low-rise Multifamily	P	P	P	P	P

Zone		Capacity for Future Housing Units	Density Category	Select Housing Types				
				Single-Family	Townhome	2, 3, or 4-Plex	Apartment	ADU
MR-7-13	UGA	0	Moderate Density	P	P	P	P	P
MS	City	217	Mid-rise Multifamily	P	P	P	P	P
NR	City	2	Moderate Density	P	P	P	P	P
NR	UGA	10	Moderate Density	P	P	P	P	P
NV	City	410	Low-rise Multifamily	P	P	P	P	P
PO/RM	City	688	Low-rise Multifamily	P	P	P	P	P
PUD	City	83	Mid-rise Multifamily	C	C	C	C	C
R-1/5	City	4	Low Density	P	P	P		P
R-1/5	UGA	39	Low Density	P	P	P		P
R-4	City	16	Low Density	P	P	P		P
R-4	UGA	154	Low Density	P	P			P
R-4-8	City	3,758	Moderate Density	P	P	P		P
R-4-8	UGA	1,553	Moderate Density	P	P			P
R-4CB	City	445	Low Density	P		P		P
R-6-12	City	1,141	Moderate Density	P	P	P		P
R-6-12	UGA	51	Moderate Density	P	P	P		P
RLI	City	464	Low Density	P	P	P	P	P
RLI	UGA	133	Low Density	P	P	P	P	P
RM-18	City	945	Low-rise Multifamily	P	P	P	P	P
RM-18	UGA	837	Low-rise Multifamily	P	P	P	P	P
RM-24	City	999	Mid-rise Multifamily	P	P	P	P	P
RM-H	City	0	Mid-rise Multifamily	P	P	P	P	P
RMU	City	23	Mid-rise Multifamily	P	P	P	P	P
UR	City	187	Mid-rise Multifamily	P	P	P	P	P
UV	City	271	Low-rise Multifamily	P	P	P	P	P
UW	City	778	Mid-rise Multifamily				P	
UWH	City	604	Mid-rise Multifamily		P		P	
Rainier								
All Zones	City	—	N/A					
NC	UGA	0	Low Density					
RRR1/5	UGA	108	Low Density	P	P			P
Tenino								
C-1	City	2	Low-rise Multifamily		C		C	
C-2	City	2	Low-rise Multifamily		C		C	
C-3	City	26	Low-rise Multifamily	C	C		C	
I	City	0	Nonresidential					

Zone		Capacity for Future Housing Units	Density Category	Select Housing Types				
				Single-Family	Townhome	2, 3, or 4-Plex	Apartment	ADU
MF	City	8	Low-rise Multifamily	P	P	P	P	C
P/SP	City	0	Nonresidential					
PO	City	1	Moderate Density	P				C
RRR1/5	UGA	27	Low Density	P	P			P
SF	City	346	Moderate Density	P				C
SF-D	City	28	Moderate Density	P		P		C
SF-ES	City	69	Low Density	P				C
WT	City	115	Low Density	P				C
Tumwater								
ARI	City	0	Nonresidential					
BD	City	666	Mid-rise Multifamily	P	P	P	P	P
CBC	City	742	Mid-rise Multifamily				P	
CS	City	0	Nonresidential					
GB	City	0	Nonresidential	P				
GB	UGA	0	Nonresidential	P				
GC	City	1,344	Mid-rise Multifamily				P	
GC	UGA	0	Mid-rise Multifamily				P	
HC	City	0	Mid-rise Multifamily				P	
HI	City	0	Nonresidential					
HI	UGA	0	Nonresidential					
LI	City	0	Nonresidential					
LI	UGA	-1	Nonresidential					
MFH	City	356	Mid-rise Multifamily		P	P	P	P
MFM	City	822	Low-rise Multifamily		P	P	P	P
MFM	UGA	615	Low-rise Multifamily	P	P	P	P	P
MHP	City	46	Moderate Density	P				
MU	City	17	Low-rise Multifamily		P	P	P	P
MU	UGA	1	Low-rise Multifamily		P	P	P	P
NC	City	0	Low Density		P	P	P	
NC	UGA	0	Low Density					
OS	City	3	Nonresidential	P				
OS	UGA	0	Nonresidential	P				
R/SR	City	465	Low Density	P		P		P
R/SR	UGA	53	Low Density	P				P
SFL	City	2,413	Moderate Density	P		P		P
SFL	UGA	1,923	Low Density	P				P
SFM	City	1,836	Moderate Density	P	P	P		P

Zone		Capacity for Future Housing Units	Density Category	Select Housing Types				
				Single-Family	Townhome	2, 3, or 4-Plex	Apartment	ADU
SFM	UGA	440	Moderate Density	P	P	P		P
TC-C	City	0	Nonresidential					
TC-MU	City	7	Mid-rise Multifamily				P	
TC-PO	City	0	Nonresidential					
TC-R	City	33	Mid-rise Multifamily				P	
Yelm								
AC	UGA	2	Low Density			P		
C-1	City	91	Mid-rise Multifamily				C	P
C-2	City	58	Mid-rise Multifamily				C	P
C-3	City	15	Mid-rise Multifamily				C	P
CBD	City	99	Mid-rise Multifamily	P		C		P
I	City	0	Nonresidential					P
LI	UGA	0	Nonresidential					
MPC	City	3,776	Low-rise Multifamily	Multiple housing types/densities likely in planned community. Capacity split into two categories for the land capacity analysis.				
		2,000	Moderate Density					
OS/ID	City	0	Nonresidential					
R-16	City	390	Mid-rise Multifamily	P	P	P	P	P
R-4	City	928	Moderate Density	P	P	P	P	P
R-6	City	906	Moderate Density	P	P	P	P	P
RR1/5	UGA	243	Low Density	Single-family, townhome, and ADUs currently permitted. Joint plan allows for higher densities after annexation.				
		250	Moderate Density					
		250	Low-rise Multifamily					
Grand Mound								
AC	UGA	120	Moderate Density	P	P	P	P	P
LI	UGA	0	Nonresidential					
PID	UGA	0	Nonresidential					
R3-6/1	UGA	239	Moderate Density	P	P	P	P	P
R4-16/1	UGA	47	Moderate Density	P	P	P	P	P
County								
HC		0	Nonresidential					
LTA		359	Low Density	P				P
LTF		1	Nonresidential	P				
MEI		0	Nonresidential					
MGSA		724	Low Density	P				P
MR		0	Nonresidential					

Zone	Capacity for Future Housing Units	Density Category	Select Housing Types				
			Single-Family	Townhome	2, 3, or 4-Plex	Apartment	ADU
NA	0	Nonresidential					
NC	0	Nonresidential					
PP	0	Nonresidential					
R 1/10	209	Low Density	P				P
R 1/20	374	Low Density	P				P
RCC	1	Nonresidential					
RL1/1	836	Low Density	P	P			P
RL1/2	347	Low Density	P	P			P
RL2/1	588	Low Density	P	P			P
RR1/5	257	Low Density	P	P			P
RRI	0	Nonresidential					
RRR1/5	13,817	Low Density	P	P			P
UR 1/5	235	Low Density	P				P

City of Tumwater

HOUSING ACTION PLAN



City of Tumwater

Adopted September 21, 2021 by Ordinance No. 2021-007

Contents

Executive Summary	5
What are the Housing Gaps?	5
How can We Create an Equitable Housing Market?	5
Taking Action Locally.....	6
Setting a Legislative Agenda	6
Chapter 1. Introduction.....	7
Sources of Actions.....	8
Addressing Housing Gaps and Needs	8
Equity in Housing Affordability	9
Defining Terms Used.....	10
Assumptions.....	11
Housing Element Policies.....	12
Development Regulations.....	12
Chapter 2. Actions Implemented.....	13
Chapter 3. Local Actions.....	16
Local Actions to be Undertaken by the City.....	16
Strategy 1: Increase the Supply of Permanent, Income-Restricted Affordable Housing.....	18
Strategy 2: Make It Easier for Households to Access Housing and Stay Housed.....	28
Strategy 3: Expand the Overall Housing Supply by Making It Easier to Build All Types of Housing Projects.	33
Strategy 4: Increase the Variety of Housing Choices.	37
Strategy 5: Continually Build on Resources, Collaboration, and Public Understanding to Improve Implementation of Housing Strategies.	40
Strategy 6: Establish a Permanent Source of Funding for Low-Income Housing.	45
Chapter 4. Legislative Needs	51
Appendix A. Action Details.....	53
Strategy 1: Increase the supply of permanent, income-restricts affordable housing.	53
Strategy 2: Make It Easier for Households to Access Housing and Stay Housed.....	57
Strategy 3: Expand the Overall Housing Supply by Making It Easier to Build All Types of Housing Projects.	59
Strategy 4: Increase the Variety of Housing Choices.	61
Strategy 5: Continually Build on Resources, Collaboration, and Public Understanding to Improve Implementation of Housing Strategies.	62
Strategy 6: Establish a Permanent Source of Funding for Low-Income Housing.	63
Appendix B. Considered Actions	67
Appendix C. Policy Evaluation Summary	80
Evaluation of the Policies in the City’s Comprehensive Plan Housing Element.....	80

Appendix D. Regulations Evaluation Summary.....	130
Evaluation of the Regulations in the City’s Municipal Code	130
Regulations Evaluation #1 – Housing Types	130
Regulations Evaluation #2 – Density, and Bulk and Dimensional Regulations	148
Regulations Evaluation #3 – Housing Innovation Program.....	154
Regulations Evaluation #4 – Development Code and Other Barrier Summary	161
Appendix E. Previous Work.....	166
Background	166
2016 Comprehensive Plan Update	166
2018 Resolution No. R2018-016 Homelessness and Affordable Housing	166
2019 Housing Affordability Work Plans	168

Tables

Table 1. Metrics for equity in housing.	9
Table 2. Strategy 1: Increase the supply of permanent, income-restricted affordable housing.....	20
Table 3. Strategy 2: Make it easier for households to access housing and stay housed.....	29
Table 4. Strategy 3: Expand the overall housing supply by making it easier to build all types of housing projects.	34
Table 5. Strategy 4: Increase the variety of housing choices.....	39
Table 6. Strategy 5: Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.....	41
Table 7. Maximum rent and housing costs at various income levels, 2020.	45
Table 8. Example of monthly costs associated with developing an apartment complex.....	46
Table 9. Strategy 6: Establish a permanent source of funding for low-income housing.....	48
Table 10. Adopted SEPA Exemptions as of January 2021.....	60
Table 11. Additional costs to households with a \$0.50 per \$1,000 property tax levy.....	64
Table 12. Potential affordable housing funding from maximum property tax levy.	64
Table 13. Potential affordable housing funding from maximum affordable housing sales tax in 2019....	65
Table 14. Actions considered but not included in the Housing Action Plan.....	67
Table 15. Housing Element policy and action evaluation – Goal H-1.	83
Table 16. Housing Element policy and action evaluation – Goal H-2.	86
Table 17. Housing Element policy and action evaluation – Goal H-3.	89
Table 18. Housing Element policy and action evaluation – Goal H-4.	96
Table 19. Housing Element policy and action evaluation – Goal H-5.	99
Table 20. Housing Element policy and action evaluation – Goal H-6.	102
Table 21. Housing Element policy and action evaluation – Goal H-7.	109
Table 22. Housing Element policy and action evaluation – Goal H-8.	113
Table 23. Housing Element policy and action evaluation – Goal H-9.	118
Table 24. Housing Element policy and action evaluation – Goal H-10.....	121
Table 25. Housing Element policy and action evaluation – Goal H-11	123
Table 26. Housing Element policy and action evaluation – Goal H-12.....	125
Table 27. Housing Element policy and action evaluation – Goal H-13.....	128

Table 28. Development code housing type summary (1 of 3).....	131
Table 29. Development code housing type summary (2 of 3).....	136
Table 30. Development code housing type summary (3 of 3).....	141
Table 31. Development code density, and bulk and dimensional regulation summary (1 of 3).....	149
Table 32. Development code density, and bulk and dimensional regulation summary (2 of 3).....	151
Table 33. Development code density, and bulk and dimensional regulation summary (3 of 3).....	152
Table 34. Housing innovation program review.....	154
Table 35. Development code barrier summary.....	161
Table 36. Other potential barriers summary.....	165

Figures

Figure 1. Household income in the Cities of Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average.....	19
Figure 2. Tenure by race and ethnicity in the Cities of Lacey, Olympia, and Tumwater combined, 2014-2018 average.....	28
Figure 3. Relationship between housing types, price, and rent, household income in the Cities of Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average.....	38

Executive Summary

The City of Tumwater Housing Action Plan began as a collaborative effort between the Cities of Lacey, Olympia, and Tumwater to develop a Regional Housing Needs Assessment and Housing Gap Analysis, a Landlord Survey, and a draft set of actions to address the gaps identified in the housing gap analysis. The City Council adopted the City's Housing Action Plan to reflect the specific conditions and concerns of the City. The plan is intended to inform the City's Comprehensive Plan policies and development regulations and to guide implementation strategies to help the City meet its housing needs and strategic objectives.

What are the Housing Gaps?

The following seven housing gaps were identified through the Housing Needs Assessment:

1. Reduce housing costs for low-income and cost-burdened households.
2. Increase the overall housing supply.
3. Increase the variety of housing sizes and types.
4. Increase senior housing options.
5. Maintain in good condition and improve the existing housing stock.
6. Provide safe, stable options for both renters and homeowners.
7. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness.

How can We Create an Equitable Housing Market?

About one in four Thurston County residents is a person of color, those who are Hispanic or Latino of any race, and those who are any race other than white alone. People of color generally have more people in their household, are less likely to own their own home, have a smaller household income, and are more likely to experience homelessness than their white, non-Hispanic counterparts. Increasing housing equity is not a single action but an overarching theme in this plan. Affordable housing opportunities cannot be created without also reducing housing-related inequities faced by people of

COVID-19 Pandemic and the Housing Action Plan

In response to the outbreak of the COVID-19 pandemic, Governor Inslee issued a series of proclamations and declarations aimed at reducing the spread of the virus in Washington state, including requiring all non-essential workers to stay home and stay healthy and extending a moratorium on evictions to protect renters. As a result, significant changes in the Lacey, Olympia, and Tumwater area occurred, affecting businesses and residents alike.

The City of Tumwater will continue to monitor the impact of the pandemic on housing in the coming months and develop plans for implementing appropriate actions whether included in this plan or not.

color. Each strategy in this report includes a discussion of how it, and the actions associated with it, will reduce inequity in our community.

Taking Action Locally

Since the City Council adopted Resolution No. R2018-016 “Actions to Address Homelessness and Increase Affordable Housing in the City” in the summer of 2018 and approved the 2019 Housing Affordability Text and Fee Work Plans, the City has been working on a number of actions to reduce homelessness, increase affordable housing, and collaborate with other jurisdictions and agencies to explore regional solutions to these issues. A summary of that work may be found in Appendix E *Previous Work*.

The Housing Action Plan builds on the affordable housing work the City has completed to date or that is underway, which was guided by Resolution No. R2018-016 and the 2019 City Council Housing Affordability Text and Fee Work Plans. The Housing Action Plan is the next step in the process of identifying actions to increase the amount of affordable housing in the City. The Plan will consolidate all affordable housing action items into one document that the City will use going forward to support the development of more affordable housing in the City.

The City is actively implementing actions that remove barriers and encourage appropriate housing development. Of the actions considered in developing this plan, the City has already implemented 31 actions, including making strategic investments in infrastructure, reducing setback requirements, relaxing ground floor retail requirements, and simplifying requirements for accessory dwelling units.

In addition to the work the City has already accomplished, this plan identifies a menu of 39 more actions the City will take to address housing gaps, needs, and equity:

- Thirteen actions that help increase the supply of permanent, income-restricted affordable housing.
- Eight actions that make it easier for households to access housing and stay housed.
- Five actions that help expand the overall housing supply.
- Two actions that help increase housing variety.
- Six actions that help the City maintain forward momentum in implementing housing strategies.
- Five actions that help establish a permanent source of funding for low-income housing.

Some of these actions are in the process of development/implementation and some have not been implemented. In addition, actions that were reviewed by the City as part of the development of Plan, but were not included in the final list of actions, may be found in Appendix B *Considered Actions*.

Setting a Legislative Agenda

While this plan outlines actions the City can take to address housing gaps, needs, and equity, barriers also exist at the state and federal levels. By far, the largest barrier is a lack of funding for low-income and income-restricted housing, whether it is construction, improvement, rehabilitation, or rental subsidies. Other barriers include condominium liabilities for builders, tariffs on construction materials imported to the United States, and the impact of prevailing wage requirements tied to federal funding for small, non-profit housing developers. Chapter 4 *Legislative Needs* addresses this in more detail.

Chapter 1.

Introduction

Thurston County is one of the fastest growing counties in Washington State. The pressure to ensure all households have affordable access to housing is also growing and it represents a significant challenge for all stakeholders. The challenge to provide sufficient affordable housing is complicated by rising construction costs, insufficient inventory, and a greater need for coordinated responses between jurisdictions.

Since the City Council adopted Resolution No. R2018-016 “Actions to Address Homelessness and Increase Affordable Housing in the City” in the summer of 2018 and approved the 2019 Housing Affordability Text and Fee Work Plans, the City of Tumwater has been working on a number of actions to reduce homelessness, increase affordable housing, and collaborate with other jurisdictions and agencies to explore regional solutions to these issues. A summary of that work may be found in Appendix E *Previous Work*.

In 2019, the Washington State Legislature passed HB 1923 encouraging cities planning under the state Growth Management Act to take actions to increase residential building capacity. These actions include developing a housing action plan “...to encourage construction of additional affordable and market rate housing in a greater variety of housing types and at prices that are accessible to a greater variety of incomes, including strategies aimed at the for-profit single-family home market” (RCW 36.70A.600).

In recognition of the cross-jurisdiction need for affordable housing, the Cities of Lacey, Olympia, and Tumwater chose to collaborate with Thurston Regional Planning Council to develop a Regional Housing Needs Assessment and Housing Gap Analysis, a Landlord Survey, and a draft set of actions to address the housing gaps identified in the gap analysis. The draft set of actions was used as the basis for developing this local Housing Action Plan for adoption by the City Council. The Washington State Department of Commerce provided funding.

The project included four components:

- A regional housing needs assessment.
- A household income forecast to identify future housing needs.
- A survey of landlords and rental property owners to understand rental housing costs better.
- A draft housing action plan framework, to be modified to reflect current conditions and concerns adopted by the City, identifying a menu of actions for the City to implement to encourage development of a housing stock adequate and affordable for current and future residents.

The Housing Action Plan identifies a menu of actions for the City to implement. These actions are intended to encourage development of a housing stock adequate and affordable for current and future residents of all income levels. This information will be used by the City to update the Housing Element of the Comprehensive Plan and the Tumwater / Thurston County Joint Plan covering the urban growth areas in collaboration with Thurston County, as well as the implementing regulations.

Appendix A *Action Details* provides more detailed information on each action, while Appendix B *Considered Actions* lists all the actions considered through the development of this plan. Where appropriate, explanations as to why an action was not included in the plan are provided.

Sources of Actions

The plan combined data and action ideas from a range of sources. Key sources included:

- **Washington State Department of Commerce.** Actions identified in Commerce’s “Guidance for Developing a Housing Action Plan (public review draft)” were used as a starting point for the action list.
- **Comprehensive Plans.** Staff reviewed housing elements in the City’s Comprehensive Plan and those of the cities of Lacey and Olympia for actions to include. See Appendix C *Policy Evaluation Summary* for more information.
- **Development Codes.** Staff reviewed the City’s development code and those of the cities of Lacey and Olympia for actions to include. See Appendix D *Regulations Evaluation Summary* for more information.
- **Stakeholder Committee.** A stakeholder committee that included the Housing Authority of Thurston County, other low-income housing providers, real estate professionals, housing developers (low-income and market rate), and representatives of the Thurston Thrives Housing Action Team reviewed and added to the action list.
- **Staff from the Cities of Lacey, Olympia, and Tumwater.** City staffs provided feedback on actions that have already been completed or are underway, added actions that were local priorities, and removed actions that were outside of the Cities’ authority.
- **Previous City Work on Affordable Housing.** City staff incorporated actions completed, underway, or not yet started from the City Council’s 2019 Housing Affordability Text and Fee Work Plans. See Appendix E *Previous Work* for more information.
- **City Elected and Advisory Bodies.** The Mayor, City Council, and Planning Commission reviewed, discussed, and proposed amendments to the Housing Action Plan before adoption.
- **Other Sources.** Outreach was done to additional stakeholders as needed, including Habitat for Humanity, the Low-Income Housing Institute, Northwest Cooperative Development Center, and the Thurston Housing Land Trust.

Addressing Housing Gaps and Needs

The Regional Housing Needs Assessment preceded the Housing Action Plan. The Regional Housing Needs Assessment reviewed data available on the region’s housing needs and the available housing stock to identify gaps. The most pressing needs identified were the following:



Affordability. Reduce the cost of housing for low-income and cost-burdened households.



Supply. Increase the inventory of housing for all households.



Variety. Increase the variety of housing sizes and types



Seniors. Increase the stock of housing options needed for aging seniors.



Improvements. Maintain the existing housing stock, including improving energy efficiency and air quality.



Stability. Increase household wealth by providing safe, stable options for rental housing and pathways to homeownership.



Supportive Housing. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness.

Many actions included in this plan address multiple housing gaps or needs, and each action in this plan identifies which area of need it addresses.

Equity in Housing Affordability

Not all households have access to affordable housing. Across Thurston County, people of color, those identifying as Hispanic or a race other than white alone, have lower incomes, are less likely to own their own home, are more likely to be housing cost-burdened, and are more likely to be homeless (Table 1).

Table 1. Metrics for equity in housing.

Metric	Person of Color	White, Non-Hispanic
Cost Burdened Households	37%	31%
Homeowners	52%	66%
People Experiencing Homelessness	~ 4.4 per 1,000	~2.4 per 1,000
Household with an Income Less than \$50,000	41%	33%

Across the United States, including Thurston County and its communities, policies have led to and reinforce housing inequities faced by people of color:

- **Redlining.** Neighborhoods with a large number of people of color were denied access to financing for home improvement and construction. This made it harder for people of color to build financial equity and stay or move out of poverty. While redlining is now illegal, people of color are still more likely to have mortgage applications denied or pay higher interest rates.
- **Zoning.** Zoning regulations explicitly barred racial and ethnic minorities. While this is illegal, zoning regulations today may implicitly bar people of color by placing restrictions on the sizes and types of housing that are affordable and accessible to disadvantaged populations. Zoning that exclusively allows single-family neighborhoods, an estimated 75 percent of all residential-zoned land across major cities in the United States, perpetuates this legacy of barring racial and ethnic minorities.
- **Covenants.** Privately enforced housing covenants used to exclude racial and ethnic minorities from predominantly white neighborhoods. Racial covenants became more common after the United States Supreme Court deemed racial zoning ordinances unconstitutional. Such covenants excluding racial and ethnic minorities are now illegal.

The City can help reverse the disparities caused by these problems by creating more opportunities for affordable housing. The City is also responsible for ensuring that new policies, which are not just around housing, do not exacerbate inequities. Resources like the Government Alliance on Race and Equity's "Racial Equity Toolkit" can help the City incorporate equity considerations in policymaking.

How is Equity Addressed in the Plan?

Because creating affordable housing opportunities goes hand-in-hand with reducing housing-related inequities faced by people of color, increasing equity is not a single action but an overarching theme in this plan. Each strategy in this plan includes a discussion of how it and the actions associated with it work to reduce inequity in our community.

An action that promotes affordable housing, especially for the most vulnerable in our community, is an action that will promote equity.

Defining Terms Used

The following terms are used in this plan.

Affordable Housing. Housing for which the household pays no more than 30 percent of its gross income for housing costs, including utilities.

Income Restricted Housing. Housing for which the occupancy of the units is restricted to households making 80 percent or less of the area median family income, as defined by the United States Department of Housing and Urban Development.

Low-Income Housing. Housing that is affordable for households making 80 percent or less of the area median family income, as defined by the United States Department of Housing and Urban Development. Low-income housing can take the form of income-restricted housing units or subsidized housing. Subsidized housing can take the form of the unit itself being subsidized or the household receiving a housing voucher to subsidize market-rate rent conditions.

Manufactured Home Park. A site under single ownership where ground space is made available for mobile homes, manufactured homes, or a combination of the two. Mobile homes and manufactured homes are both factory-built and considered dwellings for habitation rather than vehicles, such as a recreational vehicle. Mobile homes refer to those units that were factory-constructed prior to June 15, 1976, while manufactured homes are units were factory-constructed after that date.

Permanent Supportive Housing. Permanent housing intended specifically for chronically homeless and permanently disabled individuals and families. Supportive services, such as medical, mental health, enrichment programs, etc., and case management are available on site or closely coordinated to reduce barriers the inhibit households from accessing such services.

Assumptions

Four primary assumptions guided development of this plan:

Menu of options. This plan is intended as a menu of actions for the City to implement. Actions that have already been implemented by the City are found in Chapter 2 *Actions Implemented*. Actions that considered by the City, but not implemented are found in Appendix B *Considered Actions*. Actions that can only be taken by other entities are not included in this plan.

Analysis before implementation. The City is a unique community with different priorities, development patterns, and resources that changes over time. This plan cannot respond to every future issue and need, but it does provide a framework for the City to consider how best to act. Further analysis on an action should be undertaken to determine how well it would respond to the specific need or gap the City attempts to fill.

People experiencing homelessness. This action plan addresses permanent housing solutions. The Thurston County Homeless Crisis Response Plan guides the region's emergency response to homelessness. Although there will be some overlap, this plan is limited to actions that result in or support the creation or preservation of affordable and low-income housing, including permanent supportive housing. Permanent housing is a fundamental part of solving the homelessness crisis our region is experiencing. Despite having a coordinated entry system designed to connect people experiencing homelessness quickly to housing, being responsive to needs is hampered by high housing costs and a lack of housing units.

The City also participates in the newly formed Regional Housing Council with the cities of Lacey, Olympia, and Yelm and Thurston County, created to leverage resources and partnerships to promote equitable access to safe and affordable housing in Thurston County. The Regional Housing Council looks at funding issues for responding to homelessness and housing affordability in the region.

Addressing household income. This plan does not address the income side of the housing equation. Attracting living wage jobs, increasing the minimum wage, and other actions affecting a household's income could help make housing more affordable. The City's Economic Development Plan and the Thurston Economic Development Council guide the region's response to economic development, which has a direct impact on household incomes. Although there will be some overlap, this plan is limited to actions that result in or support the creation and preservation of affordable and low-income housing units.

Housing Element Policies

Appendix C *Policy Evaluation Summary* reviewed the City's current Comprehensive Plan housing policies in the Housing Element for connections to the gaps identified in the housing needs assessment and the status of policy implementation.

All the Housing Element goals, policies, and actions were reviewed and updated as part of 8-year GMA Comprehensive Plan Update in 2016 in Ordinance No. O2016-012. The Housing Element has been amended since the update. The next required eight-year Growth Management update of the Comprehensive Plan is expected to begin in 2022.

The City's housing policies are relevant to the housing needs assessment findings. Some minor adjustments may be appropriate for consideration as part of the 2021 annual Comprehensive Plan amendment docket.

See Appendix C *Policy Evaluation Summary* for complete details.

Development Regulations

Appendix D *Regulations Evaluation Summary* reviewed the City's development regulations for connections to the gaps identified in the housing needs assessment.

The City's Development Code is in the process of being reviewed and updated as part of the work on the 2019 Housing Affordability Text and Fee Work Plans.

The City's development regulations are relevant to the housing needs assessment findings. Some adjustments may be appropriate for consideration in a future development code amendment docket.

See Appendix D *Regulations Evaluation Summary* for complete details.

Chapter 2.

Actions Implemented

As of August 1, 2021, the following 31 actions have been implemented by the City of Tumwater.

- **Adopt design standards that assist new forms of high-density housing and promote infill.** The City adopted the Citywide Design Guidelines in 2016.
- **Allow accessory dwelling units in all residential zones.** Accessory dwelling units allow for increased density on existing residential lots.
- **Simplify requirements for accessory dwelling units (ex: title notification, owner living on site, etc.).** In cooperation with the cities of Lacey and Olympia, the City has developed pre-approved accessory dwelling unit plans free for residents.
- **Allow group homes in all residential zones and commercial zones that allow residential uses.** Group homes are a source of housing for people with disabilities, seniors, those undergoing treatment for a variety of medical concerns, children in foster care, etc.
- **Establish a multifamily tax exemption (MFTE) program.** The Multifamily Tax Exemption (MFTE) Program is intended to encourage the construction of new, rehabilitated, or converted multifamily housing within designated areas. MFTE is limited to multifamily units with four or more units. Eligible projects typically receive an eight-year tax break or twelve years if the property owner/developer commits to renting or selling at least 20 percent of the units to households with an income at or below 115 percent of the median family income during the same period. Once the period lapses, the owner/developer is free to rent or sell units at market rate. The City adopted the MFTE program for the Brewery District and Capitol Boulevard Corridor for eight- and twelve-year projects in 2017 and expanded the MFTE program to include the Town Center and Littlerock Road Subarea for twelve-year projects in 2020.
- **Make strategic investments in infrastructure expansion to reduce development costs.** The City makes a concerted effort to invest in infrastructure expansion where it makes the most sense, thereby reducing development costs and spurring needed development in the right locations. Although the City makes such strategic investments, new development constructs the majority of infrastructure, affecting the overall cost of housing in that development.
- **Process short plat applications administratively.** Short platting is the division of land into a limited number of lots. Typically, approving land divisions is a legislative function of the City Council. However, state law requires cities to have a short plat process and approve such requests administratively. As of 2021, the City allows administrative approvals of short plats for land divisions of nine or fewer lots, the state's current limit for short platting.
- **Recognize modular/manufactured housing as a viable form of housing construction.** Since 2004, state law has recognized the value manufactured housing has on housing affordability. Cities must treat manufactured housing the same as it does traditionally built housing and must allow mobile and manufactured homes to locate in existing manufactured home parks.

- **Reduce setbacks and increase lot coverage/impervious area standards.** The City has reduced setback standards and high increase lot coverage/impervious area standards in residential zone districts.
- **Relax ground floor retail requirements to allow residential units.** In commercial zones, retail uses are often required on the ground floor for mixed-use developments. The City has never established a requirement for ground floor retail in a mixed-use development.
- **Require minimum residential densities.** The City has required minimum residential densities since the approval of the Growth Management Act.
- **With major comprehensive plan updates, confirm land is suitably zoned for development of all housing types.** The City is required to include a Housing Element in its Comprehensive Plan. The Growth Management Act requires the Housing Element to include information on the types of housing available in the City and to confirm there is enough land available for such uses. As part of these updates, the City confirms whether the land itself is zoned properly to sufficiently allow the types of units envisioned in the community in the quantities necessary to meet housing needs. The City is undertaking a similar exercise now with Thurston County to update the Tumwater / Thurston County Joint Plan for the urban growth areas of the City.
- **Support compact development.** The City's Comprehensive Plan supports compact urban development to reduce urban sprawl and reduce the costs of public services.
- **Support low-income senior housing.** The City provides property tax and utility fee discounts for low income seniors.
- **Process development applications expeditiously.** The City is subject to deadlines under the GMA for processing housing plat applications. In general, these deadlines are being met. In addition, the City uses a hearing examiner for hearings related to larger new development projects and subdivisions, taking the politics out of these decisions and administratively approves final plats, reducing approval time.
- **Support transit oriented development** The City is served by public transit, operated by Intercity Transit. Public transit is an important component of affordable housing because parking requirements can be reduced, reducing construction costs, and income not spent on buying and maintaining vehicles means more of that income is available for housing.
- **Support place making.** According to TRPC's Urban Corridors Task Force (Dec 2011 report), place making is an important element of attracting high-density housing along urban corridors. The City is engaged in extensive place making such as restoration of the Historic Brewhouse and construction of the Deschutes Valley Trail to attract high-density residential development to the Brewery District and along Capitol Blvd.
- **Use design guidelines to manage higher intensity uses.** The City has adopted design guidelines for higher density housing to better integrate new development into existing neighborhoods.
- **Regional Housing Council.** In addition to these actions, the City is also taking advantage of a local revenue-sharing program established by [HB 1406](#), which allows the cities to receive a portion of the State's existing sales and use tax to fund affordable housing programs and services. The cities of Lacey, Olympia, Tumwater, and Yelm and Thurston County pool their resources with guidance from the Regional Housing Council to help pay for housing supportive services.

- **Provide funding for renovating and maintaining existing housing that serves low-income households or residents with disabilities.** The City has implemented this action through funding to nonprofits, CDBG funding, and work through the Regional Housing Council.
- **Offer density bonuses for low-income housing.** The City implemented this action through Ordinance No. O2020-005 Housing Affordability Text Amendments.
- **Rezone manufactured home parks to a manufactured home park zone to promote their preservation.** The City has implemented this action through Ordinance O2008-009, which established the Manufactured Home Park (MHP) zone district in the City.
- **Offer developers density and/or height incentives for desired unit types.** The City implemented this action through Ordinance No. O2020-005 Housing Affordability Text Amendments.
- **Reduce parking requirements for residential uses, including for multifamily developments near frequent transit routes.** The City implemented this action through Ordinance No. O2020-005 Housing Affordability Text Amendments. The City needs to see how things work under Ordinance No. O2020-005 before proposing additional changes.
- **Identify strategically placed but underdeveloped properties and determine what barriers exist to developing desired housing types.** The City has implemented this action in the Brewery District and Capitol Boulevard Corridor, specifically the WSDOT property.
- **Reduce minimum lot sizes.** The City implemented this action through Ordinance No. O2020-005 Housing Affordability Text Amendments.
- **Expand the multifamily tax exemption to make it available in all transit corridors.** The City has implemented this action. Ordinance No. O2017-004 established the multi-family tax exemption program at the City. Resolution No. R2017-002 established the Brewery District and the Capitol Boulevard Corridor as the initial target areas. Following the 2019 Housing Affordability Work Plan Development Fee Amendment 3) *Expand the multifamily tax exemption program to other areas of the City, such as the Town Center, and the Littlerock Road Subarea, and look at expanding the percentage of permanently affordable units that would need to be provided*, Resolution No. R2019-022 expanded the target areas to include the Littlerock Subarea and the Town Center.
- **With major comprehensive plan updates, confirm land is suitably zoned for development of all housing types.** The City has implemented this action as part of every required eight-year GMA Comprehensive Plan update.
- **Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, etc.).** The City implemented this action through Ordinance No. O2020-005 Housing Affordability Text Amendments.
- **Allow more housing types in commercial zones.** The City has implemented this action. The City currently allows residential development in all commercial and mixed-use zone districts.
- **Allow single-room occupancy (SRO) housing in all multifamily zones.** The City has implemented this action. The City currently allows single-room occupancy in all multifamily zone districts.

Chapter 3.

Local Actions

Local Actions to be Undertaken by the City

This chapter discusses the specific local actions that the City of Tumwater will be implementing as part of the Housing Action Plan.

The Housing Action Plan identifies six strategies for addressing housing needs in the City:

1. Increase the supply of permanent, income-restricted affordable housing.
2. Make it easier for households to access housing and stay housed.
3. Expand the overall housing supply by making it easier to build all types of housing projects.
4. Increase the variety of housing choices.
5. Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.
6. Establish a permanent source of funding for low-income housing.

Thirty-nine actions are associated with one of the six strategies in the Housing Action Plan, and each action is associated with filling one or more of the seven gaps identified in the Housing Needs Assessment:



Affordability. Reduce the cost of housing for low-income and cost-burdened households.



Supply. Increase the inventory of housing for all households.



Variety. Increase the variety of housing sizes and types



Seniors. Increase the stock of housing options needed for aging seniors.



Improvements. Maintain the existing housing stock, including improving energy efficiency and air quality.



Stability. Increase household wealth by providing safe, stable options for rental housing and pathways to homeownership.



Supportive Housing. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness.

Table of Actions

The table of actions associated with each strategy includes key information to know:

- Gaps or needs addressed by the action (as indicated by the above icons)
- Implementation status for the City, as represented by the following symbols:



The action is pending – the City has begun the work necessary to implement the action, but it is not yet fully implemented.



The action will be considered – the City will consider the work necessary to implement the action, but the work has not been scheduled.

Detailed information on each action is provided in Appendix A *Action Details*. For a complete list of actions considered as part of the development of this plan, see Appendix B *Considered Actions*.

Neither the strategies nor the actions associated with them are in priority order. Not all actions will be implemented by the City, and actions that can only be taken by other entities are not included in this plan.

Effort to Implement

High – Action would require significant resources to implement (funding, staff, political effort, etc.)

Medium – Action would require moderate resources to implement (funding, staff, political effort, etc.)

Low – Action would require few resources to implement (funding, staff, political effort, etc.)

N/A – Action not applicable to the City

Effect on Housing Supply

High – Action would result in a significant increase in desired housing units

Medium – Action would result in a moderate increase in desired housing units

Low – Action would result in a small increase in desired housing units

N/A – Action not applicable to the City

Strategy 1: Increase the Supply of Permanent, Income-Restricted Affordable Housing.

Strategy 1 includes actions that increase the supply of housing affordable to low-income households (those making 80 or less percent of the area median family income) and actions that support the providers of low-income housing.

Why is this strategy important?

Demand for housing is straining the limited supply of affordable options. For households with the lowest incomes, such as those headed by a retail clerk, a home health aide, or a childcare provider, market rate housing is unlikely to be an affordable option. For these households, even home maintenance costs, let alone rent or mortgage payment costs, can be unaffordable.

How do these actions reduce housing costs?

Increasing opportunities for developing housing affordable to households with the lowest incomes increases housing affordability for these households. The need is great: according to the needs assessment, about 11,700 households in the Cities of Lacey, Olympia, and Tumwater have an income of 50 percent or less of the median family income. Another 7,500 households in the same category are anticipated over the 25 years.

Reducing the cost of renting and owning a home are both part of the solution. For households looking towards homeownership, the up-front costs associated with purchasing a home can put this option out of reach. Low-income households, however, can benefit from the stabilization in housing costs owning a home offers, in general, monthly mortgage payments stay the same over 30 years while monthly rent payments increase.

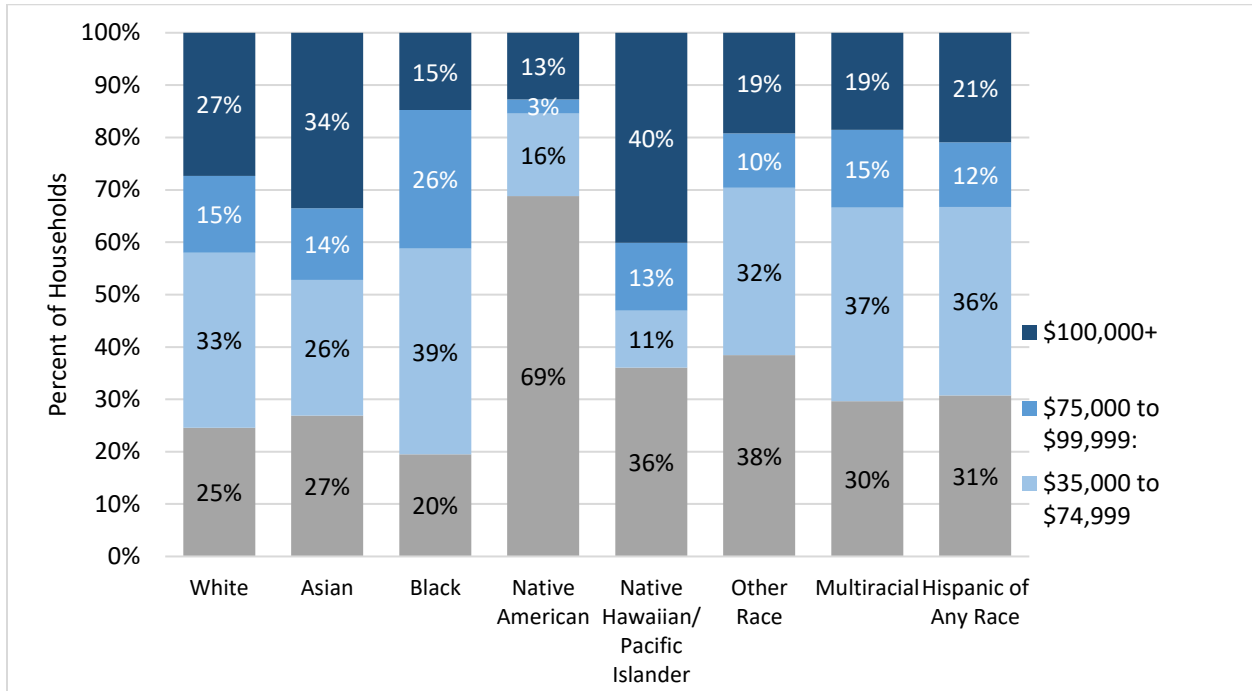
These actions also address the need for permanent supportive housing. For people moving out of emergency housing situations, such as a homeless shelter, permanent supportive housing provides not only affordable housing but also access to health and social services. These services build stability and decrease the likelihood residents experience homelessness again.

How do these actions address equity?

People of color (Figure 1) disproportionately head the lowest income households in Thurston County. The same is true for people experiencing homelessness. Permanent, income restricted housing directly benefits both of these populations by providing affordable, stable housing options. Housing affordable to households with the lowest incomes can be rental or owner units, both of which help stabilize

households. Programs that expand homeownership opportunities can significantly improve a household’s wealth; this is especially important to addressing inequities for households of color stemming from historical policies like redlining and zoning.

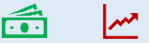



Figure 1. Household income in the Cities of Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average.












NOTE: In the figure above, householders who are Latino or Hispanic are only represented in “Hispanic of Any Race.”

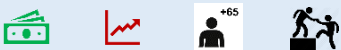



Source: U.S. Census Bureau American Community Survey



Table 2. Strategy 1: Increase the supply of permanent, income-restricted affordable housing.



Strategy 1: Increase the supply of permanent, income-restricted affordable housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
1.a. Donate or lease surplus or underutilized jurisdiction-owned land to developers that provide low-income housing and establish a process for accepting or coordinating the acceptance of land donations from others this action. <i>Gaps/Needs Addressed:</i> 		M	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. While the City does not have any land to donate for housing that is not already committed to other uses, the City could accept or coordinate the acceptance of land donations from others this action.	<ul style="list-style-type: none"> • Time for staff to develop and manage a program.
1.b. Where a Planned Unit Development is used for residential development, consider requiring a portion of the housing be low-income housing. <i>Gaps/Needs Addressed:</i> 		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance.








Strategy 1: Increase the supply of permanent, income-restricted affordable housing.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
1.c. Adopt a “Notice of Intent to Sell” ordinance for multifamily developments. <i>Gaps/Needs Addressed:</i> 		H	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance. 	
1.d. Provide funding for the Housing Authority of Thurston County and other non-profit organizations to buy income-restricted units proposed to be converted to market rate housing. <i>Gaps/Needs Addressed:</i>  		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. Could be part of the Regional Housing Council discussions as well.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. 	




Strategy 1: Increase the supply of permanent, income-restricted affordable housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
1.e. As part of Comprehensive Plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households. <i>Gaps/Needs Addressed:</i> 		M	L	The City will consider the work necessary to implement the action, but the work has not been scheduled. It is important to recognize that sometimes impacts are unavoidable when trying to balance multiple priorities, such as implementation of the Thurston Climate Mitigation Plan, Building Code updates, and the Housing Action Plan.	<ul style="list-style-type: none"> Additional time for staff to include such reviews during the preparation of amendments to the Comprehensive Plan and the development code.
1.f. Provide funding for low-income and special needs residents to purchase housing through community land trusts. <i>Gaps/Needs Addressed:</i> 		H	L	The City will consider the work necessary to implement the action, but the work has not been scheduled. This should be explored on a regional level through the Regional Housing Council, nonprofits, and whether the HATC could do this.	<ul style="list-style-type: none"> Funding through the City Council's biennial budgeting process.

Strategy 1: Increase the supply of permanent, income-restricted affordable housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
1.g. Offer and/or expand fee waivers for low-income housing developments. <i>Gaps/Needs Addressed:</i> 		H	M	The City has begun the work necessary to implement the action, but it is not yet fully implemented as part of Ordinance No. O2021-001 Housing Affordability Fee Amendments.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance.
1.h. Encourage low-income housing units as part of new developments. <i>Gaps/Needs Addressed:</i> 		H	H	The City will consider the work necessary to implement the action, but the work has not been scheduled. This could be required if the residential market can support it. As a requirement, there is concern that it could negatively affect new residential developments. This could also consider allowing density bonuses in the Single Family Medium Density Residential (SFM) zone district for permanent low-income housing in the form of triplexes and quads. In a related discussion, the Planning Commission suggested considering removing “single-family” and “multifamily” from residential zone district titles.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance.

Strategy 1: Increase the supply of permanent, income-restricted affordable housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
1.i. Fund development projects that increase low-income housing through grants or loans. <i>Gaps/Needs Addressed:</i> 		H	M	The City is currently implementing this action through funding to nonprofits, CDBG funding, and work through the Regional Housing Council. Need to document what is done with City of Tumwater funds.	<ul style="list-style-type: none"> Time for staff to manage the annual reporting for such projects.

Strategy 1: Increase the supply of permanent, income-restricted affordable housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
1.j. Establish a program to preserve and maintain healthy and viable manufactured home parks. <i>Gaps/Needs Addressed:</i> 		M	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 6) <i>Assess actions for assuring mobile home parks continue to provide affordable housing toward a goal of property ownership by residents under B) Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. The City has discussed how to get manufactured home parks into a land trust arrangement and inventorying existing manufactured home parks in the City to develop a list of needs.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program. • Time for staff to manage the annual reporting for such projects.

Strategy 1: Increase the supply of permanent, income-restricted affordable housing.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
1.k. Enhance enforcement of property maintenance codes to keep housing in good repair. <i>Gaps/Needs Addressed:</i>   		H	M	The City is currently implementing this action and may look at moving beyond the current complaint driven process, to consider periodic inspections of rental property such as mold/vermin inspections. Suggest starting as a voluntary program. Review City of Lacey and City of Aberdeen's programs.	<ul style="list-style-type: none"> Funding through the City Council's biennial budgeting process. Time for staff to develop and run such a program. 	
1.l. Partner with low-income housing developers (such as Habitat for Humanity) to expand homeownership opportunities. <i>Gaps/Needs Addressed:</i>  		M	M	The City is currently implementing this action through funding to nonprofits, CDBG funding, and work through the Regional Housing Council.	<ul style="list-style-type: none"> Funding through the City Council's biennial budgeting process. Time for staff to develop and run such a program. 	

Strategy 1: Increase the supply of permanent, income-restricted affordable housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
1.m. Extend public water and sewer to unserved areas to allow infill development in underdeveloped areas. <i>Gaps/Needs Addressed:</i>  		H	M	<p>The City Council’s 2019 Housing Affordability Fee Amendment Work Plan included the item “making infrastructure investment for infill areas needing upgrades.”</p> <p>The Comprehensive Plan describes where the City expects, and is trying to direct, growth over the next twenty years. The private sector has traditionally done utility extension and upgrades as areas grow. For infill development, the City could invest to promote development in areas where new housing is desired, but upgrades to infrastructure, such as utilities and sidewalks, would be needed to support it.</p>	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • New funding source will need to be confirmed and may not be from ratepayers. • Time for staff to develop and run such a program. • Amendments to the Comprehensive Plan Lands for Public Purposes and Transportation Elements • Amendments to the priorities of the Capital Facilities Plan

Strategy 2: Make It Easier for Households to Access Housing and Stay Housed.

Strategy 2 actions address housing stability by preventing evictions and displacement and creating opportunities to build financial equity through homeownership.

Why is this important?

Housing stability is an important component of housing affordability. When households face housing insecurity due to income or other issues, there can be a fine line between being housed and being homeless. Evictions and foreclosures are both destabilizing and can lead to long-term poverty. These events also make it more likely a household will experience homelessness.

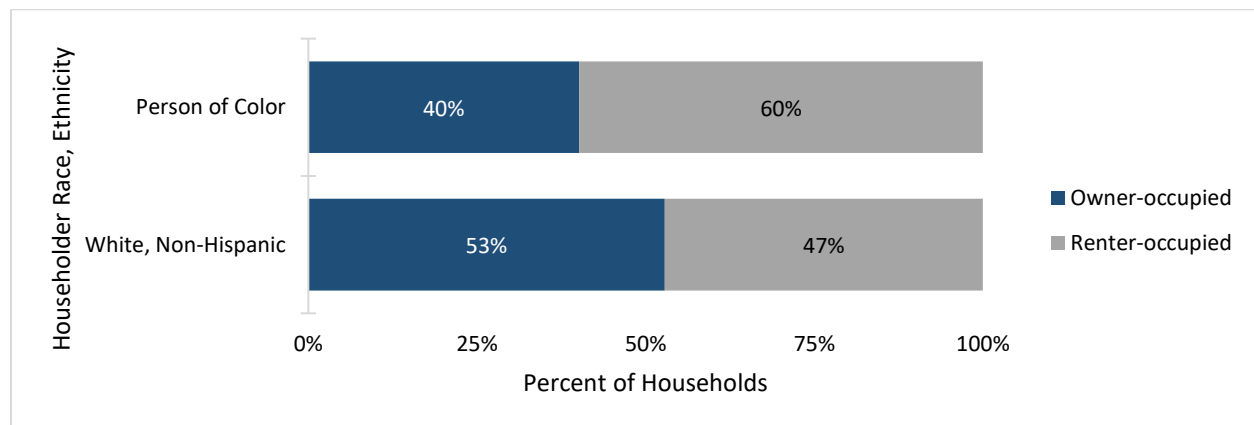
How do these actions reduce housing costs?

For housing service providers, preventing homelessness in the first place is more cost-effective than housing someone experiencing homelessness. Households that can avoid evictions and foreclosures also avoid likely increases in their monthly housing costs, if they are even able to find a new home to live in. For renters, this can also include application fees, deposits, and other costs associated with finding new rental housing.

How do these actions address equity?

People of color are more likely to rent (Figure 2) and more likely to have a lower income than their white, non-Hispanic counterparts. This makes them particularly vulnerable to eviction when rent increases exceed their ability to pay. This concern is reflected in the population experiencing homelessness, which are also disproportionately people of color.

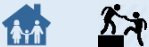

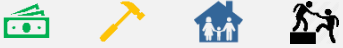

Figure 2. Tenure by race and ethnicity in the Cities of Lacey, Olympia, and Tumwater combined, 2014-2018 average.











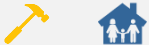

Source: U.S. Census Bureau American Community Survey







Homeownership is an important way for a household to build financial equity, move people out of poverty, and create generational wealth. Creating these opportunities for people of color, who were historically denied access to mortgages and loans, is particularly important.

Table 3. Strategy 2: Make it easier for households to access housing and stay housed.

Strategy 2: Make it easier for households to access housing and stay housed. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
2.a. Have developers provide tenants displaced by redevelopment with relocation assistance. <i>Gaps/Needs Addressed:</i> 		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. More details would need to be provided for the action. It may be best implemented through funding to nonprofits, CDBG funding, and work through policies from the Regional Housing Council.	<ul style="list-style-type: none"> • Funding for displacement assistance from developers. • Funding for running program through the City Council’s biennial budgeting process • Time for staff to develop and run such a program.
2.b. Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training. <i>Gaps/Needs Addressed:</i> 		M	L	The City will consider the work necessary to implement the action, but the work has not been scheduled. The City would like to see how to get more people into the building trades to help alleviate the labor shortage. Furthermore, the City could ask EDC to focus on helping people who want to start a construction company.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process • Time for staff to develop and run such a program.

Strategy 2: Make it easier for households to access housing and stay housed.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
2.c. Adopt short-term rental regulations to minimize impacts on long-term housing availability. <i>Gaps/Needs Addressed:</i>  		H	L	The City will consider the work necessary to implement the action if we start to see a problem, but the work has not been scheduled. Consider requiring on site ownership for accessory dwelling units used as short-term rentals.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance. • Time for staff to develop and run such a program. 	
2.d. Support down payment assistance programs for homeownership and programs that assist people entering the rental market. <i>Gaps/Needs Addressed:</i>  		H	M	The City will consider the work necessary to implement the action if we start to see a problem, but the work has not been scheduled. While it is beyond the financial capacity of the City to manage such programs and it would be better as state or regional programs, the City could support regional programs with non-profit management.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for staff to develop and run such a program. 	

Strategy 2: Make it easier for households to access housing and stay housed. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
2.e. Identify and implement appropriate tenant protections that improve household stability. <i>Gaps/Needs Addressed:</i> 		H	M	The City has begun the work necessary to implement the action, but it is not yet fully implemented as part of Rental Housing Amendments. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 9) <i>Enact policies to protect tenants experiencing housing instability</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this action. Tenant protections can mean putting a burden on small owners, who often are unable to afford to subsidize their rental property. Start this program with larger rental properties.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance. • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.
2.f. Develop a technical assistance or education program for small landlords. <i>Gaps/Needs Addressed:</i> 		M	M	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.

Strategy 2: Make it easier for households to access housing and stay housed. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
2.g. Assist non-profits in the process of acquiring mobile home parks to turn them into public trusts so that lot rental fees can be controlled. <i>Gaps/Needs Addressed:</i>  		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.
2.h. Fund an energy assistance program for rental housing/make landlords do upgrades when the unit is sold. <i>Gaps/Needs Addressed:</i>  		M	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.

Strategy 3: Expand the Overall Housing Supply by Making It Easier to Build All Types of Housing Projects.

Strategy 3 includes actions that streamline the development and construction of market rate housing, both owner and renter-occupied homes.

Why is this important?

Between 2020 and 2045, the population of the Cities of Lacey, Olympia, and Tumwater and their urban growth areas is projected to increase by over 60,000 people. This growth will require nearly 30,000 new housing units. When demand for housing is high, as it is now, but supply remains low, housing costs increase, reducing affordability. The increase in costs affects both renters, and those looking to buy.

How do these actions reduce housing costs?

The Housing Needs Assessment showed that we would likely see a growth of households in all income categories, from the lowest earning ones to those earning well above the median income. This will require the construction of housing affordable to a wide range of incomes.

Expanding the housing supply also means people can find housing better suited to their needs. For example: high prices for condos and rentals means empty nesters who want to downsize are more likely to stay in their single-family home. A young family looking to buy their first home may continue to rent or pay more than 30 percent of their household income on a mortgage if home sale prices are too high.







How do these actions address equity?



When demand for housing is high but supply remains low, housing costs rise, decreasing affordability. Those with the lowest incomes, who are disproportionately people of color, are most affected. Rising rents are correlated with increased evictions and homelessness.






Rising home prices mean homeownership, a way for disadvantaged households to build equity, becomes more difficult. Increasing costs can also lead to cultural displacement as people move to new neighborhoods that lack the businesses and institutions important to their community. While this process may be voluntary, it can be destabilizing for communities of color. When higher income households, those that can afford to rent or purchase at market rates, find housing that better meets their needs and budgets, more units are freed up that lower income households can afford. Expanding the overall housing stock also slows the rent/housing price increases that disproportionately affect people of color.

Market rate housing alone will not address the needs of the most disadvantaged populations, and pressure to develop market rate housing in communities of color can cause displacement. Strategy 1 includes actions to increase the supply of housing for the lowest-income households while Strategy 2 includes actions to make it easier for households to access housing and stay housed.

Table 4. Strategy 3: Expand the overall housing supply by making it easier to build all types of housing projects.

Strategy 3: Expand the overall housing supply by making it easier to build all types of housing projects.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
3.a. Lower transportation impact fees for multifamily developments near frequent transit service routes. <i>Gaps/Needs Addressed:</i>   		H	M	The City has begun the work necessary to implement the action for low-income households, but it is not yet fully implemented as part of Ordinance No. O2021-001 Housing Affordability Fee Amendments. Discuss with Intercity Transit.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance. 	
3.b. Allow deferral of impact fee payments for desired unit types. <i>Gaps/Needs Addressed:</i> 		M	L	The City has begun the work necessary to implement the action, but it is not yet fully implemented as part of Ordinance No. O2021-001 Housing Affordability Fee Amendments.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance. 	

Strategy 3: Expand the overall housing supply by making it easier to build all types of housing projects. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
3.c. Maximize use of SEPA threshold exemptions for residential and infill development. <i>Gaps/Needs Addressed:</i> 		H	M	<p>The City has begun the work necessary to implement the action in support the City's affordable housing goals of raising the SEPA categorical exemption thresholds for multifamily residential development from 25 to 60 multifamily residential units to reduce duplicative environmental review. Ordinance No. O2017-008 raised the SEPA exemption level for short plats to the maximum allowed by state law (9 lots) and to 25 for multifamily dwelling units. Ordinance No. O2019-022 raised the SEPA exemption level for multifamily dwelling units to the maximum allowed by state law (60 for multifamily dwelling units).</p> <p>Focus on reviewing SEPA exemptions and planned actions that support residential development in the Brewery District, Capitol Boulevard Corridor, and Town Center.</p>	<ul style="list-style-type: none"> • Funding through the City Council's biennial budgeting process. • Revise TMC Chapter 15.48 <i>Transportation Concurrency Requirements</i> to allow for review of traffic impacts and ensure concurrency. • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance. • Consider reviewing SEPA exemptions that support residential development in the Brewery District, Capitol Boulevard Corridor, and Town Center. • Align with MFTE program.

Strategy 3: Expand the overall housing supply by making it easier to build all types of housing projects.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
3.d.	Continue to look for place-making opportunities along urban corridors. <i>Gaps/Needs Addressed:</i>  		L	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Time for staff to develop and run such a program. • Funding through the City Council’s biennial budgeting process.
3.e.	Mix market rate and low-income housing to avoid creating areas of concentrated low-income housing. <i>Gaps/Needs Addressed:</i> 		L	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance.

Strategy 4: Increase the Variety of Housing Choices.

Strategy 4 actions address way to increase the variety of housing options, including duplexes, triplexes, accessory dwellings, and other housing forms that are not as common in the Cities of Lacey, Olympia, and Tumwater.

Why is this important?

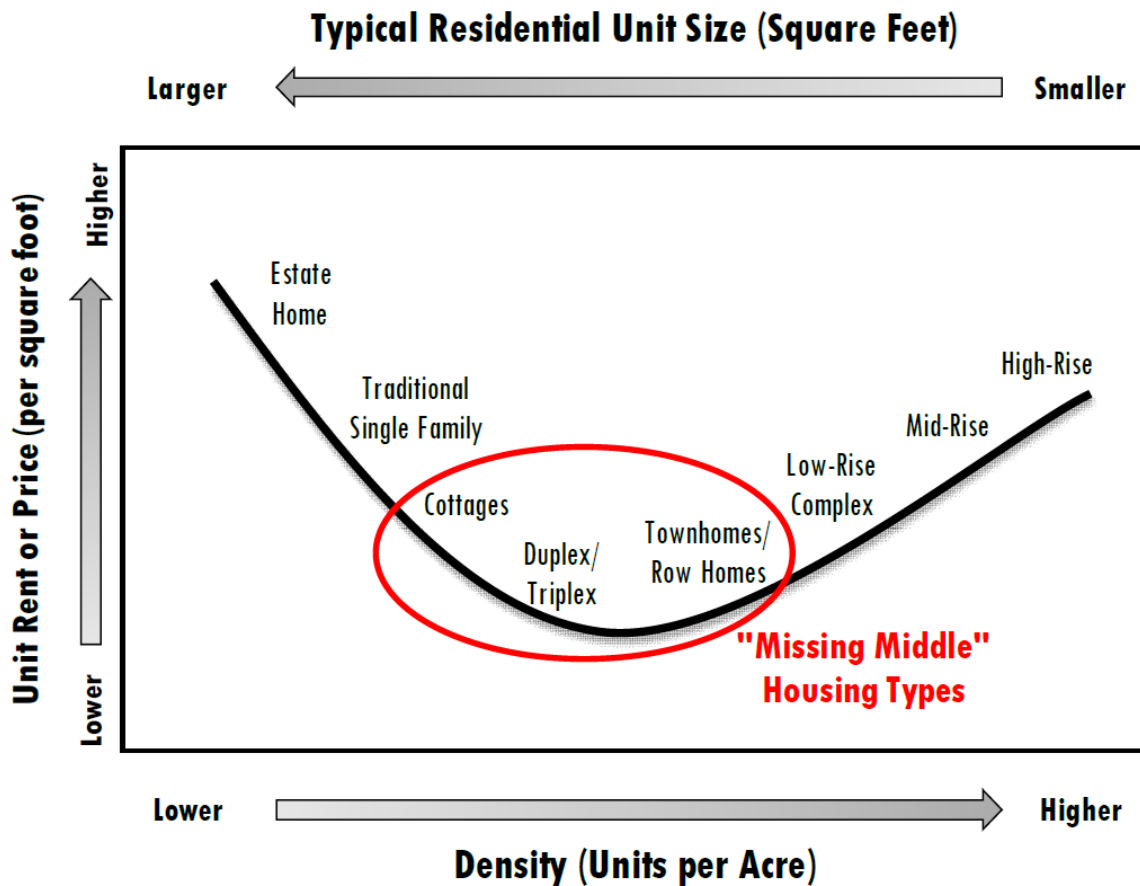
Household sizes in Thurston County have gotten smaller, an average of 2.5 people per household today. There are more single-parent families and householders living alone. As household formation and composition have changed over time, so have their housing needs. Increasing the variety of housing types allows households more choices and creates a dynamic housing market better able to meet the needs of people living in the Cities of Lacey, Olympia, and Tumwater.

How do these actions reduce housing costs?

“Middle density” housing, a small part of the Cities of Lacey, Olympia, and Tumwater’s current housing stock, is an important part of an affordable housing strategy. Middle density housing includes small multifamily housing (duplexes and triplexes), attached townhomes, cottage housing, and accessory dwellings. Per unit costs tend to be lower than single-family homes, because the homes are smaller and developers can benefit from economies of scale. Per unit costs are also less than high-density multifamily because they are stick built (they do not require structured parking or other concrete and steel structures) and are typically in neighborhoods with existing infrastructure. This leads to lower costs for both homeowners and renters (Figure 3).

Diversifying the housing stock also recognizes that households are unique and have a wide range of housing needs. This is particularly true as our population ages. Middle density housing provides seniors a way to downsize while remaining in the neighborhoods they love.

Figure 3. Relationship between housing types, price, and rent, household income in the Cities of Lacey, Olympia, and Tumwater combined by race and ethnicity, 2014-2018 average.







Source: Washington State Department of Commerce, *Housing Memorandum: Issues Affecting Housing Availability and Affordability* (2019), p. 85. <https://deptofcommerce.app.box.com/s/npwem3s3rvcsya15nylbroj18e794ykZ>.

How do these actions address equity?

Increasing the variety of housing options provides more affordable housing options for low-income households, who are disproportionately people of color. Middle density housing can be both rental and owner-occupied. Affordable owner-occupied units would be a potential way to build financial equity.

Middle density housing also expands the housing options available in predominantly single-family neighborhoods, leading to a mix of household incomes. This allows low-income households to access some of the resources, such as better school districts or healthier neighborhoods, available to higher-income households.

Table 5. Strategy 4: Increase the variety of housing choices.

Strategy 4: Increase the variety of housing choices. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
4.a. Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods. <i>Gaps/Needs Addressed:</i> 		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance.
4.b. Strategically allow live/work units in nonresidential zones. <i>Gaps/Needs Addressed:</i> 		M	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to review and develop ordinance updating development code. • Time for the Planning Commission to review and the City Council to review and approve an ordinance.

Strategy 5: Continually Build on Resources, Collaboration, and Public Understanding to Improve Implementation of Housing Strategies.

Strategy 5 actions recognize the need for the Cities of Lacey, Olympia, and Tumwater to engage with the community and establish strong partnerships with affordable housing providers to address housing affordability.

Why is this important?

While the City does not build or manage low-income housing, the policies they enact can affect how much housing can be built and at what cost.

How do these actions reduce housing costs?

By establishing partnerships and collaborations with organizations who serve low-income households, the City can ensure that they are directing their resources and enacting policies that best serve low-income households.

For some, changes brought on by growth and new development in their established neighborhoods can be seen as difficult. As a result, residents may support more affordable housing while at the same time seek to prevent actions needed to increase affordable options. By also engaging with the community, the City can build a shared understanding of the challenges faced by low-income households and develop informed consent around the strategies needed to increase housing affordability.

How do these actions address equity?

Building public understanding around the challenges faced by low-income households includes recognizing the historical reasons why they are disproportionately people of color.





The people who typically engage in public review processes, especially land use processes, are often white and of higher income. Developing relationships with organizations that work with or represent communities of color and disadvantaged groups can help the City better:



- Identify who benefits or is burdened by an action.
- Examine potential unintended consequences of taking an action.
- Mitigate unintended negative consequences of taking an action.
- Build in strategies to advance racial equity.



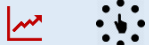

Proactive efforts to ensure engagement in decision-making processes are broadly inclusive and grounded in achieving equity is necessary. With broader input representative of the whole community, decisions are better balanced and actions the City take can be more successfully implemented in an equitable fashion.



Inviting and bringing in people of all walks of life into the community conversation provides the most direct. Collaborating with leaders of disadvantaged populations can help make this happen and ensure government action does not increase inequities faced by people of color.

Table 6. Strategy 5: Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.

Strategy 5: Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
5.a Conduct education and outreach around city programs that support affordable housing. <i>Gaps/Needs Addressed:</i> 		M	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. Need to define clearly the purposes and expected outcomes of such programs. Begin by clearly defining the purposes and expected outcomes of programs and use trained volunteers were possible.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program. 	
5.b Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues. <i>Gaps/Needs Addressed:</i> 		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. It would be good to have an ombudsperson resource for renters established through the Regional Housing Authority or another regional organization. Use trained volunteers were possible.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program. 	

Strategy 5: Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
5.c. Identify and develop partnerships with organizations that provide or support low-income, workforce, and senior housing as well as other populations with unique housing needs. <i>Gaps/Needs Addressed:</i> 		M	M	The City has begun the work necessary to implement the action through partnerships with low-income housing providers and work through the Regional Housing Council.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.

Strategy 5: Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
5.d. Establish a rental registration program to improve access to data and share information with landlords. Gaps/Needs Addressed: 		H	L	The City has begun the work necessary to implement the action, but it is not yet fully implemented as part of Rental Housing Amendments. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 9) <i>Enact policies to protect tenants experiencing housing instability</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this action. This may be best considered as a regional action. A rental registration program will give the City a way to educate landlords about issues.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.
5.e. Partner with a public or private developer to build a townhouse or row house demonstration project. Gaps/Needs Addressed: 		H	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.

Strategy 5: Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
5.f. Track data on affordable housing at the regional level. <i>Gaps/Needs Addressed:</i> 		L	L	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> • Funding through the City Council’s biennial budgeting process. • Time for staff to develop and run such a program.

Strategy 6: Establish a Permanent Source of Funding for Low-Income Housing.

The actions address the need to increase funding for low-income housing and to provide a regional strategy for distributing funds.

Why is this important?

While the private sector will build most of the housing needed to meet demand in the Cities of Lacey, Olympia, and Tumwater, a significant portion of households earn less than 80 percent of the median area income. Paying market rate rents or mortgages may not be affordable for them (Table 7).

Table 7. Maximum rent and housing costs at various income levels, 2020.

HUD Income Limit* for a:	Yearly Income	Hourly Wage (Full Time)**	Monthly Rent or Mortgage Payment
<i>2-Person Family</i>			
Extremely Low Income (30%)	\$20,800	\$10.00	\$500
Very Low Income (50%)	\$34,700	\$16.70	\$900
Low Income (80%)	\$55,500	\$26.70	\$1,400
<i>4-Person Family</i>			
Extremely Low Income (30%)	\$26,200	\$12.60	\$700
Very Low Income (50%)	\$43,350	\$20.80	\$1,100
Low Income (80%)	\$69,350	\$33.30	\$1,700

NOTE: *For 2020, HUD income limits are based on a median family income of \$86,700 for Thurston County. Assumes 3.5 percent fixed interest rate over a 30-year mortgage. Costs do not account for other housing-related expenses such as utilities, property taxes, and insurance.

**Assumes one household member works full time at 40 hours per week.

Source: Thurston Regional Planning Council

Whether you are a nonprofit or a for-profit developer, there are real costs to consider in making a development project feasible. Table 8 provides an example of the monthly costs associated with developing a 100-unit apartment complex. This example is intended to give readers an idea of the costs associated with multifamily development; actual numbers for a real project will vary based on variety of factors.

Overall, each apartment unit costs \$250,000 to develop and includes acquiring land, engineering and architectural fees, environmental review, appraisals, city fees, construction costs, etc. Most developers do not have the cash to develop a project without financing. Some may not have funds for even a down payment to qualify for the development loan. Developers must also consider the ongoing costs once the development is up and running, costs for managing the property, taxes, and insurance, reserving funds for basic and more extensive repairs, etc. Monthly costs per unit could be \$1,695 just to cover the

financing and ongoing operating costs; this does not take into account any profit, just the cost to break even on the project and ensure the developer does not lose any money.

If a non-profit developer has the down payment covered through grant funding (about 25 percent of the total project cost), the cost can be reduced to \$1,395 per month. If the non-profit developer were able to obtain grant funding for the total cost of development, the developer would still need about \$500 per unit per month to cover maintenance and operation costs. For households with extremely low incomes, those making less than \$21,000 per year, this is a hard ask.

Table 8. Example of monthly costs associated with developing an apartment complex.

	Per Unit Cost – Not Grant Funded	Per Unit Cost – 25% Grant Funded	Per Unit Cost – 100% Grant Funded
Total Cost of Development <i>Covers the total cost of development including land acquisition, engineering and architectural fees, environmental reports, appraisals, city fees, construction, etc.</i>	\$250,000	\$250,000	\$250,000
Monthly Cost for Down Payment Financing <i>approximately 25% of overall development cost. Assumes 5.8% return on investment.</i>	\$300	\$0	\$0
Monthly Cost for Loan Payment <i>approximately 75% of overall development cost. Assumes 4% interest rate.</i>	\$895	\$895	\$0
Monthly Cost for Ongoing Operating Costs and Reserves* <i>Covers property taxes and insurance; utilities; landscaping and general maintenance; basic repairs; property management; and maintenance reserves for painting, new roofs, appliance replacements, etc.</i>	\$500	\$500	\$500
TOTAL Cost per month over 30-year loan term	\$1,695	\$1,395	\$500

*Per the Housing Authority of Thurston County, \$500 per unit is likely a modest amount for well-maintained properties

Note: This example is intended to give readers an idea of the costs associated with development; actual numbers for real project will vary.

Source: Housing Authority of Thurston County

How do these actions reduce housing costs?





Providing affordable housing for the lowest income households and those experiencing homelessness requires significant resources; right now, those resources are scarce, leaving many households unable to afford a decent and affordable place to live that does not have unsafe or unhealthy living conditions. Many of the actions identified in this plan will not be possible without more funding. The Cities of Lacey, Olympia, and Tumwater can play a significant role in leveraging local, state, and federal dollars for low-income housing. The City also recognizes the need to collaborate regionally on a funding strategy so that funds are used efficiently and distributed to the areas of greatest need. With more funding, housing units become more affordable for households, when costs for developing and maintaining units are reduced.

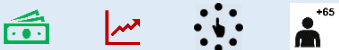

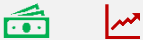

While the City has some capacity to increase funding, Chapter 4 recognizes the need for action at the state and federal level to increase funding for affordable housing.

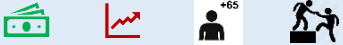

How do these actions address equity?

People of color are disproportionately low-income, at risk of experiencing homelessness, or homeless. However, many of the actions in this plan to address these issues will be impossible to implement without additional funding.

Table 9. Strategy 6: Establish a permanent source of funding for low-income housing.

Strategy 6: Establish a permanent source of funding for low-income housing.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
6.a. Develop a comprehensive funding strategy for affordable housing that addresses both the sources of funding and how the funds should be spent. <i>Gaps/Needs Addressed:</i> 		H	H	The City has begun the work necessary to implement the action, but work is needed through the Regional Housing Council and other regional forums to determine overall allocation goals for shelters, transitional and permanent low income housing. Otherwise, we will continue to spend most of our money on shelters and never build any affordable units. Continue to provide funding for shelters and transitional housing through non-profits.	<ul style="list-style-type: none"> Funding through the City Council’s biennial budgeting process. Time for staff to develop and run such a program. 	
6.b. Establish an affordable housing property tax levy to finance affordable housing for very low-income households. <i>Gaps/Needs Addressed:</i> 		H	H	The City will consider the work necessary to implement the action, but the work has not been scheduled. The City would need to survey taxpayers and our large property tax generators first. Push to early in schedule.	<ul style="list-style-type: none"> Funding through the City Council’s biennial budgeting process. Time for staff to develop and run such a program. Requires public vote. 	

Strategy 6: Establish a permanent source of funding for low-income housing.		Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
Action						
6.c.	Establish an affordable housing sales tax. <i>Gaps/Needs Addressed:</i> 		H	H	The City will consider the work necessary to implement the action, but the work has not been scheduled. The City would need to survey taxpayers and our big sales tax generators first. Push to early in schedule.	<ul style="list-style-type: none"> Funding through the City Council’s biennial budgeting process. Time for staff to develop and run such a program. Requires councilmatic or commissionmatic action.
6.d.	Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit. <i>Gaps/Needs Addressed:</i> 		H	M	The City will consider the work necessary to implement the action, but the work has not been scheduled. We would need to do more research on what this involved or how to do it other than what we already do via latecomer agreements.	<ul style="list-style-type: none"> Funding through the City Council’s biennial budgeting process. Time for staff to develop and run such a program.

Strategy 6: Establish a permanent source of funding for low-income housing. Action	Implementation Status	Effort to Implement	Effect on Housing Supply	Comment	City Resources Needed
6.e. Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives. <i>Gaps/Needs Addressed:</i> 		L	M	The City will consider the work necessary to implement the action, but the work has not been scheduled.	<ul style="list-style-type: none"> Time for staff to develop and run such a program.

Chapter 4.

Legislative Needs

The Housing Action Plan identified a number of barriers to affordable housing that need to be addressed at the state or federal level. Cities that are Tumwater's size are not the best suited to leverage sufficient funding to meet the needs identified in this plan. They need state and federal government relief to fill the gap. Loss of funding at either the state or federal level can have severe impacts at the local level. A joint legislative agenda developed by the Cities of Lacey, Olympia, and Tumwater will be necessary to address these issues.

Many of the actions in this plan require funding, especially actions to create affordable housing for the lowest income households and people moving out of emergency and temporary housing situations. Therefore, an important part of this legislative agenda is the need for funding for the construction and maintenance of low-income housing and permanent supportive housing.

State Legislative Agenda

- Increase funding for low-income housing construction.
- Increase funding for permanent supportive housing for those recently experiencing homelessness and moving out of emergency/transitional housing.
- Increase funding for renovating low-income housing to address accessibility upgrades, energy efficiency retrofits, and indoor health (e.g. lead and mold).
- Reform Washington's condominium liability laws.
- Amend the Manufactured/Mobile Home Landlord-Tenant Act, such as in [HB 2610](#), to provide protections for tenants in the event of a sale.
- Allow tax increment financing.
- Require a portion of the Washington State Housing Trust Fund to be used for affordable homeownership projects.
- Update the multifamily tax exemption program to include projects that support homeownership opportunities.
- Encourage local manufacturing of construction products
- Review how state law regulates homeowner associations about affordable housing issues, such as whether accessory dwelling units are allowed in covenants.

Federal Legislative Agenda

- Reduce tariffs that raise housing construction costs, making it more expensive to build housing.

Example: the cost of softwoods (heavily used in construction) from Canada are up by about 25 percent.

- Increase federal Housing and Urban Development (HUD) funding for affordable housing, including housing vouchers and funding for the Community Development Block Grant (CDBG) program, the Self-Help Homeownership Opportunity Program (SHOP), and the Home Investment Partnerships Program (HOME).
- Increase funding for down payment assistance. This could include providing tax credits for first-time homebuyers with low-income, targeted down payment assistance for disadvantaged populations and communities of color, and increased funding for homeownership savings programs like Assets for Independence and the Family Self-Sufficiency initiative.
- Support the Neighborhood Homes Improvement Act tax credit, which would make it economically feasible to rehabilitate distressed homes for homeownership and expand affordable homeownership opportunities for local residents.

Appendix A.

Action Details

This appendix includes a fuller description of what each action included in this plan entails. Where appropriate, the appendix includes applicable information on what the City of Tumwater can do or has done as well as resources with more information. The actions are grouped into their strategy categories:

1. Increase the supply of permanently affordable housing for households that make 80 percent or less of the area median income.
2. Make it easier for households to access housing and stay housed.
3. Expand the overall housing supply by making it easier to build all types of housing projects.
4. Increase the variety of housing choices.
5. Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.
6. Establish a permanent source of funding for low-income housing.

Strategy 1: Increase the supply of permanent, income-restricts affordable housing.

1.a. Donate or lease surplus or underutilized jurisdiction-owned land to developers that provide low-income housing and establish a process for accepting or coordinating the acceptance of land donations from others this action.

In areas with high land costs, acquiring suitable land can add significant expense to an affordable housing project. Public lands can be donated or leased to affordable housing developers, thereby reducing the cost of development. In this case, affordable housing means housing for households with incomes 80 percent or less of the area median income.

When a jurisdiction does not own land appropriate for housing development, purchasing such land may be an appropriate measure. The land can then be donated or leased to developers that provide low-income housing.

For more information on donating public lands, see [RCW 39.33.015](#).

1.b. Where a Planned Unit Development is used for residential development, require a portion of the housing be low-income housing.

Planned Unit Developments are intended to provide a developer flexibility when designing very large subdivisions. Generally, flexibility is provided in terms of lot size and housing types. Requiring low-income housing as part of low-density Planned Unit Developments can introduce a greater variety of housing of low-density housing types (duplexes, small apartment buildings, cottage housing, etc.) into a new neighborhood and ensure the neighborhood is affordable for a wider range of households. This

may also encourage the private sector to partner with non-profits such as Habitat for Humanity to develop detached single-family homes for low-income households.

Low-density developments are more likely to consist only of detached single-family homes. Requiring Planned Unit Developments for low-density development can encourage more housing types in such developments. Requiring low-income housing in Planned Unit Developments proposals is a type of inclusionary zoning (income-restricted affordable housing must be included as part of new developments).

1.c. Adopt a “Notice of Intent to Sell” ordinance for multifamily developments.

Requiring notice to the city, housing officials, and tenants when the owner of a multifamily development intends to sell gives the city the opportunity to preserve low-income units for the same purpose and tenants ample additional time to prepare for a potential move. Not every multifamily development is appropriate for purchase to preserve affordability, but the notice allows jurisdiction staff the time to consider it. The City may consider developing a list of criteria to determine the types of multifamily developments they want to preserve, including units currently required to be dedicated for use by low-income households, but which may be converted to market-rate units in the future.

Resources

- National Housing Preservation Database. Provides information on developments that have received housing subsidies. As of December 2020, more than 3,000 multifamily units (two or more units in a building) in Thurston County have active subsidies.

1.d. Provide funding for the Housing Authority of Thurston County and other non-profit organizations to buy income-restricted units proposed to be converted to market rate housing.

Income-restricted housing units developed or rehabilitated with federal money may in the future be converted to market-rate units. Partnering with HATC and other nonprofit organizations to purchase such units can help preserve housing options for low-income households.

1.e. As part of comprehensive plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.

Changes to comprehensive plans and development codes should include an evaluation of how they would affect the amount of housing, the types of housing allowed, and the cost to permit, construct, and renovate housing. Evaluating the potential for displacement when affordable units are likely to be lost to redevelopment (such as a mobile home park that is redeveloped) is also appropriate. Particular attention should be given to areas of need identified in the Housing Needs Assessment, including low-income and permanent supportive housing, housing for seniors, and improving and retrofitting existing low-income housing.

1.f. Provide funding for low-income and special needs residents to purchase housing through community land trusts.

Community land trusts provide permanently affordable housing opportunities by holding land on behalf of a place-based community. As non-profit organizations, housing land trusts help to make

homeownership both possible and affordable for low-income households. Locally, the Thurston Housing Land Trust serves all of Thurston County.

1.g. Offer and/or expand fee waivers for low-income housing developments.

Impact fees, utility connection fees, project review fees, and other fees increase the cost of housing construction. Reducing or waiving fees for low-income housing developments reduces their development costs and acknowledges that providing low-income housing has a positive impact on a community by:

- Ensuring vulnerable households can afford a home.
- Preventing individuals and families from becoming homeless.
- Reducing the cost of providing social services for households in crisis.

The costs for such offsets must be made up elsewhere. According to the Washington State Department of Commerce, reducing or waiving impact fees are most effective when paired with other housing affordability incentives.

See also Action 3.b.

For more information on fee waivers for low-income housing, see:

- [RCW 82.02.060](#) for exempting impact fees for low-income housing.
- [RCW 35.92.380](#) and [RCW 35.92.020](#) for waiving utility connection and other utility fees for low-income persons.
- [RCW 36.70A.540](#) for waiving or exempting fees for affordable housing.

1.h. Encourage low-income housing units as part of new developments.

Future Thurston County households will have a range of incomes, and a portion of residential development will need to be affordable to low-income households. Encouraging low-income housing units, whether for rent or ownership, helps to ensure such units will be built as part of development. Consideration should be given to the number of low-income units required, how they are integrated with market-rate units, and whether thresholds should be enacted that exempt smaller developments from this requirement. This policy is best implemented in coordination with low-income housing providers. Once housing market has further evolved, consider making this a requirement of new developments. If implemented now, there is a concern that it would discourage residential development.

1.i. Fund development projects that increase low-income housing through grants or loans.

The City can provide funding directly to low-income and permanent supportive housing providers through grants or loans. This recognizes the need for public funding to build low-income housing beyond what market-driven incentives can provide. This action can be best implemented for projects located close to transit and with good access to organizations and agencies that serve low-income households.

1.j. Establish a program to preserve and maintain healthy and viable manufactured home parks.

Manufactured home parks can be prime locations for higher density redevelopment in communities with strong demand for new housing. However, they also serve as one of the most affordable housing options for households in the region. A program that seeks to preserve and maintain healthy and viable manufactured home parks may consider ways to assist:

- Unit owners to purchase the park outright.
- Unit owners to maintain and repair individual manufactured homes.
- Unit owners with funding to replace units that would be better replaced than repaired.
- Unit owners with funding for relocation when a park cannot be preserved.
- Park owners with making service and utility upgrades.
- Park owners with converting from septic to sewer service.

1.k. Enhance enforcement of property maintenance codes to keep housing in good repair.

Property maintenance codes are intended to ensure the health, safety, and welfare of the public is adequately protected. Improved enforcement can help ensure pest infestations, lack of sanitary conditions, presence of mold, and structural issues are addressed in a timely fashion, thereby protecting homeowners, tenants, and the public at large. Enforcing adopted property maintenance codes is difficult due to the time, staffing, and funding needed to identify and address issues as they arise.

This strategy could have a negative impact on low-income households if resources are not also made available to such households (or their landlords) to make required repairs.

1.l. Partner with low-income housing developers (such as Habitat for Humanity) to expand homeownership opportunities.

Affordable homeownership opportunities allow low-income households to build wealth. Local jurisdictions can go beyond their own capabilities to encourage affordable homeownership opportunities by partnering with local housing groups and non-profit developers. This may include providing funding, gifting publicly owned property, supporting grant applications, assisting property owners, and other programs that increase affordable homeownership opportunities. See also Action 1.a.

1.m. Extend public water and sewer to unserved areas to allow infill development in underdeveloped areas.

The Comprehensive Plan describes where the City expects, and is trying to direct, growth over the next twenty years. The private sector has traditionally done utility extension and upgrades as areas grow. For infill development, the City could invest to promote development in areas where new housing is desired, but upgrades to infrastructure, such as utilities and sidewalks, would be needed to support it.

Advantages:

- City could direct improvements where it would like to see development

- Attract private development with public investments - public/private partnerships

Disadvantages:

- Administrative requirements
- Need to refocus Capital Facilities Plan development processes
- Changes existing City investment priorities

Strategy 2: Make It Easier for Households to Access Housing and Stay Housed.

2.a. Provide tenants displaced by redevelopment with relocation assistance.

Displacement can happen for a variety of reasons through no fault of the tenant. As redevelopment becomes a more attractive option than keeping a development as is, households, especially low-income households, can be displaced. Moving costs money, and low-income households may not have the funds available for making a required move. State law authorizes local governments to adopt an ordinance requiring developers to provide displaced tenants with relocation assistance to households that have an income of 50 percent or less of the area median income. Cities and counties can also dedicate public funds or use a combination of public and private funds for relocation assistance. When public action results in tenant displacement, relocation assistance is required.

For more information on relocation assistance, see RCW 59.18.440 (developer action) and RCW 8.26 (public action).

2.b. Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training.

According to a 2019 housing memorandum prepared by PNW Economics, LLC and LDC, Inc. for the Washington State Department of Commerce, the majority of general contracting firms struggle to find skilled tradespeople (Issues Affecting Housing Availability and Affordability, p. 71.) Trade schools, apprenticeship programs, and other professionals that provide repair, retrofit, and renovation services to homeowners can scale up training with the help of homeowners who are in need of services at reduced rates.

This action may require additional assistance to the household to accomplish.

2.c. Adopt short-term rental regulations to minimize impacts on long-term housing availability.

When a property owner rents out an entire living unit on a short-term basis, generally a period less than 30 days, that housing unit cannot be used for the community's long-term housing needs. Regulating short-term rentals can reduce negative impacts to the housing market as well as the neighborhood where the short-term unit is located. While this action is most effective in communities that attract a robust tourism base, establishing regulations/registration for this use ensures the city can track the impact short-term rentals have on long-term rentals.

2.d. Support down payment assistance programs for homeownership and programs that assist people entering the rental market.

Washington State has a number of programs that provide down payment assistance to first time and low-income homebuyers. Establishing a down payment assistance program at the local level can assist more households in the Thurston County community towards the goal of homeownership. Down payment assistance typically takes the form of a low- or no-interest loan to the homebuyer, which can be paid back as part of the mortgage or at the time the mortgage is paid off, the home is sold/transferred to a new owner, or the property is refinanced.

For more information on state down payment assistance programs, see the Washington State Housing Finance Commission.

The City would like to expand this to include supporting programs that assist people in entering the rental market.

2.e. Identify and implement appropriate tenant protections that improve household stability.

Tenant protections help avoid or slow the process of displacement for households by preserving housing units, a household's tenancy, or access to information and assistance. Examples of tenant protections include but are not limited to the following:

- Adopting a just cause eviction ordinance that requires landlords to provide tenants with a legally justifiable reason for the eviction.
- Adopting a preservation ordinance, requiring developers to replace affordable housing units demolished as part of redevelopment.
- Adopting an eviction mitigation ordinance to find ways to end a rental agreement mutually rather than evicting tenants.
- Adopting an opportunity to purchase policy that better involves tenants in the decision-making process when a dwelling unit is to be sold.
- Developing a program to incentivize landlords to accept tenants with poor credit or criminal history.
- Improving enforcement of landlord/tenant laws.
- Increasing a tenant's access to legal assistance for landlord/tenant issues.
- Limiting or regulating fees associated with rental housing applications.
- Requiring landlords to establish payment plans for tenants that get behind on rent.

Each tenant protection has positive and negative aspects that should be reviewed and considered before implementing, and both tenants and landlords should be involved in the review process. For more information on protections offered by the Residential Landlord Tenant Act, see [Chapter 59.18 RCW](#).

2.f. Develop a technical assistance or education program for small landlords.

As shown by the Landlord Survey, a large number of the rental properties in the City are owned and operated by small landlords. To maintain this local ownership and maintain these properties, a technical assistance or education program would be useful for training such landlords in basic maintenance activities and help them to know where to look for support if needed.

2.g. Assist non-profits in the process of acquiring mobile home parks to turn them into public trusts so that lot rental fees can be controlled.

This action would support of Resolution No. R2018-016 Housing Affordability Action #6, “Assess actions for assuring mobile home parks continue to provide affordable housing toward a goal of property ownership by residents.” This action would help preserve a large source of existing affordable housing in the future and help to protect residents from dramatic shifts in lot rental fees.

2.h. Fund an energy assistance program for rental housing/make landlords do upgrades when the unit is sold.

This action would support actions in the Thurston Climate Mitigation Plan to reduce energy use in older housing, and support local landlords maintaining their properties without passing the costs to their tenants.

Strategy 3: Expand the Overall Housing Supply by Making It Easier to Build All Types of Housing Projects.

3.a. Lower transportation impact fees for multifamily developments near frequent transit service routes.

Transportation impact fees are one-time charges assessed by a local government against a new development project to help pay for establishing new or improving existing public streets and roads. The streets and roads must be included in a community’s Comprehensive Plan. The fee must directly address the increased demand on that road created by the development. For multifamily developments near frequent transit service routes, the idea is that many residents and visitors are able to utilize the public transit system, thereby reducing the impact of the development on public streets and roads.

January 2021 Transportation Impact Fees (rounded to the nearest dollar)

- **Lacey:** \$610-\$3,989 per dwelling unit. Varies according to unit type with detached single-family dwellings having the highest fees.
- **Olympia:** \$728-\$3,219 per dwelling unit. Varies according to unit type with detached single-family dwellings having the highest fees.
- **Tumwater:** \$497-\$3,919 per dwelling unit. Varies according to unit type with detached single-family dwellings having the highest fees. Assisted living facilities have a fee of \$439 per bed.

3.b. Allow deferral of impact fee payments for desired unit types.

New development affects existing municipal and community investments, and impact fees are a way to ensure new development pays their fair share. Impact fees may be delayed, but they must be paid before the impact is realized. Delaying payment of such fees allows a developer building desired unit types to spread the costs of a development over a longer period. State law already requires the City to establish a system for deferring impact fee payments for small, single-family residential developments. This action would expand the deferral program to developments with desired unit types.

Desired unit types depend on the neighborhood or policy context and could include defining the type of building (courtyard apartment or manufactured home, for example), the need for income-restricted units, units of a certain size, or units containing a certain number of bedrooms.

See also Action 1.g.

3.c. Maximize use of SEPA threshold exemptions for residential and infill development.

The State Environmental Policy Act (SEPA) review process is intended to ensure government actions have fully taken into consideration the environment before a decision is made. Actions that will likely result in an adverse impact on the environment must go through a more rigorous review (an environmental impact statement or EIS). Some projects are exempt from the SEPA review process because their impact on the environment is generally considered minimal and not adverse, but developments must still meet environmental standards. Single-family and multifamily developments with four or fewer units are automatically exempt from review under SEPA, and state law allows cities to adopt exemptions that are more flexible. The Cities of Lacey, Olympia, and Tumwater may exempt single-family developments with up to 30 units and multifamily developments with up to 60 units from SEPA review.

Table 10. Adopted SEPA Exemptions as of January 2021.

Exemptions	Development Type	
	Single-Family	Multifamily
Allowed per SEPA	30 units	60 units
Lacey	4 units	60 units
Olympia	9 units	No exemption
Tumwater	9 units	60 units

Infill Exemptions

In order to accommodate infill development, the Cities of Lacey, Olympia, and Tumwater may adopt SEPA exemptions for infill development to help fill in urban growth areas.

To qualify for the infill exemption:

- An EIS must already be issued for the comprehensive plan or the city must prepare an EIS that considers the proposal’s use or density/intensity in the exempted area.
- The density of the area to be infilled must be roughly equal to or lower than what the adopted comprehensive plan calls for.
- The development must be residential, mixed-use, or non-retail commercial development. Commercial development that exceeds 65,000 square feet does not qualify for the exemption.
- Impacts to the environment from the proposed development must be adequately addressed by existing regulations.

If a city takes action to adopt an infill exemption before April 1, 2023, the city's action cannot be appealed through SEPA or the courts.

Planned Actions

Up front review and analysis of impacts to the environment can help streamline the process for developments. Individual developments projects associated with an adopted plan (subarea plan or master planned development, for example) can be exempted from further SEPA review when a threshold determination or EIS has been issued for the adopted plan. The threshold determination or EIS for the adopted plan must detail the project-level impacts of the proposed development, thereby forgoing the need for review when the specific project applies for permitting. The City did a planned action for the historic brewery complex part of the former brewery property.

For more information, see:

- RCW 43.21C.229 (infill exemptions).
- RCW 43.21C.440 (planned actions).

3.d. Continue to look for place-making opportunities along urban corridors.

In support of actions identified in the Sustainable Thurston Plan and the Thurston Climate Mitigation Plan, this action would help incentivize new residential developments in areas of the City, such as the Brewery District and the Capitol Boulevard Communities where redevelopment is encouraged to meet land use and economic goals and provide more residential development opportunities.

3.e. Mix market rate and low-income housing to avoid creating areas of concentrated low-income housing.

The action would ensure that not only market rate and low-income housing is created in the City, but residents of both would be able to intermix and create more opportunities for all economic classes.

Strategy 4: Increase the Variety of Housing Choices.

4.a. Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.

A form-based code uses the physical form and design of the public realm (building façade and streetscape) as the framework for regulation rather than the need to separate uses. Because of this, form-based codes are most useful in mixed-use zones where the widest variety of uses are already allowed and encouraged. Form-based codes are also useful when the goal is to protect an existing neighborhood character or where developing a cohesive character is desired.

4.b. Strategically allow live/work units in nonresidential zones.

A live/work unit is a single dwelling unit consisting of both a commercial/office space and a residential component that is occupied by the same resident who has the unit as their primary dwelling. The intent is to provide both affordable living and business space for a resident/business owner. The configuration of the live/work unit can vary:

- Live-within. The workplace and living space completely overlap.

- Live-above. The workplace is below the living space with complete separation between the two.
- Live-behind. The workplace is in front of the living space with complete separation between the two possible.
- Live-in-front. The workplace is behind the living space (typically a single-family dwelling) with some overlap between the two possible.

Although home occupations are a type of live/work unit, the emphasis here is on a more intensive nonresidential component (size, traffic generation, employees on site, etc.) that may not be appropriate to classify as a home occupation. Live/work units may also be appropriate in residential zones. In either case, cities will need to conduct additional analysis to determine the locations and types of uses appropriate for live/work units.

Strategy 5: Continually Build on Resources, Collaboration, and Public Understanding to Improve Implementation of Housing Strategies.

5.a. Conduct education and outreach around city programs that support affordable housing.

Providing the public and developers information about affordable housing programs can help households in need find assistance and developers identify resources for building desired unit types. Desired unit types depend on the neighborhood or policy context and could include defining the type of building (triplex or single-room occupancy building, for example), the need for income-restricted units, units of a certain size, or units containing a certain number of bedrooms. Education and outreach can also invite community dialogue on the need for diverse housing options in the community.

5.b. Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.

Housing issues are complex, and so are the resources available to households and landlords. When problems arise or a party needs to find information, having a designated resource to navigate issues and identify resources (development funding, tax assistance, housing opportunities, legal aid, weatherization programs, etc.) gives people more tools to reach their goals.

5.c. Identify and develop partnerships with organizations that provide or support low-income, workforce, and senior housing as well as other populations with unique housing needs.

Both for-profit and non-profit agencies provide or support low-income, workforce, and senior households. They often have expertise to deliver programs and housing the Cities of Lacey, Olympia, and Tumwater do not have as well as access to funding streams unavailable to the cities. Identifying shared vision and goals can help each organization to leverage funding and improve household access to assistance.

5.d. Establish a rental registration program to improve access to data and share information with landlords.

Understanding how many dwelling units are being rented, the types of units being rented, and the cost of rent is important information needed to understand the impacts on landlords and tenants of many of the actions in this plan. It also provides the Cities of Lacey, Olympia, and Tumwater with an easy way to

reach out to landlords and tenants, who are both important stakeholders when enacting many of the actions in this plan. This action is particularly suited to being implemented at the regional level and may be appropriate for the cities to develop through the Regional Housing Council. Doing so would ensure the same data is collected across the jurisdictions effectively and economically.

5.e. Partner with a public or private developer to build a townhouse or a row house demonstration project.

The action would encourage townhouse or row house development in the City.

5.f. Track data on affordable housing at the regional level.

In order to understand if the actions in this Plan are working, regional housing data needs to be collected annually. The Regional Housing Needs Assessment and Housing Gap Analysis were valuable tools in the development of this Plan and maintaining an annual collection of data would be very useful.

Strategy 6: Establish a Permanent Source of Funding for Low-Income Housing.

6.a. Develop a comprehensive funding strategy for affordable housing that addresses both the sources of funding and how the funds should be spent.

Without a comprehensive funding strategy, it will be difficult to ensure dollars earmarked for developing affordable housing in the community are used to their full effect and meet the greatest need. A comprehensive funding strategy takes into consideration how the funds can be used, whether they can be leveraged to obtain other funding (grants, loans, etc.), and the types of projects the funding can support. This action is particularly suited to being implemented at the regional level and may be appropriate for the cities to develop through the Regional Housing Council.

6.b. Establish an affordable housing property tax levy to finance affordable housing for very low-income households.

The Cities of Lacey, Olympia, and Tumwater may impose a property tax levy up to \$0.50 per \$1,000 of a property's assessed value to fund affordable housing. The levy must be used for low-income households.

The levy, which lasts for up to 10 years, can only be enacted if:

- The city declares an emergency exists concerning the availability of affordable housing for households served by the levy.
- A majority of voters approve it.
- The city adopts a financial plan for spending the money.

If a property tax levy were enacted at the maximum rate of \$0.50 per \$1,000 of assessed value, homeowners can expect their property taxes to go up. This amounts to \$175 per year for a home valued at \$350,000 (Table 11). Households that rent can expect their monthly rent to increase on average between \$6.71 and \$11.91 each month, depending on the type of unit rented.

Table 11. Additional costs to households with a \$0.50 per \$1,000 property tax levy.

Owner-Occupied*		Renter-Occupied	
Assessed Value	Additional Property Taxes (annual)	Building Size	Additional Monthly Rent (average) per unit
\$350,000	\$175	Single-Family Dwelling	\$11.91
\$450,000	\$225	Duplex, Triplex, and Fourplex units	\$9.04
\$550,000	\$275	5+ Unit Apartments	\$6.71

Note: Rates for owners only apply to detached single-family homes. Costs, which are rounded, are based on the 2017 total assessed value of all taxable non-exempt properties and are adjusted for inflation to 2020 dollars.

Source: Thurston County Assessor.

Thurston County also has the ability to establish a property tax levy. If both cities and Thurston County impose the levy, the last jurisdiction to receive voter approval for the levies must be reduced or eliminated so that the combined rate does not exceed the \$0.50 per \$1,000 of assessed property value.

If the Cities of Lacey, Olympia, and Tumwater each enact the levy, nearly \$9.7 million could be collected for affordable housing in 2021 (Table 12). If the tax levy were adopted countywide, more than \$30 million would be available to serve low-income households in 2021. This includes developing new housing, enabling affordable homeownership, and making home repairs.

Table 12. Potential affordable housing funding from maximum property tax levy.

Jurisdiction	2020 Assessed Property Values	Potential Affordable Housing Funds
Lacey	\$7.4 billion	\$3.7 million
Olympia	\$8.2 billion	\$4.1 million
Tumwater	\$3.9 billion	\$1.9 million
TOTAL (cities only)	\$19.5 billion	\$9.7 million
TOTAL (Countywide)	\$31.5 billion	\$31.5 million

Note: Values, which are rounded, are based on the 2020 total assessed value of taxable non-exempt properties. Potential affordable housing funds are based on the total assessment of all properties combined.

Source: Thurston County Assessor.

Property Tax Levies

- **Lacey:** has not established a property tax levy.

- **Olympia:** has not established a property tax levy.
- **Tumwater:** has not established a property tax levy.
- **Thurston County:** has not established a property tax levy.

For more information, see [RCW 84.52.105](#).

6.c. Establish an affordable housing sales tax.

Beginning in 2020, cities may establish a 0.1 percent affordable housing sales tax by legislative authority or by voter approval. At least 60 percent of the revenue must be used for one or more of the following:

- Constructing affordable housing (new construction or retrofitting an existing building).
- Constructing facilities providing housing-related services.
- Constructing mental and behavioral health-related facilities.
- Funding the operations and maintenance costs of the three projects above.

Thurston County can also establish the affordable housing sales tax. If it does so before the Cities of Lacey, Olympia, and Tumwater, the cities will not be able to establish their own funds. If the cities and Thurston County impose the sales tax, the County must provide a credit to the cities for the amount they would have collected. If the Cities of Lacey, Olympia, and Tumwater had been able to enact an affordable housing sales tax in 2019, nearly \$5 million would be available to serve low-income households (Table 13).

For more information, see [RCW 82.14.530](#).

Table 13. Potential affordable housing funding from maximum affordable housing sales tax in 2019.

Jurisdiction	2019 Taxable Retail Sales	Potential Affordable Housing Funds
Lacey	\$1.5 billion	\$1.5 million
Olympia	\$2.4 billion	\$2.4 million
Tumwater	\$0.9 billion	\$0.9 million
TOTAL (cities only)	\$4.8 billion	\$4.8 million
TOTAL (countywide)	\$6.2 billion	\$6.2 million

Note: Taxable retail sales are rounded.

Source: Washington State Department of Revenue, [Taxable Retail Sales](#).

Affordable Housing Sales Tax

- **Lacey:** has not established an affordable housing sales tax.

- **Olympia:** established an affordable housing sales tax in 2018, referred to as the “Home Fund.” Approximately 65 percent of funds are dedicated to construction projects and 35 percent to housing program operations. Must be re-authorized by voters in 2028.
- **Tumwater:** has not established a sales tax.
- **Thurston County:** has not established an affordable housing sales tax.

6.d. Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit.

Value capture is a type of public financing that recovers some or the entire value public infrastructure generates for private landowners. When roads are improved, water and sewer lines extended, or new parks or public amenities developed, property values tend to increase. Value capture is best planned for from the outset of a project and it can include developer contributions and special taxes and fees.

6.e. Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives.

The Housing Authority of Thurston County is the primary source of low-income housing in community. Being able to take greater advantage of all federal and state housing grants and incentives would help support the production of more affordable housing.

Appendix B.

Considered Actions

In developing this plan, many actions were considered, though not all were included. This appendix provides a full list of the actions considered in the plan’s development. Where appropriate, explanations for why an action was excluded are included. Actions were developed and refined over six months and the wording may not match previous versions.

Table 14. Actions considered but not included in the Housing Action Plan.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Included (1.a)	Donate or lease surplus or underutilized jurisdiction-owned land to developers that provide low-income housing.	Not excluded, included.
Excluded	Create shovel-ready housing developments that can be handed off to a developer to construct.	Action is out of scale with what our region can reasonably accomplish. Cities do not have the budgets or expertise to perform this action.
Excluded	Purchase property with the intent to donate or lease to developers that provide income-restricted affordable housing.	Combined with Action 1.a.
Implemented	Offer developers density and/or height incentives for desired unit types.	Not excluded, implemented.
Included (1.b)	Where a Planned Unit Development is used for residential development, require a portion of the housing be low-income housing.	Not excluded, included.
Excluded	Make regulations and permit processing more predictable, to remove some uncertainty for both builders and lenders.	Action not specific enough. Other actions more specifically address the need to improve predictability of regulations and permit processing.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Excluded	Allow third-party review and approval of development projects (anytime OR when cities are backlogged).	Note included for implementation by the City, as there are concerns about the partiality of third-party reviewers. The City would rather intergovernmental agreement where we can share development review staff when things slowdown in one jurisdiction.
Excluded	Allow third-party review of building permits for development projects.	Note included for implementation by the City, as there are concerns about the partiality of third-party reviewers. The City would rather intergovernmental agreement where we can share development review staff when things slowdown in one jurisdiction.
Excluded	Adopt a single development code for The Cities of Lacey, Olympia, Tumwater, and their urban growth areas to make regulations and permit processing more predictable.	Each community has a different identity with a desire for different standards.
Excluded	Waive reviews for energy code compliance when a project receives a green building certification.	It does not appear that a green building certification actually makes housing more affordable versus complying with energy code. In the right market conditions, may be an incentive to buy.
Excluded	Require shot clocks for permit processing.	State law already requires timelines for review, and the City is able to accomplish their reviews in a timely manner.
Included (1.c)	Adopt a “Notice of Intent to Sell” ordinance for multifamily developments.	Not excluded, included.
Included (1.d)	Provide funding for the Housing Authority of Thurston County and other non-profit organizations to income-restricted units proposed to be converted to market rate housing.	Not excluded, included.
Included (2.a)	Provide tenants displaced by redevelopment with relocation assistance.	Not excluded, included.
Implemented	With major comprehensive plan updates, confirm land is suitably zoned for development of all housing types.	Not excluded, implemented.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Excluded	On a regular basis, hold a series of community meetings to discuss how housing and zoning regulations affect equity goals.	See Action 5.a.
Implemented	Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, etc.).	Not excluded, implemented.
Excluded	Allow more housing types in commercial and industrial zones.	Creates inappropriate conflicts between uses.
Implemented	Allow more housing types in commercial zones.	Not excluded, implemented.
Included (4.a)	Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	Not excluded, included.
Excluded	Develop a plan for adapting vacant commercial space into housing.	Action not implemented by the City, as it may raise questions about a gift of public funds. Every property is unique. If there is a problem property, the City can focus resources on it. The City may want to consider a checklist of issues to address in such situations
Excluded	Expand allowance of residential tenant improvements without triggering land use requirements.	City had concerns about life and safety issues regarding this action and recommended that the action not be implemented.
Excluded	Prior to finalizing a draft for public review, vet comprehensive plans and development code changes with the development community to ensure desired housing types and locations are supported by market conditions.	See Action 1.e.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Included (1.e)	As part of comprehensive plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	Not excluded, included.
Implemented	Recognize modular/manufactured housing as a viable form of housing construction.	Not excluded, implemented.
Excluded	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.	This action is already implemented.
Implemented	Simplify requirements for accessory dwelling units (ex: title notification, owner living on site, etc.).	Not excluded, implemented.
Implemented	Allow accessory dwelling units in all residential zones.	Not excluded, implemented.
Excluded	Allow accessory dwelling units in commercial zones.	Not an issue that has ever been raised to staff; need to focus on actions that have real and lasting impacts.
Implemented	Reduce parking requirements for residential uses, including for multifamily developments near frequent transit routes.	Not excluded, implemented.
Implemented	Identify strategically placed but underdeveloped properties and determine what barriers exist to developing desired housing types.	Not excluded, implemented.
Implemented	Identify strategically placed properties where up zoning is appropriate.	Not excluded, implemented.
Implemented	Require minimum residential densities.	Not excluded.
Excluded	Increase minimum residential densities.	The City already has reasonable minimum residential densities.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Implemented	Reduce minimum lot sizes.	Not excluded, implemented.
Excluded	Support and plan for assisted housing opportunities using federal, state, or local aid.	Action not clear/specific enough
Excluded	Support diverse housing alternatives and ways for older adults and people with disabilities to remain in their homes and community, as their housing needs change.	Action not specific enough. Other actions more specifically address the need to support diverse housing alternatives for seniors.
Excluded	Retain existing subsidized housing.	None of the cities has subsidized units at this time, so it is not an action they would pursue. Other actions can support other entities in retaining existing subsidized housing.
Excluded	Encourage new housing on transportation arterials and in areas near public transportation hubs.	Action not specific enough. See Actions 3.a for actions that more specifically address the issue of housing near transportation facilities.
Included (3.a)	Lower transportation impact fees for multifamily developments near frequent transit service routes.	Not excluded, included.
Implemented	Reduce parking requirements for multifamily developments near frequent transit routes.	Not excluded, implemented.
Implemented	Allow group homes in all residential zones and commercial zones that allow residential uses.	Not excluded, implemented.
Excluded	Limit the density of group homes in residential areas to prevent concentration of such housing in any one area.	May create a hindrance to ensuring there are enough housing opportunities for seniors. There are nearly 150 adult family homes in Thurston County now; their concentration in any one area is not known to be an issue.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Implemented	Provide funding for renovating and maintaining existing housing that serves low-income households or residents with disabilities.	Not excluded, implemented.
Excluded	Support programs to improve energy efficiency, health conditions and public recognition of improvements in low-income rental housing	Statewide need - not just a local need.
Excluded	Fund programs that improve the energy efficiency and health conditions in low-income rental housing.	Statewide need - not just a local need.
Excluded	Encourage self-help housing efforts and promote programs in which people gain home equity in exchange for work performed in renovation or construction.	Action not specific enough. See Action 1.1.
Included (1.1)	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training.	Not excluded, included.
Excluded	Establish a manufactured home park zone to promote their preservation.	Already in place in the City.
Implemented	Rezone manufactured home parks to a manufactured home park zone to promote their preservation.	Not excluded, implemented.
Excluded	Allow manufactured home parks in multifamily and commercial areas.	The City has enacted Ordinance No. O2008-009, which established the Manufactured Home Park (MHP) zone district in the City as the means to address this action and manufactured home parks are an inefficient use of land in multifamily and commercial zone districts.
Included (1.f)	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	Not excluded, included.
Excluded	Fund programs that prevent homelessness for persons returning to the community from institutional or other sheltered settings (including foster care).	Action better suited to the Thurston County Homeless Response Plan.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Excluded	Fund self-sufficiency and transitional housing programs that help break the cycle of homelessness.	Deals with a temporary/emergency housing situation better addressed through the Regional Housing Council and other, more targeted efforts to address homelessness.
Excluded	Provide funding to the Regional Housing Council for temporary emergency housing programs.	Deals with a temporary/emergency housing situation better addressed through the Regional Housing Council and other, more targeted efforts to address homelessness.
Implemented	Adopt design standards that assist new forms or high-density housing and promote infill.	Not excluded, implemented.
Implemented	Allow single-room occupancy (SRO) housing in all multifamily zones.	Not excluded, implemented.
Included (4.b)	Strategically allow live/work units in nonresidential zones.	Not excluded, included.
Excluded	Promote Planned Unit Developments and cluster subdivisions.	See Action 1.b.
Implemented	Establish a multifamily tax exemption.	Not excluded, implemented.
Included (6.a)	Develop a comprehensive funding strategy for affordable housing that addresses both sources of funding and how the funds should be spent.	Not excluded, included.
Excluded	On a regular basis, evaluate the effectiveness of how the multifamily tax exemption is being used to further affordable housing goals.	Required by state law that an annual review be done for multifamily tax exemption projects.
Included (6.b)	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	Not excluded, included.
Included (6.c)	Establish an affordable housing sales tax.	Not excluded, included.
Implemented	Expand the multifamily tax exemption to make it available in all transit corridors.	Not excluded, implemented.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Implemented	Offer density bonuses for low-income housing.	Not excluded, implemented.
Excluded	Require developers to provide income-restricted units as part of low-density developments.	The Thurston Region does not have the market to implement this action. Requires a market evaluation before implementing.
Excluded	Require property owners to provide an affordable housing fee when building homes over a certain size.	The Thurston Region does not have the market to implement this action. Requires a market evaluation before implementing.
Excluded	Establish alternative development standards for affordable housing. (standards in the zoning code to support affordable housing)	Action not specific enough.
Excluded	Define income-restricted housing as a different use from other forms of housing in the zoning code.	The City considered this action as part of Ordinance No. O2020-005 Housing Affordability Text Amendments discussions, but determined that defining income-restricted housing as a different use in Title 18 Zoning created more potential complications and restrictions on the use.
Included (1.g)	Offer and/or expand fee waivers for low-income housing developments.	Not excluded, included.
Excluded	Expand fee waivers for affordable housing developments.	Combined w/ Action 1.g.
Included (3.b)	Allow deferral of impact fee payments for desired unit types.	Not excluded, included.
Included (1.h)	Require low-income housing units as part of new developments.	Not excluded, included.
Included (1.i)	Fund development projects that increase low-income housing through grants or loans.	Not excluded, included.
Excluded	Establish a regional housing trust fund to provide dedicated funding for affordable housing.	This should be what the Thurston Housing Authority does. The City should not create another entity.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Excluded	Establish a local housing trust fund to provide dedicated funding for low-income housing.	Coordination at the regional scale will have more of an impact than developing individual plans.
Excluded	Create partnerships with local housing groups to increase affordable housing options for seniors and other populations with unique needs.	Combined w/ Action 5.c.
Implemented	Make strategic investments in infrastructure expansion to reduce development costs.	Not excluded, implemented.
Excluded	Simplify land use designation maps in the comprehensive plan to help streamline the permitting process.	The City currently has six residential zone district and allows residential development in all other zone districts, except for industrial zone districts. This has not been raised as an issue by residential developers in the City.
Excluded	Inventory housing units dedicated for seniors, low-income households, and ADA-accessible units.	Data should support the actions that result in change.
Excluded	Inventory substandard housing units (units with poor energy efficiency, indoor air quality/mold issues, etc.).	Data should support the actions that result in change.
Included (5.d)	Establish a rental registration program to improve access to data and share information with landlords.	Not excluded, included.
Excluded	Require the owners of rental properties to obtain a business license.	Data should support the actions that result in change.
Excluded	On a regular basis, inventory rental housing.	Data should support the actions that result in change.
Excluded	Integrate or adjust floor area ratio standards.	The City uses floor area ratios in a very limited way for residential uses in the Capitol Boulevard Corridor – North Trosper District for mixed-use commercial and residential developments.
Implemented	Relax ground floor retail requirements to allow residential units.	Not excluded, implemented.
Implemented	Reduce setbacks and increase lot coverage/impervious area standards.	Not excluded, implemented.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Excluded	Maximize SEPA threshold exemptions for single-family and multifamily development proposals.	See Action 3.c.
Included (3.c)	Maximize use of SEPA threshold exemptions for residential and infill development.	Not excluded, included.
Excluded	Utilize SEPA exemptions to encourage infill development in urban growth areas	See Action 3.c.
Excluded	Create subarea plans with non-project environmental impact statements.	See Action 3.c.
Excluded	Develop SEPA-authorized "planned actions" to streamline permitting process in designated areas.	See Action 3.c.
Excluded	Consult with Washington State Department of Transportation as part of the SEPA review process to reduce appeals based on impacts to the transportation element for residential, multifamily, or mixed-use projects.	This has not been an issue for the City.
Implemented	Process short plat applications administratively.	Not excluded, implemented.
Excluded	Process preliminary long plat applications that meet specific requirements administratively.	Can implement this but if even one person requests a public hearing, a public hearing must be held. May not be worth implementing if a public hearing is always anticipated and it has different noticing requirements from the norm (administrative headaches).
Excluded	Market available housing incentives.	See Action 5.a.
Excluded	Establish a foreclosure intervention counseling program.	Already existing programs that fill this need.
Included (1.j)	Establish a program to preserve and maintain healthy and viable manufactured home parks.	Not excluded, included.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Excluded	Require developers to provide relocation assistance when a manufactured home park cannot be preserved.	No seen as an issue in the City.
Excluded	Help residents convert manufactured home parks into cooperatives.	See Action #63
Excluded	Adopt a just cause eviction ordinance.	See Action 2.e.
Excluded	Adopt a “right to return” policy for tenants if displaced by redevelopment.	Planning Commission and City Council decided that the action should not be implemented by the City, because this would involve the City too much in market decisions.
Included (2.c)	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	Not excluded, included.
Included (2.d)	Establish a down payment assistance program.	Not excluded, included.
Excluded	Establish a property tax assistance program for low-income homeowners.	This may not be in the cities’ purview.
Excluded	Establish a property tax assistance program for homeowners with disabilities.	This may not be in the cities’ purview.
Excluded	Require an impact analysis for new housing and land use proposals.	This action will lead to an increase in housing costs. Transportation impact analyses are already required where needed.
Excluded	Require subsidized housing be integrated with unsubsidized housing.	See Action 1.h.
Excluded	Develop and implement an education and outreach plan for affordable housing options	See Action 5.a.
Included (5.a)	Conduct education and outreach around city programs that support affordable housing.	Not excluded, included.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Included (5.b)	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	Not excluded, included.
Excluded	Review and, if necessary, update property maintenance codes (including standards for mold/moisture) to keep housing in good repair.	Enforcement of property maintenance codes is really the issue.
Included (1.k.)	Enhance enforcement of property maintenance codes to keep housing in good repair.	Not excluded, included.
Excluded	Co-locate emergency, transitional, and permanent affordable housing.	This is an action taken by the developer; may not be appropriate for the city to require.
Excluded	Working through the Regional Housing Council, identify appropriate locations for emergency housing within each jurisdiction.	This action deals with a temporary/emergency housing situation better addressed through the Regional Housing Council and other, more targeted efforts to address homelessness.
Included (5.c)	Identify and develop partnerships with organizations that provide or support for low-income, workforce, and senior housing as well as other populations with unique housing needs.	Not excluded, included.
Excluded	Look at options for creating workforce housing.	Action is not specific enough. Need to define what exactly should the cities be doing.
Implemented	Explore creating dormitory-style housing, similar to what colleges have, with common bathrooms and communal kitchens for transitional housing.	Not excluded, implemented.
Implemented	Identify underutilized properties ripe for redevelopment.	Not excluded, implemented.
Excluded	Review the recommendations in the Urban Corridors Task Force Report (TRPC, 2012).	Data should support the actions that result in change.
Excluded	Adopt a preservation ordinance.	Combined with Action 2.e.

Action Status (Plan Reference)	Action	Explanation for Exclusion
Included (1.1)	Partner with low-income housing developers (such as Habitat for Humanity) to expand homeownership opportunities.	Not excluded, included.
Excluded	Identify and remove code and fee impediments/disincentives to affordable housing.	Like equity, need to review all actions through an affordable housing lens. See Action 1.e.
Included (6.d)	Use value capture to generate and reinvest in neighborhoods experiencing increased private investment (with a focus on areas with planned or existing transit).	Not excluded, included.
Excluded	Limit or regulate fees associated with rental housing applications.	See Action 2.e.
Excluded	Require landlords to establish payment plans for tenants that get behind on rent.	See Action 2.e.
Excluded	Eviction mitigation to find mutual termination of rental agreement instead of evicting tenants.	See Action 2.e.
Excluded	Improve access to enforcement landlord/tenant laws (court enforcement is a barrier).	See Action 2.e.
Excluded	Increase access to legal assistance for landlord/tenant issues (free or sliding scale).	See Action 2.e.
Excluded	Program to incentivize landlords to accept tenants with poor credit or criminal history.	See Action 2.e.
Included (2.e)	Identify and implement appropriate tenant protections that improve household stability.	Not excluded, included.

Appendix C.

Policy Evaluation Summary

Evaluation of the Policies in the City’s Comprehensive Plan Housing Element

This appendix evaluates the City’s current Comprehensive Plan housing policies for connections to the gaps identified in the housing needs assessment and the status of policy implementation.

All the Housing Element goals, policies, and actions were reviewed and updated as part of 8-year GMA Comprehensive Plan Update in 2016 in Ordinance No. O2016-012 and there have been amendments to the Housing Element through the annual Comprehensive Plan amendment process since then.

As noted in Chapter 3 *Local actions*, some minor adjustments to the Housing Element goals, policies, and actions may be appropriate for consideration in a future Comprehensive Plan amendment docket to support the six strategies for addressing housing needs in the City.

Criteria

Connections to Housing Needs Assessment and HAP Objectives

V Valid, continuing need for goal/policy to meet identified gap in Housing Needs Assessment (HNA) and/or Housing Action Plan (HAP) objectives.

A Amend to address:

- 1) One of the seven gaps identified in the Housing Needs Assessment:



Affordability. Reduce the cost of housing for low-income and cost-burdened households.



Supply. Increase the inventory of housing for all households.



Variety. Increase the variety of housing sizes and types



Seniors. Increase the stock of housing options needed for aging seniors.



Improvements. Maintain the existing housing stock, including improving energy efficiency and air quality.



Stability. Increase household wealth by providing safe, stable options for rental housing and pathways to homeownership.



Supportive Housing. Increase permanent housing options for people with disabilities and those at risk of or experiencing homelessness.

2) One of the six Housing Action Plan strategies:

1 Increase the supply of permanent, income-restricted affordable housing.

2 Make it easier for households to access housing and stay housed.

3 Expand the overall housing supply by making it easier to build all types of housing projects.

4 Increase the variety of housing choices.

5 Continually build on resources, collaboration, and public understanding to improve implementation of housing strategies.

6 Establish a permanent source of funding for low-income housing.

N Not directly related to housing needs or objectives.

Achievement of goals and policies

1) Goals and policies, progress in implementation:

E Early/initiated

M Moderate progress/maturing implementation through funding/code/program development

C Completed

2) Compatibility with Growth Management Act and County-Wide Planning Policies since Adoption:

R Retain, still compatible and valid

U Update to recognize recent city initiatives, clarity, or ease of implementation

Housing Element

Table 15. Housing Element policy and action evaluation – Goal H-1.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
GOAL H-1	To conserve and improve the existing city housing stock and quality of life of neighborhoods.				
Policy H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.	Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 8) <i>Encourage abandoned houses moving back into the active housing inventory</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy.	V	E R	The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council. See Action H-3.1.2 and Policy 7.2.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2019-004 updated the Economic Development Plan. 4. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the policy.</p> <p>See Policies H-4.1 and H-6.2.</p>
Policy 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.	Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.	V	M R	<p>Continue implementation of the policy.</p> <p>The eight-year GMA update is on proposed 2022 Long Range Planning work program.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.	The 2019 Housing Affordability Work Plans identified Development Fee Amendment Action #6 <i>Make infrastructure investments for infill areas needing upgrades with follow-up by City staff to develop potential scenarios with emphasis on areas where affordable housing is most likely to occur</i> to address this policy.	V	E R	Continue implementation of the policy. Development Fee Amendment Action #6 is on proposed 2022 Long Range Planning work program.
Policy H-1.5	Encourage and facilitate economic development as an important part of provision of housing by providing jobs.	Policy not directly related to housing needs or objectives. Ordinance No. O2019-004 updated the Economic Development Plan.	N	M R	Continue implementation of the policy. While the Economic Development Plan is not directly tied to housing, but it plays an important role in raising wages, which have not kept pace with housing costs.
Action H-1.5.1	Continue implementation of economic development efforts to provide jobs in Tumwater.	Policy not directly related to housing needs or objectives. Ordinance No. O2019-004 updated the Economic Development Plan.	N	M R	Continue implementation of the action. While the Economic Development Plan is not directly tied to housing, but it plays an important role in raising wages, which have not kept pace with housing costs.

Table 16. Housing Element policy and action evaluation – Goal H-2.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.				
Policy 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, multi-family, and manufactured homes in manufactured home parks and on single lots.	<p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p> <p>Draft 2021 Buildable Lands Report indicates that there is sufficient, suitably zoned land for development of all housing types.</p>	V	M U	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the policy. Consider expanding the types of housing listed in the policy.</p> <p>Eight-year GMA update of the Comprehensive Plan is on proposed 2022 Long Range Planning work program.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-2.2	Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City 	V	M R	<p>As noted in the City's 2019 policy analysis, this policy directly supports the City's work to expand the range of housing options.</p> <p>Continue implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-2.2.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned land.	<p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p> <p>The draft 2021 Buildable Lands Report indicates that there is sufficient, suitably zoned land for development of all housing types.</p>	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the action. Eight-year GMA update is on proposed 2022 Long Range Planning work program.</p> <p>See Action H-5.1 and H-6.2.1.</p>

Table 17. Housing Element policy and action evaluation – Goal H-3.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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 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.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 6) <i>Assess actions for assuring mobile home parks continue to provide affordable housing toward a goal of property ownership by residents under B) Boost Housing Affordability – Actions to increase affordable housing to address this policy.</i>	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options. Continue implementation of the action.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 8) <i>Encourage abandoned houses moving back into the active housing inventory</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy.	V	E U	As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options. The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council. See Policies H-1.1 and H-7.2.
Policy H-3.2	Encourage provision of adequate building sites through appropriate land use planning and zoning codes, infrastructure supply, and overall regulatory climate.	Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The draft 2021 Buildable Lands Report indicates that there is sufficient, suitably zoned land for development of all housing types.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options. Continue implementation of the policy.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy 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.	<ol style="list-style-type: none"> <li data-bbox="735 483 1251 727">1. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action C) <i>Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.</i> <li data-bbox="735 743 1251 922">2. The City began formally working with the cities of Lacey, Olympia, and Yelm and Thurston County as part of the Regional Housing Council to address such issues in 2019. 	V	E R	<p data-bbox="1461 483 1881 621">As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p data-bbox="1461 638 1860 743">Continue work with the Regional Housing Council and on implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action C) <i>Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.</i> 2. The City began formally working with the cities of Lacey, Olympia, and Yelm and Thurston County as part of the Regional Housing Council to address such issues in 2019, including data collection. 3. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 10) <i>Inventory and track affordable housing units in Tumwater</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing.</i> 	V	E R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue work with the Regional Housing Council on implementation of the action.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	<p>Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 2) <i>Develop strategies with the Tumwater School District and nonprofit partners to house homeless students/families</i> under A) <i>Reduce Homelessness – Increase resources/actions to combat/decrease regional homelessness</i> to address this action.</p> <p>The City has been working with Together! in the Tumwater School District to address these issues.</p>	V	E R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the action.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	<ol style="list-style-type: none"> 1. Ordinance No. O2017-004 established the multi-family tax exemption program at the City. 2. Resolution No. R2017-002 established the Brewery District and the Capitol Boulevard Corridor as the initial target areas. 3. The 2019 Housing Affordability Work Plan Development Fee Amendment 3) noted <i>Expand the multifamily tax exemption program to other areas of the City, such as the Town Center, and the Littlerock Road Subarea, and look at expanding the percentage of permanently affordable units that would need to be provided.</i> 4. Resolution No. R2019-022 expanded the target areas to include the Littlerock Subarea and the Town Center. 	V	C U	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>No further action needed on the action, beyond monitoring implementation of the programs.</p>

Table 18. Housing Element policy and action evaluation – Goal H-4.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.					
Policy H-4.1	Support the inclusion of living opportunities for families with children throughout the city.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	E R	As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options. Continue implementation of the policy.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-4.2	Support and encourage a variety of housing types and price ranges through appropriate policies and regulations.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the policy.</p> <p>See Policies H-1.2 and H-6.2.</p>
Action 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.	The draft 2021 Buildable Lands Report indicates that the new development is occurring on smaller lot sizes than the previous report.	V	M R	Continue implementation of the action.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-4.2.2	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.	Part of the final project review and approval process.	V	E U	As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options. Continue implementation of the action.

Table 19. Housing Element policy and action evaluation – Goal H-5.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.					
Policy H-5.1	Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.	<p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p> <p>The draft 2021 Buildable Lands Report indicates that there is sufficient, suitably zoned land for development of all housing types</p>	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options.</p> <p>Continue implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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)	<p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p> <p>The draft 2021 Buildable Lands Report indicates that there is sufficient, suitably zoned land for development of all housing types.</p>	V	M R	<p>Continue implementation of the action.</p> <p>See Actions H-2.2.1 and H-6.2.1.</p>
Action H-5.1.2	Continue joint planning with Thurston County to plan for future growth in Tumwater.	The City is currently working with Thurston County on an update to the Tumwater / Thurston County Joint Plan.	V	E R	Continue implementation of the action.
Policy 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.	<p>Policy not directly related to housing needs or objectives.</p> <p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p>	N	M R	Continue implementation of the policy.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy 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.	Ongoing evaluation process through amendments to the Development Guide and Building Codes. 2018 Building Codes adopted by Ordinance No. O2021-005.	V	E R	As noted in the City’s 2019 policy analysis, this policy directly supports the City’s work to expand the range of housing options. Continue implementation of the policy.

Table 20. Housing Element policy and action evaluation – Goal H-6.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.					
Policy H-6.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Ongoing code enforcement of the City’s nuisance code (TMC 8.04) and the International Property Maintenance Code (TMC 15.18) by the City Police Department in cooperation with the Community Development Department. Same as Action H-8.2.1.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy 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.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities.</p> <p>Continue implementation of the policy.</p> <p>See Policies H-1.2 and H 4.2.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	<p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p> <p>The draft 2021 Buildable Lands Report indicates that there is sufficient, suitably zoned land for development of all housing types</p>	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities.</p> <p>Continue implementation of the action.</p> <p>See Actions H-2.2.1 and H-5.1.1.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	M U	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities.</p> <p>Continue implementation of the action.</p> <p>Update language to reflect current design techniques.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-6.3	Support increasing housing opportunities along urban corridors and centers.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 2) <i>Strengthen incentives for affordable housing within the Capital Corridor and Brewery District and explore extending these incentives to the entire InterCity Transit #13 bus corridor</i> under Action B) <i>Boost Housing Affordability – Actions to increase affordable housing.</i> 2. Ordinance No. O2017-004 established the multi-family tax exemption program at the City. 3. Resolution No. R2017-002 established the Brewery District and the Capitol Boulevard Corridor as the initial target areas. 4. Resolution No. R2019-022 expanded the target areas to include the Littlerock Subarea and the Town Center. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities and continued implementation of land use and transportation connections.</p> <p>Continue implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-6.4	Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 2) <i>Strengthen incentives for affordable housing within the Capital Corridor and Brewery District and explore extending these incentives to the entire InterCity Transit #13 bus corridor</i> under Action B) <i>Boost Housing Affordability – Actions to increase affordable housing.</i> 2. Ordinance No. O2017-004 established the multi-family tax exemption program at the City. 3. Resolution No. R2017-002 established the Brewery District and the Capitol Boulevard Corridor as the initial target areas. 4. Resolution No. R2019-022 expanded the target areas to include the Littlerock Subarea and the Town Center. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of land use and transportation connections.</p> <p>Continue implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-6.4.1	Continue to involve Intercity Transit in Tumwater's development review process.	Action not directly related to housing needs or objectives.	N	M R	As noted in the City's 2019 policy analysis, this policy directly supports continued implementation of land use and transportation connections. Continue implementation of the action.
Policy H-6.5	Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.	Ongoing evaluation process through amendments to the Development Guide and Building Codes. 2018 Building Codes adopted by Ordinance No. O2021-005.	V	M R	Continue implementation of the policy.
Action H-6.5.1	Host training with developers and staff on implementation of Low Impact Development.	Completed in 2017.	V	C U	Completed action. Propose removing action.

Table 21. Housing Element policy and action evaluation – Goal H-7.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.					
Policy H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.	Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022. Similar to Policy H-8.1 below.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities. Continue implementation of the policy. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action 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.	<p>Citywide Design Guidelines implemented by Ordinance No. O2016-013.</p> <p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p>	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued expansion of the City’s design guidelines to balance increase in densities.</p> <p>Continue implementation of the action.</p>
Policy H-7.2	Assure housing will be well maintained and safe.	<p>Ongoing code enforcement of the City’s nuisance code (TMC 8.04) and the International Property Maintenance Code (TMC 15.18) by the City Police Department in cooperation with the Community Development Department.</p> <p>Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 8) <i>Encourage abandoned houses moving back into the active housing inventory</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy.</p> <p>Same as Policy H-8.2 below.</p>	V	M R	<p>Continue implementation of the policy.</p> <p>The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council.</p> <p>See Policy 1.1 and Action 3.1.2.</p> <p>During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-7.3	Enhance the appearance of and maintain public spaces in residential areas.	Ongoing code enforcement of the City’s nuisance code (TMC 8.04) and the International Property Maintenance Code (TMC 15.18) by the City Police Department in cooperation with the Community Development Department. Same as Policy H-8.3 below.	V	E U	Continue implementation of the policy. The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-7.4	Promote community involvement to achieve neighborhood improvement.	Ongoing program. Same as Policy H-8.4 below.	V	E R	<p>Continue implementation of the policy.</p> <p>The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council.</p> <p>During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.</p>

Table 22. Housing Element policy and action evaluation – Goal H-8.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
GOAL H-8 To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.					
Policy H-8.1	Support the stability of established residential neighborhoods.	Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022. Similar to Policy H-7.1 above.	V	M R	Consider update of the policy to support Goal H-8. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-8.2	Assure housing will be well maintained and safe.	<p>Resolution No. R2018-016 Homelessness and Affordable Housing identified Action 8) <i>Encourage abandoned houses moving back into the active housing inventory</i> under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy.</p> <p>Ongoing code enforcement of the City’s nuisance code (TMC 8.04) and the International Property Maintenance Code (TMC 15.18) by the City Police Department in cooperation with the Community Development Department.</p> <p>Same as Policy H-7.2 above.</p>	V	M R	<p>Update of the policy to support Goal H-8.</p> <p>The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council.</p> <p>See Policy 1.1 and Action 3.1.2.</p> <p>During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-8.2.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Ongoing code enforcement of the City’s nuisance code (TMC 8.04) and the International Property Maintenance Code (TMC 15.18) by the City Police Department in cooperation with the Community Development Department. Same as Policy H-6.1 above.	V	M R	Update of the policy to support Goal H-8. The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-8.3	Enhance the appearance of and maintain public spaces in residential areas.	Ongoing code enforcement of the City’s nuisance code (TMC 8.04) and the International Property Maintenance Code (TMC 15.18) by the City Police Department in cooperation with the Community Development Department. Same as Policy H-7.3 above.	V	M R	Update of the policy to support Goal H-8. The City could consider a formal maintenance and rehabilitation program beyond the current code enforcement procedures. This would be in coordination with its actions with the Regional Housing Council. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.
Policy H-8.4	Promote community involvement to achieve neighborhood improvement.	Ongoing program. Same as Policy H-7.4	V	E U	Update of the policy to support Goal H-8. During the next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022, eliminate duplication in policies and actions.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-8.4.1	Encourage neighborhood meetings to discuss community issues as situations and concerns arise.	Ongoing program.	V	E U	Continue implementation of the action.
Policy H-8.5	Encourage home ownership for Tumwater residents.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 	V	E U	Continue implementation of the policy.

Table 23. Housing Element policy and action evaluation – Goal H-9.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
GOAL H-9 To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.					
Policy 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.	City is addressing this policy subject to the state requirements for location of special housing.	V	E U	As noted in the City’s 2019 policy analysis, this policy directly supports continued efforts to address a range of special housing needs, including homelessness. Continue implementation of the policy.
Policy H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.	<ol style="list-style-type: none"> Resolution No. R2018-016 Homelessness and Affordable Housing identified Action C) <i>Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.</i> The City began formally working with the cities of Lacey, Olympia, and Yelm and Thurston County as part of the Regional Housing Council to address such issues in 2019. 	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued efforts to address a range of special housing needs, including homelessness. Continue implementation of the policy through Council action and the Regional Housing Council.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-9.3	Support and plan for assisted housing opportunities using federal, state, or local aid.	<ol style="list-style-type: none"> Resolution No. R2018-016 Homelessness and Affordable Housing identified Action C) <i>Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.</i> The City began formally working with the cities of Lacey, Olympia, and Yelm and Thurston County as part of the Regional Housing Council to address such issues in 2019. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued efforts to address a range of special housing needs, including homelessness.</p> <p>Continue implementation of the policy through Council action and the Regional Housing Council.</p>
Policy 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.	<ol style="list-style-type: none"> Resolution No. R2018-016 Homelessness and Affordable Housing identified Action C) <i>Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.</i> The City began formally working with the cities of Lacey, Olympia, and Yelm and Thurston County as part of the Regional Housing Council to address such issues in 2019. 	V	E R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued efforts to address a range of special housing needs, including homelessness.</p> <p>Continue implementation of the policy through Council action and the Regional Housing Council.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy H-9.5	Encourage alternative housing strategies for homeless youth, which may include Host Homes.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified Action C) <i>Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.</i> 2. The City began formally working with the cities of Lacey, Olympia, and Yelm and Thurston County as part of the Regional Housing Council to address such issues in 2019. 3. City funding work with school aged children by Together! in the Tumwater School District 	V	E R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued efforts to address a range of special housing needs, including homelessness.</p> <p>Continue implementation of the policy through Council action and the Regional Housing Council.</p>

Table 24. Housing Element policy and action evaluation – Goal H-10.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.					
Policy 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.	Citywide Design Guidelines implemented by Ordinance No. O2016-013. Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.	V	M R	As noted in the City's 2019 policy analysis, this policy directly supports continued implementation of the expansion of the City's design guidelines to balance increase in densities. Continue implementation of the policy.
Policy 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.	Citywide Design Guidelines implemented by Ordinance No. O2016-013. Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.	V	M R	As noted in the City's 2019 policy analysis, this policy directly supports continued implementation of the expansion of the City's design guidelines to balance increase in densities. Continue implementation of the policy.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-10.2.1	Continue to implement multi-family housing design standards.	<p>Citywide Design Guidelines implemented by Ordinance No. O2016-013.</p> <p>Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.</p>	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of the expansion of the City’s design guidelines to balance increase in densities.</p> <p>Continue implementation of the action.</p>

Table 25. Housing Element policy and action evaluation – Goal H-11

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.				
Policy H-11.1	Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.	Policy not directly related to housing needs or objectives.	N	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of the policy supporting the land use and transportation connection. Continue implementation of the policy.
Policy H-11.2	Reference utility plans and the impact of housing decisions on capital improvements planning.	Policy not directly related to housing needs or objectives.	N	E R	Continue implementation of the policy.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy 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.	<ol style="list-style-type: none"> 1. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 2. Ordinance No. O2017-002 allowed cottage housing uses in the City. 3. Ordinance No. O2020-005 expanded where cottage housing uses could be located and reduced size and parking requirements for ADUs. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of efforts to connect new housing types and increased density to transit corridors would support many different goals.</p> <p>Continue implementation of the policy.</p>

Table 26. Housing Element policy and action evaluation – Goal H-12.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
GOAL H-12 To encourage urban growth within the city limits with gradual phasing outward from the urban core.					
Policy 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.	<ol style="list-style-type: none"> 1. Resolution No. R2018-016 Homelessness and Affordable Housing identified a number of actions under B) <i>Boost Housing Affordability – Actions to increase affordable housing</i> to address this policy. 2. The 2019 Housing Affordability Work Plans identified a number of text and fee amendments to support this policy. 3. Ordinance No. O2020-005 addressed a number of housing text amendments to increase the range of housing in the City. 	V	M R	<p>As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of using an expanded range of housing types to support development of the core of the City outwards.</p> <p>Continue implementation of the policy.</p>

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-12.1.1	Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.	Ongoing evaluation process through amendments to the development regulations, Development Guide, and Building Codes. 2018 Building Codes adopted by Ordinance No. O2021-005.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of using an expanded range of housing types to support development of the core of the City outwards. Continue implementation of the action.
Action 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.	City has enacted high-density zoning for the Brewery District, Capitol Boulevard Corridor, and Town Center, and allows multifamily development in its commercial and mixed-use zone districts.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of using an expanded range of housing types to support development of the core of the City outwards. Continue implementation of the action.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Action H-12.1.3	Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.	Ongoing evaluation process through amendments to the Comprehensive Plan and development regulations. The next required eight-year GMA update of the Comprehensive Plan is expected to start in 2022.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports continued implementation of using an expanded range of housing types to support development of the core of the City outwards. Continue implementation of the action.
Action H-12.1.4	Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.	Currently working with Thurston County on an update to the Tumwater / Thurston County Joint Plan as well as an annexation agreement to address “island” annexations.	V	E R	Continue implementation of the action.

Table 27. Housing Element policy and action evaluation – Goal H-13.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
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.					
Policy 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.	Continuing implementation of the Ordinance No. O2008-009, which established the Manufactured Home Park (MHP) zone district in the City as the means to address this policy.	V	M R	As noted in the City’s 2019 policy analysis, this policy directly supports manufactured housing options. Continue implementation of the policy.
Action H-13.1.1	Encourage manufactured housing park district zoning to locate near transit services.	Continuing implementation of the Ordinance No. O2008-009, which established the Manufactured Home Park (MHP) zone district in the City as the means to address this policy.	V	E R	As noted in the City’s 2019 policy analysis, this policy directly supports manufactured housing options. Continue implementation of the action.

Goal, Policy, or Action Number	Adopted Housing Element Goals, Policies, and Actions	Status	Connection to HNA or HAP	Achievement of Goals & Policies	Recommendation
Policy 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.	Part of Resolution No. R2017-013, which was an update to the Hazards Mitigation Plan for the Thurston Region.	V	M R	As noted in the City’s 2019 policy analysis, this policy was a major focus of the City’s recently adopted Hazard Mitigation Plan. Continue implementation of the policy.

Appendix D.

Regulations Evaluation Summary

Evaluation of the Regulations in the City's Municipal Code

This appendix evaluates the City's current development regulations for connections to the seven gaps identified in the housing needs assessment as well as acknowledging the work the City has completed to date to address these gaps.

After the City Council adopted Resolution No. R2018-016 in the summer of 2018 and approved the 2019 Housing Affordability Work Plan, the City worked on a number of actions to reduce homelessness, increase affordable housing, and collaborate with other jurisdictions and agencies to explore regional solutions to these issues.

The evaluation of the regulations starts first summaries of the housing types allowed in the zone districts in the City and the density and bulk and dimensional regulations for those zone districts. Then there is a review of the regulations using the Puget Sound Regional Council's Housing Innovation Program and finally there is a development code barrier summary.

As noted in Chapter 3 *Local actions*, some minor adjustments to the development code may be appropriate for consideration in a future development code amendment docket to support the six strategies for addressing housing needs in the City.

Regulations Evaluation #1 – Housing Types

Tables 28 - 30 *Development code housing type summary* list all the housing types that are allowed in the City by zone district.

Table 28. Development code housing type summary (1 of 3).

Housing Types	City Definition (TMC 18.04)	RSR Residential/Sensitive Resource Zone District (2-4 DU/Acre) ¹	SFL Single-Family Low Density Residential Zone District (4-7 DU/Acre)	SFM Single-Family Medium Density Residential Zone District (6-9 DU/Acre)
Single-family detached dwellings	A building that is not attached in any way to another dwelling unit or structure providing complete, independent living facilities for a family.	Allowed	Allowed	Allowed
Manufactured Homes	A single-family dwelling built according to the Department of Housing and Urban Development Manufactured Home Construction and Safety Standards Act, which is a national, preemptive building code. A manufactured home does not meet the criteria to be classified as a “designated manufactured home	Allowed	Allowed	Allowed

¹ DU/Acre = Dwelling units per acre. For example, 2-4 DU/Acre means that the minimum allowed density in the RSR zone district is two dwelling units per acre and the maximum allowed density is four dwelling units per acre. In many zone districts, achieving the maximum listed DU/acre is dependent on the purchase of transfer of development rights in accordance with TMC Chapter 18.57. The calculation of the density requirements is based on the portion of the site devoted to residential and associated uses (e.g., dwelling units; private community clubs; open space; stormwater detention, treatment and infiltration). The following land is excluded from density calculations:

1. Land that is required to be dedicated for public use as open space, right-of-way, or land on which development is prohibited by TMC Title 16, Environment, and land that is to be used for private roads. Provided, that portion of open space/park areas that consists of stormwater facilities and that is designed for active and/or passive recreational purposes in accordance with the drainage design and erosion control manual for Tumwater shall not be excluded from density calculations;
2. Land that is intended for future phases of development created in accordance with TMC 18.14.060;
3. Land that consists of lots devoted to uses other than residential and associated uses, including but not limited to churches, schools, and support facilities (except for stormwater detention, treatment, and infiltration facilities).

Housing Types	City Definition (TMC 18.04)	RSR Residential/Sensitive Resource Zone District (2-4 DU/Acre) ¹	SFL Single-Family Low Density Residential Zone District (4-7 DU/Acre)	SFM Single-Family Medium Density Residential Zone District (6-9 DU/Acre)
Accessory Dwelling Units (ADUs)	A dwelling unit that is an accessory use or structure subordinate to a single-family detached dwelling subject to the general land use regulations found in TMC 18.42.010.	Allowed	Allowed	Allowed
Manufactured Home Parks	Any real property lot which is rented or held out for rent to others for the placement of three or more manufactured homes, designated manufactured homes, or new manufactured homes for the primary purpose of production of income, except where such real property lot is rented or held out for rent for seasonal recreational purposes only and is not intended for year-round occupancy			
Cottage Housing	A grouping of smaller than average detached single-family dwellings clustered around a common area and developed with a coherent plan for the entire site	Allowed	Allowed	Allowed

Housing Types	City Definition (TMC 18.04)	RSR Residential/Sensitive Resource Zone District (2-4 DU/Acre) ¹	SFL Single-Family Low Density Residential Zone District (4-7 DU/Acre)	SFM Single-Family Medium Density Residential Zone District (6-9 DU/Acre)
Duplexes	A building designed for and used exclusively for occupancy by two families independent of each other where both dwelling units are located on the same lot and are completely separated from each other by an unpierced wall extending from ground to roof or an unpierced ceiling and floor extending from exterior wall to exterior wall, except for common stairwell or garage exterior to both dwelling units.	Allowed ²	Allowed ³	Allowed ⁴
Townhomes or Rowhouses	One of a line or row of dwelling units attached one to the other, having common walls between individual units, generally two stories in height (and sometimes three). Each unit occupies the space between common walls from the lowest level to the roof.			Allowed ⁵ Only within a residential planned unit development

² Duplexes are allowed in the Residential/Sensitive Resource (RSR) and Single Family Low Density Residential (SFL) zone districts. Such uses shall not occupy more than twenty percent of the total lots in a new short plat or subdivision, which was legally established after April 15, 2021. In such cases, the Community Development Director shall have the discretion to alter the percentage in order to allow the new short plat or subdivision to meet minimum required densities due to topography or other special conditions related to the site, such as critical areas.

³ Duplexes are allowed in the Residential/Sensitive Resource (RSR) and Single Family Low Density Residential (SFL) zone districts. Such uses shall not occupy more than twenty percent of the total lots in a new short plat or subdivision, which was legally established after April 15, 2021. In such cases, the Community Development Director shall have the discretion to alter the percentage in order to allow the new short plat or subdivision to meet minimum required densities due to topography or other special conditions related to the site, such as critical areas.

⁴ Duplexes are allowed in the Single Family Medium Density Residential (SFM) zone district. Such uses shall not occupy more than thirty percent of the total lots in a new short plat or subdivision, which was legally established after April 15, 2021. In such cases, the Community Development Director shall have the discretion to alter the percentage in order to allow the new short plat or subdivision to meet minimum required densities due to topography or other special conditions related to the site, such as critical areas.

⁵ Townhouses and rowhouses are allowed within a residential planned unit development in the Single Family Medium Density Residential (SFM) zone district.

Housing Types	City Definition (TMC 18.04)	RSR Residential/Sensitive Resource Zone District (2-4 DU/Acre) ¹	SFL Single-Family Low Density Residential Zone District (4-7 DU/Acre)	SFM Single-Family Medium Density Residential Zone District (6-9 DU/Acre)
Triplexes	A building designed for and used exclusively for occupancy by three families independent of each other where all three dwelling units are located on the same lot and are completely separated from each other, except for common stairwells or garages.			
Fourplexes	A building designed for and used exclusively for occupancy by four families independent of each other where all four dwelling units are located on the same lot and are completely separated from each other, except for common stairwells or garages.			
Multifamily Dwellings	A building designed and used for occupancy by five or more families all living independent of each other and where all dwelling units are located on the same lot.			
Boardinghouses and roominghouses	A dwelling unit having only one kitchen and used for the lodging (with or without meals) for compensation of persons other than the related family members or operator of such dwelling unit. A roominghouse that is rented for less than thirty consecutive days at a time requires a business license per TMC Chapter 5.04. A roominghouse may allow for an unlimited stay, unlike a bed and breakfast which is limited to two weeks.			

Housing Types	City Definition (TMC 18.04)	RSR Residential/Sensitive Resource Zone District (2-4 DU/Acre) ¹	SFL Single-Family Low Density Residential Zone District (4-7 DU/Acre)	SFM Single-Family Medium Density Residential Zone District (6-9 DU/Acre)
Independent Senior Housing Facility	An independent living facility consisting of dwellings designed for and occupied by persons fifty-five years of age or older in accordance with 42 U.S.C. 3607. These facilities may consist of individual dwelling units of a barrier-free design, with separate bathroom facilities and a full kitchen. These facilities may have a communal dining area, recreation facilities (such as a library, lounge, or game room), laundry facilities, and open space. No nursing staff or assisted living staff is provided in an independent living facility.			
Assisted Senior Housing Facility	An assisted living facility, which is an establishment which provides living quarters and a variety of limited personal care and supportive health care to persons fifty-five years of age or older in accordance with 42 U.S.C. 3607 who are unable to live independently, but who do not need the skilled nursing care of a rest home, nursing home, or convalescent center. These facilities may consist of individual dwelling units of a barrier-free design, with separate bathroom facilities and a full kitchen. The facility may provide a minimal amount of supportive health care monitoring, such as assistance with medication, but is limited to health care services that do not require state or federal licensing. These facilities may have a communal dining area, recreation facilities (such as a library, lounge, or game room), laundry facilities, and open space.			

Table 29. Development code housing type summary (2 of 3).

Housing Types	City Definition (TMC 18.04)	MFM Multifamily Medium Density Residential Zone District (9-15 DU/Acre)	MFH Multifamily High Density Residential Zone District (14-29 DU/Acre)	MU Mixed Use Zone District (14 DU/Acre and greater)
Special Zone District Notes				All residential uses are allowed, provided that minimum density standards are met
Single-family detached dwellings	A building that is not attached in any way to another dwelling unit or structure providing complete, independent living facilities for a family.	Allowed ⁶	Allowed ⁷	See above
Manufactured Homes	A single-family dwelling built according to the Department of Housing and Urban Development Manufactured Home Construction and Safety Standards Act, which is a national, preemptive building code. A manufactured home does not meet the criteria to be classified as a “designated manufactured home	Allowed		See above

⁶ Single-family detached dwellings constructed after April 15, 2021 are not allowed in the Multifamily Medium Density Residential (MFM) zone district, except as part of a PUD planned unit development overlay as regulated by TMC 18.36 if the site to be developed has more than one zone district.

⁷ Single-family detached dwellings and duplexes are not allowed in the Multifamily High Density Residential (MFH) zone district, except as part of a PUD planned unit development overlay as regulated by TMC 18.36 if the site to be developed has more than one zone district.

Housing Types	City Definition (TMC 18.04)	MFM Multifamily Medium Density Residential Zone District (9-15 DU/Acre)	MFH Multifamily High Density Residential Zone District (14-29 DU/Acre)	MU Mixed Use Zone District (14 DU/Acre and greater)
Accessory Dwelling Units (ADUs)	A dwelling unit that is an accessory use or structure subordinate to a single-family detached dwelling subject to the general land use regulations found in TMC 18.42.010.	Allowed	Allowed	See above
Manufactured Home Parks	Any real property lot which is rented or held out for rent to others for the placement of three or more manufactured homes, designated manufactured homes, or new manufactured homes for the primary purpose of production of income, except where such real property lot is rented or held out for rent for seasonal recreational purposes only and is not intended for year-round occupancy	Allowed		See above
Cottage Housing	A grouping of smaller than average detached single-family dwellings clustered around a common area and developed with a coherent plan for the entire site	Allowed		Allowed
Duplexes	A building designed for and used exclusively for occupancy by two families independent of each other where both dwelling units are located on the same lot and are completely separated from each other by an unpierced wall extending from ground to roof or an unpierced ceiling and floor extending from exterior wall to exterior wall, except for common stairwell or garage exterior to both dwelling units.	Allowed		See above

Housing Types	City Definition (TMC 18.04)	MFM Multifamily Medium Density Residential Zone District (9-15 DU/Acre)	MFH Multifamily High Density Residential Zone District (14-29 DU/Acre)	MU Mixed Use Zone District (14 DU/Acre and greater)
Townhomes or Rowhouses	One of a line or row of dwelling units attached one to the other, having common walls between individual units, generally two stories in height (and sometimes three). Each unit occupies the space between common walls from the lowest level to the roof.	Allowed	Allowed	See above
Triplexes	A building designed for and used exclusively for occupancy by three families independent of each other where all three dwelling units are located on the same lot and are completely separated from each other, except for common stairwells or garages.	Allowed	Allowed	See above
Fourplexes	A building designed for and used exclusively for occupancy by four families independent of each other where all four dwelling units are located on the same lot and are completely separated from each other, except for common stairwells or garages.	Allowed	Allowed	See above
Multifamily Dwellings	A building designed and used for occupancy by five or more families all living independent of each other and where all dwelling units are located on the same lot.	Allowed	Allowed	Allowed

Housing Types	City Definition (TMC 18.04)	MFM Multifamily Medium Density Residential Zone District (9-15 DU/Acre)	MFH Multifamily High Density Residential Zone District (14-29 DU/Acre)	MU Mixed Use Zone District (14 DU/Acre and greater)
Boardinghouses and roominghouses	A dwelling unit having only one kitchen and used for the lodging (with or without meals) for compensation of persons other than the related family members or operator of such dwelling unit. A roominghouse that is rented for less than thirty consecutive days at a time requires a business license per TMC Chapter 5.04. A roominghouse may allow for an unlimited stay, unlike a bed and breakfast which is limited to two weeks.	Allowed, as an accessory use	Allowed, as an accessory use	See above
Independent Senior Housing Facility	An independent living facility consisting of dwellings designed for and occupied by persons fifty-five years of age or older in accordance with 42 U.S.C. 3607. These facilities may consist of individual dwelling units of a barrier-free design, with separate bathroom facilities and a full kitchen. These facilities may have a communal dining area, recreation facilities (such as a library, lounge, or game room), laundry facilities, and open space. No nursing staff or assisted living staff is provided in an independent living facility.	Allowed	Allowed	Allowed

Housing Types	City Definition (TMC 18.04)	MFM Multifamily Medium Density Residential Zone District (9-15 DU/Acre)	MFH Multifamily High Density Residential Zone District (14-29 DU/Acre)	MU Mixed Use Zone District (14 DU/Acre and greater)
Assisted Senior Housing Facility	<p>An assisted living facility, which is an establishment which provides living quarters and a variety of limited personal care and supportive health care to persons fifty-five years of age or older in accordance with 42 U.S.C. 3607 who are unable to live independently, but who do not need the skilled nursing care of a rest home, nursing home, or convalescent center. These facilities may consist of individual dwelling units of a barrier-free design, with separate bathroom facilities and a full kitchen. The facility may provide a minimal amount of supportive health care monitoring, such as assistance with medication, but is limited to health care services that do not require state or federal licensing. These facilities may have a communal dining area, recreation facilities (such as a library, lounge, or game room), laundry facilities, and open space.</p>	Allowed, as a conditional use	Allowed, as a conditional use	Allowed

Table 30. Development code housing type summary (3 of 3).

Housing Types	City Definition (TMC 18.04)	CBC Capitol Boulevard Community Zone District (30 DU/Acre and greater)	TC Town Center Mixed Use and/or Town Center Residential Subdistrict (30 DU/Acre and greater)	BD Brewery District Zone (10 DU/Acre and greater)	MHP Manufactured Home Park Zone District (6-9 DU/Acre)
Special Zone District Notes		All residential uses are allowed, provided that minimum density standards are met	Residential uses approved after June 9, 2002, provided the minimum density standards in TMC 18.23.030(B)(2) and Residential uses which were legally established prior to June 9, 2002 are met, rooming houses, and senior housing facilities are allowed	"Residential" uses are permitted in the zone district	
Single-family detached dwellings	A building that is not attached in any way to another dwelling unit or structure providing complete, independent living facilities for a family.	See above	See above	See above	Allowed

Housing Types	City Definition (TMC 18.04)	CBC Capitol Boulevard Community Zone District (30 DU/Acre and greater)	TC Town Center Mixed Use and/or Town Center Residential Subdistrict (30 DU/Acre and greater)	BD Brewery District Zone (10 DU/Acre and greater)	MHP Manufactured Home Park Zone District (6-9 DU/Acre)
Manufactured Homes	A single-family dwelling built according to the Department of Housing and Urban Development Manufactured Home Construction and Safety Standards Act, which is a national, preemptive building code. A manufactured home does not meet the criteria to be classified as a “designated manufactured home	See above	See above	See above	Allowed
Accessory Dwelling Units (ADUs)	A dwelling unit that is an accessory use or structure subordinate to a single-family detached dwelling subject to the general land use regulations found in TMC 18.42.010.	See above	See above	Allowed	
Manufactured Home Parks	Any real property lot which is rented or held out for rent to others for the placement of three or more manufactured homes, designated manufactured homes, or new manufactured homes for the primary purpose of production of income, except where such real property lot is rented or held out for rent for seasonal recreational purposes only and is not intended for year-round occupancy	See above	See above	See above	Allowed

Housing Types	City Definition (TMC 18.04)	CBC Capitol Boulevard Community Zone District (30 DU/Acre and greater)	TC Town Center Mixed Use and/or Town Center Residential Subdistrict (30 DU/Acre and greater)	BD Brewery District Zone (10 DU/Acre and greater)	MHP Manufactured Home Park Zone District (6-9 DU/Acre)
Cottage Housing	A grouping of smaller than average detached single-family dwellings clustered around a common area and developed with a coherent plan for the entire site			Allowed only in the Triangle, Bates South, Bluff, and Deschutes Subdistricts	
Duplexes	A building designed for and used exclusively for occupancy by two families independent of each other where both dwelling units are located on the same lot and are completely separated from each other by an unpierced wall extending from ground to roof or an unpierced ceiling and floor extending from exterior wall to exterior wall, except for common stairwell or garage exterior to both dwelling units.	See above	See above	See above	
Townhomes or Rowhouses	One of a line or row of dwelling units attached one to the other, having common walls between individual units, generally two stories in height (and sometimes three). Each unit occupies the space between common walls from the lowest level to the roof.	See above	See above	See above	

Housing Types	City Definition (TMC 18.04)	CBC Capitol Boulevard Community Zone District (30 DU/Acre and greater)	TC Town Center Mixed Use and/or Town Center Residential Subdistrict (30 DU/Acre and greater)	BD Brewery District Zone (10 DU/Acre and greater)	MHP Manufactured Home Park Zone District (6-9 DU/Acre)
Triplexes	A building designed for and used exclusively for occupancy by three families independent of each other where all three dwelling units are located on the same lot and are completely separated from each other, except for common stairwells or garages.	See above	See above	See above	
Fourplexes	A building designed for and used exclusively for occupancy by four families independent of each other where all four dwelling units are located on the same lot and are completely separated from each other, except for common stairwells or garages.	See above	See above	See above	
Multifamily Dwellings	A building designed and used for occupancy by five or more families all living independent of each other and where all dwelling units are located on the same lot.	See above	See above	See above	

Housing Types	City Definition (TMC 18.04)	CBC Capitol Boulevard Community Zone District (30 DU/Acre and greater)	TC Town Center Mixed Use and/or Town Center Residential Subdistrict (30 DU/Acre and greater)	BD Brewery District Zone (10 DU/Acre and greater)	MHP Manufactured Home Park Zone District (6-9 DU/Acre)
Boardinghouses and roominghouses	A dwelling unit having only one kitchen and used for the lodging (with or without meals) for compensation of persons other than the related family members or operator of such dwelling unit. A roominghouse that is rented for less than thirty consecutive days at a time requires a business license per TMC Chapter 5.04. A roominghouse may allow for an unlimited stay, unlike a bed and breakfast which is limited to two weeks.	See above	See above	See above	
Independent Senior Housing Facility	An independent living facility consisting of dwellings designed for and occupied by persons fifty-five years of age or older in accordance with 42 U.S.C. 3607. These facilities may consist of individual dwelling units of a barrier-free design, with separate bathroom facilities and a full kitchen. These facilities may have a communal dining area, recreation facilities (such as a library, lounge, or game room), laundry facilities, and open space. No nursing staff or assisted living staff is provided in an independent living facility.	Allowed	Allowed	Allowed	

Housing Types	City Definition (TMC 18.04)	CBC Capitol Boulevard Community Zone District (30 DU/Acre and greater)	TC Town Center Mixed Use and/or Town Center Residential Subdistrict (30 DU/Acre and greater)	BD Brewery District Zone (10 DU/Acre and greater)	MHP Manufactured Home Park Zone District (6-9 DU/Acre)
Assisted Senior Housing Facility	An assisted living facility, which is an establishment which provides living quarters and a variety of limited personal care and supportive health care to persons fifty-five years of age or older in accordance with 42 U.S.C. 3607 who are unable to live independently, but who do not need the skilled nursing care of a rest home, nursing home, or convalescent center. These facilities may consist of individual dwelling units of a barrier-free design, with separate bathroom facilities and a full kitchen. The facility may provide a minimal amount of supportive health care monitoring, such as assistance with medication, but is limited to health care services that do not require state or federal licensing. These facilities may have a communal dining area, recreation facilities (such as a library, lounge, or game room), laundry facilities, and open space.	Allowed	Allowed	Allowed	Allowed

Notes

- Courtyard apartments are not addressed specifically by the zoning code, but would be allowed as a triplex, fourplex, or multifamily dwelling, depending on the number of units.

- Tiny houses as defined by state law would be allowed as detached single-family dwellings or as accessory dwelling units.
- Adult family homes and residential care facilities are allowed in all residential zone districts, except for the MHP Manufactured Home Park zone district and in all commercial zone districts.
- Group foster homes are allowed in all residential zone districts and in the Neighborhood Commercial (NC) zone district as a conditional use and are allowed in all other commercial zone districts except the Historic Commercial (HC) zone district.
- Convalescent centers, rest homes, and nursing homes are allowed in the Mixed Use (MU), Capitol Boulevard Community (CBC), and General Commercial (GC) zone districts.
- High-rise residential (five stories or more) uses are permitted in the some subdistricts of the Capitol Boulevard Community (CBC), Brewery District (BD), and Town Center (TC) zone districts and it is a conditional use in the GC General Commercial zone district.
- Mid-rise multifamily residential (three or four stories) uses are permitted in the GC General Commercial zone district.
- Multifamily dwellings, adult family homes, and residential care facilities are a permitted use in the HC Historic Commercial zone district.
- Independent Senior Housing Facilities are allowed in the Neighborhood Commercial (NC) zone district and Assisted Senior Housing Facilities are allowed in the Neighborhood Commercial (NC) zone district as a conditional use.
- Dwelling or dwelling unit is defined in the TMC as a building or a portion thereof designed for occupancy by one family for residential purposes, having kitchen and bathroom facilities, and on a permanent foundation. A dwelling used as a rental unit shall not be rented for less than thirty consecutive days at a time.
- Family is defined in the TMC as an individual or two or more persons, related by blood, marriage or adoption, or two or more persons with functional disabilities as defined in TMC Chapter 18.53, or a group of not more than six unrelated persons, living together to share a single dwelling unit. **Mayor's June 6, 2021 Comment:** *The Mayor noted the legislature changed the law in 2021 limiting our ability to limit the number of unrelated persons in a house.*

Regulations Evaluation #2 – Density, and Bulk and Dimensional Regulations

Tables 31-33 *Development code density, and bulk and dimensional regulation summary* lists the density, and bulk and dimensional regulations for each of the zone districts that allow housing in the City.

Table 31. Development code density, and bulk and dimensional regulation summary (1 of 3).

Density and Bulk and Dimensional Regulations ⁸	RSR Residential /Sensitive Resource Zone District	SFL Single-Family Low Density Residential Zone District	SFM Single-Family Medium Density Residential Zone District
Density (low to high number of dwelling units per acre)	2 to 4 ⁹	4 to 7 ⁸	6 to 9 ⁸
Lot Size (Minimum)	9,000 SF	3,200 SF	3,200 SF
Lot Size (Maximum)	None	None	None
Clustered Subdivision	Yes	Yes	Yes
Impervious Lot Coverage	Depends on lot size	60%	70%
Structure Height	35 feet	35 feet	35 feet
Front Yard	20 – 25 feet	10 feet	10 feet

⁸ Table 31 is intended to be a summary for general comparison only. Refer to the Tumwater Municipal Code for additional requirements and exceptions.

⁹ DU/Acre = Dwelling units per acre. For example, 2-4 DU/Acre means that the minimum allowed density in the RSR zone district is two dwelling units per acre and the maximum allowed density is four dwelling units per acre. In many zone districts, achieving the maximum listed DU/acre is dependent on the purchase of transfer of development rights in accordance with TMC Chapter 18.57. The calculation of the density requirements is based on the portion of the site devoted to residential and associated uses (e.g., dwelling units; private community clubs; open space; stormwater detention, treatment and infiltration). The following land is excluded from density calculations:

1. Land that is required to be dedicated for public use as open space, right-of-way, or land on which development is prohibited by TMC Title 16, Environment, and land that is to be used for private roads. Provided, that portion of open space/park areas that consists of stormwater facilities and that is designed for active and/or passive recreational purposes in accordance with the drainage design and erosion control manual for Tumwater shall not be excluded from density calculations;
2. Land that is intended for future phases of development created in accordance with TMC 18.14.060;
3. Land that consists of lots devoted to uses other than residential and associated uses, including but not limited to churches, schools, and support facilities (except for stormwater detention, treatment, and infiltration facilities).

Density and Bulk and Dimensional Regulations ⁸	RSR Residential /Sensitive Resource Zone District	SFL Single-Family Low Density Residential Zone District	SFM Single-Family Medium Density Residential Zone District
Side Yard	7.5 feet	5 feet	5 feet
Rear Yard	20 – 25 feet	20 feet ¹⁰	20 feet ¹¹
Planned Unit Development	Not Allowed	Allowed	Allowed

¹⁰ Accessory dwelling units may be located a minimum of five feet from property line.

¹¹ Accessory dwelling units may be located a minimum of five feet from property line.

Table 32. Development code density, and bulk and dimensional regulation summary (2 of 3).

Density and Bulk and Dimensional Regulations ¹²	MFM Multifamily Medium Density Residential Zone District	MFH Multifamily High Density Residential Zone District	MU Mixed Use Zone District
Density (low to high number of dwelling units per acre)	9 to 15 ⁸¹³	14 to 29 ⁸¹⁴	14 and greater
Lot Size (Minimum)	N/A	N/A	None
Lot Size (Maximum)	None	N/A	None
Clustered Subdivision	N/A	N/A	N/A
Impervious Lot Coverage	70%	70%	85%
Structure Height	40 feet	Lesser of 50 feet or five stories ¹⁵	Lesser of 50 feet or five stories
Front Yard	10 feet	10 feet	No minimum
Side Yard	5 feet	5 feet	No minimum
Rear Yard	5 feet	5 feet	No minimum
Planned Unit Development	Allowed	Allowed	Allowed

¹² Table 32 is intended to be a summary for general comparison only. Refer to the Tumwater Municipal Code for additional requirements and exceptions.

¹³ Note that maximum density in the Multifamily Medium Density Residential (MFM) zone district can be increased to 20 dwelling units per acre if permanently affordable housing units are provided in a new multifamily housing project ten or more dwelling units in size and meet the requirements of TMC 18.42.140.

¹⁴ Note that maximum density in the Multifamily High Density Residential (MFH) zone district can be increased to 39 dwelling units per acre if permanently affordable housing units are provided in a new multifamily housing project ten or more dwelling units in size and meet the requirements of TMC 18.42.140.

¹⁵ Note that maximum height in the Mixed Use (MU) zone district can be increased to the lesser of 60 feet or six stories if permanently affordable housing units are provided in a new multifamily housing project 30 or more dwelling units in size and meet the requirements of TMC 18.42.140.

Table 33. Development code density, and bulk and dimensional regulation summary (3 of 3).

Density and Bulk and Dimensional Regulations ¹⁶	CBC Capitol Boulevard Community Zone District	TC Town Center Mixed Use and/or Town Center Residential Subdistrict	BD Brewery District Zone	MHP Manufactured Home Park Zone District
Density (low to high number of dwelling units per acre)	30 and greater	30 and greater	10 and greater	6 to 9 ⁸
Lot Size (Minimum)	None	None	None	N/A
Lot Size (Maximum)	None	None	None	N/A
Clustered Subdivision	N/A	N/A	N/A	N/A
Impervious Lot Coverage	None	None	75% - 100%	85%
Structure Height	50 to 65 feet ¹⁷	55 to 85 feet ¹⁸	35 to 55 feet ¹⁹	40 feet
Front Yard	12 feet from curb line	0 feet	0 to 10 feet	10 feet
Side Yard	No minimum	0 feet	0 to 10 feet	5 feet
Rear Yard	No minimum	feet	0 to 10 feet	5 feet

¹⁶ Table 33 is intended to be a summary for general comparison only. Refer to the Tumwater Municipal Code for additional requirements and exceptions.

¹⁷ Note that maximum height in portions of the Capitol Boulevard Community (CBC) zone district can be increased to 75 feet or 50 feet if permanently affordable housing units are provided in a new multifamily housing project 30 or more dwelling units in size and meet the requirements of TMC 18.42.140.

¹⁸ Note that maximum height in portions of the Town Center (TC) zone district can be increased to 65 feet if permanently affordable housing units are provided in a new multifamily housing project 30 or more dwelling units in size and meet the requirements of TMC 18.42.140.

¹⁹ Note that maximum height in portions of the Brewery District (BD) zone district can be increased by 10 feet if permanently affordable housing units are provided in a new multifamily housing project 30 or more dwelling units in size and meet the requirements of TMC 18.42.140.

Density and Bulk and Dimensional Regulations ¹⁶	CBC Capitol Boulevard Community Zone District	TC Town Center Mixed Use and/or Town Center Residential Subdistrict	BD Brewery District Zone	MHP Manufactured Home Park Zone District
Planned Unit Development	Allowed	Allowed	Allowed	Not Allowed

Notes

- The General Commercial (GC) zone district, new multifamily or mixed use projects with a total of thirty or more dwelling units that provide thirty percent of those units as permanently affordable housing units would be allowed a maximum building height increase of ten feet, subject to imaginary airspace surface limitations. This would create a new maximum height limit of 75 feet. Projects providing permanently affordable housing units by this method would have to meet the requirements of TMC 18.42.140.

Regulations Evaluation #3 – Housing Innovation Program

Table 34 *Housing innovation program review* assesses the number of housing tools that are currently used the City by comparing them to those recommended in the Puget Sound Regional Council’s Housing Innovation Program. The Housing Innovation Program was created to promote housing options and affordability in local communities. This assessment of housing tools will assist in the development of Housing Action Plan strategies to increase housing options in the city.

This evaluation shows that the City utilizes 32 of the 49 Housing Innovation Program Housing Tools and the City would be willing to consider using more of the tools.

Table 34. *Housing innovation program review.*

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Development Types		
Accessory dwelling units (ADU)	Yes	Accessory dwelling units have been allowed in the City with minimal restrictions. The City Council updated the codes further in 2021 by Ordinance No. O2020-005 on March 16, 2021. In addition, the City is providing free accessory dwelling unit house plans for residents wanting to build units.
Cluster development	Yes	Allowed through the transfer of development rights program.
Cottage housing	Yes	Cottage housing allowed as a use in 2017. The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to allow cottage housing in all single-family zone districts.
Infill development	Yes	Encouraged and allowed.
Master planned communities	No	The City has limited areas that would be appropriate for a master planned community, but the City does use the Planned Unit Development process, as well as development agreements to meet the intent of a master planned community.

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Mixed use development	Yes	Brewery District (BD), Capitol Boulevard Community (CBC), Town Center (TC), and Neighborhood Commercial (NC) and Mixed Use (MU) zone districts encourage these types of development as well as the General Commercial (GC) zone district.
Mobile/manufactured homes	Yes	Allowed in all residential zone districts.
Multifamily development	Yes	Allowed in multifamily zone districts as well as Brewery District (BD), Capitol Boulevard Community (CBC), Town Center (TC), and Neighborhood Commercial (NC) and Mixed Use (MU) zone districts encourage these types of development as well as the General Commercial (GC) zone district.
Planned unit development	Yes	Encouraged and allowed.
Preservation & rehabilitation	Yes	Encouraged and allowed.
Small lot single family development	Yes	The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to allow 3,200 SF lots in the Single Family Low Density Residential (SFL) and Single Family Medium Density Residential (SFM) zone districts.
Townhomes	Yes	The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to expand where such uses are allowed.
Zero lot line development	Yes	Part of townhouse and rowhouse developments. The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to expand where such uses are allowed.

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Other Regulatory Tools		
Design guidelines	Yes	Design guidelines adopted in 2016.
Flexible single family development regulations	No	The City would be willing to consider this tool in certain areas of the City.
Form based zoning	No	The City would be willing to consider this tool in certain areas of the City.
Inclusionary zoning	Yes	The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to allow in multifamily zone districts as well as Brewery District (BD), Capitol Boulevard Community (CBC), Town Center (TC), and Neighborhood Commercial (NC) and Mixed Use (MU) zone districts encourage these types of development.
Lot size averaging	No	The City would be willing to consider this tool in certain areas of the City.
Minimum densities	Yes	In all zone districts that allow residential uses.
No maximum densities	Yes	In the Brewery District (BD), Capitol Boulevard Community (CBC), Town Center (TC), Neighborhood Commercial (NC), Mixed Use (MU), and General Commercial (GC) zone districts.
Performance zoning	No	The City would be willing to consider this tool in certain areas of the City.
Regulatory streamlining	Yes	Ongoing process of identifying and improving regulatory processes.
SEPA categorical exemptions	Yes	In November 2019, the City Council approved Ordinance No. O2019-022, which raised the SEPA categorical exemption threshold for multifamily projects to the maximum under State law.

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Short plats	Yes	Short plats are defined as nine or fewer lots to match the maximum allowed by state law.
Transit oriented development (TOD) overlays	Yes	The Brewery District (BD), Capitol Boulevard Community (CBC), Town Center (TC) and zone districts are effectively this kind of overlay. Could be expanded to include the Littlerock Subarea.
Transfer of development rights (TDR) for affordable housing	No	The City would be willing to consider this tool. There would need to be work with Thurston County to do this.
Up-zones & rezones	Yes	The City has been exploring more options for this tool, most recently in 2020 in various locations in the City.
Incentives		
Density bonuses	Yes	The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to allow for density bonuses as an incentive for permanently affordable multifamily housing as well as the already existing bonuses for transfer of development rights for rural development.
Fee waivers or reductions	Yes	The fee reductions were identified in a strategy to pursue in the 2019 City Council Affordable Housing Work Program. City is currently developing a fee resolution for review and approval by the City Council in 2021.
Incentive zoning	Yes	The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to allow for permanently affordable housing to be built in exchange for density or building height increases depending on the zone district.

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Multifamily tax exemption (MFTE)	Yes	<p>The City Council established the Multifamily tax exemption program on April 4, 2017 by Ordinance No. O2017-004 for 8-years and the 12-year Multifamily Tax Exemption developments in the Brewery District (BD) and Capitol Boulevard Community (CBC) plan areas.</p> <p>On January 21, 2020, the City Council approved Ordinance No. O2019-023, which expanded the 12-year Multifamily Tax Exemption program to the Tumwater Town Center (TC) and Littlerock Road Subarea.</p>
Parking reductions	Yes	<p>The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to reduce parking requirements for certain residential use.</p>
Permitting priority	No	<p>The City has considered a permitting priority system for affordable housing, but has not seen the need given the current permit approval timelines.</p>
Planned action EIS	No	<p>The City would be willing to consider this tool in certain areas of the City, such as the Brewery District or the Capitol Boulevard Community Plan Areas.</p>
Other Financial Tools		
Commercial linkage fees	No	<p>Economic conditions at not right for the City to use this tool.</p>
Credit enhancement	No	<p>Economic conditions at not right for the City to use this tool.</p>
Local housing fund	Yes	<p>The City is working with the regional Housing Council in allocating regional housing funds as well as allocating CDGB funds for housing assistance.</p>

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Public land for affordable housing	No	The City has considered this tool, but it did not identify any surplus public land that could be used for this purpose.
Project-Level Tools		
Affordability covenants	Yes	The City Council updated the codes in 2021 by Ordinance No. O2020-005 on March 16, 2021 to allow for permanently affordable housing to be built in exchange for density or building height increases depending on the zone district to be managed by permanent covenants and restrictions.
Development agreements	Yes	The City uses development agreements for new development now and it can be used for affordable housing projects.
Renter/Homeowner Assistance		
Displacement resources	No	The City has considered this tool, but has decided it does not have the financial or staff resources to fund and manage its use. If it is considered, it may be part of the actions of the Regional Housing Council.
Direct Household Assistance	Yes	The City has considered this tool, and has funded local non-profits to run programs for rental assistance.
Foreclosure resources	No	The City has considered this tool, but has decided it does not have the financial or staff resources to fund and manage its use. If it is considered, it may be part of the actions of the Regional Housing Council.
Partnerships		
Nonprofit partnerships	Yes	The City has a number of local non-profits it work with directly as well as regional non-profits through the Regional Housing Council.

HIP Housing Tools	Housing Tools Currently Available in in the City	Comments
Interjurisdictional cooperation	Yes	The City has worked with other jurisdictions in a number of ways, such as the development of the regional Thurston Climate Mitigation Plan and the Housing Action Plan development process, as well as formally on homelessness and affordable housing through the Regional Housing Council.
Education & Outreach		
Community outreach plans	No	The City would be willing to consider developing this tool.
Educating permitting officials	No	The City would be willing to consider developing this tool.
NIMBY, strategies to address	No	The City would be willing to consider developing this tool.
Strategic marketing	No	The City would be willing to consider developing this tool.

Regulations Evaluation #4 – Development Code and Other Barrier Summary

Table 35 *Development code barrier summary* identifies potential barriers to building housing within the City’s current development codes and practices.

Table 36 *Other potential barriers summary* identifies potential barriers to building housing within the City’s current development codes and practices.

The identification of these potential barriers will assist in the development of Housing Action Plan strategies to increase housing in the City.

Table 35. *Development code barrier summary.*

Potential Development Code Barriers	
Housing Types	
HIGH DENSITY	
Multifamily	<p>Pedestrian & Vehicle Access and Circulation</p> <ul style="list-style-type: none"> • Explore reciprocal access easements for adjacent developments <p>Parking</p> <ul style="list-style-type: none"> • Consider reducing minimum stall size for some portion of parking requirements • Re-examine required minimum parking requirements • Re-examine drive aisle minimum width • Consider shared parking provisions as a means of reducing parking requirements <p>Landscaping</p> <ul style="list-style-type: none"> • Explore options for alternative landscape buffer widths • Consider changes to parking lot landscaping requirements • Consider granting more flexibility in landscape chapter <p>Incentives</p> <ul style="list-style-type: none"> • Explore expanding incentives, including by encouraging three bedroom units

Potential Development Code Barriers	
MEDIUM DENSITY	
Triplex and Fourplex	<p>Allowed Uses</p> <ul style="list-style-type: none"> • Expand as a permitted use to the Single-Family Medium Density Residential (SFM) zone district <p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements • Consider shared parking provisions as a means of reducing parking requirements
Townhouse	<p>Allowed Uses</p> <ul style="list-style-type: none"> • Expand as a permitted use to the Single-Family Medium Density Residential (SFM) zone district without a Planned Unit Development • Expand as a permitted use to the Single-Family Low Density Residential (SFL) zone district with a Planned Unit Development <p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements • Consider shared parking provisions as a means of reducing parking requirements
Duplex	<p>Allowed Uses</p> <ul style="list-style-type: none"> • Expand as a permitted use without restrictions in the Single-Family Low Density Residential (SFL) and Single-Family Medium Density Residential (SFM) zone districts <p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements • Consider shared parking provisions as a means of reducing parking requirements

Potential Development Code Barriers	
LOW DENSITY	
Small Lot Single Family	<p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements • Review parking requirements to allow tandem garages or clustered parking <p>Other</p> <ul style="list-style-type: none"> • Consider adding a provision regarding zero-lot line development
Accessory Dwelling Units	<p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements <p>Other</p> <ul style="list-style-type: none"> • Consider increasing accessory dwelling unit size to 1,000 square feet • Simplify water and sewer connection requirements • Work on promotion of accessory dwelling unit options
Detached Single family	<p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements • Review parking requirements to allow tandem garages or clustered parking <p>Other</p> <ul style="list-style-type: none"> • Review lot coverage and setback requirements
Manufactured Homes	<p>Parking</p> <ul style="list-style-type: none"> • Re-examine required minimum parking requirements
Code Requirements	
GENERAL STANDARDS	
Density	<p>Potential Density Increases</p> <ul style="list-style-type: none"> • Explore increasing minimum densities for multifamily zone districts • Consider allowing up zones within the large lot residential low zones once utility infrastructure, such as sewers, is available

Potential Development Code Barriers	
Landscaping Standards	<p>Landscaping</p> <ul style="list-style-type: none"> • Consider changes to the landscaping code that would be more supportive of and complimentary to higher density and mixed use residential development types • Consider options for alternative landscape buffer widths • Consider changes to surface parking landscaping • Consider removing/reducing the non-compatible buffer requirement between residential developments of different densities, and certain commercial uses
Parking	<p>Parking</p> <ul style="list-style-type: none"> • Reduce required off-street parking ratios in residential areas near transit service and where there is sufficient on street parking to increase the buildable land available for housing
Incentives	<p>Development Incentives</p> <ul style="list-style-type: none"> • Add a development incentive chapter to Title 18 <i>Zoning</i> to explore methods to incentivize a variety of different housing types
OTHER	
Design Guidelines	<ul style="list-style-type: none"> • Review design guidelines to determine if amendments are needed to allow for the development of more affordable housing
Parking Lots, Driveways	<ul style="list-style-type: none"> • Consider reducing the amount of pavement required in parking lots and driveways for multifamily developments
Planned Unit Development	<ul style="list-style-type: none"> • Review the Planned Unit Development requirements and consider amendments to TMC 18.36 <i>Planned Unit Development (PUD) Overlay</i>
Height Limits	<ul style="list-style-type: none"> • Explore increasing height limits
Neighborhood Compatibility	<ul style="list-style-type: none"> • Consider reducing requirements for multifamily developments near higher intensity uses • Examine setbacks and screening and consider basing it on structure height or mass as opposed to zone district

	Potential Development Code Barriers
Unit Lot Subdivision	<ul style="list-style-type: none"> Explore options for subdivision of attached units (unit lot subdivision) to allow for fee-simple ownership instead of condominium ownership. This would be specifically for detached and attached housing units in multifamily residential and mixed-use zone districts
General Development Standards	<ul style="list-style-type: none"> Vary development standards, such as parking, open space, and setbacks, by certain housing types to provide permanently affordable housing

Table 36. Other potential barriers summary.

	Other Potential Barriers
OTHER BARRIERS	
Infrastructure Investments	<ul style="list-style-type: none"> Make infrastructure investments for infill areas needing upgrades with follow-up by City staff to develop potential scenarios with emphasis on areas where affordable housing is most likely to occur
Development Standards	<ul style="list-style-type: none"> Review the City’s Engineering Development Standards to identify potential barriers
Comprehensive Plan Map Amendments and Rezones	<ul style="list-style-type: none"> Review the City’s Comprehensive Plan and the Citywide zoning map designations and determine if there are areas in the City that could support a higher range of residential densities

Appendix E.

Previous Work

Background

After the City Council adopted Resolution No. R2018-016 in July 2018, the City has been working on a number of actions to reduce homelessness, increase affordable housing, and collaborate with other jurisdictions and agencies to explore regional solutions to these issues.

The Planning Commission and the City Council undertook a significant effort from September 2018 to May 2019 to develop the Affordable Housing Work Plan for the City Council to use in make informed decisions when prioritizing the next steps to implement Resolution No. R2018-016. Since 2019, the City had spent a substantial amount of time implementing the 2019 Affordable Housing Work Plan through ordinances and process changes.

While the City was implementing the 2019 Affordable Housing Work Plan, the state legislature passed E2SHB 1923 in 2019, which created state grants through the Department of Commerce to address the need to create more affordable housing through the creation of local housing action plans. Seeing an opportunity to pool resources and work regionally to create materials to support the development of a City's Housing Action Plan, the City joined with the Cities of Lacey and Olympia in applying for the state grant.

By January 2020, the three cities were awarded the grant, agreed to an interlocal agreement to work together on the initial work products, and contracted with the Thurston Regional Planning Council (TRPC) to do the work. With the help of TRPC staff, a stakeholder group made up of developers, real estate professionals, and housing activists, as well as staff from the three jurisdictions, over the course of 2020 and into January 2021, a Regional Needs Housing Assessment, a Landlord Survey, and a draft Housing Action Plan template were completed.

2016 Comprehensive Plan Update

In 2016 to ensure the plan complied with the requirements of the GMA, Chapter 36.70A RCW as part of the Growth Management Plan requirement to update the City's Comprehensive Plan every eight years in accordance with RCW 36.70A.130(1) under Ordinance No. O2016-012, the City reviewed and revised the Housing Element of the Comprehensive Plan.

2018 Resolution No. R2018-016 Homelessness and Affordable Housing

In the first half of 2018, the City Council devoted considerable time to discussions of the causes of and resources available to address homelessness and the lack of affordable housing in the City. In July 2018, the City Council adopted Resolution No. R2018-016 Homelessness and Affordable Housing, which included a number of actions to start to reduce homelessness, increase affordable housing, and continue to work with other jurisdictions and agencies to explore regional solutions to these issues.

A. Reduce Homelessness – Increase resources/actions to combat/decrease regional homelessness.

Take the following actions now:

1. Review, and clarify as necessary, policies related to homelessness for first responders.
2. Develop strategies with the Tumwater School District and nonprofit partners to house homeless students/families.
3. Better understand and describe the extent and general location of Tumwater poverty and low-income areas.
4. Commit more current City resources to targeted regional homelessness actions.
5. Act to better connect people to services.
6. Continue to participate in homeless count each year.
7. Meet with Tumwater faith leaders to explore faith community's potential role addressing homelessness.
8. Assess and track homeless/low-income services in Tumwater.

Review and evaluate the following actions once the actions above are complete and their outcomes evaluated:

1. Further explore community support for a new tax/fee source for targeted homeless housing and services.
2. Evaluate Tumwater's future role in providing managed encampments, safe overnight parking areas, and shelters. May include code amendments addressing these land uses.

B. Boost Housing Affordability – Actions to increase affordable housing.

Take the following actions now:

1. Pursue grants for affordable housing.
2. Strengthen incentives for affordable housing within the Capital Corridor and Brewery District and explore extending these incentives to the entire InterCity Transit #13 bus corridor.
3. Evaluate and, if necessary, propose amendments to City code and zoning to support smaller scale affordable housing in neighborhoods to offer a greater variety of housing options.
4. Promote actions property owners can take to increase affordable housing such as accessory dwelling units.
5. Participate in regional discussions to understand factors affecting housing affordability and what steps can be taken to mitigate new housing costs.
6. Assess actions for assuring mobile home parks continue to provide affordable housing toward a goal of property ownership by residents.
7. Encourage more housing development overall.
8. Encourage abandoned houses moving back into the active housing inventory.

9. Enact policies to protect tenants experiencing housing instability, which may include:
 - a. Review current eviction/renter protection policies, laws, and legal services and assess possible actions.
 - b. Assess need for/knowledge of landlord-tenant conflict resolution services.
 - c. Support renter resources (mediation, etc.).
10. Inventory and track affordable housing units in Tumwater.

Review and evaluate the following actions once the actions above are complete and their outcomes evaluated:

1. Further explore community support for a new tax/fee source to support affordable housing and low-income services.
2. Consider options for reducing fees and service charges for certified affordable housing units.
3. Focus on creating one significant affordable housing project with partners in the next five years.

C. Ongoing Regional Actions – Continue work with other jurisdictions and agencies to explore regional solutions to homelessness and affordable housing.

2019 Housing Affordability Work Plans

After the City Council adopted Resolution No. R2018-016 in the summer of 2018, the City worked on a number of actions to reduce homelessness, increase affordable housing, and continue to collaborate with other jurisdictions and agencies to explore regional solutions to these issues.

One of those tasks was the City Council's 2019 Housing Affordability Work Plan, which is intended to increase the amount of privately and publicly funded residential development in the City to bring the supply and demand of housing in the City more into balance.

Objective

The City Council's development text and fee work plans addressed the following actions from Resolution No. R2018-016, which support the goal of increasing housing affordability:

GOAL: Boost Housing Affordability

Action #2 – Strengthen incentives for affordable housing within the Capitol Corridor and Brewery District and explore extending these incentives to the entire InterCity Transit #13 bus corridor

Action #3 – Evaluate and, if necessary, propose amendments to City code and zoning to support smaller scale affordable housing in neighborhoods to offer a greater variety of housing options

Action #4 – Promote actions property owners can take to increase affordable housing such as accessory dwelling units

Action #7 – Encourage more housing development overall

Background

After the City Council adopted Resolution No. R2018-016, the Planning Commission studied material on homelessness and the lack of affordable housing in the City in the fall of 2018. In the winter of 2019, the Planning Commission reviewed potential implementation actions the City could take to increase its affordable housing supply by reviewing the City's land use regulations and development fee structures for barriers to affordable housing.

Staff prepared draft tables of potential implementation actions for the Planning Commission to consider, which included background information as well as a rough estimate of the complexity of enacting the change, its relative effect in increasing the affordable housing stock in the City, and potential costs to the City. The Planning Commission completed its recommended development text and fee work plans on March 12, 2019.

The City Council reviewed the Planning Commission's proposed development text and fee amendment work plans at worksessions on March 26, 2019, April 23, 2019, and May 28, 2019. At their May 28, 2019 worksession, the City Council decided to focus on specific items in the Planning Commission's proposals in the final development text and fee amendment work plans.

Development Code Text Amendments

The intent of the development code text amendments is to increase the amount of privately and publicly funded residential development in the City, which would increase the overall supply of housing. Some of the development code text amendments would focus on increasing the amount of permanently affordable housing in the City.

The City Council's final work plan for development code text amendments to provide more housing, affordable and otherwise, in the City included the following actions:

1. Review the City's Comprehensive Plan and the Citywide zoning map designations and determine if there are areas in the City that could support a higher range of residential densities.
2. Provide an affordable housing density bonus in addition to the maximum density permitted in residential zone districts in limited areas of the City, if the proposed project provides permanently affordable housing units. In addition, consider a density bonus to incentivize developers to provide specific housing types in limited areas of the City that provide permanently affordable housing units.
3. Expand the locations where special residential development types such as accessory dwelling units and cottage housing and smaller types of housing such as micro-housing, tiny homes, and smaller lot single-family development are permitted. In addition, consider incentives for including accessory dwelling units with new single-family home developments.
4. Streamline accessory dwelling unit permitting by researching what other jurisdictions such as the City of Lacey and the cities in east King County are doing and look at ways to incorporate that work into the City's processes.
5. Add duplexes or other smaller types of housing units as a permitted uses to single family residential zone districts, such as the Residential/Sensitive Resource (RSR), Single-Family Low Density Residential (SFL), and Single-Family Medium Density Residential (SFM) zone districts.

6. Increase height limits in the Knoll subdistrict of the Brewery District zone district for permanently affordable housing projects.
7. Reduce required off-street parking ratios in residential areas near transit service and where there is sufficient on street parking to increase the buildable land available for housing. In addition, consider eliminating the 1.0 parking space per dwelling unit requirement for accessory dwellings.
8. Vary development standards, such as parking, open space, and setbacks, by certain housing types to provide permanently affordable housing. Note: Council asked that a more detailed proposal be prepared for this item before it gives its approval to include in the work plan.
9. Require new housing created specifically to be affordable to remain affordable in perpetuity with protective covenants and deed restrictions.
10. Raise the SEPA categorical exemption thresholds for multifamily residential development from 25 to 60 multifamily residential units.
11. Explore options for subdivision of attached units (unit lot subdivision) to allow for fee-simple ownership instead of condominium ownership. This would be specifically for detached and attached housing units in multifamily residential and mixed-use zone districts.

Development Fee Amendments

Based on the implementation actions identified in the Brewery District and Capitol Corridor Subarea Plans, the City Council's development fee amendment work plan included actions to reduce development fees to encourage the building of more housing, which could include permanently affordable housing. The actions in the development fee amendment work plan are focused in the Brewery District and the Capitol Boulevard Corridor subareas, the Town Center, and the Littlerock Road Subarea.

The intent would be to improve the financial viability of new development by allowing private and public developers to spread out or reduce the costs of infrastructure and capital improvements over the course of the development process and in turn allow more dwelling units of all types to be built.

The City Council's final work plan for development code fee amendments to provide more housing in the Brewery District, the Capitol Boulevard Corridor, the Town Center, and the Littlerock Road Subarea of the City included the following actions:

1. Lower, delay, or adjust the timing of development fees, such as impact fees and connection charges, such as:
 - a. Transportation impact fees where there is a nexus between the location of affordable housing and access to transit and after working with the Public Works Department to assess transportation demand in these neighborhoods;
 - b. Park impact fees after reviewing the assumptions the City considered as part of the Metropolitan Park District ballot measure and working with the Parks and Recreation Department;
 - c. Water and sewer connection fees after working with the Public Works Department; and
 - d. Sewer capacity development charges for permanently affordable housing after working with the Public Works Department.

2. Exempt emergency housing from impact fees (SHB 2538).
3. Expand the multifamily tax exemption program to other areas of the City, such as the Town Center, and the Littlerock Road Subarea, and look at expanding the percentage of permanently affordable units that would need to be provided.
4. Cut, reduce, or cap fees for nonprofits building permanently affordable housing.
5. Reduce fees for private-sector development of permanently affordable homes and units.
6. Make infrastructure investments for infill areas needing upgrades with follow-up by City staff to develop potential scenarios with emphasis on areas where affordable housing is most likely to occur.
7. Reduce fees for affordable, single-family homes (under 1,500 sq. ft.) and manufactured homes.



HOUSING DISPLACEMENT RISK ANALYSIS

For the Cities of Lacey, Olympia, Tumwater, and Yelm

Prepared by:





Introduction

This report analyzes housing displacement risks in the cities of Lacey, Olympia, Tumwater, and Yelm. As city populations grow and evolve, policies protecting residents from displacement are critical. Based on analysis of historical policies, current trends, and community dynamics, this report offers actionable recommendations for local governments to enhance housing security and promote equitable living conditions. The research process was informed by robust engagement with community stakeholders.

Communities face unparalleled challenges at the local level. Inflation, fentanyl, and the mental healthcare crisis all contribute to housing displacement. Housing interventions alone cannot succeed without the support of other human and social services. An analysis such as this should be considered within the context of those challenges and the unique way they play out amongst different places and people. While the social conditions for creating housing security are complex, there are policy opportunities that cities can take to reduce displacement and protect community wellbeing.

How can the cities of Lacey, Olympia, Tumwater, and Yelm use this document?

1. To **describe populations at risk** of housing displacement.
2. To explore the dynamics of **housing displacement risk metrics**.
3. To outline **risk reduction policy avenues**.



WHAT IS HOUSING DISPLACEMENT?

Displacement is the process by which a household is forced to move from its community because of conditions beyond their control. Displacement can be described through a number of lenses, including:

- **Economic Displacement** - Displacement due to inability to afford rising rents or costs of homeownership like property taxes.
- **Physical Displacement** - Displacement as a result of eviction, acquisition, rehabilitation or demolition of property, or the expiration of covenants on rent-or income-restricted housing.
- **Cultural Displacement** - Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Increasing levels of housing displacement have significant implications for communities across the United States. The following section explores how past and present housing policies have contributed to resident displacement, highlighting the disproportionate impact on specific demographic groups. By analyzing the failures of existing policies and the socio-economic dynamics at play, we aim to shed light on pathways to reform that prioritize housing security for all residents. A complete analysis of the sources referenced in the next section can be found in the Housing Displacement Academic Field Scan Memo.

WHO IS AT THE GREATEST RISK OF HOUSING DISPLACEMENT?



Older, Poorer, People of Color

Residential mobility amongst the poor is variable, unplanned, and typically involuntary. Eviction filings doubled between 2000 and 2016. Older people, African Americans, and Latinos are overrepresented across most types of displacement.



Suburban populations

Suburban poverty creates conditions ripe for displacement. With less public transit, poorer households must spend more money to get around. They have limited access to nonprofit services typically concentrated in cities, and confront a municipal infrastructure less suited to deliver holistic social services.



Manufactured Housing Residents

Households in mobile homes are over twice as likely to live in poverty. Half of all mobile homes in the US are in urban areas. There are 1.7 million mobile home renter households and 5.3 million mobile homeowners in the US. Mobile home closures should be treated as mass evictions, which are primary indicators of displacement risk. Those who own their trailers but don't have the means to move them to another location face an additional loss of a valuable household asset.



Families with Children

Households with children are at an increased risk of displacement. A Milwaukee study found that renters with two children have an 11.7% chance of being evicted and a 9.5% chance with one child.



Cost-Burdened Households

Cost-burdened households spend more than 30% of income on housing costs including rent, mortgage, and utilities. Households spending more than half of their income on housing are considered severely cost-burdened.

WHAT PAST HOUSING POLICIES RESULTED IN RESIDENT DISPLACEMENT?



Property owners have significantly more protection under the law than renters.

The de facto imbalance of power between landlords and tenants creates situations where the wellbeing of renters becomes secondary to financial profit with little to no regulation. For example, the Housing Choice Voucher Program provides choices to renters beyond government housing projects, however the lack of protection under anti-discriminatory law makes it difficult for renters to find landlords who accept vouchers, opening the door for residential self-segregation by socio-economic class.



Even when protections for renters exist, a lack of information can be exploited by property managers to coerce renters to act against their own interests.

The housing-specific COVID-19 programs are a prime example of protections put in place that many renters didn't realize they were eligible for.



Policies to improve housing stability in the US most often exacerbate housing insecurity for renters.

That is because US housing policy has a legacy of protecting, preferring, and subsidizing for homeownership and homeowners. Little is done for rent-burdened renters to alleviate displacement risk other than advocating for them to buy homes, a distant possibility for most.



The conversion of public housing projects into mixed-income communities drives housing displacement for low-income households.

Despite the opportunity intentionally designed into mixed-income, multifamily public housing projects, research shows that only one-fifth of original project residents return to experience those benefits.

WHAT TYPES OF CURRENT HOUSING POLICIES CREATE THE RISK OF RESIDENT DISPLACEMENT?



Government subsidized housing aid delivery is notoriously slow.

But it is irreplaceable in the fight to reduce housing displacement. Nesting housing aid into existing, successful, and well-known programs creates a waterfall effect by increasing household disposable income and thereby decreasing the percentage of total income a household spends on housing.



Current market trends and the existing housing policy environment are resulting in growing suburban corporate landlord conglomerates.

Governments should work to support, subsidize, and grow the amount of local small businesses that provide rental housing while incentivizing them to pass on savings to renters. Local property owners are more likely to provide support and relief to renters in financial distress, while corporate landlords are more likely to immediately resort to eviction.



Policies restricting housing development contribute to displacement.

Increasing housing supply makes housing more affordable, and housing affordability is directly correlated to an individual's housing cost burden, an indicator of displacement risk. When new housing is built and priced higher, it pushes older housing into a lower price range, creating additional housing availability for lower-income households. This concept, known as housing stock filtering, is at odds with the commonly accepted drivers of gentrification and neighborhood change.

WHAT ARE COMMUNITY STAKEHOLDERS SAYING?

To gain a locally rooted understanding of housing goals and displacement risks, the project team conducted extensive collaborative outreach. We held a series of planning staff meetings, four community affinity group roundtable discussions, and a community survey that resulted in 167 responses. Affinity groups included those with lived experience and relevant connections to **1) Manufactured housing communities, 2) Communities of low-wage workers, 3) Military families and households, and 4) Accessory dwelling units.** Emergent themes collected during community feedback are outlined below. A full accounting of all engagement analysis and raw data is provided as an attachment to this report.

4

Planning Staff Meetings

4

Affinity Group Roundtables

167

Survey Responses

WHAT WE HEARD

Cities should promote educational programs that **explain the long-term investment opportunity of ADUs**, and the financial plan required to pursue.

Cities should ensure robust transportation is available to residents and **minimize land used for parking in favor of housing density.**

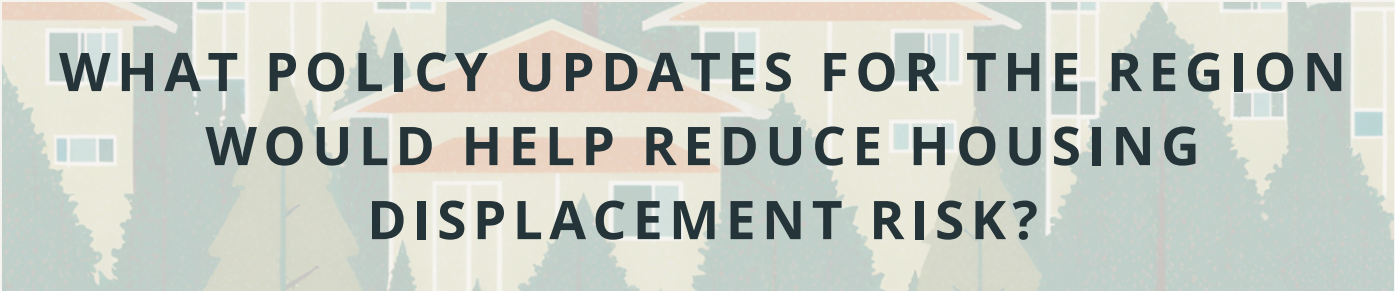
Affordable housing and **homelessness prevention** programs should work closer together as they share the same clientele.

Cities should work with community groups to coordinate a **one-stop shop for housing benefit explanations** and application support.

Cities should **disincentivize corporate ownership of housing** and create a program to support private ownership of mobile home communities and rental units by local, family-owned operations with on-site or local management.

Cities should promote an **educational campaign to private landlords about legal requirements, renters rights,** and renter income qualifications for those on supplemental income.

Cities should use **creative zoning overlays and innovative land use policies** to classify and protect mobile home communities, as well as other types of affordable housing.



WHAT POLICY UPDATES FOR THE REGION WOULD HELP REDUCE HOUSING DISPLACEMENT RISK?

While each jurisdiction has unique policies that support and challenge affordable housing and displacement, several common themes stand out. Every jurisdiction has policies that support various housing types for all income levels, including efforts to minimize regulatory review and unnecessary barriers to housing and support the development of housing for all needs. Jurisdictions also have policies to assist individuals experiencing homelessness and partnerships with organizations that provide assistance or resources to unhoused community members.

While many policies are supportive, crucial policy gaps remain. Broadly speaking, each city can enrich its housing policies by identifying intentional efforts to increase affordability and prevent and mitigate displacement while prioritizing low-income and historically marginalized populations. For example, every city uses the term “neighborhood character,” which could lead to exclusionary housing practices and be leveraged to maintain high-cost housing types unattainable to those with lower incomes. Rather than relying on this vague term, policies could be strengthened by specifying aspects of neighborhoods that should be maintained or enhanced while considering how those requirements may disproportionately impact low-income or historically marginalized populations.

It’s clear from this policy analysis that the cities of Lacey, Olympia, Tumwater, and Yelm are each engaged in important work to increase housing affordability and reduce displacement pressures. The next step is identifying ways these cities can build upon the work they are already doing, whether that is through increasing partnerships with local organizations, implementing additional actions in their Housing Action Plans, and developing new policies to address gaps in the cities’ housing policies to better address racially disparate impacts, displacement, and exclusion in housing.

HOW CAN WE TELL IF A POLICY REDUCES DISPLACEMENT RISK?

To assess and evaluate policy options and recommendations, we completed a policy evaluation using two sets of criteria: displacement-specific and locality-specific. The displacement specific criteria were based on the Department of Commerce's categories of displacement: economic, physical, and cultural. Through discussions with city staff, audits of the cities' Housing Needs Assessments, and stakeholder feedback, we identified additional criteria to better evaluate potential policies and recommendations based on the jurisdiction's unique needs. City specific criteria are included within the displacement risk profile section of this report.

Policy Evaluation Criteria for All Cities



Racially Disparate Impacts: Does this policy prevent racially disparate impacts or work to repair past harm?



Economic Displacement: Does this policy help prevent or mitigate economic displacement?



Physical Displacement: Does this policy help prevent or mitigate physical displacement?



Cultural Displacement: Does this policy help prevent or mitigate cultural displacement?



Housing Exclusion: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?



Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?



Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and feedback from the community.

A full accounting of all proposed proposals and proposed policy updates can be found in the **Policy Recommendation Matrix** attachment of this report.

HOUSING DISPLACEMENT RISK PROFILE KEY

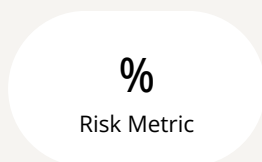
Risk Statements

Synthesized Statements of Housing Displacement Risk

Policy Avenues

- Policy Avenues to Reduce Housing Displacement Risk

Risk Factors



Policy Evaluation Criteria

- City Specific Policy Evaluation Criteria

Sources: HUD Comprehensive Housing Affordability Strategy (CHAS)(2017-2021), US Census American Community Survey 5-Year Estimates (2023), Thurston Regional Planning Council Small Area Population Estimates (2024)

HOUSING DISPLACEMENT RISK PROFILE

LACEY, WA

Lacey has an aging population, where 1 in 3 households are cost burdened, and severely limited vacant units for extremely-low income residents.

Policy Avenues to Reduce Housing Displacement Risk Using the Comprehensive Plan Housing Chapter

- Identify and develop partnerships with organizations that provide or support low income, workforce, and senior housing as well as other populations with unique housing needs.
- Create a manufactured home park zone type to promote preservation. Allow manufactured home parks in multifamily and commercial areas.
- Encourage housing affordable to lower wage earners so those who work in Lacey can afford to live in the city

Where is our risk coming from?

36%

of All Households are Cost Burdened

38%

of Residents are Low, Very Low, or Extremely Low Income

57%

of Vacant Rental Units are for Low or Very Low Income Residents

0%

of Vacant Rental Units are for Extremely-Low Income Residents

90%

Growth of non-White population 2010-2023

25%

of Residents are 60+ Years Old

23%

of residents are Under 19 Years Old

2,380

Total Manufactured Housing Units

Most Prominent Risk Type:
Economic Displacement

Policy Evaluation Criteria

- Does this policy encourage or remove barriers to providing affordable housing?
- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?
- Does this policy increase overall housing supply?
- Does this policy reduce housing costs?

HOUSING DISPLACEMENT RISK PROFILE

OLYMPIA, WA

Housing for all income levels exists in Olympia, but nearly 40% of households are cost burdened and there is a relative lack of units for extremely-low income residents.

Policy Avenues to Reduce Housing Displacement Risk Using the Comprehensive Plan Housing Chapter

- Policies for the protection and preservation of the manufactured home community.
- Additional measures to encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.
- Evaluate the relationship between the Olympia and county's home fund to ensure housing goals are met.
- Expanding allowance of residential tenant improvements without triggering land use requirements
- Allowing Single Room Occupancy (SRO) housing in all multifamily zones

Where is our risk coming from?

36%

of All Households are Cost Burdened

44%

of Residents are Low, Very Low, or Extremely Low Income

65%

of Vacant Rental Units are for Low or Very Low Income Residents

11%

of Vacant Rental Units are for Extremely-Low Income Residents

91%

Growth of non-White population 2010-2023

23%

of Residents are 60+ Years Old

20%

of residents are Under 19 Years Old

1,030

Total Manufactured Housing Units

Most Prominent Risk Type
Physical Displacement

Policy Evaluation Criteria

- Does this policy incentivize and support the development of affordable and deeply affordable housing, including supportive?
- Does this policy increase housing supply, including middle housing and ADUs?
- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?

HOUSING DISPLACEMENT RISK PROFILE

TUMWATER, WA

Tumwater has experienced a significant growth in population diversity accompanied by an increase in income variability where 4 in 10 residents are low, very-low, or extremely-low income.

Policy Avenues to Reduce Housing Displacement Risk Using the Comprehensive Plan Housing Chapter

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

Where is our risk coming from?

30%

of All Households are Cost Burdened

39%

of Residents are Low, Very Low, or Extremely Low Income

50%

of Vacant Rental Units are for Low or Very Low Income Residents

0%

of Vacant Rental Units are for Extremely-Low Income Residents

196 %

Growth of non-White population 2010-2023

22%

of Residents are 60+ Years Old

21%

of residents are Under 19 Years Old

1,280

Total Manufactured Housing Units

Most Prominent Risk Type
Economic Displacement

Policy Evaluation Criteria

- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?
- Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?
- Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?

HOUSING DISPLACEMENT RISK PROFILE

YELM, WA

Yelm has experienced a significant growth in both population diversity and households with children. Affordable units are lacking as 1 in 3 households are spend more than 30% of income on housing.

Policy Avenues to Reduce Housing Displacement Risk Using the Comprehensive Plan Housing Chapter

- Protection and preservation of the manufactured home community.
- Policies limiting long-term housing being used for transient rentals.
- Partnerships with low-income housing developers, Housing Authority of Thurston County, and other organizations that provide support for low-income, workforce, senior housing, and those with unique housing needs.
- Community Development Block Grants, Section 108 loans, and other federal resources for affordable housing.
- Offering density bonuses for low-income housing.

Where is our risk coming from?

33%

of All Households are Cost Burdened

33%

of Residents are Low, Very Low, or Extremely Low Income

0%

of Vacant Rental Units are for Low or Very Low Income Residents

0%

of Vacant Rental Units are for Extremely-Low Income Residents

164 %

Growth of non-White population 2010-2023

10%

of Residents are 60+ Years Old

33%

of residents are Under 19 Years Old

290

Total Manufactured Housing Units

Most Prominent Risk Type
Physical Displacement

Policy Evaluation Criteria

- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?
- Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?

Academic Field Scan Citations

1. Besbris, Max, Sadie Dempsey, Brian McCabe, and Eva Rosen. "**Pandemic Housing: The Role of Landlords, Social Networks, and Social Policy in Mitigating Housing Insecurity During the COVID-19 Pandemic.**" RSF: The Russell Sage Foundation Journal of the Social Sciences 10, no. 4 (2024): 207-224.
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More information is available

The executive summary provides an overall picture of housing displacement context risk and relevant approaches for each city. Specific recommendations and data are included in a full report that has been presented to the cities. Each city has been provided with a respective set of policy evaluations and recommendations for next steps.

Technical Appendix Table of Contents

- A. Project Methodology
- B. Housing Displacement Academic Field Scan Memo
- C. Existing Comp Plan Policy Eval Framework
- D. Data & Indicators Summary
- E. Engagement Themes Summary
- F. Risk Profiles & Policy Recommendations
 - 1. Lacey
 - 2. Olympia
 - 3. Tumwater
 - 4. Yelm

File Attachments

- 1. Policy Evaluation Summary Memo
- 2. Policy Recommendation Matrix
- 3. Planning Staff Meeting Summaries
- 4. Affinity Group Summaries
- 5. Engagement Survey Analysis
- 6. Engagement Survey Raw Data
- 7. Engagement Outreach Database

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Project Methodology

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction

This report analyzes housing displacement risks in the cities of Lacey, Olympia, Tumwater, and Yelm. As urban areas evolve, the need for effective policies that safeguard against displacement becomes increasingly critical. This analysis aims to identify factors contributing to housing instability and displacement, especially among vulnerable populations. By examining historical policies, current trends, and community dynamics, we seek to outline actionable recommendations for local governments to enhance housing security and promote equitable living conditions for all residents. Through collaborative engagement with community stakeholders, this report underscores the importance of inclusive housing strategies that prioritize the needs of marginalized groups while fostering sustainable development.

Research

The project team submitted a Housing Displacement Academic Field Scan memo synthesizing the latest peer-reviewed journals from the last decade that responds to the lines of questioning set out within the Housing Displacement Analysis project for the cities of Lacey, Olympia, Tumwater, and Yelm, including:

- What past housing policies resulted in resident displacement?
- What types of current housing policies create the risk of resident displacement?
- What groups and communities are at the greatest risk of housing displacement?

Data Indicators

For a localized understanding of displacement risk, the project team completed a demographic analysis based on the Racially Disparate Impacts (RDI) tool published by the Washington State Department of Commerce outlining a variety of indicators to measure displacement risk. The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD). Additionally, demographic data was pulled from the American Community Survey.

Public Engagement

Affinity Groups

Uncommon Bridges coordinated four (4) affinity group conversations to gather community stakeholders for a discussion about housing displacement risk in Lacey, Olympia, Tumwater, and Yelm. Affinity group topics included:

- 1) Manufactured housing communities,
- 2) Communities of low-wage workers,
- 3) Military families and households, and;
- 4) Accessory dwelling units.

Public Survey

A key aspect of this project involves assessing community insight, perceptions, and lived experiences around the impacts of livability, affordability, and displacement in Olympia, Lacey, Tumwater, and Yelm. A robust data collection effort, including multi-lingual outreach via community anchors, focus groups, and an open-access multi-modal survey, sought to engage both those who have been frequently engaged as well as new perspectives and experiences not included in past policy and housing assessments conducted in the region.

Policy Recommendation Analysis

To assess and evaluate policy options and recommendations, we completed a policy evaluation using two sets of criteria: displacement-specific and locality-specific. The displacement-specific criteria were based on the Department of Commerce's categories of displacement: economic, physical, and cultural. Through discussions with city staff, audits of the cities' Housing Needs Assessments, and stakeholder feedback, we identified additional criteria to better evaluate potential policies and recommendations based on the jurisdiction's unique needs.

Criteria Evaluation Method and Scoring

Policies were evaluated with a set of criteria and scored based on the following scale. These were then totaled to calculate an overall impact score for each policy option.

- **Yes, positive impact (+2):** The policy option has a positive impact and directly addresses the criterion.
- **Somewhat positive impact (+1):** The policy option has a somewhat positive impact, or indirectly addresses the criterion.
- **Neutral/ No impact (+0):** The policy option does not directly address the criterion, but may benefit other housing priorities for the jurisdiction.

- **Negative impact** (-1): The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some options may have a negative impact on one element of the scoring criteria, it does not mean that they are bad options overall. For example, encouraging redevelopment may increase housing supply overall and reduce long-term displacement pressures, but also increase physical displacement pressures in the short-term.

We used the following criteria for all jurisdictions in this report as a common set.

- **Racially Disparate Impacts:** Does this policy prevent racially disparate impacts or work to repair past harm?
- **Economic Displacement:** Does this policy help prevent or mitigate economic displacement?
- **Physical Displacement:** Does this policy help prevent or mitigate physical displacement?
- **Cultural Displacement:** Does this policy help prevent or mitigate cultural displacement?
- **Housing Exclusion:** Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?
- **Implementation Considerations:** Does the city have the staff and resources necessary to implement this policy effectively?

In addition to these, each of the jurisdictions had their own, unique (yet sometimes related and similar) policy evaluation criteria.

Lacey

- Does this policy encourage or remove barriers to providing affordable housing?
- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?
- Does this policy increase the overall housing supply?
- Does this policy reduce housing costs?

Olympia

- Does this policy incentivize and support the development of affordable and deeply affordable housing, including supportive?
- Does this policy increase the housing supply, including middle housing and ADUs?
- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?

Tumwater

- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?

- Does this policy incentivize and support the development of affordable and deeply affordable housing?
- Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?
- Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?

Yelm

- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?
- Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?

Identifying Policy Recommendations

After analyzing the critical issues in each jurisdiction and the challenges of housing displacement, we compiled a comprehensive inventory of potential policies and programs to address these concerns. The list also included each city's respective Housing Action Plan policies to better reflect existing programs and policies to show how these contribute to or detract from anti-displacement goals, and to help the cities prioritize future implementation actions of their HAP.

MEMORANDUM

Date: October 17, 2024
To: Planning and Community Development Departments of the Cities of Lacey, Olympia, Tumwater, and Yelm
From: Ariam Ford, AICP, Equity & Engagement Lead, Uncommon Bridges
Subject: Housing Displacement Academic Field Scan

Purpose

The following document is a synthesis of the latest peer reviewed journals from the last decade that responds to the lines of questioning set out within the Housing Displacement Analysis project for the cities of Lacey, Olympia, Tumwater, and Yelm, including:

- What past housing policies resulted in resident displacement?
- What types of current housing policies create the risk of resident displacement?
- What groups and communities are at the greatest risk of housing displacement?

What past housing policies resulted in resident displacement?

- 1. Property owners have significantly more protection under the law than renters do.** The de facto imbalance of power between landlords and tenants creates situations where the wellbeing of renters becomes secondary to financial profit with little to no regulation. For example, the Housing Choice Voucher Program provides choices to renters beyond government housing projects, however the lack of protection under anti-discriminatory law makes it difficult for renters to find landlords who accept vouchers, opening the door for residential self-segregation by socio-economic class (Besbris et al. 2024, 210).
- 2. Even when protections for renters exist, a lack of information can be exploited by property managers to coerce renters to act against their own interests.** The housing-specific COVID-19 programs are a prime example of protections put in place that many renters didn't realize they were eligible for (Besbris et al. 2024, 212).
- 3. Policies to improve housing stability in the US most often exacerbate housing insecurity for renters.** That is because US housing policy has a legacy of protecting, preferring, and subsidizing for homeownership and homeowners. Little is done for rent-burdened renters to alleviate displacement risk other than advocating for them to buy homes, a distant possibility for most (DeLuca, Stefanie, and Eva Rosen 2022, 345).
- 4. Driven by macro-level increases in income inequality, neighborhoods are becoming more segregated by income.** Contrastingly, racial integration is increasing, especially in U.S. cities (Chapple et al. 2017, 10).
- 5. The definition of displacement is not universal.** Caused by investment or divestment, displacement takes many forms - direct, indirect, physical, economic, or exclusionary (Chapple et al. 2017, 27).

6. **The conversion of public housing projects into mixed-income communities drives housing displacement for low-income households.** Despite the opportunity intentionally designed into mixed-income, multifamily public housing projects, only one-fifth of original project residents return to experience those benefits (Lee and Evans 2020, 6).
7. **Market corrections and global events do little to overcome the effects of racism and socio-economic discrimination on housing displacement.** While major events such as Covid-19 may create housing uncertainty across all demographics and identities, low-income people of color remain the most likely to experience housing displacement (Lee and Evans 2020, 18).
8. **Quantitative efforts to measure displacement underrepresent the plight of disadvantaged populations by not considering lived experience.** To counter this, displacement studies must include user generated, geographically tracked content to truly understand the state of gentrification risk in a community (Chapple and Zuk 2016, 115).

What types of current housing policies create the risk of resident displacement?

1. Government aid delivery is notoriously slow but critical when trying to implement policies designed to reduce housing displacement. **Nesting housing aid into existing, successful, and well-known programs creates a waterfall effect by increasing household disposable income** and thereby decreasing the percentage of total income a household spends on housing (Besbris et al. 2024, 212).
2. **Governments should take a holistic and comprehensive approach to mapping the overlap of government aid programs in their communities.** Only 1 in 4 households eligible for rental assistance actually receives it. There are opportunities to “nest” housing-specific policies within existing and more consistent government programs to boost successful delivery (Besbris et al. 2024, 208).
3. **Housing relief is most expediently and directly delivered via a landlord or property manager.** Government aid can oftentimes fail to provide timely relief for even those who qualify for assistance (Besbris et al. 2024, 217).
4. **To reduce housing displacement risk, governments should focus on increasing household financial stability and reducing socioeconomic inequities within Suburban communities.** Today, most low-income Americans live in the inner suburbs, where evictions are increasing faster than in urban areas. (Rutan et al. 2023, 164)
5. **To fight a growing trend of suburban corporate landlord conglomerates, governments should work to support, subsidize, and grow the amount of local small businesses that provide rental housing while incentivizing them to pass on savings to renters.** Local property owners are more likely to provide support and relief to renters in financial distress, while corporate landlords are more likely to immediately resort to eviction. (Rutan et al. 2023, 166)
6. **Code enforcement and condemnation can be a policy-driven displacement factor without a comprehensive plan to support displaced tenants.** Low-income households may reside in substandard conditions, and in cases where a property owner is unable or refuses to make improvements, tenants may be forced to vacate (Lee and Evans 2020, 3).

7. **Policies restricting housing development contribute to displacement risk.** Increasing housing supply makes housing more affordable, and housing affordability is directly correlated to an individual's housing cost burden, an indicator of displacement risk (Been, Gould Ellen, and O'Regan 2019, 4).
8. **New housing is required to achieve the displacement risk reduction benefits of housing stock filtering.** When new housing is built and priced higher, older housing is pushed down into a lower price range, creating additional housing availability for lower-income households. This concept is at odds with the commonly accepted drivers of gentrification and neighborhood change (Been, Gould Ellen, and O'Regan 2019, 6).

What groups and communities are at the greatest risk of housing displacement?

1. **Suburban poverty is ripe for displacement.** With less public transit, poorer households must spend more money to get around. They have limited access to non-profit services typically concentrated in cities, and confront a municipal infrastructure less suited to deliver holistic social services support (Rutan et al. 2023, 166).
2. **Residential mobility amongst the poor is variable, unplanned, and typically involuntary.** Eviction filings doubled between 2000 and 2016 (DeLuca, Stefanie, and Eva Rosen 2022, 348).
3. **Households in mobile homes are over twice as likely to live in poverty.** Half of all mobile homes in the US are in urban areas. There are 1.7 million mobile home renter households and 5.3 million mobile homeowners in the US (DeLuca, Stefanie, and Eva Rosen 2022, 348).
4. **Mobile home closures should be treated as mass evictions, which are primary indicators of displacement risk.** Those who own their trailers but don't have the means to move them to another location face an additional loss, leading to not only displacement but also the loss of a valuable household asset (Lee and Evans 2020, 6).
5. **Older people, African Americans, and Latinos are overrepresented across most types of displacement** (Lee and Evans 2020, 9).
6. **Households with children are at an increased risk of displacement.** A Milwaukee study found that renters with two children have an 11.7% chance of being evicted and a 9.5% chance with one child (Desmond and Gershenson 2017, 8).
7. **Renters who experience job loss are more likely to be evicted.** A Milwaukee study found that renters who lost their jobs were twice as likely to be evicted (Desmond and Gershenson 2017, 8).
8. **Community character change, or gentrification, is not necessarily an indicator of displacement.** A Milwaukee study found no significant difference in eviction risk between those living in racially or economically transitioning neighborhoods and those who live in homogenous communities (Desmond and Gershenson 2017, 9).
9. **Having a more affluent support system is not necessarily a buffer to experiencing housing displacement, but decreasing poverty shocks amongst those in your social networks will decrease displacement risk.** A Milwaukee study found that while renters in social networks with others experiencing poverty shocks are more likely to experience

eviction, having a more affluent social network did not decrease a renter's risk of eviction (Desmond and Gershenson 2017, 8).

Bibliography

1. Besbris, Max, Sadie Dempsey, Brian McCabe, and Eva Rosen. "**Pandemic Housing: The Role of Landlords, Social Networks, and Social Policy in Mitigating Housing Insecurity During the COVID-19 Pandemic.**" RSF: The Russell Sage Foundation Journal of the Social Sciences 10, no. 4 (2024): 207-224.
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Policy Framework Review

Evaluation Method

With the passage of [HB 1220 in 2021](#), jurisdictions are required to make adequate provisions for housing for all economic segments of the community. This includes identifying “*local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.*”

The following evaluation table assesses the existing Comprehensive Plan’s goals and policies for impacts for racially disparate impacts, including displacement and exclusion, in the Housing Element and residential goals and policies in the Land Use Element. The evaluation used the following criteria in evaluating each goal and policy, consistent with the Department of Commerce’s Racially Disparate Impacts guidance:

- **Supportive:** The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.
- **Approaching:** The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.
- **Challenging:** The policy may challenge the jurisdiction’s ability to meet the identified housing needs. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution of benefits and burdens imposed by the policy.
- **Not Applicable (NA):** The policy does not impact the jurisdiction’s ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.

All Goals and policies in the Housing Element were included in this evaluation. For the Land Use Element, only residential-use-related policies were evaluated.

City of Olympia

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Land Use and Urban Design Element, Comprehensive Plan				
PL6.1	<p>Establish and periodically update a design review process and design criteria consistent with the goals and policies in the Comprehensive Plan for:</p> <ul style="list-style-type: none"> ● Commercial and mixed use development adjacent to freeways and public streets ● Other highly-visible, non-residential development, such as the Port of Olympia, campus developments, and master planned developments ● Multifamily residential development and manufactured housing parks ● Detached homes on smaller lots (less than 5,000 square feet) and in older neighborhoods (pre-1940) ● Properties listed on a Historic Register or located within a designated historic district 	Approaching	<p>The policy could address that the design review process should be reviewed and updated to ensure a streamlined review process and sufficient housing production to meet capacity goals.</p>	<p>Establish and periodically review and update a design review process and design criteria that ensures streamlined review, encourages sufficient housing production to meet the City’s housing capacity goals, and is consistent with the goals and policies in the Comprehensive Plan for:</p> <ul style="list-style-type: none"> ● Commercial and mixed use development adjacent to freeways and public streets ● Other highly-visible, non-residential development, such as the Port of Olympia, campus developments, and master planned developments ● Multifamily residential development and manufactured housing parks ● Detached homes on smaller lots (less than 5,000 square feet) and in older neighborhoods (pre-1940)

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
				<ul style="list-style-type: none"> • Properties listed on a Historic Register or located within a designated historic district

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL6.4	Require multi-family housing to incorporate architectural forms and features common to nearby housing; to include porches, balconies, bay windows and similar details; to have entries oriented to streets or a courtyard, and include accessible open space; and to be reduced in size near lower density residential districts.	Challenging	Additional restrictions on multi-family housing types can result in less affordable rents. While design standards are not necessarily negative—they can ensure liveable spaces—this policy should be updated to balance both design and affordability goals, allowing flexibility to ensure housing production and choices.	Balance design standards for multi-family housing that require developers incorporate architectural forms and features similar to existing development, include entries oriented towards streets or a courtyard, and include accessible open space, with flexibility to ensure design standards do not increase the cost of development and prevent housing production.
PL8.4	Avoid height bonuses and incentives that interfere with landmark views.	Challenging	Limiting density for aesthetic reasons can result in lower housing capacity. However, this may be an acceptable compromise as long as the housing and affordability considerations are planned for elsewhere. To avoid subjective views being used as a tool for limiting housing development, this policy should be updated to specify or map viewsheds are most	Avoid height bonuses and incentives that interfere with the City's special landmark views and specify which areas of the city this applies to in the city's code.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			important to preserve through code provisions.	
PL11.2	Provide incentives for housing in commercial districts near transit stops.	Approaching	Providing housing near jobs can be helpful in preventing displacement while reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability as well.	Provide incentives for housing and affordable housing in commercial districts near transit stops.
GL14	Olympia's neighborhoods provide housing choices that fit the diversity of local income levels and lifestyles. They are shaped by thorough public planning processes that involve community members, neighborhoods, and city officials.	Approaching	While this policy does address housing for the different income levels, it should be expanded to clearly call-out low income groups and prioritize housing for historically marginalized groups.	Olympia's neighborhoods provide housing choices that fit the diversity of local income levels and lifestyles. They are shaped by thorough public planning processes that involve community members, neighborhoods, and city officials, and actively seek input from historically marginalized or overburdened populations.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL14.2	<p>Concentrate housing into three high-density Neighborhoods: Downtown Olympia, Pacific/Martin/Lilly Triangle; and the area surrounding Capital Mall. Commercial uses directly serve high-density neighborhoods and allow people to meet their daily needs without traveling outside their neighborhood. High-density neighborhoods are highly walkable. At least one-quarter of the forecasted growth is planned for downtown Olympia.</p>	Approaching	<p>While this policy does address the city's housing needs and demands, it does not address reducing displacement and affordability pressures.</p>	NA
PL14.3	<p>Preserve and enhance the character of existing Low-density Neighborhoods. Disallow medium or high-density development in existing Low-density Neighborhood areas except for Neighborhood Centers.</p>	Challenging	<p>Language that aims to preserve low-density, single-family neighborhood "character" can often be used as a proxy for prohibiting more diverse housing choices. Instead of "character," this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing</p>	<p>Focus medium or high-density development in Neighborhood Centers of low-density neighborhoods.</p>

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			types such as middle housing.	
PL14.4	In low-density Neighborhoods, allow medium-density Neighborhood Centers that include civic and commercial uses that serve the neighborhood. Neighborhood centers emerge from a neighborhood public process.	Approaching / Supporting	Depending on how inclusive the Neighborhood Center identification and engagement process is, this policy would support anti-displacement through placemaking and housing, or it may cause further displacement.	Ensure neighborhood centers are developed around a public process that actively seeks input from all residents, prioritizing those from historically marginalized or overburdened communities.
Land Use and Urban Design Element, Comprehensive Plan - Housing Section				
GL16	The range of housing types and densities are consistent with the community's changing population needs and preferences.	Approaching	While the policy acknowledges different community and population needs, it could be improved by incorporating affordability and anti-displacement language.	Ensure a range of housing types and densities consistent with the community's changing population needs, preferences, and to provide housing affordable for all income brackets.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL16.2	Adopt zoning that allows a wide variety of compatible housing types and densities.	Approaching	The policy intends to allow a variety of housing types. However, “compatible” is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Adopt zoning that allows a wide variety of housing types and densities to provide housing for all needs.
PL16.3	Allow 'clustering' of housing compatible with the adjacent neighborhood to preserve and protect environmentally sensitive areas.	Approaching	This goal would allow parcels that would be undevelopable under strict application of the zoning code to be developable. However, “compatibility” could be further defined to ensure the building types used are not exclusionary.	Allow clustering of housing to preserve and protect environmentally sensitive areas and increase the developable area of parcels with critical areas present.
PL16.4	Disperse low and moderate-income and special needs housing throughout the urban area.	Approaching	While this policy seeks to ensure lower income households are not isolated to certain parts of the city, it could be enhanced to go further by allowing and fostering capacity rather	Allow and increase the amount of low and moderate-income and special needs housing in the city.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			than focusing on dispersion.	
PL16.5	Support affordable housing throughout the community by minimizing regulatory review risks, time and costs and removing unnecessary barriers to housing, by permitting small dwelling units accessory to single-family housing, and by allowing a mix of housing types.	Supportive	This policy supports housing growth and affordability.	NA
PL16.6	Promote home ownership, including by allowing manufactured homes on individual lots, promoting preservation of manufactured home parks and allowing these parks in multi-family and commercial areas, all subject to design standards ensuring compatibility with surrounding housing and land uses.	Approaching	This policy could be improved by better defining compatibility. Consider identifying whether compatibility is driven by architectural massing or design styles.	Promote home ownership, including by allowing manufactured homes on individual lots, promoting the preservation of manufactured home parks, and allowing these parks in multi-family and commercial areas, with appropriate development standards.
PL16.7	Allow single-family housing on small lots, but prohibit reduced setbacks abutting conventional lots.	Approaching	Allowing smaller homes on smaller lots reduces land costs.	NA. The intent of this policy needs to be clarified by City staff.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			"Conventional lots" is unclear however.	
PL16.8	Encourage and provide incentives for residences above businesses.	Supportive	Incentivizing residences over businesses creates flexibility and a variety of units.	NA
PL16.9	In all residential areas, allow small cottages and townhouses, and one accessory housing unit per home -- all subject to siting, design and parking requirements that contribute to neighborhood character.	Approaching	While allowing cottages and townhouses supports housing and affordability goals, "neighborhood character" is vague and could be tied to exclusionary housing practices.	Allow small cottages, townhomes, and one accessory dwelling unit per home, all subject to design standards and parking requirements consistent with the underlying zone.
PL16.10	Require effective, but not unreasonably expensive, building designs and landscaping to blend multi-family housing into neighborhoods.	Approaching	Requiring additional standards for multi-family housing types ultimately hinders affordability.	Require effective, but not unreasonably expensive, building standards and landscaping to blend multi-family housing into neighborhoods, and periodically review these standards to ensure they do not prevent the development of affordable housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL16.11	Require that multi-family structures be located near a collector street with transit, or near an arterial street, or near a neighborhood center, and that they be designed for compatibility with adjacent lower density housing; and be 'stepped' to conform with topography.	Approaching	Requiring multi-family housing to be located near transit or neighborhood centers increases their accessibility, but this policy could be expanded to include multi-family housing throughout the city to increase the number of housing units. This policy could also be improved by better defining compatibility.	Require that multi-family structures be prioritized near a collector street with transit, near an arterial street, or near a neighborhood center, encouraged throughout the city, and be designed to conform with topography in a stepped formation.
PL16.12	Require a mix of single-family and multi-family structures in villages, mixed residential density districts, and apartment projects when these exceed five acres; and use a variety of housing types and setbacks to transition to adjacent low-density areas.	Approaching	Requiring a mix of single- and multi-family housing types could support housing growth and affordability, but it does not address reducing displacement and affordability pressures. This policy could be better improved by specifying the "mix" of housing.	NA
PL16.13	Encourage adapting non-residential buildings for housing.	Supportive	Adapting non-residential buildings for housing supports housing growth and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL16.14	Provide annual information on affordable homeownership and rentals in the City, including the operative definitions of affordable housing, criteria to qualify for local, state, and federal housing assistance, data on current levels of market-rate and affordable housing, demand for market-rate and affordable housing, and progress toward meeting market-rate and affordable housing goals.	Supportive	Reviewing affordability and funding opportunities to increase housing annually is supportive of housing growth and affordability.	NA
Land Use and Urban Design Element, Comprehensive Plan - Downtown and Other Neighborhoods - Neighborhoods Section				
GL20	Development maintains and improves neighborhood character and livability.	Approaching	This policy could be improved by specifying what “neighborhood character” means, as the term is vague and could be tied to exclusionary housing practices.	Ensure new developments maintain the scale and form of existing neighborhoods while increasing their livability and affordability.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL20.1	Require development in neighborhoods to be of a type, scale, orientation, and design that maintains or improves the character, aesthetic quality, and livability of the neighborhood.	Challenging	This policy could be improved by specifying “character”, which is vague and could be tied to exclusionary housing practices. This policy does not directly address housing affordability or supply. Requiring additional standards could ultimately hinder affordability.	Maintain development standards for new residential developments that balance maintaining the scale and form of existing neighborhoods with flexible standards that encourage diverse housing types.
PL20.2	Unless necessary for historic preservation, prohibit conversion of housing in residential areas to commercial use; instead, support redevelopment and rehabilitation of older neighborhoods to bolster stability and allow home occupations (except convalescent care) that do not degrade neighborhood appearance or livability, nor create traffic, noise or pollution problems.	Approaching	This policy preserves housing in residential areas, but it could increase displacement risk as it does not address protecting residents from potential displacement or racially disparate impacts that may result from the redevelopment and rehabilitation of older neighborhoods.	Prohibit the conversion of housing in residential areas to commercial use unless necessary for historic preservation and support the redevelopment and rehabilitation of older neighborhoods to maintain existing affordable housing stock and allow home occupations, considering and preventing the potential displacement impacts that may result from the redevelopment and rehabilitation of older neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
20.3	Allow elder care homes and seniors-only housing and encourage child care services everywhere except industrial areas; but limit hospice care to multi-family and commercial districts.	Approaching	This policy addresses housing supply and affordability by allowing housing for the elderly. It could be more equitably applied to residential zones, rather than only being allowed in multi-family and commercial districts.	NA, could consider allowing hospice care in all areas but industrial, as well.
PL20.4	Support development and public improvements consistent with healthy and active lifestyles.	Supportive	This policy could be improved by prioritizing investment in neighborhoods that have historically experienced a lack of investment.	NA
PL20.5	Prevent physical barriers from isolating and separating new developments from existing neighborhoods.	Supportive	This policy supports housing growth, affordability, and the integration of new developments.	NA
Public Services Element, Comprehensive Plan				
GS3	Affordable housing is available for all income levels throughout the community.	Supportive	Providing affordable housing advances housing growth. This goal should be updated to consider housing by income bracket to meet	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			the requirements of HB 1220.	
PS3.1	Promote a variety of residential densities and housing types so that housing can be available in a broad range of costs.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing. This policy should be updated to consider housing by income bracket to meet the requirements of HB 1220.	NA
PS3.2	Encourage preservation of existing houses.	Approaching	This policy is supportive of housing goals but could prevent affordable housing from being built.	Encourage the preservation of existing or naturally affordable housing units.
PS3.3	Take steps to ensure housing will be available to all income levels based on projected community needs.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing. This policy should be updated to consider housing by income bracket to meet the requirements of HB 1220.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GS4	Deteriorating residential areas within the City are revitalized.	Approaching	This policy is supportive of housing goals but could lead to displacement or disproportionate impacts to vulnerable or historically marginalized communities.	Encourage renovation or retrofit of deteriorating residential units to maintain the quality of the existing housing stock, and partner with other organizations or create a city program to provide temporary relocation assistance where needed.
PS4.1	Support efforts to preserve the historic features or character of historic properties in City housing rehabilitation programs.	Challenging	This policy could place additional burdens or barriers to housing rehabilitation.	Ensure rehabilitation programs support efforts to preserve historic features of historic properties in the City where feasible and do not prevent housing rehabilitation or the provision of safe housing.
PS4.2	Provide assistance and incentives to help low-income residents rehabilitate properties they cannot afford to maintain.	Supportive	Providing assistance to low income residents to rehabilitate their properties is supportive of housing growth and maintaining existing affordable housing stock, while prioritizing assistance for low income groups.	NA
GS5	Special needs populations, such as people with developmental disabilities, the homeless, the frail elderly, and others who have difficulty securing housing,	Supportive	This goal is supportive of housing goals, especially to provide housing for vulnerable populations.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	have adequate, safe, and affordable housing.			
PS5.1	Disperse housing for low-income, moderate-income, and special-needs residents throughout Olympia and its Urban Growth Area, and discourage concentration of such housing in any one geographic area.	Approaching / Supportive	This policy is supportive of housing growth and ensuring low income or other types of housing are integrated throughout the city.	NA
PS5.2	Support the Fair Share Housing allocation process and work with other jurisdictions to monitor progress toward achieving agreed upon goals.	Approaching	This policy helps support housing growth, but doesn't directly address affordability or displacement.	NA
PS5.3	Evaluate the possibility of providing density bonuses to builders who provide low-income housing in market-rate developments, and of tying the bonus to affordability.	Approaching	This policy could be strengthened by requiring low income units.	Evaluate the possibility of providing density bonuses to builders who provide low-income housing in market rate developments or requiring the provision of low-income units.
PS5.4	Encourage new housing on transportation arterials and in areas near public transportation hubs.	Approaching	While greater housing density and new units near transportation facilities—especially transit—can connect households to	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			employment, this policy may also result in greater densities of housing adjacent to toxic and harmful emissions near busier streets, resulting in environmental justice concerns.	
PS5.5	Encourage self-help housing efforts in which people earn home equity in exchange for renovation or construction work, such as "sweat equity" volunteer programs.	Approaching	This policy provides incentive and a way to build home equity but could include other ways for people who are not able bodied.	Encourage self-help housing efforts in which people earn home equity in exchange for renovation or construction work, such as "sweat equity" volunteer programs, and explore other methods of building home equity for those who are not able bodied.
PS5.6	Retain existing subsidized housing.	Supportive	This policy is supportive of housing goals and displacement prevention.	NA
GS6	Our community is safe and welcoming and social services are accessible to all who need them.	Supportive	This goal aims to provide social services to those who need them, but could be strengthened by prioritizing the most vulnerable populations in Olympia to ensure their needs are met.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS6.1	Support non-profit and faith-based charitable organizations that provide funding and/or oversight for social service funding.	Supportive	This policy aims to provide social services by assisting other organizations.	NA
PS6.2	Work with other local governments to provide financial support and oversight of social service funding.	Supportive	This policy aims to provide social services by working with other local governments.	NA
PS6.3	Support programs and projects that assist low-income people and those at risk of homelessness with public funding.	Supportive	This policy aims to provide social services by contributing public funding, which could help mitigate or prevent potential displacement.	NA
PS6.4	Identify barriers to social service, shelter and housing resources for low-income people and those at risk of becoming homeless.	Supportive	This policy helps to mitigate or prevent displacement by reducing barriers to providing services.	NA
GS7	There is enough emergency housing, transitional housing, permanent housing with supportive services, and independent affordable housing.	Supportive	This goal is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS7.1	Encourage a strong network of emergency shelter resources for homeless and at-risk families with children, childless adults, unaccompanied youth, and victims of sexual and domestic violence.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA
PS7.2	Take a regional approach with other jurisdictions so that support for a broad range of social services and resources, including shelter and housing, can be maximized.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA
PS7.3	Encourage businesses, charitable non-profit organizations, and faith-based community organizations to provide shelter and housing services.	Approaching	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness, but could be strengthened by recognizing the city's role in providing shelter and housing services.	Encourage and support businesses, charitable non-profit organizations, and faith-based community organizations to provide shelter and housing services.
PS7.4	Support coordinated service delivery models to maximize the best use of public, charitable,	Supportive	This policy addresses housing exclusion for individuals experiencing or at risk of homelessness and	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	and privately-funded shelter and housing resources.		helps mitigate or prevent displacement by reducing barriers to providing services.	
PS7.5	Support best practices that reflect current standards of care, and incorporate emerging models that optimize the use of public and charitable resources.	Supportive	This policy addresses housing exclusion for individuals experiencing or at risk of homelessness and helps mitigate or prevent displacement by reducing barriers to providing services.	NA
PS7.6	Encourage shelter and housing providers and programs to locate in the greater Olympia area, or near transportation arterial hubs, so residents can easily access them.	Supportive	This policy addresses housing exclusion for individuals experiencing or at risk of homelessness and helps mitigate or prevent displacement by reducing barriers to accessing services.	NA
PS7.7	Work toward making the community more aware of homelessness in Olympia and how it can be prevented as a way to encourage charitable	Approaching	This policy may have good intent to get community members involved, but making the community more aware of homelessness could lead to the	Raise awareness of the city's homelessness and displacement prevention efforts and resources, especially with residents at risk of displacement.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	support and involve community members.		community not being supportive of supportive housing services or emergency housing.	
PS7.8	Use data to continually assess the community's need for shelter and housing and who it is serving. Use this data to continually improve these services.	Supportive	This policy is supportive of housing goals, to continually evaluate where gaps in housing are needed. It could be improved by saying "who it is serving and who is being left out" in order to evaluate any disproportionate impacts.	NA
PS7.9	Revise policies that limit or prevent the community from providing shelter and housing resources.	Approaching	This policy is supportive of housing goals and could be improved by addressing displacement.	Periodically review (<i>the City would need to specify how often</i>) and revise policies that limit or prevent the provision of shelter, housing resources, or that may increase displacement.
PS7.10	Coordinate land use, housing, transportation, and capital facility planning to support all aspects of shelter and housing resources, including emergency shelter,	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	transitional housing, permanent housing with supportive services, and low-income housing.		experiencing or at risk of homelessness.	
PS7.11	Integrate group homes into all residential areas of the community. Set zoning standards to ensure group home sizes (number of residents and staff) are compatible with allowed densities and that transportation and other services are available.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals living in group homes.	NA
PS7.12	Evaluate regulations so the City can be more flexible in locating shelters and increasing capacity.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA
GS8	The existing low-income housing stock is preserved.	Supportive	This policy is supportive of housing goals and displacement prevention.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS8.1	Continue to fund the repair and rehabilitation of single-family and multi-family housing using federal, state, and local funding sources.	Supportive	This policy is supportive of maintaining existing housing. It could be strengthened by considering potential displacement impacts and affordability.	NA
PS8.2	Support applications by the Housing Authority of Thurston County and other non-profit housing developers to construct or purchase existing units for low-rent public housing.	Supportive	This policy is supportive of maintaining existing affordable housing, while prioritizing opportunities for low income groups.	NA
PS8.3	Support applications from eligible non-profits to federal and state funding sources to build new, or rehabilitate existing housing to meet low-income housing needs.	Supportive	This policy is supportive of maintaining existing affordable housing, while prioritizing opportunities for low income groups. It could be strengthened by considering potential displacement impacts.	NA
PS8.4	Encourage and provide technical assistance to private developers and non-profits applying for below-market-rate state or federal loans to construct or	Supportive	This policy is supportive of housing and growth, while prioritizing opportunities for low income groups. It could be strengthened by considering potential	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	rehabilitate low-income, multifamily rental housing.		displacement impacts from rehabilitation.	
PS8.5	When Community Development Block Grant or Housing and Urban Development-funded buildings are at risk of being converted to market-rate status, inform the tenants of any purchase and relocation options available. When possible, help the Housing Authority of Thurston County and non-profit organizations buy such housing.	Approaching	This policy aims to mitigate the impacts of displacement, but could be improved by prioritizing avoiding displacement.	NA
PS8.6	<p>Enforce policies* that provide financial and relocation help to people who are displaced from their homes as a result of construction and development projects using federal funds.</p> <p><i>*(Per section 104(d) of the Housing and Community Development Act of 1974 as amended, requiring the replacement of low- and moderate-income housing units that are demolished or converted to another use, in connection with a</i></p>	Approaching	This policy aims to mitigate the impacts of displacement, but could be improved by prioritizing avoiding displacement.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	<i>Community Development Block Grant project.)</i>			
GS9	New low-income housing is created to meet demand.	Supportive	This policy is supportive of housing and growth, while prioritizing opportunities for low income groups.	NA
PS9.1	Continue to support projects funded by low-income tax credits and revenue bonds.	Supportive	This policy is supportive of housing and growth, while prioritizing opportunities for affordable housing.	NA
PS9.2	Investigate and support appropriate multi-jurisdictional support for the Housing Authority of Thurston County bond sales.	Approaching	This policy helps support housing growth, but doesn't directly address affordability or displacement.	NA
PS9.3	Promote partnerships between public and private non-profit organizations to increase housing and home ownership opportunities for people with special needs, and for low- and moderate-income households.	Supportive	This policy encourages homeownership and is supportive of housing affordability and mitigating displacement, while prioritizing opportunities for low and middle incomes.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS9.4	Continue to encourage development of single-room occupancy units downtown, along urban corridors, and in other areas where high-density housing is permitted. This could include encouraging alliances between public, private, and nonprofit organizations.	Approaching	This policy is supportive of housing goals and displacement but could be more equitably applied throughout the city.	NA, but consider expanding this to more areas of the city.
PS9.5	Evaluate the possibility of supporting a program that would allow low-income tenants of manufactured home parks to jointly purchase and renovate permanent sites for their manufactured homes. Consider funding programs to subsidize the interest rates, loan origination fees, and/or other costs of acquiring the land.	Supportive	This policy is supportive of housing affordability, and could be improved to address displacement.	NA
PS9.6	Help low-income and special needs residents find ways to purchase housing, such as shared or limited-equity housing, lease-purchase options, co-housing, land trusts, and cooperatives.	Supportive	This policy is supportive of housing growth and affordability for potentially vulnerable or at risk populations.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS9.7	Work with jurisdictional partners through the county-wide Home Consortium, to fund affordable housing projects that serve low- and very low-income residents.	Supportive	This policy is supportive of housing growth and affordability.	NA
PS9.8	Continue to administer the Housing Tax Credit program to develop both market-rate and low-income housing.	Approaching	This policy is supportive of housing goals but could better address affordability and provide housing for all income bands.	NA
PS9.9	Support non-profit and faith-based organizations in their efforts to provide emergency homeless shelters.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA

City of Lacey

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
<h2>Planning Areas - Central</h2>				
<p>Goal 2</p>	<p>Maintain quality and function of existing residential areas in the Central Planning Area.</p>	<p>Approaching</p>	<p>This policy could be improved by specifying what “quality and function” means, as the terms are vague and could be tied to exclusionary housing practices, and by addressing how this policy would prevent exclusion, disproportionate impacts, or displacement.</p>	<p>Maintain existing affordable housing where feasible and ensure future residential development maintains the existing scale and form of residential areas in the Central Planning Area.</p>
<p>Policy A</p>	<p>Acknowledge historical character and value of the Lacey Historic Neighborhood as a unique housing resource. Continue to require special development standards for Lacey Historic Neighborhood that recognize and preserve historical values and neighborhood character while allowing reasonable infill and development.</p>	<p>Approaching</p>	<p>This policy allows for infill and housing development in the Historic Neighborhood, but could be improved by defining what “reasonable” infill and development means, as well as “neighborhood character”, as the term is vague and could be tied to exclusionary housing practices.</p>	<p>Acknowledge the value of the Lacey Historic Neighborhood as a unique housing resource by continuing to require development standards that recognize, preserve, or honor historical values and design while accommodating infill development.</p>

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy B	Acknowledge character and value of older residential neighborhoods adjacent to the Central Business District as an affordable housing resource.	Supportive	This policy addresses housing supply and affordability, but should better define “character”.	Acknowledge the value of older residential neighborhoods adjacent to the Central Business District as a potential affordable housing resource.
Policy C	Develop and implement a subarea plan for the Golf Club Road neighborhood.	NA	This policy could be improved by discussing goals to improve housing affordability and avoid disproportionate impacts to vulnerable communities in this neighborhood.	NA
Goal 3	Provide opportunities for infill in the Central Planning Area.	Supportive	This policy is supportive of housing growth and affordability, but could be strengthened to consider potential racially disparate impacts.	Provide opportunities for infill development in the Central Planning Area.
Policy A	Maintain the liberal policy on accessory residential units while maintaining quality and character of neighborhood through performance standards and design review.	Approaching	While allowing ADUs supports housing growth and affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices.	Continue to maintain the city's ADU policies while maintaining the scale and form of existing neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy B	Provide opportunities for duplexes, triplexes and quadraplexes to locate in lower density neighborhoods as infill mechanisms which enhance neighborhood character by requiring exceptional and rigorous design requirements.	Approaching	While allowing duplexes, triplexes, and quadraplexes supports housing growth and affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices. “Exceptional and rigorous design requirements” can be leveraged to maintain high-cost housing types, unattainable to those from lower incomes or historically marginalized communities.	Increase opportunities for locating duplexes, triplexes, and quadraplexes in low-density neighborhoods and ensure development standards and any design requirements are not overly stringent or increase the cost of development.
Policy C	Provide opportunities for single-family cluster housing on smaller lot sizes than the under-lying zone with exceptional and rigorous design requirements to maintain quality and character of neighborhood areas.	Approaching	While allowing cluster housing on smaller lots may reduce land costs and support housing affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices. Requiring “rigorous design requirements” could ultimately hinder affordability.	Develop standards for single-family cluster housing on smaller lot sizes than the underlying zoning to reduce land costs and support housing affordability.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Planning Areas – Horizons Planning Area				
Goal 1	Continue to encourage the development of a range of residential types, providing opportunity for high density residential development along arterials with transitions to existing low density residential development.	Approaching	This policy is supportive of housing growth and affordability, but could be strengthened to expand high density housing throughout the city and to consider affordability as well.	Continue to encourage the development of a range of residential types, providing opportunity for high density residential development throughout the Horizons Planning Area, especially in areas near existing services.
Policy A	Undeveloped property along College, Yelm, Ruddell, and Rainier Road should be zoned for moderate or high density residential development.	Approaching	This policy is supportive of housing growth, but could be strengthened to consider potential racially disparate impacts.	Zone undeveloped property along College, Yelm, Ruddell, and Rainier Road for moderate or high density residential development.
Policy B	Support infill development in higher density areas primarily around existing neighborhood centers, recognized nodes, and urban corridor areas.	Supportive	Providing housing near jobs and neighborhood centers can be helpful in preventing displacement while reducing overall community impacts such as traffic. The policy could be expanded to consider affordability as well.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Encourage a full range of higher density residential uses, including single-family zero lot line developments, townhouse units, mixed residential use, planned residential developments and multifamily apartments.	Supportive	This policy is supportive of housing growth.	NA
Policy D	Pay careful attention to blend different land use types to minimize potential land use conflicts while maintaining walkability as a priority.	NA	NA	NA
Planning Areas – Lakes Planning Area				
Goal 3	Maintain existing moderate and high density housing opportunities along major arterials with convenient access to transit where no impact to environmentally sensitive areas will occur.	Supportive	Providing housing near transit can be helpful in reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability and anti-displacement as well.	Maintain existing affordable and moderate and high density housing units along major arterials with convenient access to transit where no impact to environmentally sensitive areas will occur.
Policy A	Maintain areas for medium density development opportunities along Ruddell Road.	Approaching	This policy is supportive of housing growth, but could be expanded to allow high density housing or address anti-displacement in this area.	Maintain areas for medium or high density development opportunities along Ruddell Road. <i>(Edited to add "high density" as medium and high density options are both included in the Horizons</i>

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
				<i>Planning Area policies, along the same road).</i>
Planning Areas – Pleasant Glade Planning Area				
Goal 2	Provide opportunities for moderate and high density housing along major arterials with convenient access to potential transit, designating “urban reserve areas”, and annexing areas for public use where appropriate.	Approaching	Providing housing near transit can be helpful in reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability and anti-displacement as well.	Provide opportunities for affordable and moderate and high density housing along major arterials with convenient access to potential transit, designating “urban reserve areas”, and annexing areas for public use where appropriate.
Policy A	Maintain existing areas for moderate and high density development opportunities along arterials of Sleater Kinney and 15th Avenue, contingent on provisions for public sewer.	Supportive	This policy is supportive of housing growth, but could be expanded to address anti-displacement in this area.	Maintain existing affordable housing and areas for moderate and high density development opportunities along arterials of Sleater Kinney and 15th Avenue, contingent on provisions for public sewer.
Policy B	Study and analyze designating the northwest portion of the planning area as an “urban reserve area” or “urban holding area” until sewer service can be extended.	Supportive	This policy is supportive of housing growth that is supported by adequate public facilities and infrastructure.	NA
Policy C	Consider the annexation of the Greg J. Cuoio Community Park property for the future completion for public access.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Planning Areas – Seasons Planning Area				
Goal 3	Over the long term, encourage development of a range of residential types, with emphasis on providing additional moderate and high density opportunities.	Approaching	This policy addresses the city’s housing needs and growth, but does not address affordability.	Encourage the development of a range of housing types, with an emphasis on medium and high density development as well as units affordable to low-income households.
Policy A	Maintain areas along Marvin Road for moderate density development as sewer becomes available. Review areas along Mullen, Yelm Highway, and 58th for moderate density development as sewer becomes available. Moderate and High Density zones should be planned to provide transitions to existing low density residential development.	Approaching	This policy supports housing growth but could be strengthened by considering impacts on vulnerable populations and racially disparate impacts.	Maintain areas along Marvin Road and review areas along Mullen, Yelm Highway, and 58th for moderate density development as sewer becomes available.
Policy B	Encourage a full range of residential uses when adequate facilities and services are available to serve them.	Approaching	This policy supports housing growth but could be strengthened by considering impacts on vulnerable populations and racially disparate impacts.	Encourage a full range of residential uses and housing types for all incomes when adequate facilities and services are available to serve them.
Policy C	Pay careful attention to creating effective transitions between new developments of moderate	Approaching	This neighborhood area allows a variety of housing types	Ensure new development fits the scale and form of existing development through development regulations.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	density and existing low density development.		supportive of housing supply objectives.	
Housing Element, Comprehensive Plan				
Goal 1	Have a sufficient number of single-family dwelling units, multifamily units, and group and special need housing to provide a selection of rental and home ownership affordable housing opportunities for all persons.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability.	NA
Policy A	Provide opportunities for development of all housing types to accommodate future needs for each type of housing.	Supportive / Approaching	While supportive, this policy will need to be updated to meet HB 1220 guidance on specific household income brackets. However, providing housing across all income segments reduces displacement risk and enables housing opportunities to all, regardless of income.	Increase opportunities to develop a wide range of housing types to accommodate diverse housing needs and provide housing for all income brackets.
Policy B	Monitor the market and available land in the urban growth boundary to provide sufficient area zoned to meet the demand for various types of housing.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Encourage a wide variety of housing from low to high income in range to allow placement and mobility within the housing market.	Supportive	This policy is supportive of providing housing for all needs. It could be improved by prioritizing the provision of housing for low-moderate incomes and considering potential displacement impacts. This policy will need to be updated to meet HB 1220 guidance on specific household income brackets.	Encourage a wide variety of housing available to all income brackets to allow placement and mobility within the housing market.
Policy D	Promote preservation and improvement of existing single-family and multifamily units.	Approaching	This policy supports housing growth by preserving existing housing stock. It could be improved by considering anti-displacement.	Promote the preservation and maintenance of existing housing units, prioritizing those that serve low income households or provide special housing needs.
Policy E	Support neighborhood revitalization through available grants from the State, Federal and local levels to maintain and improve infrastructure.	Approaching	This policy supports housing growth by pursuing grant funding, but could be strengthened by prioritizing affordable housing or improving infrastructure in vulnerable neighborhoods. "Neighborhood revitalization" could be	Pursue grants to provide funding for renovating and maintaining existing affordable housing units and ensure there are anti-displacement mechanisms in place, such as the provision of relocation assistance or a right to return policy.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			better defined, as it could lead to the displacement of historically marginalized populations.	
Policy F	Support policies and programs to address the unique housing needs of the military population, including active duty, reserves, dependents and contractors.	Supportive	This policy is supportive of providing housing for all needs. It could be improved by addressing potential displacement impacts.	NA
Goal 2	Achieve a balanced community with each planning area accommodating a fair share of housing needs for all persons.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability. It could be improved by addressing potential disproportionate impacts.	NA
Policy A	Consider requirements and incentives designed to result in a balanced, increased supply of affordable housing in all parts of the City for very low, low and moderate income households.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.	Consider requirements and incentives that result in a balanced, increased supply of affordable housing throughout the City for very low, low, and moderate income households.
Policy B	Consider programs that include mandatory requirements for new developments targeting individual planning areas until	Approaching	This policy supports housing growth by pursuing grant funding, but could be	Consider programs that include mandatory requirements for new developments targeting individual planning areas until housing goals

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	housing goals for target groups are achieved.		strengthened by specifying anti-displacement goals and prioritizing vulnerable populations or those with special housing needs.	for affordability, anti-displacement, and special needs housing are met.
Goal 3	Work with regional agencies and bodies to implement affordable housing techniques consistently and on a regional scale.	Supportive	This policy is supportive of housing growth and affordability.	NA
Policy A	A myriad of affordable housing strategies should be implemented by all surrounding jurisdictions in Thurston County to meet housing needs on a regional scale for very low, low and moderate income households.	Supportive	This policy is supportive of housing growth and affordability.	Work with surrounding jurisdictions in Thurston County to implement a myriad of affordable housing strategies to meet regional housing goals to support very low, low, and moderate income households.
Policy B	Public and nonprofit agencies, such as the Housing Authority with expertise in housing practices and special needs, should be a major partner in inclusionary programs.	Supportive	This policy is supportive of housing growth and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	The Housing Authority, or other agencies, should take a lead role where its expertise and function lend itself to best accomplish program objectives. Lead responsibility might include such tasks as qualifying households by income bracket, monitoring target objectives, administration of an affordable housing trust, taking ownership of dedicated lots and units, contracting for the development of units, monitoring the sale and resale controls of designated public units, and other related tasks.	Supportive	This policy is supportive of housing growth and affordability.	NA
Goal 4	Achieve housing that is compatible and harmonious with existing neighborhood character while allowing infill and providing for environmental sensitivity.	Approaching	Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices. Instead of “character,” this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing	Ensure infill development that incorporates various housing types and sizes maintains the existing scale and form of neighborhoods and prioritizes the provision of affordable housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			types such as middle housing.	
Policy A	When designating areas for infill and zoning classifications, consider and place emphasis on the composition of the neighborhood, housing need, available infrastructure, principals of walk- ability and healthy communities.	Approaching	This policy is supportive of housing growth, but could be strengthened to address reducing displacement and affordability pressures.	NA
Policy B	When implementing infill projects in designated areas, require design of infill projects that: <ul style="list-style-type: none"> ● Meet the housing needs of the planning area considering variety and choice. ● Integrate successfully into the existing residential environment considering form based concepts and healthy community objectives. ● Provide a form, look and feel and social functionality that will add to the character, desirability and value of the surrounding neighborhood. 	Approaching	This policy is supportive of housing growth, but could be strengthened to address reducing displacement and affordability pressures. Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices.	When implementing infill projects in designated areas, prioritize infill projects that meet diverse housing needs, provide affordable housing, and incorporate different housing types.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Continue to utilize design review guidelines for all residential developments.	Approaching	The policy intends to ensure new development is integrated with the rest of the city, but additional design requirements could ultimately hinder the development of affordable housing.	Review design guidelines to ensure they are not overly stringent or disincentivize the provision of housing.
Goal 5	Provide a variety of housing opportunities for those with special needs.	Supportive	This policy supports housing growth and could be strengthened to address affordability.	NA
Policy A	Provide opportunities for development of various types of group housing.	Supportive	This policy supports housing growth and could be strengthened to address affordability.	NA
Policy B	Ensure a full range of housing and facilities for the accommodation of persons with special needs exist within each planning area, with consideration for promotion of housing in those planning areas providing the most services for such individuals.	Supportive	This policy supports housing growth and could be strengthened to address affordability.	NA
Policy C	Design group homes and facilities for special populations so that they are integrated, compatible, and harmonious with surrounding land uses.	Approaching	The policy intends to allow housing for a variety of needs. However, “compatible” is vague and can be	Ensure housing for populations with specific housing needs, such as group homes or transitional housing, are integrated with surrounding neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	<i>(Recommended to delete Goal 6, Policy C for redundancy).</i>
Policy D	Enforce all requirements of the International Building Code that addresses the Americans with Disabilities Act and the Fair Housing amendments.	Supportive	This policy supports housing for all needs. It could be strengthened by addressing housing affordability.	NA
Goal 6	Work cooperatively with local jurisdictions, nonprofits and religious organizations to reduce homelessness and find ways for providing emergency and transitional shelter to serve the identified needs of this population.	Supportive	This policy addresses housing exclusion for individuals experiencing homelessness.	NA
Policy A	Based upon identified need, provision of facilities and services should be addressed by all local jurisdictions with fair share commitment reflected in local budgets.	Approaching	This policy supports services for all needs, but does not directly address ways to increase housing supply or affordability, or to mitigate racially disparate impacts.	NA
Policy B	Provide the opportunity to accommodate innovative strategies that will include	Supportive	This policy addresses housing exclusion for individuals	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	emergency and transitional housing for the homeless population.		experiencing homelessness.	
Policy C	Ensure location and use of emergency and transitional housing considers, and is successfully integrated into, the surrounding neighborhood without impact to other land use activities.	Approaching	This policy addresses the provision of housing for individuals experiencing homelessness, but could better specify what it means to be integrated into the surrounding neighborhood without impact to other land use activities. Requiring additional standards for transitional and emergency housing types may ultimately hinder their development and affordability.	Recommended to delete for potential redundancy with Goal 5 Policy C.
Policy D	Maintain and expand linkages with the business, religious and nonprofit communities as partners in ending homelessness.	Approaching	This policy addresses provisions for individuals experiencing homelessness, but could be more specific in outlining what the city's role may be.	Actively maintain and expand collaborative efforts with the business, religious, and nonprofit communities as partners in ending homelessness and seek their input on housing-related decisions.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy E	An emphasis in City policy will be to reflect the Continuum of Care approach, which emphasizes supporting self-sufficiency and transitional housing programs rather than stop gap measures which fail to break the cycle of homelessness.	Supportive	This policy addresses housing exclusion for individuals experiencing homelessness. It could be improved by addressing housing affordability for those who are transitioning out of homelessness.	NA
Policy F	The City supports an increased role in meeting the problems of homelessness from the private sector through funds, in-kind, and volunteer support and will evaluate its funding decisions partially on the basis of other funding sources. The City will use its resources to leverage support for homeless services from the state and federal government and other funding sources.	Approaching	This policy addresses housing exclusion for individuals experiencing homelessness. It could be improved by better, more inclusive language, and the city could consider playing a larger role to supplement the efforts of the private sector.	The City supports an increased role in preventing homelessness by seeking private sector support through funds, in-kind donations, and volunteer support and will evaluate its funding decisions partially on the basis of other funding sources. The City will use its resources to leverage support for homelessness services from the state and federal government and other funding sources.
Policy G	As much as practical, consider the needs of the intended uses and site facilities to provide convenient access to the services the population will require.	Approaching	This policy aims to provide services necessary for various housing needs. It could be improved by prioritizing historically disadvantaged communities or vulnerable populations.	Ensure facilities and services are accessible to the populations they are serving, prioritizing the needs of historically marginalized or overburdened communities.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy H	Continue to review and monitor participation and experience in programs that support the homeless population, assess effectiveness in meeting the needs of Lacey’s homeless individuals, and provide opportunities for programs that can better serve this demographic.	Supportive	This policy addresses strategies to meet the needs of individuals experiencing homelessness. It could be expanded to include housing considerations in addition to the programs mentioned.	NA
Policy I	Particular priority will be provision of services to minors without family resources and families with children. The City will place its highest priority on assisting homeless children and families with children and victims of domestic violence and other special needs groups.	Supportive	This policy addresses a particularly vulnerable subset of individuals experiencing homelessness. It could be expanded to include housing considerations in addition to the services mentioned.	NA
Policy J	As long as there is a demonstrated need for temporary transitional housing and the tent city program continues to operate in a fashion that is compatible with adjacent land uses, Lacey should consider continued support of the opportunity for local churches to administer to the home- less by hosting a tent city.	Approaching	This policy aims to provide transitional or temporary housing for houseless individuals. It could be improved by removing vague language around “compatibility”, which could hinder the provision of housing for houseless individuals.	Consider ways to develop transitional housing, support the tent city program, and assist local churches that host or assist individuals experiencing homelessness.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Goal 7	Identify and support a central contact to provide a help response for the homeless and citizens at risk of becoming homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA
Policy A	Support Lacey’s community partners in improving the community’s response to the needs of the homeless with identification of a referral point of contact for people to find services. This can include a service like the 211 referral line.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potential displacement, or to assist those who are experiencing homelessness.	NA
Policy B	Support homeless persons or those at risk of becoming homeless by identifying referrals that can put people in contact with the organizations that provide the services that they need.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Make technical assistance documents available to citizens and jurisdictional staff on the 211 referral line and related social services so more people will be aware of community resources and where individuals can find help. Distribution of information to publicize the 211 services should include internet information, distribution at relevant community meetings, contact phone numbers, and informational flyers to community service and religious faith-based organizations.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potential displacement, or to assist those who are experiencing homelessness.	NA
Policy D	Continue to take a regional perspective in addressing homelessness in the Thurston County community through support and participation in the Thurston County Home Consortium that provides coordinated planning, activities and evaluations that address homelessness.	Supportive	This policy addresses providing housing and services for individuals experiencing homelessness through increased coordination with other regional jurisdictions.	NA
Policy E	As supported programs formulate future budgets or experience budget growth, promote a sharpened focus on addressing priority issues	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	identified for Lacey’s homeless demographic.		potentially displacement.	
Policy F	As Lacey reviews programs asking for support through the Housing Consortium, support should be prioritized based upon a program reflecting the goals and priorities identified in this Housing Element.	Approaching	This policy could be improved by including equity, racially disparate impacts, and anti-displacement as priorities of the housing element or this policy.	Prioritize programs asking for support through the Housing Consortium to support based on programs that work to undo racially disparate impacts, address displacement, and increase the affordability and availability of housing.
Goal 8	Strive for no net increase in the number of homeless people identified in future homeless census counts by focusing on proactive intervention.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA
Policy A	Look for opportunities to strengthen outreach and engagement activities that will facilitate enrollment in treatment and service programs of individuals who are homeless or at risk of becoming homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA
Policy B	Promote programs designed to ensure that persons returning to the community from institutional or other sheltered settings (including foster care) do not become homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			displacement. It could be improved by including efforts to increase housing affordability for these individuals.	
Policy C	Encourage the use of effective prevention interventions, ranging from family strengthening and high-risk youth programs to specific discharge planning.	Supportive	This policy addresses disparate impacts and potential displacement through preventative strategies.	NA
Goal 9	Achieve maximum utilization of public buildings for use in the public interest by scheduling secondary uses and activities at times facilities are not being utilized for primary functions.	Approaching	This policy could be improved by specifying what activities are in the public interest, especially in terms of supportive housing services or emergency shelter.	NA
Policy A	Review opportunities for shared use of public facilities where it will not conflict with primary use of the structure and associated activities.	Approaching	This policy could be improved by specifying what activities are in the public interest, especially in terms of supportive housing services or emergency shelter.	Review opportunities for the shared use of public facilities when they do not conflict with the primary use of the facility and its associated activities, such as utilizing the facilities to support housing assistance programs or act as emergency shelters during extreme weather.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy B	When designing new public buildings and planning expansions of existing buildings, consider design to serve dual roles in providing a full range of public services, including emergency shelter, meal services, and other services that might be needed.	Supportive	This policy supports housing services and emergency shelter.	NA

City of Tumwater

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Land Use Element, Comprehensive Plan				
LU-2.3	Encourage innovative land use management techniques such as density bonuses, cluster housing, zero-lot-line development, planned unit developments, and transfer of development rights to create vibrant centers, corridors, and neighborhoods while accommodating growth.	Supportive	This policy is supportive of housing growth and affordability. It could be expanded to consider anti-displacement.	NA
LU-4.3	Continue to allow manufactured housing on individual lots within the City, as well as within mobile and manufactured home parks, to encourage affordable housing.	Supportive	This policy is supportive of housing growth and affordability.	NA
LU-4.4	Permit implementing regulations to experiment in new forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems such as density, diversity, equitability, and affordability can be achieved.	Approaching	This policy intends to create development regulations that encourage diverse, affordable, and equitable housing types with high quality amenities. It could be rewritten to improve clarity.	Develop implementing regulations that provide flexibility for innovative forms of residential development that improve open space amenities, provide privacy, and allow for diverse housing options that are affordable and equitable.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
LU-4.5	Encourage higher density residential uses in order to provide affordable housing. These uses should blend with the existing character of the community.	Approaching	The policy intends to allow housing for a variety of needs. However, “character” is vague and can be leveraged to maintain high-cost housing types that are unattainable to those with lower incomes or from historically marginalized communities.	Encourage higher density residential uses that increase affordable housing stock and fit the overall scale and form of existing development.
LU-4.6	Increase housing types and densities in corridors and centers to meet the needs of a changing population.	Supportive	Increasing housing types and densities is supportive of housing growth, especially in areas with jobs and services.	NA
LU-4.7	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.	Approaching	The policy intends to allow housing for a variety of needs. However, extensive design guidelines can be leveraged to maintain high-cost housing types that are unattainable to those with lower incomes or from historically marginalized communities.	Increase the variety of housing types allowed in areas outside of corridors and centers to support the needs of a changing population.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL LU-9	Identify what conditions should be applied to development in residential areas.	Approaching	The policy intends to ensure new development is integrated with the rest of the city, but additional requirements, especially in terms of design, could ultimately hinder the development of affordable housing.	Identify appropriate conditions and requirements for development in residential areas to ensure diverse housing types can be built without rigorous standards that may increase building costs.
LU-9.1	Protect residential developments from excessive noise, odors, dirt, glare, and other nuisances emanating from commercial and industrial uses.	NA	NA	NA
LU-9.2	Allow for multi-family residential development in the zoning code. Consideration should be given to encouraging this type of development near centers of community services.	Approaching	Allowing multi-family developments in the zoning code is supportive of housing growth, especially in areas with jobs and services. It could be improved by prioritizing housing for historically disadvantaged communities or vulnerable populations.	Allow multi-family residential development in the zoning code and encourage multifamily development near centers, community services, and public transportation.
LU-9.3	Integrate design features of existing natural systems into the layout and siting of new residential dwelling units. Preserve trees and significant ecological systems, whenever possible and practical.	Approaching	This policy would bring health benefits from additional greenery and shade, but could ultimately hinder the	Where feasible, encourage the integration of design features that highlight the natural environment and preserve existing trees, provided that they don't hinder the development of housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			development of affordable housing.	
LU-9.4	Permit experimentation in development regulations with newer forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems can be achieved.	Approaching	Flexible standards for diverse housing types would support housing growth, but this policy should include emphasis on providing housing for low income or historically marginalized populations.	Develop implementing regulations that provide flexibility for innovative forms of residential development that improve open space amenities, provide privacy, and allow for diverse housing options that are affordable and equitable. (Note: may be redundant with LU-4.4)
LU-9.5	Do not permit private residential gated communities.	Supportive	This policy helps prevent exclusive residential communities.	NA
LU-9.6	Promote nearby access to healthy food for residential developments.	Approaching	This policy does not directly help the city increase housing supply, but helps increase food security for residential developments, but could be expanded to prioritize promoting access to healthy foods in historically marginalized and low-income communities.	Promote access to healthy food for residential developments, prioritizing historically marginalized or overburdened communities or low-income households.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Housing Element, Comprehensive Plan				
GOAL H-1	To conserve and improve the existing city housing stock and quality of life of neighborhoods.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures.	NA
H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.	Supportive	Preserving and improving existing affordable housing stock can help reduce displacement pressures and increase housing supply.	NA
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.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures and increase housing supply. Special care should be taken to ensure vulnerable populations are displaced through rehabilitation of housing.	NA
H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.	Approaching	"Revitalization" of neighborhoods could lead to displacement. This policy should be expanded to include anti-displacement language.	Encourage a range of housing, promote economic development, and ensure the existing housing stock remains in good condition to retain existing affordable housing units.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	Including affordable housing policies that prioritize anti-displacement, affordability, and equity in the comprehensive plan and development regulations supports housing growth.	NA
H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.	Approaching	Improving infrastructure to better serve communities is supportive of housing growth, but “improve community surroundings” is vague and could lead to displacement or disproportionate impacts to historically marginalized communities. This policy should consider displacement impacts.	Maintain and improve infrastructure where needed to support existing residential areas and preserve existing affordable housing units.
H-1.5	Encourage and facilitate economic development as an important part of provision of housing by providing jobs.	Approaching	Providing jobs does not provide housing in itself, but increasing employment opportunities near housing	Encourage and facilitate economic development to increase employment opportunities near existing housing. OR Encourage the provision of affordable housing near

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
				employment opportunities and encourage economic development to increase employment opportunities near existing housing.
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Provide a sufficient number of diverse housing types and affordable units for each income bracket to meet the City's housing targets and needs for households from all economic backgrounds.
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Ensure sufficient and suitably zoned residential land to accommodate a range of housing types to meet all income levels, including those earning 0 to 40% of the Area Median Income (AMI), and update development regulations to allow these diverse housing types, such as single family detached dwellings, accessory dwelling units, townhouses, multi-family dwellings, cottage housing, senior housing, roominghouses, group housing, and manufactured home parks in manufactured home parks and on single lots, among others.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-2.2	Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.	Approaching	Providing opportunities for diverse housing types and incomes is important.	Provide opportunities for a range of housing types to provide affordable housing 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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	(Probably captured in edits to Policy H-2.1.)
GOAL H-3	To provide adequate, affordable housing for residents of all income groups, including sufficient housing affordable to low and moderate-income groups.	Supportive	Providing affordable housing advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
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.	Approaching	This policy would help the city provide additional housing using innovative methods but could be improved by considering how these innovative plans could increase affordability of housing and prevent displacement.	Encourage the development of innovative plans, codes, standards, and procedures to take advantage of new private and public sector approaches to providing housing for all needs and affordable for all household incomes.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	Preserving existing affordable housing stock like manufactured homes reduces displacement risk and maintains affordable housing supply.	NA
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.	Approaching	Retrofitting existing affordable housing stock reduces displacement risk and maintains affordable housing supply. However, this is phrased as retrofitting unfit structures for use as transitional or affordable housing, rather than retrofitting <i>existing</i> transitional or affordable housing, which could create disproportionate impacts if only buildings in need of repair are designated for transitional or affordable housing.	Increase code enforcement to ensure the existing affordable housing stock is well maintained and retrofitted where needed to provide safe housing, and build public private partnerships to identify opportunities for adapting existing buildings for transitional or deeply affordable housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-3.2	Encourage provision of adequate building sites through appropriate land use planning and zoning codes, infrastructure supply, and overall regulatory climate.	Supportive	Allowing for additional housing with sufficient infrastructure through land use planning and code changes contributes to housing growth.	NA
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.	Supportive	Providing affordable housing advances housing growth and affordability. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
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.	Supportive	Providing sufficient land for housing advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
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.	Supportive	Pursuing opportunities to increase transitional housing for families supports housing for vulnerable communities and could help mitigate displacement. This policy	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			could be expanded to prioritize low income families or those from historically marginalized communities.	
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.	Supportive	This policy is supportive of housing growth and affordability. It could be expanded to include anti-displacement measures in the “target areas”.	NA
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.	Supportive	This policy is supportive of housing affordability and preventing displacement, by expanding collaboration with neighboring jurisdictions to provide affordable housing and resources to support individuals experiencing homelessness.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	Providing opportunities for housing for all needs advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
H-4.1	Support the inclusion of living opportunities for families with children throughout the city.	Supportive	Providing opportunities for housing for families with children advances housing growth. This goal should be updated to prevent displacement of these households.	NA
H-4.2	Support and encourage a variety of housing types and price ranges through appropriate policies and regulations.	Supportive	Providing opportunities for housing for all needs advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
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.	Supportive	Setting maximum lot sizes increases the land available for new residential development. This policy could be expanded to reference diverse housing types	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			affordable for all income levels.	
H-4.2.2	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.	Approaching	This policy could be strengthened to require homeowner associations to not prevent affordable or diverse housing types or require strict design requirements that may hinder affordability.	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) that do not hinder the provision of diverse housing types or affordable housing and do not include strict design requirements that may hinder housing affordability.
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.	Supportive	This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220, and to prevent potential displacement of existing residents.	NA
H-5.1	Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Ensure appropriate land use designations and zoning code designations to provide sufficient land for housing affordable for all household incomes.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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)	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	(Probably captured in edits to Policy H-2.1.)
H-5.1.2	Continue joint planning with Thurston County to plan for future growth in Tumwater.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.	NA
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.	Supportive	This policy would allow the city to have an accurate determination of land available for new housing.	NA
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.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	Increasing diverse housing types is supportive of housing growth, especially in areas with jobs and services.	NA
H-6.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Challenging	This policy is at a high risk of having a disproportionate impact on lower income and historically marginalized communities, resulting in greater displacement.	(Recommended to delete this policy)
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Provide for a dynamic mix of residential land uses and zones in order to allow a diverse mix of sites available for different housing types affordable for all household income levels and to meet residents' diverse housing needs.
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.	Supportive	Providing land for a mix of housing advances housing growth. This goal should be updated to consider displacement and affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	This policy is supportive of housing growth. Ensuring clear and predictable standards for housing and building codes supports housing production goals. Strict design requirements can be leveraged to maintain high-cost housing types, unattainable to those from lower incomes or historically marginalized communities.	NA
H-6.3	Support increasing housing opportunities along urban corridors and centers.	Supportive	Increasing housing supply is supportive of housing growth, especially in areas with jobs and services.	NA
H-6.4	Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.	Approaching	Ensuring that neighborhoods encourage active transportation is important for inclusive communities. However, this goal could be edited to pay special attention to underserved neighborhoods.	Encourage the provision of affordable housing near public transit routes, prioritizing neighborhoods that are underserved by affordable housing.
H-6.4.1	Continue to involve Intercity Transit in Tumwater's development review process.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-6.5	Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.	Supportive	Ensuring clear and predictable standards for housing and building codes supports housing production goals.	NA
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.	Supportive	Ensuring clear and predictable standards for housing and building codes supports housing production goals.	NA
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.	Approaching	“Compatible” as it relates to design is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Ensure new housing development maintains the existing scale and form of surrounding land uses, traffic patterns, public facilities, and prevents impacts to environmentally sensitive areas.
H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.	Approaching	This policy may help prevent residential displacement, but may also provide a barrier to increasing housing diversity and affordability in existing neighborhoods.	Support the stability of existing affordable housing through appropriate plans and codes.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Approaching	The policy intends to allow a variety of housing types. However, “compatible” is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Continue to implement design standards for multi-family and attached single-family dwellings, ensuring they are not overly stringent or increasing the cost of housing development.
H-7.2	Assure housing will be well maintained and safe.	Supportive	Ensuring housing is well-maintained and safe is supportive of housing goals, but should prioritize low income or other historically marginalized communities.	NA
H-7.3	Enhance the appearance of and maintain public spaces in residential areas.	NA	NA	NA
H-7.4	Promote community involvement to achieve neighborhood improvement.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.	Promote community involvement and opportunities to increase a sense of community by prioritizing historically marginalized neighborhoods and actively seeking their input on city decisions.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL H-8	To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.	Approaching	This policy could be strengthened by addressing affordability and to prevent displacement of existing residents.	NA
H-8.1	Support the stability of established residential neighborhoods.	Approaching	This policy may help prevent residential displacement, but may also provide a barrier to increasing housing diversity and affordability in existing neighborhoods.	(Redundant with H-7.1.)
H-8.2	Assure housing will be well maintained and safe.	Supportive	Ensuring housing is well-maintained and safe is supportive of housing goals, but should prioritize low income or other historically marginalized communities.	NA
H-8.2.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Challenging	This policy is at a high risk of having a disproportionate impact on lower income and historically marginalized communities, resulting in greater displacement.	(Recommended to delete this policy, redundant with H-6.1 as well.)
H-8.3	Enhance the appearance of and maintain public spaces in residential areas.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-8.4	Promote community involvement to achieve neighborhood improvement.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.	(Redundant with H-7.4.)
H-8.4.1	Encourage neighborhood meetings to discuss community issues as situations and concerns arise.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.	(May be redundant with proposed edits for H-7.4.)
H-8.5	Encourage home ownership for Tumwater residents.	Approaching	Encouraging homeownership helps mitigate displacement, but should prioritize opportunities for low and middle incomes.	Encourage home ownership for Tumwater residents of all household incomes and provide assistance for low-income households, where feasible.
GOAL H-9	To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability. It could be improved by preventing the potential displacement of those with special housing needs.	NA
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.	Supportive	This policy is supportive of providing housing for all needs throughout the city. It could be improved by preventing the	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			potential displacement of those with special housing needs.	
H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.	Supportive	This policy addresses support for housing for individuals experiencing homelessness, and could help mitigate displacement.	NA
H-9.3	Support and plan for assisted housing opportunities using federal, state, or local aid.	Supportive	This policy addresses pursuing funding to support assisted housing opportunities which could mitigate displacement and increase the amount of affordable housing in the city.	NA
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.	Supportive	This policy addresses services to support populations with special needs to help mitigate displacement.	NA
H-9.5	Encourage alternative housing strategies for homeless youth, which may include Host Homes.	Supportive	This policy addresses the provision of housing for homeless youth.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Approaching	The policy intends to allow a variety of housing types. However, "neighborhood character" is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Provide innovative housing that reflects the existing scale and form of Tumwater's neighborhoods and provides housing affordable for all household incomes.
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.	Approaching	Encouraging diverse and innovative design could ultimately hinder housing affordability or supply by requiring additional, subjective design standards.	Encourage diverse and innovative housing design that incorporates diverse housing types that are affordable for all household income brackets.
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.	Approaching	Design standards intend to integrate new housing developments with existing ones, but can be leveraged to maintain high-cost housing types, which are unattainable to those from lower incomes or historically marginalized communities.	Ensure design standards for multi-family housing maintain the existing scale and form of development and landscaping in Tumwater without increasing the cost to develop housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-10.2.1	Continue to implement multi-family housing design standards.	Approaching	Design standards intend to integrate new housing developments with existing ones, but can be leveraged to maintain high-cost housing types, which are unattainable to those from lower incomes or historically marginalized communities.	(Redundant with H-10.2 above.)
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.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure.	NA
H-11.1	Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure. It should also prioritize affordability.	NA
H-11.2	Reference utility plans and the impact of housing decisions on capital improvements planning.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure. It should also prioritize equity in the provision of services.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	Providing housing near transit supports housing supply goals and reduces impacts to transportation and provides access to jobs.	NA
GOAL H-12	To encourage urban growth within the city limits with gradual phasing outward from the urban core.	Approaching	This policy could be improved by addressing affordability and encouraging increased density throughout the city.	NA
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.	Approaching	This policy supports housing growth, but could better address affordability and anti displacement, especially related to the redevelopment of underdeveloped property to ensure people are not displaced.	Encourage the construction of affordable, transitional, or supportive housing on vacant properties within the city to minimize urban sprawl and associated public service costs.
H-12.1.1	Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.	Supportive	This policy supports housing growth and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
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.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure.	NA
H-12.1.3	Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.	Supportive	This policy supports housing growth. It could be improved by addressing affordability.	NA
H-12.1.4	Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.	NA	Consider moving to Land Use Element	NA
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing, in order to provide housing affordable for all income brackets.
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.	Supportive	Preserving existing affordable housing stock reduces displacement risk.	NA
H-13.1.1	Encourage manufactured housing park district zoning to locate near transit services.	Supportive	Providing access to services such as transit reduces community vulnerabilities and dependence on car travel,	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			especially for vulnerable community members such as elderly and youth.	
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.	Supportive	Renters and lower income communities often have higher risk and vulnerabilities to natural hazards and events. Ensuring that zoning does not push manufactured home parks into high-risk areas reduces displacement and threats to community member safety.	NA

City of Yelm

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Land Use Element, Comprehensive Plan				
Policy 3.3	Adopt two categories of residential single family land use to meet community needs: <ul style="list-style-type: none"> • Single Family - 4 units per acre; and 	NA - Dependent on Land Capacity Analysis	See Land Capacity Analysis Report	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	<ul style="list-style-type: none"> Single Family - 6 units per acre. 			
Policy 3.4	<p>Adopt two categories of residential multifamily land use to meet community needs:</p> <ul style="list-style-type: none"> Multifamily - Medium Density — 6 units per acre; and Multifamily - High Density — 16 units per acre. 	NA - Dependent on Land Capacity Analysis	See Land Capacity Report	NA
Policy 3.5	<p>Adopt a mixed use development category which allows both residential and commercial uses suitable for planned developments on larger parcels and which provides for a variety of land uses, more efficient use of open space, and more cost effective public infrastructure.</p>	Approaching	This policy supports housing near commercial services. It could better address affordability.	NA
Policy 4.4	<p>Adopt development regulations that accommodate “live-work” structures (where citizens can live and work within the same structure).</p>	Supportive	Allowing live-work structures creates both housing and economic opportunities for community members who wish to start a business, but cannot afford a home and a commercial space.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 4.6	Adopt development regulations that allow permits to be processed in a timely and efficient manner.	Supportive	Streamlining permit processes reduces barriers to housing production to meet housing supply deficits and reduce building costs.	NA
Goal 5	Encourage diverse residential growth.	Supportive	Allowing diverse housing types and growth allows housing supply to meet the shifting housing needs of households.	NA
Policy 5.2	Adopt development standards that allow duplexes, townhouses, and accessory dwelling units within residential areas. These are intended to increase the variety of housing in the community and aid in achieving an overall urban density.	Supportive	Allowing housing diversity supports overall goals of providing different housing types to address different household needs.	NA
Policy 5.3	Adopt development regulations that encourage mixed use subdivisions.	Supportive	Allowing housing diversity supports overall goals of providing different housing types to address different household needs.	NA
Goal 10	Create vibrant centers, corridors, and neighborhoods while accommodating growth.	NA	NA	NA
Policy 10.1	Promote a greater mix of uses and densities to support efficient provision of services.	Supportive	Allowing housing and land use diversity supports overall goals of providing different housing types to	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			address different household needs.	
Goal 11	Create safe and vibrant neighborhoods with places that build community and encourage active transportation.	Approaching	Ensuring that neighborhoods are safe and encourage active transportation is important for inclusive communities. However, this goal could be edited to take special attention to underserved neighborhoods.	Create safe and vibrant neighborhoods that build community, support historically marginalized or overburdened communities, and encourage active transportation.
Policy 11.1	Plan at the neighborhood level to increase housing density and diversity while preserving neighborhood character and quality of life.	Approaching	While local-level planning can result in inclusive and grassroots actions, the element of “preserving neighborhood character” can sometimes be used as an argument for continuing exclusionary housing types and disputing zoning changes that seek to allow more housing diversity.	Plan at the neighborhood level to increase housing diversity and the quality of life for residents.
Policy 11.2	Plan for land use patterns that provide most neighborhood residents an array of basic services within a half mile or 20 minute walk from home.	Supportive	Providing retail and services within a half-mile walkshed encourages community resilience and reduces dependency on vehicular transportation, which can be a large cost factor for households.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 11.3	Encourage appropriately scaled home-based business and live/work opportunities in neighborhoods.	Supportive	Allowing live-work structures creates both housing and economic opportunities for community members who wish to start a business, but cannot afford a home and a commercial space.	NA
Goal 12	Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation.	Supportive	Reducing the overall land and infrastructure investment while also expanding residential buildable lands supports housing supply goals.	NA
Policy 12.1	Mitigate the additional cost of development in centers and corridors by making public infrastructure investment that adds value, safety and public enjoyment for the entire community and that result in appropriate public return on investment when adjacent properties are developed. Allow for latecomers and other methods of repayment for government outlay for infrastructure.	Approaching	While this policy does facilitate housing growth, it could be enhanced by including affordability considerations.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Housing Element, Comprehensive Plan				
Goal 1	Encourage a variety of housing types, densities and a range of affordable housing within Yelm and its Urban Growth Area.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing.	NA
Policy 1.1	Allow a variety of housing types within the residential and mixed use designations to promote a range of housing alternatives within the community. This may include but not be limited to: government assisted housing, housing for low-income families, manufactured housing, multi-family housing, and group or foster homes.	Supportive	Ensuring access to affordable housing types—including manufactured home types and group homes—is essential to reducing displacement risks among vulnerable community members.	NA
Policy 1.2	Allow accessory dwelling units in all residential land use categories subject to development standards and design criteria.	Supportive	Accessory Dwelling Units provide opportunities for aging in place and adapting existing housing stock and residential land uses to meet the changing housing needs of households.	NA
Policy 1.3	Encourage opportunities for a range of housing costs to enable housing for all segments of the population.	Supportive / Approaching	While supportive, this policy will need to be updated to meet HB 1220 guidance on specific household income	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			brackets. However, providing housing across all income segments reduces displacement risk and enables housing opportunities to all, regardless of income.	
Policy 1.4	Encourage the provision of adequate affordable building sites through appropriate zoning, infrastructure, and other development regulations.	Supportive	Regularly reviewing and ensuring zoning, development regulations, and infrastructure support housing at different affordability levels supports anti-displacement efforts.	NA
Policy 1.5	Review development regulations to ensure that a range of housing types is available throughout Yelm.	Supportive	Allowing and reducing barriers to housing types through development regulations is essential to enabling affordable housing options.	NA
Policy 1.6	Review development regulations to ensure residents can safely walk throughout Yelm.	Supportive	Not all community members have consistent access to vehicles, including vulnerable populations such as youth and elderly. Providing walkable residential neighborhoods promotes inclusion and positive health outcomes.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 1.7	Monitor the need for special needs housing and increase opportunities for such housing.	Supportive	Providing housing for special needs reduces displacement and homelessness risk among community members with special needs.	NA
Policy 1.8	Consider density increase incentives to promote a variety of housing types, mixed uses, range of housing costs, affordability, and increased special needs housing.	Supportive	Providing a wide range of housing types and densities—at different affordability levels—provides options	NA
Goal 2	Meet the county wide planning policy to ensure a fair share of affordable housing.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.	NA
Policy 2.1	Encourage a variety of housing types in the residential designations to assure choice, opportunity, and availability of a fair share of affordable housing throughout Yelm, its UGA, and adjacent areas of Thurston County.	Supportive	Providing housing diversity and sufficient housing options reduces displacement risk and encourages affordability.	NA
Policy 2.2	Participate with other jurisdictions and Thurston County in a regional process to monitor Fair Share Affordable Housing targets within the County.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Goal 3	Conserve and improve the existing housing stock and neighborhoods.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures.	NA
Policy 3.1	Maintain up-to-date development regulations for building, housing, mechanical, and other design standards.	Supportive	Ensuring clear and predictable standards to housing and building codes supports housing production goals.	NA
Policy 3.2	Require owners of unsafe dwelling units to correct significant problems and encourage the maintenance of existing structures consistent with the standards of the neighborhood.	Approaching	Ensuring housing is safe and habitable is important. Rehabilitation, however, can also result in physical displacement pressures as existing households may be forced to move or incur high costs of repair. Such support should involve connecting households with alternatives or incentive programs to reduce these risks.	Require owners of unsafe dwelling units to correct significant problems and encourage the maintenance of existing structures consistent with the city's code, and consider funding assistance for low-income owners or incentive programs to reduce displacement risks.
Policy 3.3	Support rehabilitation efforts for substandard housing.	Approaching	Ensuring housing is safe and habitable is important. Rehabilitation, however, can also result in physical displacement pressures as existing households may be forced to move or incur high costs of repair. Such support should	Support rehabilitation efforts for substandard housing and develop assistance programs to reduce displacement risks.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			involve connecting households with alternatives or incentive programs to reduce these risks.	
Policy 3.4	Encourage and facilitate local economic development as an important element of improving housing conditions by providing economic opportunity.	Approaching	While economic development is an important step for ensuring housing growth and conditions—particularly when it comes to local financing—such growth should not result in the rapid displacement of community members through rising costs.	Encourage and facilitate economic development to provide increased economic opportunity for existing residents, so more people can work near their home.
Policy 3.5	Encourage local community groups, churches, and businesses to provide voluntary assistance with maintain existing structures for the elderly, low income, and those with special needs.	Approaching	While encouraging local groups is beneficial, this policy would be strengthened through active support and connecting these groups with funding to do so.	Encourage and provide funding for local community groups, churches, and businesses to provide voluntary assistance with maintaining existing housing for the elderly, low income households, and those with special housing needs.
Goal 4	Promote energy efficient housing to reduce the overall costs of home ownership.	Supportive	Reducing barriers to home ownership, especially when aimed at historically marginalized or vulnerable community members, could reduce displacement pressures.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 4.1	Support programs that make existing structures more energy efficient.	NA	NA	NA
Policy 4.2	Periodically review the energy efficiency development regulations to ensure that they are up-to-date.	NA	NA	NA
Policy 4.3	Promote residential subdivision designs that maximize solar heating opportunities.	NA	NA	NA
Goal 5	Provide sufficient housing for low- and moderate-income households within each jurisdiction.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.	NA
Policy 5.1	Provide sufficient housing for low- and moderate-income households.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 5.2	Provide tenants and landlords information about housing rights and responsibilities.	Supportive	Ensuring awareness on housing rights can empower tenants and ensure safe housing.	NA
Policy 5.3	Incentivize developers to set aside a percentage of multifamily housing units for low- and moderate-income buyers and renters.	Supportive	Providing incentives for less than market rate housing provides opportunities for community members to remain in the community as prices increase, and provides opportunities for new community members to live in the City.	NA
Policy 5.4	Support efforts to provide funding for shared-equity policies — via community land trust or down-payment assistance models — to make buying housing of all types affordable.	Supportive	Providing programs to control the variable costs of land could create long lasting affordable housing opportunities for community members, particularly those from vulnerable groups or lower incomes.	NA
Goal 6	Provide sufficient service-enriched housing for homeless and high-risk populations.	Supportive	Allowing shelters and other types of emergency housing reduces displacement pressures, and provides services to respond to and prevent households from experiencing homelessness.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 6.1	Allow shelters, group homes, transitional housing, and permanent housing with social services in development regulations in locations where these facilities have access to transit, parks, and other amenities.	Supportive	Allowing shelters and other types of emergency housing reduces displacement pressures, and provides services to respond to and prevent households from experiencing homelessness.	NA
Goal 7	Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity.	Supportive	Allowing housing density and diversity across neighborhoods gives the community means and options to avoid displacement pressures.	NA
Policy 7.1	Review and amend residential development regulations to provide opportunity for the mix and density of housing needed to meet the needs of changing demographics, use land wisely, and support nearby transit and businesses.	Approaching	Providing housing near transit supports housing supply goals and reduces impacts to transportation and provides access to jobs. However, this policy could be further expanded to call out affordability goals as well.	Review and amend residential development regulations to provide opportunities for the mix and density of housing needed to meet the needs of changing demographics, provide affordable housing, use land wisely, and support nearby transit and businesses.
Policy 7.2	Allow densification by providing for accessory dwelling units, small houses on small lots, attached housing types or appropriately scaled multifamily buildings, cottage housing, and village cohousing developments in development regulations.	Supportive	Allowing more diverse housing types that support affordability goals, such as smaller houses on smaller lots, also mitigates displacement pressures from increasing land costs	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			and greater demand than supply.	
Goal 8	Encourage the construction, weatherization and operation of homes to boost energy efficiency.	Supportive	Preserving existing housing stock through energy upgrades reduces costs by extending the useful life of the unit.	NA
Policy 8.1	Prioritize home weatherization funds to preserve affordable housing.	Supportive	Preserving existing affordable housing stock, without increasing renter costs, reduces displacement pressures from aging buildings and increasing maintenance needs.	NA
Policy 8.2	Support regional efforts to engage landlords and property managers in energy efficiency efforts.	Supportive	Supporting easier upgrades can maintain naturally affordable housing units from going into disrepair and being redeveloped into newer, less affordable housing options.	NA
Policy 8.3	Support the efforts of local financial institutions to facilitate affordable financing of energy upgrades.	Supportive	Supporting easier upgrades can maintain naturally affordable housing units from going into disrepair and being	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			redeveloped into newer, less affordable housing options.	
Policy 8.4	Support regional efforts to conduct energy audits of large power consumers to identify efficiency improvements, such as RESNET's Home Energy Rating System.	NA		
Goal 9	Increase housing amid urban corridors and centers to meet the needs of a changing population.	Approaching	Providing housing opportunities in key centers and corridors fosters housing near jobs and opportunities. This goal could be expanded to consider affordability needs as well.	Increase housing affordable to all income brackets in urban corridors and centers to meet the needs of a changing population.
Policy 9.1	Review regulations that stymie or prevent housing development near or within urban corridors and centers.	Supportive	Addressing barriers to housing supply development ensures supply can meet demands, especially in areas with jobs and services.	NA
Policy 9.2	Remove barriers or "right-size" regulations to achieve goals.	Supportive	Reviewing and removing regulatory barriers to housing supports housing supply and streamlines review processes.	NA
Policy 9.3	Identify priority areas ripe for housing development that will meet multiple goals.	Approaching	This goal aims to increase housing supply. However, it should not come at the	Identify vacant or underdeveloped lots for housing development, prioritizing affordable housing and

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			cost of displacing historically marginalized households.	ensuring existing households are not displaced.
Policy 9.4	Examine ways to encourage smaller, affordable housing units through the fee structure, especially in centers, corridors or adjacent to neighborhood service hubs.	Supportive	Allowing and encouraging more diverse housing types that are more affordable support affordability and anti-displacement objectives.	NA
Policy 9.5	Reduce impact fees for those projects located where there is less impact.	Supportive	Targeting reduce the burden to build housing would support housing unit construction	NA
Policy 9.6	Use tax exemptions, such as Special Valuation, or other financing tools to make projects financially feasible.	Supportive	Providing flexibility to support housing construction supports housing supply goals.	NA
Policy 9.7	Identify opportunities to aggregate properties where housing density is needed to achieve community goals and make multifamily projects feasible to build and finance.	Supportive	Allowing flexibility to support multifamily housing construction supports anti-displacement by providing diverse housing types.	NA

Data & Indicators Summary

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

How do we measure the effectiveness of our strategies against displacement, gentrification, and racially disparate impacts? Through its Racially Disparate Impacts (RDI) tool, the WA Department of Commerce suggests the following 5 measures as “bullseye” or supportive metrics.¹ The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD) and is presented in four-year ranges. This analysis compares RDI data points from two timeframes, 2015-2019 and 2017-2021. Additionally, demographic data was pulled from the American Community Survey.

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

Racial Diversity

All cities are increasing in population, but Lacey, Tumwater, and Yelm have seen decreases in certain demographics of non-white residents.

Racial diversity estimates are based on data collected by the U.S. Census Bureau, which classifies people into distinct race and ethnicity categories. Race is a social identity, with a history rooted in oppression and exploitation of people not classified as "white".² Ethnicity refers to groups of people who share common ancestry, language, or dialect. There is a wide range of ethnic identities, which may or may not be tied to nationality. The Census asks respondents to identify as either Hispanic or Latino or Not Hispanic or Latino. The

¹ The RDI toolkit is designed for use by the Department of Commerce (Commerce) in its support of local jurisdiction efforts to meet the requirements of the Growth Management Act (GMA). The toolkit compiles statistics relevant to a jurisdiction's analysis of racially disparate impacts in its community.

² The Census offers six racial identities for people to choose from. Respondents self-identify. Since the 2000 census, respondents can self-identify as one or more options. The options provided are: White, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Other.

Office of Management and Budget defines "Hispanic or Latino" as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

The table below shows the change in racial and ethnic diversity across the four cities between 2010 and 2023, using the US Census American Community Survey 5-Year Estimate data.

Change in # of Residents by Race & Ethnicity	Lacey	Olympia	Tumwater	Yelm
American Indian and Alaska Native	-54	2	-154	89
Asian	1,437	924	608	-132
Black or African American	1,345	345	755	279
Hispanic or Latino (of any race)	4,126	3,099	1,484	908
Native Hawaiian and Other Pacific Islanders	658	421	106	468
Other Race	-44	132	470	0
Two or more races	2,908	2,617	1,786	604
White	6,278	2,335	4,630	2,216
Net Pop Change	16,654	9,875	9,685	4,432

Cost Burden

All cities are increasing in the number of non-cost burdened homeowners. Comparatively, the growth of non-cost burdened renter households is significantly fewer. In some cases, the number of non-cost burdened renter households is decreasing.

A household experiencing a housing cost burden is paying more for housing than it can afford based on income. This means one or multiple of a house's critical needs (i.e., food, physical health, mental health, education, and/or general well-being) are not being met. A household is considered cost-burdened if its monthly housing costs are greater than 30% of its monthly income. Estimates of households experiencing cost burden include:

- Not cost-burdened includes households paying less than 30% of their household income on housing costs.
- Cost-burdened (30-50%) includes households paying between 30% and 50% of their household income on housing.

- Severely cost-burdened (>50%) includes households paying more than 50% of their income on housing costs.

The tables below show the change in the cost burdened populations across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets representing a difference in the data between the years of 2015-2019 and 2017-2019.

Change in # Households by Cost-Burdened Status: Renters	Lacey	Olympia	Tumwater	Yelm
Not Cost Burdened	110	-655	100	-35
Cost-Burdened (30-50%)	65	-305	-65	-30
Severely Cost-Burdened (>50%)	200	15	-105	45
Not Calculated	-30	-75	11	5

Change in # Households by Cost-Burdened Status: Homeowners	Lacey	Olympia	Tumwater	Yelm
Not Cost Burdened	765	840	355	435
Cost-Burdened (30-50%)	370	145	-175	-59
Severely Cost-Burdened (>50%)	185	190	45	50
Not Calculated	45	5	-10	0

Rental Affordability

All cities have less rental housing for very low-income households (30-50% AMI).

In addition to estimates of households within an income range, CHAS data also provides estimates of the number of rental housing units affordable to households with incomes within the income range. A housing unit is considered affordable if gross housing costs are less than 30% of a household's income. The estimates are based on self-reported housing costs. Since self-reported housing costs reflect the costs to the household, the housing unit estimates reflect all the housing subsidies or other benefits in use in the area. A rental unit affordable to a household with an extremely low income (<30% of AMI) may or may not be occupied by a household in that income range. RDI tool rental affordability estimates use the corresponding household income thresholds:

- <30% AMI includes housing units that are affordable to a household with an income up to 30% of AMI.
- 30 - 50% AMI includes housing units that are affordable to a household with an income between 30% and 50% of AMI.
- 50% - 80% includes housing units that are affordable to a household with an income between 50% and 80% of AMI.
- >80% AMI includes housing units that are affordable to a household with an income greater than 80% of AMI.

Rental unit affordability estimates exclude housing units without complete kitchen or plumbing facilities, as well as vacant units that are not listed as either for rent or for sale and group quarter units.

The table below shows the change in vacant affordable units across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets representing a difference in the data between the years of 2015-2019 and 2017-2019.

Change in # of Rental Units by Affordability Rating	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	0	25	0	0
Very-Low Income (30-50% AMI)	-90	-110	-45	0
Low-Income (50-80% AMI)	40	10	10	0
Moderate-Income (80%-100% AMI)	150	75	5	0

Income

All cities are experiencing growth in renter and homeowner households above the median income (>100% AMI). High incomes coupled with continued high housing cost burdens points to high cost of housing outpacing wage gains.

To account for regional variation in labor and housing markets, the WA Department of Commerce RDI tool uses area median income (AMI). AMI represents the midpoint of an area's income distribution. Fifty percent (50%) of households have an income higher than the area median income and 50% have an income lower than the AMI. The Growth Management Act requires jurisdictions to account for the housing needs of households across the income spectrum. Income data and housing affordability estimates are provided by US Housing and Urban Development's Comprehensive Housing Affordability Strategy (CHAS) data. Household income estimates are for the number of households with a

household income up to a threshold based on a percentage of the area median income, with adjustments based on household size. The income bins are:

- Extremely Low Income (<30% of AMI)
- Very Low Income (30% - 50% of AMI)
- Low Income (50% - 80% of AMI)
- Moderate Income (80% - 100% of AMI)
- Above Median Income (>100% of AMI)

The tables below show the change in population income levels across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets representing a difference in the data between the years 2015-2019 and 2017-2019.

Change in # Households by Income Status: Renters	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	-160	-110	-240	15
Very-Low Income (30-50% AMI)	-235	-180	-85	-60
Low-Income (50-80% AMI)	-475	225	-20	-15
Moderate-Income (80%-100% AMI)	535	-85	-15	35
Above Median Income (>100%)	680	730	305	20

Change in # Households by Income Status: Homeowners	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	250	-90	-145	-10
Very-Low Income (30-50% AMI)	15	40	60	-65
Low-Income (50-80% AMI)	-255	-130	-90	5
Moderate-Income (80%-100% AMI)	-150	25	-10	-90
Above Median Income (>100%)	1495	1345	400	585

Tenure/Homeownership

All cities but Yelm are increasing in overall homeowner households of all income levels. Yelm and Tumwater are decreasing in overall renter households of all income levels.

Tenure refers to the distribution of homeowners and renter households across the region.

The tables below show the change in renter and owner households across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets representing a difference in the data between the years 2015-2019 and 2017-2019.

Change in # of Households	Lacey	Olympia	Tumwater	Yelm
Renters	345	590	-60	-715

Change in # of Households	Lacey	Olympia	Tumwater	Yelm
Homeowners	1365	1190	225	-640

Age

Yelm and Olympia saw the biggest changes in any individual age range. Overall, there is great variation in population change by age across the cities, but a trend of aging populations is detectable.

The table below shows the change in age distribution across the four cities between 2010 and 2023, using the US Census American Community Survey 5-Year Estimate data.

% Change in Population by Age	Lacey	Olympia	Tumwater	Yelm
Under 5 years	-0.90%	0.00%	-1.10%	-4.00%
5 to 9 years	0.00%	-1.80%	0.70%	2.00%
10 to 14 years	-0.80%	-1.00%	-1.60%	-2.20%
15 to 19 years	0.00%	0.90%	-3.90%	-1.20%
20 to 24 years	-0.10%	-5.10%	0.90%	4.20%
25 to 29 years	0.30%	0.70%	0.60%	-1.80%
30 to 34 years	0.00%	2.70%	1.00%	1.30%
35 to 39 years	0.00%	0.70%	0.60%	-0.10%
40 to 44 years	1.30%	0.30%	1.60%	-0.80%
45 to 49 years	-0.10%	-0.60%	-0.90%	0.20%
50 to 54 years	-1.90%	-2.00%	-1.90%	1.20%
55 to 59 years	-2.10%	-0.90%	-1.00%	0.80%

60 to 64 years	1.50%	-0.10%	2.50%	2.00%
65 to 69 years	2.30%	1.30%	2.00%	-0.30%
70 to 74 years	1.10%	3.50%	1.10%	2.20%
75 to 79 years	-0.10%	1.80%	0.30%	-0.20%
80 to 84 years	-0.30%	0.00%	0.40%	-1.10%
85 years and over	-0.30%	-0.60%	-0.80%	-1.60%

Engagement Themes Summary

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

To gain a locally rooted understanding of housing goals and displacement risks, the project team undertook an extensive and collaborative outreach process. We connected with planning staff, residents, and housing advocates across sectors to get a better understanding of the housing challenges facing the area.

The project team was able to aggregate and synthesize the stakeholder feedback across all engagement touchpoints to distill the main takeaways into the following themes for consideration. These takeaways should be read with the context that they are direct feedback from community stakeholders from their own viewpoints, level of understanding, and lived experience with housing. Final policy recommendations are not solely based on this feedback, rather, they aim to integrate the perspectives into what is actually possible within the confines of law and institutional standards.

1. Cities should identify ways to monitor renter income verification, establish local ordinances to enforce attainable income verification and identify and address price fixing.
2. Cities should use creative zoning overlays and innovative land use policies to classify and protect mobile home communities, as well as other types of affordable housing.
3. Zoning should balance commercial development with opportunities for affordable housing.
4. Cities should create a program to support upgraded utilities and infrastructure and promote incentives for property owners, including multifamily, single family, accessory, and mobile homes, to improve their properties. Tenants who are forced to relocate due to substandard maintenance (condemned properties) should receive support so they can effectively relocate to a nearby affordable housing option.
5. Affordable housing and homelessness prevention programs should work closer together as they share the same clientele.
6. Military service providers, including VAs, volunteer groups, bases, centers, and cities, should ensure that their programs are adequately staffed with the most current information regarding housing and support benefits for military families and households.

7. Cities should promote educational programs that explain to homeowners and potential buyers the long-term investment opportunity of ADUs, and the financial plan required to pursue a build.
8. Permitting processes to develop new affordable housing should continue to be simplified and streamlined.
9. Cities could support residents, including current residents of manufactured home communities, in forming cooperatives or community land trusts (CLTs) to be prepared to exercise the right of first refusal and manage properties independently.
10. Cities should create a program to support private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management and disincentivize corporate owners from buying land on which manufactured home communities are located.
11. Cities should take steps to minimize the amount of potential long-term housing being used for short-term transient rentals (Air BnBs).
12. Cities should work with community groups to coordinate a one-stop shop for housing benefit explanations and application support.
13. Cities should promote an educational campaign to private landlords about legal requirements and renter income qualifications for those on supplemental income.
14. Cities should offset the impacts of increased taxes and tax increment financing, as they are seen to contribute to unaffordability for renters and low-income households by way of increased cost of living as new upscale developments are built.
15. Cities should consider rent control options and develop and enforce adequate tenant protections (eviction proceedings, rent increase management, etc.).
16. Cities should balance suburban development with investment in affordable housing in urban centers.
17. Cities should ensure robust transportation is available to residents and minimize land used for parking over housing.
18. Urban renewal efforts should include the protection of existing affordable housing units.

Lacey, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

The City of Lacey has been engaged in collaborative planning to address various regional housing issues with the cities of Yelm, Tumwater, and Olympia. As part of this, Lacey has been working to address housing issues specific to their city, and while the city has made significant efforts to increase affordability and undo racially disparate impacts in Lacey by implementing or initiating many actions in their Housing Action Plan (HAP), the city is facing significant barriers in seeing additional progress. In particular, the city has identified its intent to develop more policies, programs, and partnerships to address economic, physical, and cultural forms of displacement. However, policy alone is not effective enough to meet the city's housing goals. Therefore, the bulk of the recommendations included in this report focus on various partnerships and programs the city could collaborate on to take the existing, revised, and recommended policies further.

Assets

The City of Lacey has worked on many housing-related issues through various planning efforts in recent years, recognizing that housing displacement is a multi-faceted issue requiring multiple strategies and collaboration with regional partners.

In 2019, Lacey adopted an Affordable Housing Strategy as an appendix to their Housing Element, which details specific actions the city can take to increase affordable housing and provide for specific residential needs and services for those experiencing homelessness. In 2021, Lacey participated in a collaborative effort with Olympia and Tumwater to develop a Housing Action Plan (HAP). The City has completed or is actively implementing many items in its HAP, including efforts to offer density bonuses or fee waivers for low-income housing, offer density or other incentives for desired unit types, reduce parking requirements for residential uses, reduce minimum lot sizes, increase minimum residential densities, allow single-room occupancy (SRO) housing in all multifamily zones, and strategically allow live/work units in nonresidential zones.

There has been a lot of progress in recent years, and the City is determined to utilize its Comprehensive Plan update to build upon the work they have done to address racially disparate impacts, housing affordability, and displacement issues, acknowledge past harm, and foster a vibrant and more livable community for its residents.

Issues

While the City of Lacey has made significant progress in advancing actions in their HAP, city staff have identified some housing issues that need greater attention. While many residents choose to call Lacey home, some do not feel like they have a strong connection to the city or feel like they belong, which could indicate potential cultural displacement pressures. Strategies to increase placemaking and retain access to cultural events, religious institutions, or businesses unique to Lacey are important to explore further. There are also concerns that those who work in Lacey cannot always afford to live in Lacey if they want to, or are forced to move out of the city due to rising housing costs. Efforts to preserve existing and naturally occurring affordable housing are also needed to maintain affordable housing and prevent displacement. Together, these issues highlight the need for future policy or efforts to address displacement in Lacey, especially as many existing efforts in Lacey are intended to increase housing affordability or supply, but don't directly address preventing housing displacement, which is a multifaceted issue in itself.

Housing Displacement Risk Policy Analysis

The City of Lacey's existing Housing Element and additional housing-related policies throughout the Comprehensive Plan were reviewed using criteria consistent with the Department of Commerce's Racially Disparate Impacts guidance, as outlined in the Project Methodology section of the technical appendix. The resulting policy analysis found that Lacey's housing-related policies are generally split between policies identified as "supportive" and "approaching." Lacey's housing policies that are "supportive" of housing growth and affordability include efforts to increase higher residential densities, support infill development, provide and incentivize a sufficient amount of housing affordable to all incomes and unique housing needs, and partner with other agencies to improve housing affordability and prevent displacement and homelessness.

Generally, Lacey's housing policies that are identified as "approaching" support housing growth but could better address affordability and anti-displacement to ensure housing is equitably provided to all incomes and those who have historically been excluded or displaced. One policy in particular (Policy C under Goal 3 in the Central Planning Area section) may be strengthened by removing vague wording. Proposed edits clarify the intent of the policy, which is to regulate development standards for middle housing options that encourage them to be sensitive and complimentary of the surrounding neighborhood while balancing other city priorities like climate resilience.

In all, Lacey's housing-related goals and policies address housing displacement and include efforts to prevent disproportionate impacts. To strengthen Lacey's existing efforts, the City should consider additional policies to strengthen community partnerships that can help prevent displacement while continuing to foster a community supportive of existing residents and those who choose to live in Lacey.

Recommendations

There are a few key ways the city can supplement existing efforts to achieve greater success related to preventing racially disparate impacts, providing deeply affordable housing, and preventing displacement (economic displacement in particular). Efforts to increase community connections and partnerships with organizations would help the city take their existing work and policies further, by effectively increasing the capacity of city staff through these partnerships. Additional efforts and social services outside of housing policy are needed for Lacey's housing policies to be more effective.

Despite this, there are several additional policy areas Lacey should consider in its Comprehensive Plan update. For one, there are several existing policies in the Housing Element of Lacey's existing Comprehensive Plan that could be updated with minor edits to clarify the intent of the policies, remove vague language, connect policies to other elements of the Comprehensive Plan, or remove language that may be exclusive. Edits are proposed for many policies in the Final Existing Comp Plan Policy Evaluation Framework Appendix.

New policies or programs are needed to address a few significant policy gaps. For one, policies are needed to preserve existing units and naturally affordable housing, which is crucial to prevent economic displacement and help residents remain in their chosen community. Similarly, efforts are also needed to protect manufactured housing and prevent displacement in these communities. Housing affordable to lower wage earners in the city is also needed to provide housing for those who work in Lacey but cannot afford to live in the city. Cultural displacement could be mitigated by increasing placemaking efforts and retaining existing events and access to businesses, religious institutions, and other facilities and places important to various communities in Lacey.

Finally, Lacey's HAP has many additional actions the city could continue to implement by advancing them to their Planning Commission. Policies from the HAP that score high in the Policy Evaluation Matrix should be considered priorities for this effort.

Data & Indicators

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

Lacey has seen a decline amongst American Indian and Alaska Native residents. White and Hispanic or Latino populations are growing the fastest.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	357	303	-54
Asian	4,125	5562	1,437
Black or African American	2,034	3379	1,345
Hispanic or Latino (of any race)	3,126	7252	4,126
Native Hawaiian and Other Pacific Islander	336	994	658
Other Race	192	148	-44
Two or more races	1,415	4323	2,908
White	28,749	35027	6,278

Cost Burdened Population

Lacey has seen a 12% increase in severely cost-burdened households between the two timeframes.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	4150	4,040	110
Cost-Burdened (30-50%)	2880	2,815	65
Severely Cost-Burdened (>50%)	1915	1,715	200
Not Calculated	10	40	-30

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	9110	8,345	765
Cost-Burdened (30-50%)	1785	1,415	370
Severely Cost-Burdened (>50%)	1015	830	185
Not Calculated	125	80	45

Rental Affordability

Lacey has limited and decreasing rental units affordable to extremely low-income and very-low-income households.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	0	0	0
Very-Low Income (30-50% AMI)	160	250	-90
Low-Income (50-80% AMI)	40	0	40
Moderate-Income (80%-100% AMI)	150	0	150

Income

Lacey is losing low income renters and gaining moderate and above medium income renters while extremely-low income homeowner households are increasing.

Change in # Households by Income Status: Renters	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	1180	1,340	-160
Very Low-Income (30-50%)	1340	1,575	-235
Low-Income (50-80%)	2125	2,600	-475
Moderate Income (80-100%)	1550	1,015	535
Above Median Income (>100%)	2755	2,075	680

Change in # Households by Income Status: Owners	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	1075	825	250

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Very Low-Income (30-50%)	635	620	15
Low-Income (50-80%)	1580	1835	-255
Moderate Income (80-100%)	1420	1570	-150
Above Median Income (>100%)	7320	5825	1495

Tenure/Homeownership

Across all income levels, Lacey has seen a 13% increase in homeowner households and a 4% increase in renter households between the two time periods.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	8950	8605	345
Owner	12035	10670	1365

Age

The fastest-growing age groups in Lacey are #1) 65 to 69 years, #2)40 to 44 years, and #3)75 to 79 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	40,334	57,088	41.54%
Under 5 years	6.70%	5.80%	-0.90%
5 to 9 years	6.40%	6.40%	0.00%
10 to 14 years	7.00%	6.20%	-0.80%
15 to 19 years	4.70%	4.70%	0.00%
20 to 24 years	6.60%	6.50%	-0.10%
25 to 29 years	8.50%	8.80%	0.30%
30 to 34 years	8.00%	8.00%	0.00%
35 to 39 years	7.60%	7.60%	0.00%
40 to 44 years	5.00%	6.30%	1.30%
45 to 49 years	5.60%	5.50%	-0.10%
50 to 54 years	6.30%	4.40%	-1.90%

% Change in Population by Age	2010 ACS	2023 ACS	Change
55 to 59 years	6.70%	4.60%	-2.10%
60 to 64 years	4.80%	6.30%	1.50%
65 to 69 years	3.40%	5.70%	2.30%
70 to 74 years	3.80%	4.90%	1.10%
75 to 79 years	3.10%	3.00%	-0.10%
80 to 84 years	2.50%	2.20%	-0.30%
85 years and over	3.50%	3.20%	-0.30%

Implementation Capacity & Limitations

Implementing the recommended policies and remaining actions of the HAP will require significant financial resources and staff time to be effective, sustainable, and serve the greatest number of residents. The primary limitation will likely be financing limitations due to the need to navigate city politics, financing, and to identify and secure available financial resources for the recommended programs. City staff would also need additional capacity to pursue funding, whether through grants, regional or state programs, or other sources, for many of these programs.

Many of the revised Housing Element policies, remaining actions in the HAP, and policy recommendations developed for Lacey would also require significant staff time to work with community partners to develop ordinances to update the city’s development regulations, in addition to time spent working with the Planning Commission and City Council to review and approve ordinances. The recommended policies would also require significant staff time to identify, develop, and maintain community partnerships and collaborative efforts with local organizations.

Olympia, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

Issues around housing and displacement in the City of Olympia are complicated and nuanced. The City has increasingly taken on a leadership role in efforts to address mounting housing and affordability crises, and they have taken on a multi-faceted approach. Many policies and implementation strategies have been enacted and tested over several years, enough time to see where substantive gains have been made and to concretely identify specific barriers to progress. Recommendations for the City of Olympia are primarily suggestions to fine-tune existing policies to specifically address displacement risk. In Olympia, data and displacement indicators point to a rental population that is at increased risk for displacement, more so than the home-owning population.

Assets

The City of Olympia has worked on many issues related to housing affordability and displacement in the last six years. They have built a web of protective policies, long-range plans, funding strategies, and community partnerships. This approach recognizes that there is no one-step solution to housing displacement; multiple issues have to be addressed simultaneously to have an impact.

The City Council adopted the One Community Plan in 2020 which explicitly seeks community agreement around responding to the homelessness crisis. In 2021, in collaboration with Lacey and Tumwater, the Olympia finalized a Housing Action Plan (HAP) based on data from a Thurston County Regional Housing Needs Assessment and Housing Gap Analysis, and in 2023, The City collaborated with Thurston County and the Housing Authority of Thurston County to conduct an Assessment of Fair Housing. The City is currently implementing many of the actions identified in their HAP, and updates to the Comprehensive Plan seek to fold and build upon all related work since 2018. Updates to the Comprehensive Plan will also support the expansion of middle housing options and opportunities.

The City has also enacted several policies and programs, such as a tenant protection policy, affordable housing incentives, and a multi-family tax exemption (MFTE) program. They are actively collaborating with the development community and manufactured homeowners, and they have dedicated staff to attend and advise during permitting meetings. The MFTE program has been particularly successful in the Downtown area.

Issues

Displacement issues identified within the City of Olympia include some specific boundaries encountered during the enactment of the City's affordable housing protection policies and implementation. These include:

- The difficulty of enforcing tenant protections
- Increases in rent beyond the control of the City (the City has increased efforts to control the costs they can, such as limiting extra fees and move-in costs)
- Restraints on middle housing development due to sewer connections or critical areas
- Middle housing is quite expensive when it does get built and does not serve affordable housing needs.
- Barriers around awareness of the MFTE program, particularly because only a handful of developers are utilizing this program
- A need for more, permanent, supportive, and deeply affordable housing.

Housing Displacement Risk Policy Analysis

To identify policies to enhance all of Olympia's existing work to improve housing affordability, nurture community partnerships, and pursue funding opportunities to prevent displacement and racially disparate impacts, the consultant team reviewed Olympia's current Comprehensive Plan. Policies in the Housing Element, along with other housing-related policies in other elements, namely Public Services, were reviewed for policies that may result in racially disproportionate impacts or are supportive of housing goals. A few of Olympia's policies are identified as "supportive", including policies that encourage adapting non-residential buildings for housing, support the provision of affordable housing by minimizing barriers and regulatory review, and prevent physical barriers from isolating new development from existing neighborhoods. Most of Olympia's housing-related policies are indicated as "approaching" because they aim to increase Olympia's housing supply but could be strengthened to better address racially disparate impacts, identify anti-displacement strategies, and prevent housing exclusion while prioritizing historically marginalized populations. Several conflicting policies are identified as "challenging" housing goals. These include policies requiring additional design or architectural features to be included in new housing or to preserve existing neighborhood "character," which could be updated or changed to remove vague language and allow greater flexibility to ensure increased housing production and choices. Proposed edits to these policies can be found in the Final Existing Comp Plan Policy Evaluation Framework Appendix.

Recommendations

A few policies float to the top of the recommendations for the City of Olympia to assist most directly in overcoming the barriers encountered by the City. A full list of new policy

recommendations is available in the specific Policy Evaluation Matrix for the City. The top-scoring ones are summarized:

- Policies for the protection and preservation of the manufactured home community.
- Additional measures to encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.

An analysis has also been completed of the City's Housing Action Plan (HAP) policies, and a number of these score very high, such as:

- Evaluate the relationship between the Olympia and the county's home fund to ensure housing goals are met.
- Expanding allowance of residential tenant improvements without triggering land use requirements.
- Allowing Single Room Occupancy (SRO) housing in all multifamily zones.

The city could consider prioritizing these HAP policies and others that score high in the Policy Evaluation Matrix for implementation by advancing them to their Planning Commission, as they meet city priorities and address existing deficiencies in the city's housing policy.

Data & Indicators

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

All racial and ethnic groups are growing in Olympia, with the Hispanic and Latino population by 118% between 2010 and 2023.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	377	379	2
Asian	2,698	3622	924
Black or African American	1,020	1365	345
Hispanic or Latino (of any race)	2,628	5727	3,099
Native Hawaiian and Other Pacific Islander	55	476	421
Other Race	52	184	132
Two or more races	1,487	4104	2,617
White	37,391	39726	2,335

Cost Burdened Population

The severely cost-burdened renter population in Olympia grew by 8% between the two timeframes. Cost-burdened homeowner households increased by 21% over the same period.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	5730	5545	185
Cost-Burdened (30-50%)	2995	2970	25
Severely Cost-Burdened (>50%)	3420	3160	260
Not Calculated	315	199	116

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	9285	8445	840
Cost-Burdened (30-50%)	1425	1280	145
Severely Cost-Burdened (>50%)	925	735	190
Not Calculated	90	85	5

Rental Affordability

Olympia lost approximately 58% of rental units affordable to very low-income households between the two time periods.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	45	20	25
Very-Low Income (30-50% AMI)	80	190	-110
Low-Income (50-80% AMI)	195	185	10
Moderate-Income (80%-100% AMI)	100	25	75

Income

Olympia renter households making above the median income increased by 29% within the two time periods. Homeowner households making above the median income grew by 21% in the same time.

Change in # Households by Income Status:			
Renters	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	2875	2985	-110
Very Low-Income (30-50%)	2220	2400	-180
Low-Income (50-80%)	2745	2520	225
Moderate Income (80-100%)	1390	1475	-85
Above Median Income (>100%)	3225	2495	730

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	660	750	-90
Very Low-Income (30-50%)	755	715	40
Low-Income (50-80%)	1355	1485	-130
Moderate Income (80-100%)	1100	1075	25
Above Median Income (>100%)	7855	6510	1345

Tenure/Homeownership

Olympia homeowner households of all income levels increased by 11% while renter households of all income levels increased by 5% in the same period.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	12460	11870	590
Owner	11725	10535	1190

Age

The fastest-growing age groups in Olympia are #1) 70 to 74 years, #2)75 to 79 years, and #3)65 to 69 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	45,708	55,583	21.60%
Under 5 years	5.10%	5.10%	0.00%
5 to 9 years	5.50%	3.70%	-1.80%
10 to 14 years	6.10%	5.10%	-1.00%
15 to 19 years	6.10%	7.00%	0.90%
20 to 24 years	10.60%	5.50%	-5.10%
25 to 29 years	8.00%	8.70%	0.70%
30 to 34 years	6.00%	8.70%	2.70%
35 to 39 years	6.80%	7.50%	0.70%
40 to 44 years	6.60%	6.90%	0.30%
45 to 49 years	6.80%	6.20%	-0.60%
50 to 54 years	7.50%	5.50%	-2.00%
55 to 59 years	6.90%	6.00%	-0.90%
60 to 64 years	5.20%	5.10%	-0.10%
65 to 69 years	3.80%	5.10%	1.30%
70 to 74 years	2.30%	5.80%	3.50%
75 to 79 years	2.10%	3.90%	1.80%
80 to 84 years	1.70%	1.70%	0.00%
85 years and over	2.90%	2.30%	-0.60%

Implementation Capacity & Limitations

The City has already expended considerable political capital enacting multi-part strategies to address housing affordability. Though these efforts may need to continue for a long period to see definitive progress, politics will need to match the necessary longevity of these programs to see significant results. Changes in leadership or shifts in City funding for programming could erode support for existing implementation efforts that are having a net positive effect.

The City has done a good job of identifying specific barriers to ease displacement pressure. The Housing Action Plan actions collectively represent quite a lot of staff time or consultant time, but quite a number of them can also be seen as making progress against displacement pressures as well.

Tumwater, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

The City of Tumwater wants to keep housing affordable for existing residents and maintain existing housing stock as affordable housing. A lot of new housing supply in the City will not be affordable when it is built.

Assets

The City has zoning protections for manufactured home parks and they anticipate higher-density homes with the enactment of development standards to meet House Bill 1110 requirements. However, the City is interested in understanding how to mitigate the impacts of this density.

The City's Housing Action Plan (HAP), written in collaboration with Lacey and Olympia, shows that the City has begun work necessary to implement anti-displacement policies. Some of these policies include policies to protect existing affordable housing stock, funding projects that increase low-income housing supply, maintaining a rental database to have better information to track whether or not rental costs are rising, helping reduce costs and fees that are under the City's control, and increasing collaboration with various community partners.

Issues

There are several housing issues the City of Tumwater hopes to address in its Comprehensive Plan update. These include wanting to maintain housing affordability for existing Tumwater residents. Also of interest are strategies to revive the market for small local builders who might take on smaller projects that also pass affordability on to residents (a lot of this community was lost in Tumwater during the pandemic). Yet another interest will be policies considering adaptive reuse to preserve existing affordable housing stock.

Housing Displacement Risk Policy Analysis

Many of Tumwater's housing-related policies are "supportive" or "approaching" housing goals. The City's policies generally support housing growth and the provision of adequate services to support housing, mitigate displacement, and support those who need transitional or supportive housing or have additional housing needs. Policies that are identified as "approaching" generally encourage diverse housing types to meet various

housing needs, but could be strengthened to better mitigate displacement, consider housing affordability and availability by income bracket, and protect historically marginalized populations from disproportionate impacts. There is only one policy (that shows up twice in the plan) identified as “challenging;” it aims to protect residential areas from undesirable activities and uses through aggressive code enforcement, which could lead to greater displacement or disproportionate impacts among lower income and historically marginalized groups.

Compared to other jurisdictions, words used in policy language in HAP are not as strong. The City will be updating and incorporating the HAP goals and actions into the 2025 CUP Housing Element. This is a potential opportunity to strengthen policy language in the Comprehensive Plan to incorporate stronger words like “require”, rather than “encourage”.

Recommendations

A few policies float to the top of the recommendations for the City of Tumwater to assist most directly as protective measures against economic and physical displacement. A full list of new policy recommendations is available in the specific Policy Evaluation Matrix for the City. The top-scoring ones are summarized:

- A Community Land Trust-style program for mobile home communities.
- A City program to support private, local, small-scale ownership of mobile home communities. This builds on the City’s mobile home housing stock and also wishes to help preserve existing affordable stock.
- Increased staffing capacity to process ADUs quickly and reduce costs under City control

An analysis has also been completed of the City’s Housing Action Plan (HAP) policies, and a number of these score very high, such as:

- Providing “notice of intent to sell” ordinance for multifamily developments
- Establishing a program to preserve and maintain healthy and viable manufactured home parks (some details of which are captured in the new recommendations)
- Mixing market rate and low-income housing to avoid creating areas of concentrated low-income housing.

The city could consider prioritizing these HAP policies and others that score high in the Policy Evaluation Matrix for implementation by advancing them to their Planning Commission, as they meet city priorities and address existing deficiencies in the city’s housing policy.

Data & Indicators

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of income on housing

- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

The fastest-growing racial and ethnic groups in Tumwater are Hispanic or Latino residents and White residents. Alternatively, Tumwater saw a 64% decrease in the American Indian and Alaska Native population between 2010 and 2023.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	395	241	-154
Asian	512	1120	608
Black or African American	192	947	755
Hispanic or Latino (of any race)	925	2409	1,484
Native Hawaiian and Other Pacific Islander	3	109	106
Other Race	84	554	470
Two or more races	474	2260	1,786
White	14,249	18879	4,630

Cost Burdened Population

Tumwater has seen a slight decrease in cost-burdened and severely cost-burdened renter households while homeowner, not cost-burdened households are growing.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	2290	2190	100

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Cost-Burdened (30-50%)	950	1015	-65
Severely Cost-Burdened (>50%)	975	1080	-105
Not Calculated	25	14	11

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	4510	4155	355
Cost-Burdened (30-50%)	495	670	-175
Severely Cost-Burdened (>50%)	450	405	45
Not Calculated	30	40	-10

Rental Affordability

Tumwater has limited rental availability across all income types, but especially for extremely low-income and very low-income households.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	0	0	0
Very-Low Income (30-50% AMI)	0	45	-45
Low-Income (50-80% AMI)	80	70	10
Moderate-Income (80%-100% AMI)	80	75	5

Income

Tumwater is seeing significant growth in households making above the median income. Renter households above the median income increased by 27% while homeowner households above the median income increased by 12%.

Change in # Households by Income Status:	2017-2021	2015-2019	Difference
Renters			
Extremely Low-Income (\leq 30% AMI)	680	920	-240
Very Low-Income (30-50%)	690	775	-85
Low-Income (50-80%)	990	1010	-20

Change in # Households by Income Status:			
Renters	2017-2021	2015-2019	Difference
Moderate Income (80-100%)	455	470	-15
Above Median Income (>100%)	1430	1125	305

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	325	470	-145
Very Low-Income (30-50%)	395	335	60
Low-Income (50-80%)	715	805	-90
Moderate Income (80-100%)	415	425	-10
Above Median Income (>100%)	3635	3235	400

Tenure/Homeownership

Tumwater saw a 1% reduction in renter households across income levels while homeowner households across income levels increased by 4%.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	4240	4300	-60
Owner	5490	5265	225

Age

The fastest-growing age groups in Tumwater are #1) 60 to 64 years, #2)65 to 69 years, and #3)70 to 74 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	16,834	26,519	57.53%
Under 5 years	5.50%	4.40%	-1.10%
5 to 9 years	6.60%	7.30%	0.70%
10 to 14 years	6.50%	4.90%	-1.60%
15 to 19 years	7.90%	4.00%	-3.90%
20 to 24 years	6.10%	7.00%	0.90%
25 to 29 years	8.30%	8.90%	0.60%

% Change in Population by Age	2010 ACS	2023 ACS	Change
30 to 34 years	7.40%	8.40%	1.00%
35 to 39 years	7.90%	8.50%	0.60%
40 to 44 years	5.50%	7.10%	1.60%
45 to 49 years	7.10%	6.20%	-0.90%
50 to 54 years	7.60%	5.70%	-1.90%
55 to 59 years	6.70%	5.70%	-1.00%
60 to 64 years	4.70%	7.20%	2.50%
65 to 69 years	2.90%	4.90%	2.00%
70 to 74 years	2.50%	3.60%	1.10%
75 to 79 years	2.30%	2.60%	0.30%
80 to 84 years	1.60%	2.00%	0.40%
85 years and over	2.70%	1.90%	-0.80%

Implementation Capacity & Limitations

The housing action plan policies are all a good start for the City. The biggest impact on displacement means focusing on preserving mobile home parks as existing affordable stock. This will require continued education and communication to explain why the focus is here to build upon the political support MHPs already have in the City.

Many of the revised Housing Element policies, remaining actions in the HAP, and policy recommendations developed for Tumwater would also require significant staff time to work with community partners to develop ordinances to update the city’s development regulations, in addition to time spent working with the Planning Commission and City Council to review and approve ordinances. The recommended policies would require significant staff time to identify, develop, and maintain community partnerships and collaborative efforts with local organizations. City staff would also need additional capacity to pursue funding, whether through grants, regional or state programs, or other sources, for many of these programs to be effective, sustainable, and serve the greatest number of residents.

Yelm, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

Market-rate housing in the City of Yelm sells quickly these days, and much of the housing is of interest to military families who are looking for a small-town feel. Yelm hasn't seen a lot of displacement yet, but economic displacement could be on the horizon and the City eyes displacement and housing affordability crises in nearby Cities with some apprehension. As of right now, the City doesn't have a specific housing program, but it looks to Cities like Tumwater, Lacey, and Vancouver for ideas and program examples that could work in Yelm.

Assets

Proximity to the military base also means a unique set of issues, such as effective price setting as rent is calibrated to be the military basic allowance for housing (bah), which makes rent a bit more affordable overall in the City.

Much of the City's affordable housing stock was built in the 1970s, and there the City runs effective rehab programs, such as for mold abatement, that help homeowners keep affordable housing stock in good condition. Housing that is older than the 1970s has mostly been converted to commercial uses.

There is an openness in Yelm to collaborating with nearby Cities on a multifamily tax exemption (MFTE) credit program. Similarly, the City has considered stock accessory dwelling unit (ADU) plans, particularly if that would help decrease the cost (and affordability) of ADU construction.

Issues

Issues and concerns raised by staff include a broad range of possible interests for the City. These include a willingness to consider additional policies to safeguard against displacement as market-rate housing continues to sell very quickly.

Yelm would like to see more policies as preventative measures against economic displacement, including an MFTE program. The primary barrier to this currently is the City Council's perception of taxation. The biggest issue for a MFTE program Yelm may be getting buy in from the community and the City Council.

Analysis of the Comprehensive Plan and House Bill 1220 showed housing deficits for all bands, including market rate.

Housing Action Plan

Yelm's Housing Action Plan (HAP) identifies a gap in housing units that are available to meet low-income and very-low income renter households. This may need to take the form of subsidized housing or rental assistance programs. The HAP also provides an evaluation of the City's density and current zoning designations to look for ways to increase density and allow for development or redevelopment of parcels.

Housing Displacement Risk Policy Analysis

Yelm's housing policies are generally supportive of housing goals, including policies that encourage diverse residential growth, efficient permit processing, allow various residential uses and types that provide for diverse housing needs, and increase funding for affordable housing or reduce barriers to home ownership. Policies indicated as "approaching" could be improved primarily by considering affordability for all income groups and prioritizing those that have been historically marginalized, but they generally encourage housing growth, the maintenance of existing housing stock, and the provision of housing near transit and other services. There aren't any policies identified as "challenging."

Recommendations

A few policies float to the top of the recommendations for the City of Yelm to assist most directly as protective measures against economic displacement. A full list of new policy recommendations is available in the specific Policy Evaluation Matrix for the City. The top-scoring ones are summarized:

- Policies for the protection and preservation of the manufactured home community.
- Short-term rental programs to minimize long-term housing being used for transient rentals

An analysis has also been completed of the City's Housing Action Plan (HAP) policies, and a number of these score very high, such as:

- Partnerships with low-income housing developers, the Housing Authority of Thurston County, and other organizations that provide support for low-income, workforce, senior housing, and other populations with unique housing needs.
- Community Development Block Grants, Section 108 loans, and other federal resources for affordable housing.
- Offering density bonuses for low-income housing.

Data & Indicators

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse

- Households are spending more than 30% of income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

Yelm lost 57% of its Asian population between 2010 and 2023. Comparatively, the Black population has grown by 115%, the Hispanic population by 158%, and the Native Hawaiian and Pacific Islander population by 720%.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	40	129	89
Asian	230	98	-132
Black or African American	242	521	279
Hispanic or Latino (of any race)	573	1481	908
Native Hawaiian and Other Pacific Islander	65	533	468
Other Race	0	0	0
Two or more races	201	805	604
White	4,835	7051	2,216

Cost Burdened Population

Yelm has seen a slight growth amongst severely cost-burdened rental households but a significant growth amongst non cost burdened homeowner households.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	515	550	-35
Cost-Burdened (30-50%)	245	275	-30
Severely Cost-Burdened (>50%)	215	170	45
Not Calculated	45	40	5

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	1545	1110	435
Cost-Burdened (30-50%)	415	474	-59
Severely Cost-Burdened (>50%)	180	130	50
Not Calculated	0	0	0

Rental Affordability

Yelm seems to only have rental units affordable to those making above 100% AMI.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	0	0	0
Very-Low Income (30-50% AMI)	0	0	0
Low-Income (50-80% AMI)	0	0	0
Moderate-Income (80%-100% AMI)	0	0	0

Income

Homeowner households making above 100% AMI have increased by 77% in Yelm while both low income renter and homeowner households have decreased.

Change in # Households by Income Status: Renters	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	245	230	15
Very Low-Income (30-50%)	130	190	-60
Low-Income (50-80%)	195	210	-15
Moderate Income (80-100%)	220	185	35

Change in # Households by Income Status:			
Renters	2017-2021	2015-2019	Difference
Above Median Income (>100%)	230	210	20

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Extremely Low-Income (\leq 30% AMI)	70	80	-10
Very Low-Income (30-50%)	85	150	-65
Low-Income (50-80%)	325	320	5
Moderate Income (80-100%)	320	410	-90
Above Median Income (>100%)	1345	760	585

Tenure/Homeownership

Yelm has seen an overall decrease in renter and owner households across all income levels.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	310	1025	-715
Owner	1080	1720	-640

Age

The fastest-growing age groups in Yelm are #1) 20 to 24 years, #2)60 to 64 years, and #3)5 to 9 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	6,186	10,618	71.65%
Under 5 years	10.80%	6.80%	-4.00%
5 to 9 years	9.20%	11.20%	2.00%
10 to 14 years	10.40%	8.20%	-2.20%
15 to 19 years	8.20%	7.00%	-1.20%
20 to 24 years	4.40%	8.60%	4.20%
25 to 29 years	9.40%	7.60%	-1.80%
30 to 34 years	9.80%	11.10%	1.30%

% Change in Population by Age	2010 ACS	2023 ACS	Change
35 to 39 years	8.20%	8.10%	-0.10%
40 to 44 years	7.10%	6.30%	-0.80%
45 to 49 years	6.10%	6.30%	0.20%
50 to 54 years	3.30%	4.50%	1.20%
55 to 59 years	4.10%	4.90%	0.80%
60 to 64 years	1.70%	3.70%	2.00%
65 to 69 years	1.00%	0.70%	-0.30%
70 to 74 years	0.40%	2.60%	2.20%
75 to 79 years	1.70%	1.50%	-0.20%
80 to 84 years	2.00%	0.90%	-1.10%
85 years and over	2.00%	0.40%	-1.60%

Implementation Capacity & Limitations

As is true in many small towns, housing programs are hard to fund, assemble, and administer. But this may be a critical piece of infrastructure needed to truly provide housing or even rental assistance programs to low- and very-low-income renters.

Housing Displacement Analysis and Comprehensive Plan Recommendations for the cities of Lacey, Olympia, Tumwater, and Yelm

PREPARED BY:

UNCOMMON BRIDGES

BHC CONSULTANTS

June 6, 2025



Table of Contents

<i>Executive Summary</i>	4
Housing Displacement Analysis Context	4
Statutory Context.....	4
How to Use this Document.....	4
What is Housing Displacement?	5
Housing Displacement Analysis Approach	6
How do we measure housing displacement risk?	6
City Housing Displacement Risk Profiles Snapshot	7
Lacey.....	8
Olympia	8
Tumwater.....	9
Yelm	9
<i>Project Methodology</i>	10
Overview	10
Academic Research	10
Data Indicators	10
Sources & Data Limitations	10
Community Engagement	12
Policy Evaluation & Criteria	13
Identifying Policy Recommendations	14
<i>Existing Conditions of Displacement Risk</i>	16
Overview	16
What Types of Housing Policies Contribute to Housing Displacement?.....	16
Who is at Greatest Risk of Housing Displacement?.....	17
Data & Indicators Summary	18
Racial Diversity.....	19
Cost Burden.....	20
Rental Affordability.....	21
Income	21
Tenure/Homeownership	23
Age.....	23
What are Community Stakeholders Saying?	25
Relevance for Analysis.....	26
<i>City Displacement Risk Profiles & Recommendations</i>	27

Overview27

Lacey – Economic & Cultural Displacement27

 Housing Displacement Risk Policy Analysis..... 28

 Priority Policy Recommendations..... 29

 Implementation Capacity & Limitations..... 30

 Conclusion..... 30

Olympia – Physical Displacement.....31

 Housing Displacement Risk Policy Analysis..... 32

 Priority Policy Recommendations..... 32

 Implementation Capacity & Limitations..... 33

 Conclusion..... 33

Tumwater – Economic Displacement34

 Housing Displacement Risk Policy Analysis..... 34

 Priority Policy Recommendations..... 35

 Implementation Capacity & Limitations..... 36

 Conclusion..... 36

Yelm – Economic & Physical Displacement37

 Housing Displacement Risk Policy Analysis..... 37

 Priority Policy Recommendations..... 38

 Implementation Capacity & Limitations..... 38

 Conclusion..... 39

***CONCLUSION* 40**

***APPENDIX* 41**

Executive Summary

HOUSING DISPLACEMENT ANALYSIS CONTEXT

This report provides foundational context around housing displacement for the cities of Lacey, Olympia, Tumwater, and Yelm that respond to appropriate statutory context guiding the housing element of periodic comprehensive plan updates. By piecing together a relatively current look at housing displacement risk for these four cities, this report provides a reasonable picture of the contributing factors for housing displacement and the implications of possible counter-balancing policy and regulatory recommendations.

Statutory Context

In 2021, the Washington State Legislature passed House Bill 1220 into law requiring all jurisdictions guided under the Growth Management Act (GMA) to “plan for and accommodate housing affordable to all economic segments of the population of this state...”¹

As part of this requirement, Section 2 of HB1220 directs jurisdictions to adopt comprehensive plans that, among other things: “identify racially disparate impacts, displacement and exclusion in housing policies and regulations, and [begins] to undo those impacts ...”²

The cities of Lacey, Olympia, Tumwater, and Yelm are working toward the 2025 deadline for their respective comprehensive plan updates which will come under the updated HB1220 requirements for the first time.

How to Use this Document

In response to these requirements, the Cities of Lacey, Olympia, Tumwater, and Yelm agreed to collate resources and contract the consultant team of Uncommon Bridges and BHC Consultants. Cities and consultants collaborated on the expectations of this housing displacement analysis, the sharing of data and connections, and clarity around the use of this product.

The consultant team was tasked with producing a report in line with state guidance that supports each jurisdiction’s work to meet stated housing element planning. The team synthesized and interpreted the findings and recommendations included in this report to organize clear, direct, and authentic narratives generated from the various inputs of the analysis.

This document should be read as a supplementary document intended to support each of the city jurisdictions with information that may be communicated to public audiences and to inform

¹ RCW 36.70A.070(2)(2021)

² Ibid

compliance with respective comprehensive plan updates. Each City should apply the outcomes of this report in the ways they deem most relevant in addressing local housing displacement, racially disparate outcomes in housing, and housing exclusion issues.

Note—This report *only* provides a perspective on addressing housing displacement through a housing policy and government-led regulatory lens. We recognize that holistic attention to displacement and broader social issues connected to housing requires an approach that includes collaboration across policy and service domains, such as homelessness, mental and behavioral health resources, economics, and more. An analysis such as this should be considered within the context of those challenges and the unique way they play out amongst different places and people. While the social conditions for creating housing security are complex, there are policy opportunities that cities can take to reduce displacement and protect community wellbeing.

WHAT IS HOUSING DISPLACEMENT?

Housing displacement is an experience that impacts both individual households as well as broader neighborhoods and communities. In its most straightforward definition, ***housing displacement is when a household is forced to move from its community because of conditions beyond its control.***

Displacement can be described through several lenses as defined by the Washington State Department of Commerce³, including:

- **Economic Displacement** - Displacement is due to the inability to afford rising rents or the costs of homeownership, like property taxes.
- **Physical Displacement** - Displacement is due to eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent or income-restricted housing.
- **Cultural Displacement** - Residents are compelled to move because the people and institutions that make up their cultural community have left the area.

Quite often, local communities likely experience intersecting factors across all three of these categories. While the use of categories provides a helpful reference point, to build a comprehensive assessment of displacement types – especially on a local scale – requires supplementing these definitions with additional insights.

Other relevant definitions from Commerce⁴ include:

³ Department of Commerce (2023). Guidance to Address Racially Disparate Impacts.

<https://deptofcommerce.app.box.com/s/11217198jattb87qobtw63pkplzhxege>

⁴ Ibid.

- **Gentrification:** The process in which the character of an area is changed, resulting in households being unable to remain in their neighborhood or move into a neighborhood that would have been previously accessible to them. This is also referred to as “neighborhood exclusionary change” or “exclusionary displacement”.
- **Racially Disparate Impacts:** When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups.

HOUSING DISPLACEMENT ANALYSIS APPROACH

This analysis aims to identify factors contributing to housing instability and displacement, especially among vulnerable populations. By examining historical policies, current trends, and community dynamics, we seek to outline actionable recommendations for local governments to enhance housing security and promote equitable living conditions for all residents. Through collaborative engagement with community stakeholders, this report underscores the importance of inclusive housing strategies that prioritize the needs of marginalized groups while fostering sustainable development.

Data collection and inputs for the analysis included:

- Academic Background Research
- Local Policy Review
- Displacement Indicator Data Analysis
- Public Engagement
- Policy Recommendations

Through these inputs, the consultant team balanced retrospective literature review, lived experience/anecdotal input, and interpretive quantitative data to build interpretations and recommendations of how to measure the effectiveness of strategies against displacement, gentrification, and racially disparate impacts.

How do we measure housing displacement risk?

For this analysis, we are guided by the Washington State Department of Commerce’s guidance on measuring possible strategies through its Racially Disparate Impacts (RDI) tool⁵. Measuring the phenomena of displacement, gentrification, and racialized disparities in housing exclusion is complex, the RDI tool guides jurisdictions to consider five primary indicators as “supportive” metrics towards

⁵ The RDI toolkit is designed for use by the Department of Commerce (Commerce) in its support of local jurisdiction efforts to meet the requirements of the Growth Management Act (GMA). The toolkit compiles statistics relevant to a jurisdiction’s analysis of racially disparate impacts in its community.

this analysis. The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD) and is presented in four-year ranges. This analysis compares RDI data points from 2015-2019 and 2017-2021. Additionally, demographic data was pulled from the American Community Survey.

According to this guidance, generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of their income on housing
- Rental units become unaffordable for extremely low-income residents (households earning between 30% and 50% of the Area Median Income (AMI))
- Poverty rates increase in a community
- Homeownership rates decline

Each of the jurisdictions agreed to track measures across these five indicators to best describe the trends and intensity of housing displacement. In measuring the same five indicators across each City, the analysis also provides an opportunity for comparative analysis and movement toward a “regional” picture of housing displacement conditions.

In addition to these five indicators, each jurisdiction integrated their own professional knowledge to identify other relevant metrics for review and consideration. These individualized metrics are described in the *Project Methodology* section of this report.

CITY HOUSING DISPLACEMENT RISK PROFILES SNAPSHOT

For each of the four cities assessed in this analysis, a predominant “displacement risk type” was identified for critical attention. To form these characterizations, the consultant team considered outputs from corresponding RDI indicators, regional engagement, and existing policy review.

As noted previously, the aim in this section is to help outline what might be the *primary* drivers of potential displacement, racially disparate impacts in housing, and housing exclusion issues.

The suggestion of any given displacement type should not be interpreted as being mutually exclusive of the other types – meaning that some interplay among economic, physical, and cultural displacement is likely always happening.

At a regional trend level, all four jurisdictions are currently experiencing stark economic pressures on housing affordability. Where possible, this section intends to make connections about how this either has, or could, impact the types of residents predominantly living in the respective City.

Note – this analysis does not make conclusive statements about the interactions of housing displacement conditions and impacts *between* cities. It is not reasonable to suggest from the basis of this analysis whether pressures in one locale influence or connect to pressures in another.

For more information and analysis see the report section titled “*City Displacement Risk Profiles and Recommendations*”.

Lacey

Most Prominent Risk Type(s): **Economic & Cultural**

Lacey’s economic pressures make it stand out as a prominent risk type. However, careful attention will be needed to ensure that these pressures do not disproportionately impact its increasingly diverse population of residents.

According to available data Lacey’s population experienced:

- A significant **increase in racial and ethnic diversity** among residents between 2010 – 2023;
- A substantial **increase in severely cost-burdened households** for both renters and homeowners between 2015–2019 and 2017–2021
- **A decrease in the availability of affordable rental units** for very-low-income (earning between 30% and 50% AMI) households.
- A relative **decrease in renters earning less than 80% AMI** but an **increase in low-income homeowners** between 2015-2019 and 2017-2021
- An **increase in overall homeowner households**

Olympia

Most Prominent Risk Type: **Physical**

While a range of housing types exist in Olympia, its displacement risk is uniquely characterized by the loss of existing low-income homeownership alongside a significant challenge in providing affordable rental units for very-low-income households.

According to available data Olympia’s population experienced:

- A significant **increase in racial and ethnic diversity** among residents between 2010 – 2023;
- A **decrease in cost-burdened renter households** but an **increase in cost-burdened and severely cost-burden homeowner households** between 2015–2019 and 2017–2021
- A slight increase in affordable units for extremely-low income households, but a **significant decrease in the availability of affordable rental units for very-low-income households** (earning between 30% and 50% AMI).
- A notable **increase in low-income renters** (50%-80% AMI) and a **decrease in low-income and extremely low-income** homeowners between 2015-2019 and 2017-2021
- An **increase in overall homeowner households**

Tumwater

Most Prominent Risk Type: **Economic**

Tumwater’s economic displacement risk is characterized by the reciprocal relationship of subtle loss of low and middle-income renters with a significant lack of affordable housing for the lowest-income segments of the population.

According to available data Tumwater’s population experienced:

- **Little to no change in relative racial and ethnic diversity** among residents between 2010 – 2023;
- A relative **decrease in cost-burdened households** for renters and homeowners between 2015–2019 and 2017–2021
- A relative **decrease in the availability of affordable rental units for very-low-income households** (earning between 30% and 50% AMI).
- A **general decrease across most income categories for renters and homeowners** except for above median income households between 2015-2019 and 2017-2021
- An **increase in overall homeowner households** and a **slight decrease in renters**.

Yelm

Most Prominent Risk Type: **Economic and Physical**

Unlike the commonly interpreted definition of physical displacement, Yelm’s greatest risk comes from its pressure to meet the demand for suburbanization. Above-median income populations make up the largest increase income type and as folks look to redevelop land effectively, it has the risk of impacting highly vulnerable population groups disproportionately.

According to available data Yelm’s population experienced:

- Little to **no change in relative racial and ethnic diversity** among residents between 2010 – 2023;
- A relative **increase of severely cost-burdened renter households** and a **significant decrease in cost-burdened homeowner households** between 2015 – 2019 and 2017 – 2021
- Little to **no observable change** in the availability of affordable rental units
- Relative **decrease of very-low and low income renters** and a **significant increase in above median income homeowners** 2015-2019 and 2017-2021
- Significant **decrease overall of renters and homeowners** households

Project Methodology

OVERVIEW

This report comprehensively analyzes housing displacement risk in Lacey, Olympia, Tumwater, and Yelm, synthesizing academic research, demographic data, and extensive community engagement. The project investigates past and present housing policies contributing to displacement, identifies vulnerable populations, and evaluates potential policy interventions. This study offers a multi-faceted understanding of displacement dynamics in the region by integrating insights from peer-reviewed journals, U.S. Census Bureau and HUD estimates, and direct community feedback through affinity groups and surveys. The policy evaluation framework, incorporating both displacement-specific and locality-specific criteria, aims to provide actionable recommendations for preventing and mitigating housing displacement, addressing racially disparate impacts, and ensuring equitable housing access for all residents.

ACADEMIC RESEARCH

The project team submitted a Housing Displacement Academic Field Scan memo synthesizing the latest peer-reviewed journals from the last decade that respond to the lines of questioning set out within the Housing Displacement Analysis project for the cities of Lacey, Olympia, Tumwater, and Yelm, including:

- What past housing policies resulted in resident displacement?
- What types of current housing policies create the risk of resident displacement?
- What groups and communities are at the greatest risk of housing displacement?

DATA INDICATORS

To localize the understanding of displacement risk, the project team completed a demographic analysis based on the Racially Disparate Impacts (RDI) tool published by the Washington State Department of Commerce, which outlines a variety of indicators to measure displacement risk. The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD). Additionally, demographic data was pulled from the American Community Survey.

SOURCES & DATA LIMITATIONS

Our data evaluation utilizes two primary sources for comparative analysis of metrics at certain snapshots in time.

The first is the HUD Comprehensive Housing Affordability Strategy (CHAS) datasets published as two distinct time frames (2015-2019 and 2017-2021) we use to measure:

- a. cost-burdened populations
- b. affordable rental units
- c. household income levels
- d. homeownership rates

The second source is the US Census American Community Survey 5-Year Estimate data published as two distinct snapshots in time (2010 and 2023) that we used to measure:

- racial and ethnic diversity
- age

Why Were These Sources Chosen

The metrics of racial and ethnic diversity, cost burden, rental unit affordability, household income levels, and homeownership rates were derived from the racially disparate impact (RDI) tool published by the WA Department of Commerce. The RDI toolkit is designed by the Department of Commerce (Commerce) for jurisdictional use and guidance in efforts to meet the requirements of the Growth Management Act (GMA). The toolkit is featured under “Step 2: Gather and analyze data” in the published Racially Disparate Impacts Guidance⁶. The toolkit compiles statistics relevant to a jurisdiction's analysis of racially disparate impacts in its community.

The US Census American Community Survey 5-Year Estimate is regularly considered a gold stand tool for national demographic data. The survey has evolved over time and is typically based on a 90% confidence interval serving as one of the most reliable data points available for this work.

What These Sources can Cannot Tell Us

As described in the Department of Commerce's Affordable Housing Planning Resources, The RDI Data Toolkit was most recently updated in November 2023 for jurisdictions completing periodic comprehensive updates in 2024 and 2025.

The currently available RDI Data Toolkit that can be accessed online currently only limits ACS Community Survey Data through 2020 and CHAS data date ranges through 2010-2014 and 2015-2019. As a result, the consultant team directly accessed and utilized the most recently available CHAS data through HUD for 2017-2021. The database was culled to ensure that the corresponding tables were pulled for Lacey, Olympia, Tumwater, and Yelm.

⁶ Department of Commerce (2023). Guidance to Address Racially Disparate Impacts. <https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege>

As the data pulled represents a snapshot in time for the corresponding date range it is difficult to pinpoint the current status of any one metric. Let alone the limitation that the most current and recent date range extends through 2021.

As a result, the consultant team used a comparative analysis across the windows to determine and interpret trends rather than provide absolute results.

The CHAS data, which were publicly available at the time of this report's publication, have some limitations. The 2017-2021 data set represents a synthesis of data from that period and does not tell us much about the effects of COVID-19 or any policy actions undertaken since 2021.

As identified in feedback from jurisdictional staff, conducted community engagement, and academic research the real and perceived impacts of the COVID-19 pandemic on housing instability were significant. We strongly recommend jurisdictions contextualize the analysis in this report for what folks know and understand about the pandemic.

Unfortunately, it is likely only very recently that there is a reasonable data range since the onset of the pandemic to begin understanding the explicit implications on housing displacement, racially disparate impacts, and housing exclusion. Without that window of data, this report is not able to make any strong correlations between the two.

Each jurisdiction is responsible for their respective responses to the updates required by the amended HB1220 (2021). As mentioned in the executive summary, this report should be utilized as a supplementary document to support jurisdictions in this effort. This report should not be considered and/or submitted as a direct response to the statutory requirements without additional deliberation from jurisdictional staff.

COMMUNITY ENGAGEMENT

Affinity Groups

Uncommon Bridges coordinated four (4) affinity group conversations to gather community stakeholders to discuss housing displacement risk in Lacey, Olympia, Tumwater, and Yelm. Affinity group topics included:

- 1) Manufactured housing communities,
- 2) Communities of low-wage workers,
- 3) Military families and households, and;
- 4) Accessory dwelling units.

Multi-Media Survey

A key aspect of this project involves assessing community insight, perceptions, and lived experiences around livability, affordability, and displacement impacts in Olympia, Lacey, Tumwater, and Yelm. A

robust data collection effort, including multi-lingual outreach via community anchors, focus groups, and an open-access multi-modal survey resulting in 167 responses, sought to engage those frequently involved and new perspectives and experiences not included in past policy and housing assessments conducted in the region.

POLICY EVALUATION & CRITERIA

To assess and evaluate policy options and recommendations, we completed a policy evaluation using two sets of criteria: displacement-specific and locality-specific. The displacement-specific criteria were based on the Department of Commerce’s categories of displacement: economic, physical, and cultural. Through discussions with city staff, audits of the city’s Housing Needs Assessments, and stakeholder feedback, we identified additional criteria to evaluate better potential policies and recommendations based on the jurisdiction’s unique needs.

Criteria Evaluation Method and Scoring

Policies were evaluated using criteria and scored using the following scale. The scores were then totaled to calculate an overall impact score for each policy option.

- **Yes, positive impact (+2):** The policy option has a positive impact and directly addresses the criterion.
- **Somewhat positive impact (+1):** The policy option has a somewhat positive impact, or indirectly addresses the criterion.
- **Neutral/ No impact (+0):** The policy option does not directly address the criterion, but may benefit other housing priorities for the jurisdiction.
- **Negative impact (-1):** The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some options may have a negative impact on one element of the scoring criteria, it does not mean that they are bad options overall. For example, encouraging redevelopment may increase housing supply overall and reduce long-term displacement pressures, but also increase physical displacement pressures in the short-term.

We used the following criteria for all jurisdictions in this report as a common set.

- **Racially Disparate Impacts:** Does this policy prevent racially disparate impacts or work to repair past harm?
- **Economic Displacement:** Does this policy help prevent or mitigate economic displacement?
- **Physical Displacement:** Does this policy help prevent or mitigate physical displacement?
- **Cultural Displacement:** Does this policy help prevent or mitigate cultural displacement?
- **Housing Exclusion:** Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?
- **Implementation Considerations:** Does the city have the staff and resources necessary to implement this policy effectively?

In addition to these, each jurisdiction had its own unique (yet sometimes related and similar) policy evaluation criteria.

Lacey

- Does this policy encourage or remove barriers to providing affordable housing?
- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?
- Does this policy increase the overall housing supply?
- Does this policy reduce housing costs?

Olympia

- Does this policy incentivize and support the development of affordable and deeply affordable housing, including supportive housing?
- Does this policy increase the housing supply, including middle housing and ADUs?
- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?

Tumwater

- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?
- Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?
- Does this policy incentivize or reduce barriers to developing diverse housing types, including smaller homes?

Yelm

- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?
- Does this policy incentivize or reduce barriers to developing diverse housing types, including smaller homes?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?

IDENTIFYING POLICY RECOMMENDATIONS

After analyzing the critical issues in each jurisdiction and the challenges of housing displacement, we compiled a comprehensive inventory of potential policies and programs to address these concerns. The list also included each city's respective Housing Action Plan policies to better reflect existing

programs and policies, show how these contribute to or detract from anti-displacement goals, and help the cities prioritize future implementation actions of their HAP.

Existing Conditions of Displacement Risk

OVERVIEW

In addition to the data analyzed from the identified databases, the team also conducted a comprehensive literature review to expand understanding on what other factors contribute towards risk of displacement. Summarized below, this research was considered as part of the holistic evaluation of data analysis to develop recommendations.

What Types of Housing Policies Contribute to Housing Displacement?

In reviewing a swath of peer reviewed journals from the last decade, the consultant team identified eight key trends in response to the contributing policies and conditions for housing displacement nationally.

Property owners have significantly more protection under the law than renters do.

A lack of anti-discriminatory legal protection for renters using programs such as the Housing Choice Voucher Program makes it difficult to find landlords in more affluent communities who accept such vouchers, leading to displacement through residential self-segregation by socio-economic class.⁷

Even when protections for renters exist, a lack of awareness keeps renters in the dark about their rights.

A lack of information sharing and public understanding about housing protection eligibility, such as that implemented during COVID-19, enables property owners to coerce renters into arrangements against their best interests⁸

Policies to improve housing stability in the U.S. most often exacerbate housing insecurity for renters.

U.S. housing policies have historically prioritized homeownership and homeowners, often worsening housing insecurity for renters by offering few direct protections against displacement. Little is done for rent-burdened renters to alleviate displacement risk other than advocating for them to buy homes, a distant possibility for most.⁹

The conversion of public housing public housing projects into mixed-income communities drives housing displacement for low-income households.

⁷ Max Besbris, Sadie Dempsey, Brian McCabe, and Eva Rosen, "Pandemic Housing: The Role of Landlords, Social Networks, and Social Policy in Mitigating Housing Insecurity During the COVID-19 Pandemic," *RSF: The Russell Sage Foundation Journal of the Social Sciences* 10, no. 4 (2024): 210.

⁸ Besbris et al., "Pandemic Housing," 210.

⁹ Stefanie DeLuca and Eva Rosen, "Housing Insecurity among the Poor Today," *Annual Review of Sociology* 48, no. 1 (2022): 350.

The conversion of public housing into mixed-income communities, such as through the HOPE VI program, resulted in significant displacement for low-income households, with only a fraction of the original residents returning to the redeveloped properties.¹⁰

Growing suburban corporate landlord conglomerates are more likely than local small businesses to resort to eviction rather than relieving renters in financial distress.

Governments could better support, subsidize, and grow the amount of local small businesses that provide rental housing while incentivizing them to pass on savings to renters. Local property owners are more likely to provide support and relief to renters in financial distress, while corporate landlords are more likely to immediately resort to eviction.¹¹

Low housing supply drives up costs and disproportionality burdens low-income households.

Increasing housing supply makes housing more affordable, and housing affordability is directly correlated to an individual's housing cost burden, an indicator of displacement risk. When new housing is built and priced higher, it pushes older housing into a lower price range, creating additional housing availability for lower-income households. This concept, known as housing stock filtering, is at odds with the commonly accepted drivers of gentrification and neighborhood change.¹²

Who is at Greatest Risk of Housing Displacement?

Across the same period, the literature provides insight into what groups and communities are at the greatest risk of housing displacement. Five types of populations stand out:

Older, poorer people of color

Residential mobility amongst the poor is variable, unplanned, and typically involuntary. Eviction filings doubled between 2000 and 2016. Older people, African Americans, and Latinos are overrepresented across most types of displacement.¹³

Suburban dwellers living below the poverty line

Suburban poverty creates conditions ripe for displacement. With less public transit, poorer households must spend more money to get around. They have limited access to nonprofit services

¹⁰ Barrett A. Lee and Megan Evans, "Forced to Move: Patterns and Predictors of Residential Displacement during an Era of Housing Insecurity," *Social Science Research* 87 (2020): 102415.

¹¹ Devin Q. Rutan, Peter Hepburn, and Matthew Desmond, "The Suburbanization of Eviction: Increasing Displacement and Inequality Within American Suburbs," *RSF: The Russell Sage Foundation Journal of the Social Sciences* 9, no. 1 (2023): 115

¹² Vicki Been, Ingrid Gould Ellen, and Katherine O'Regan, "Supply Skepticism: Housing Supply and Affordability," *Housing Policy Debate* 29, no. 1 (2019): 35.

¹³ Lee and Evans, "Forced to Move," 102415

typically concentrated in cities and often confront a municipal infrastructure less suited to deliver holistic social services.¹⁴

Manufactured housing residents

Households in mobile homes are over twice as likely to live in poverty. Half of all mobile homes in the U.S. are in urban areas. There are 1.7 million mobile home renter households and 5.3 million mobile homeowners in the U.S. Mobile home closures should be treated as mass evictions, which are primary indicators of physical displacement risk. Those who own their trailers but don't have the means to move them to another location face an additional loss of a valuable household asset.¹⁵

Families with children

Households with children are at an increased risk of displacement. A Milwaukee study found that renters with two children have an 11.7% chance of being evicted and a 9.5% chance with one child.

¹⁶

Households spending more than 30% of their income on housing costs

Cost-burdened households spend more than 30% of income on housing costs including rent, mortgage, and utilities. Households spending more than half of their income on housing are considered severely cost-burdened.

Equipped with these learnings, the consultant team paired existing trends occurring across the Thurston County/South Sound Region to infer how housing displacement may be occurring within each of the local jurisdictions.

DATA & INDICATORS SUMMARY

For this analysis, we are guided by the Washington State Department of Commerce's guidance on measuring possible strategies through its Racially Disparate Impacts (RDI) tool¹⁷. Measuring the phenomena of displacement, gentrification, and racialized disparities in housing exclusion is complex, the RDI tool guides jurisdictions to consider five primary indicators as "supportive" metrics towards this analysis. The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD) and is presented in four-year ranges.

¹⁴ Rutan et al., "Suburbanization of Eviction," 166.

¹⁵ DeLuca and Rosen, "Housing Insecurity," 348.

¹⁶ Matthew Desmond and Carl Gershenson, "Who Gets Evicted? Assessing Individual, Neighborhood, and Network Factors," *Social Science Research* 62 (2017): 365.

¹⁷ The RDI toolkit is designed for use by the Department of Commerce (Commerce) in its support of local jurisdiction efforts to meet the requirements of the Growth Management Act (GMA). The toolkit compiles statistics relevant to a jurisdiction's analysis of racially disparate impacts in its community.

This analysis compares RDI data points from 2015-2019 and 2017-2021. Additionally, demographic data was pulled from the American Community Survey.

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of their income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

Racial Diversity

Housing displacement risk is generally understood to increase as a population becomes more racially and ethnically diverse. The U.S. Census Bureau collects data on race and ethnicity, classifying individuals into distinct categories for these estimates. Race is recognized as a social identity historically tied to oppression, while ethnicity refers to groups sharing common ancestry, language, or dialect. Respondents to the Census self-identify their race from six options (White, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Other) and can select one or more options. They also identify as either Hispanic or Latino or Not Hispanic or Latino, with "Hispanic or Latino" defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

The table above shows the change in racial and ethnic diversity across the four cities between 2010 and 2023, using the US Census American Community Survey 5-Year Estimate data.

Change in # of Residents by Race & Ethnicity	Lacey	Olympia	Tumwater	Yelm
American Indian and Alaska Native	-54	+2	-154	+89
Asian	+1,437	+924	+608	-132
Black or African American	+1,345	+345	+755	+279
Hispanic or Latino (of any race)	+4,126	+3,099	+1,484	+908
Native Hawaiian and Other Pacific Islanders	+658	+421	+106	+468
Other Race	-44	+132	+470	+0
Two or more races	+2,908	+2,617	+1,786	+604
White	+6,278	+2,335	+4,630	+2,216
Net Pop Change 2010 - 2023	+16,654	+9,875	+9,685	+4,432

Cost Burden

Housing displacement risk is a critical concern, fundamentally linked to how much households spend on housing relative to their income, and the availability of affordable rental units, particularly for those with lower incomes. A household is considered to be experiencing a "cost burden" if its monthly housing expenses exceed 30% of its income, which can severely impact its ability to meet other essential needs like food, healthcare, and education. This burden is further categorized: "not cost-burdened" (under 30%), "cost-burdened" (30-50%), and "severely cost-burdened" (over 50%).

An analysis of data between 2015-2019 and 2017-2021 reveals concerning trends in cost burden across Lacey, Olympia, Tumwater, and Yelm. For renters, the picture is mixed and, in some cases, challenging. Overall, while the number of non-cost-burdened homeowners is increasing across all cities, the growth of non-cost-burdened renter households is significantly slower, and in some areas, even declining.

The tables below show the change in the cost-burdened populations across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets, representing a difference in the data between the years 2015-2019 and 2017-2021.

Change in # Households by Cost-Burdened Status: Renters	Lacey	Olympia	Tumwater	Yelm
Not Cost Burdened	+110	-655	+100	-35
Cost-Burdened (30-50%)	+65	-305	-65	-30
Severely Cost-Burdened (>50%)	+200	+15	-105	+45
Not Calculated	-30	-75	+11	+5

Change in # Households by Cost-Burdened Status: Homeowners	Lacey	Olympia	Tumwater	Yelm
Not Cost Burdened	+765	+840	+355	+435
Cost-Burdened (30-50%)	+370	+145	-175	-59
Severely Cost-Burdened (>50%)	+185	+190	+45	+50
Not Calculated	+45	+5	-10	+0

Rental Affordability

A housing unit is officially deemed affordable if its gross housing costs constitute less than 30% of a household's income. Across all four cities—Lacey, Olympia, Tumwater, and Yelm—there is a scarcity of rental housing options suitable for very low-income households, defined as those earning between 30% and 50% of the Area Median Income (AMI). The data used for these assessments, specifically estimates of the number of rental housing units affordable to households within various income ranges, comes from the HUD Comprehensive Housing Affordability Strategy (CHAS) datasets. These estimates are derived from self-reported housing costs, which inherently reflect any housing subsidies or other benefits households might utilize. It is important to note that a rental unit designated as affordable for an extremely low-income household (less than 30% of AMI) may not necessarily be occupied by a household within that specific income bracket. The rental unit affordability estimates exclude housing units that lack complete kitchen or plumbing facilities, vacant units not explicitly listed for rent or sale, and group quarter units.

The table below shows the change in vacant affordable units across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets, representing a difference in the data between 2015-2019 and 2017-2021.

Change in # of Rental Units by Affordability Rating	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	+0	+25	+0	+0
Very-Low Income (30-50% AMI)	-90	-110	-45	+0
Low-Income (50-80% AMI)	+40	+10	+10	+0
Moderate-Income (80%-100% AMI)	+150	+75	+5	+0

Income

While all four cities are seeing growth in renter and homeowner households with above median incomes, the high cost of housing is outpacing wage gains, leading to high housing cost burdens.

The Washington Department of Commerce's RDI tool utilizes Area Median Income (AMI) to account for regional variations in labor and housing markets. AMI represents the midpoint of an area's income distribution, with half of households earning above and half earning below this figure. The Growth Management Act mandates that jurisdictions address the housing needs of families across the entire income spectrum. Income data and housing affordability estimates are derived from the U.S. Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy (CHAS) data. Household income estimates are categorized into bins based on AMI, adjusted for household size:

- Extremely Low Income (<30% of AMI)
- Very Low Income (30%–50% of AMI)
- Low Income (50%–80% of AMI)
- Moderate Income (80%–100% of AMI)
- Above Median Income (>100% of AMI)

Overall, while there's an evident increase in higher-income households (both renters and homeowners) across all four cities, the data also highlights shifts in lower-income brackets that could impact housing displacement risk, especially given the general trend of housing costs outpacing wage gains.

The tables below show the change in population income levels across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets representing a difference in the data between 2015-2019 and 2017-2021.

Change in # Households by Income Status: Renters	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	-160	-110	-240	+15
Very-Low Income (30-50% AMI)	-235	-180	-85	-60
Low-Income (50-80% AMI)	-475	+225	-20	-15
Moderate-Income (80%-100% AMI)	+535	-85	-15	+35
Above Median Income (>100%)	+680	+730	+305	+20

Change in # Households by Income Status: Homeowners	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	+250	-90	-145	-10
Very-Low Income (30-50% AMI)	+15	+40	+60	-65
Low-Income (50-80% AMI)	-255	-130	-90	+5
Moderate-Income (80%-100% AMI)	-150	+25	-10	-90
Above Median Income (>100%)	1495	+1345	+400	+585

Tenure/Homeownership

Housing displacement risk generally increases when homeownership rates decline. Tenure refers to the distribution of homeowners and renter households across a region.

The tables below show the change in renter and owner households across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets, representing a difference in the data between 2015-2019 and 2017-2021.

Change in # of Households	Lacey	Olympia	Tumwater	Yelm
Renters	+345	+590	-60	-715

Change in # of Households	Lacey	Olympia	Tumwater	Yelm
Homeowners	+1365	+1190	+225	-640

Age

Older populations face a higher risk of housing displacement. Across Lacey, Olympia, Tumwater, and Yelm, there's a noticeable trend of aging populations, although the specific population changes by age vary significantly among the cities. The document presents data from 2010 to 2023, using the US Census American Community Survey 5-Year Estimate, to illustrate these shifts in age distribution.

While there's variation, the detectable trend of aging populations, particularly in cities like Olympia and Yelm, which saw significant shifts in individual age ranges, suggests an increasing proportion of residents are more vulnerable to housing displacement.

The table below shows the change in age distribution across the four cities between 2010 and 2023, using the US Census American Community Survey 5-Year Estimate data.

% Change in Population by Age	Lacey	Olympia	Tumwater	Yelm
Under 5 years	-0.90%	+0.00%	-1.10%	-4.00%
5 to 9 years	+0.00%	-1.80%	+0.70%	+2.00%
10 to 14 years	-0.80%	-1.00%	-1.60%	-2.20%
15 to 19 years	+0.00%	+0.90%	-3.90%	-1.20%

20 to 24 years	-0.10%	-5.10%	+0.90%	+4.20%
25 to 29 years	+0.30%	+0.70%	+0.60%	-1.80%
30 to 34 years	+0.00%	+2.70%	+1.00%	+1.30%
35 to 39 years	+0.00%	+0.70%	+0.60%	-0.10%
40 to 44 years	+1.30%	+0.30%	+1.60%	-0.80%
45 to 49 years	-0.10%	-0.60%	-0.90%	+0.20%
50 to 54 years	-1.90%	-2.00%	-1.90%	+1.20%
55 to 59 years	-2.10%	-0.90%	-1.00%	+0.80%
60 to 64 years	+1.50%	-0.10%	+2.50%	+2.00%
65 to 69 years	+2.30%	+1.30%	+2.00%	-0.30%
70 to 74 years	+1.10%	+3.50%	+1.10%	+2.20%
75 to 79 years	-0.10%	+1.80%	+0.30%	-0.20%
80 to 84 years	-0.30%	+0.00%	+0.40%	-1.10%
85 years and over	-0.30%	-0.60%	-0.80%	-1.60%

WHAT ARE COMMUNITY STAKEHOLDERS SAYING?

The project team undertook an extensive and collaborative outreach process to gain a locally rooted understanding of housing goals and displacement risks. We connected with planning staff, residents, and housing advocates across sectors to better understand the housing challenges facing the area.

The project team aggregated and synthesized the stakeholder feedback across all engagement touchpoints to distill the main takeaways into the following themes for consideration.

- Cities should identify ways to monitor renter income verification, establish local ordinances to enforce attainable income verification, and identify and address price fixing.
- Cities should use creative zoning overlays and innovative land use policies to classify and protect mobile home communities and other types of affordable housing.
- Zoning should balance commercial development with opportunities for affordable housing.
- Cities should create a program to support upgraded utilities and infrastructure and promote incentives for property owners to improve their properties, including multifamily, single-family, accessory, and mobile homes. Tenants forced to relocate due to substandard maintenance (condemned properties) should receive support to relocate to a nearby affordable housing option effectively.
- Affordable housing and homelessness prevention programs should work closely together as they share the same clientele.
- Military service providers, including VAs, volunteer groups, bases, centers, and cities, should ensure their programs are adequately staffed with the most current information regarding housing and support benefits for military families and households.
- Cities should promote educational programs that explain to homeowners and potential buyers the long-term investment opportunity of ADUs and the financial plan required to pursue a build.
- Permitting processes to develop new affordable housing should continue to be simplified and streamlined.
- Cities could support residents, including current residents of manufactured home communities, by forming cooperatives or community land trusts (CLTs) to be prepared to exercise the right of first refusal and manage properties independently.
- Cities should create a program to support private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management and disincentivize corporate owners from buying land on which manufactured home communities are located.
- Cities should take steps to minimize the amount of potential long-term housing being used for short-term transient rentals (Airbnb).

- Cities should work with community groups to coordinate a one-stop shop for housing benefit explanations and application support.
- Cities should promote an educational campaign to private landlords about legal requirements and renter income qualifications for those on supplemental income.
- Cities should offset the impacts of increased taxes and tax increment financing, as they are seen to contribute to unaffordability for renters and low-income households by increasing the cost of living as new upscale developments are built.
- Cities should consider rent control options and develop and enforce adequate tenant protections (eviction proceedings, rent increase management, etc.).
- Cities should balance suburban development with investment in affordable housing in urban centers.
- Cities should ensure robust transportation is available to residents and minimize the land used for parking over housing.
- Urban renewal efforts should include the protection of existing affordable housing units.

Relevance for Analysis

Takeaways from the individual sources of data input: research, data indicators, and engagement were considered holistically

It is important to also recognize the validity of each of these sources of information. Across the various points of engagement, we heard from members of our community that are rarely offered such a prominent and direct line to our planning processes. Diverse, real, and engaged voices contributed to the findings of this analysis through written, audio & video recording, and facilitated points of engagement. This feedback should be read in the context that they are direct feedback from community stakeholders based on their viewpoints, level of understanding, and lived experience with housing.

Final policy recommendations are not solely based on any single point of feedback; as we aim to integrate the perspectives into what is possible within the confines of individual city capacity for implementation.

City Displacement Risk Profiles & Recommendations

OVERVIEW

This section examines the issues of displacement at the city level, analyzing key indicators such as increased housing cost burdens on both renters and homeowners, the diminishing availability of affordable rental units for low-income households, and significant shifts in demographic composition. Furthermore, this section will review current housing policies and provide priority policy recommendations to mitigate economic displacement and foster a more equitable housing environment.

LACEY – ECONOMIC & CULTURAL DISPLACEMENT

Lacey's economic pressures make it stand out as a prominent risk type. However, careful attention will be needed to ensure that these pressures do not disproportionately impact its increasingly diverse population of residents.

According to available data Lacey's population experienced:

- A significant **increase in racial and ethnic diversity** among residents between 2010 – 2023;
- A substantial **increase in severely cost-burdened households** for both renters and homeowners between 2015–2019 and 2017-2021
- **A decrease in the availability of affordable rental units** for and very-low-income (earning between 30% and 50% AMI) households.
- A relative **decrease in renters earning less than 80% AMI** but an **increase in low-income homeowners** between 2015-2019 and 2017-2021
- An **increase in overall homeowner households**

Considering the above trends, the data shows that while Lacey's population grew overall, people from non-white racial and ethnic backgrounds are working and living in Lacey. Given that historical research tell us that racially and ethnically diverse households are more likely to experience displacement, it is important to understand what is driving these communities to Lacey and understand the broader spectrum of cultural needs.

This is an important detail because as households become increasingly cost-burdened, families that are already living on the edge of their means must make difficult choices about where to allocate their income. Across the region, folks engaged for this process often remarked often how they see housing instability quickly teetering on to risk of homelessness for folks that must look for alternative ways to stay afloat; a reminder that "*displacement can happen to anybody*".

Over the same period, we can see that, income and wages are not keeping pace with the rising cost of living, leading to a decline in real income and purchasing power, meaning more people are cost burdened. Concerningly, this trend appears to impact both renters and homeowners alike – the latter of which might be vulnerable to economic displacement if housing costs, such as property taxes, continue to climb.

As real earnings decrease, so to have the availability of affordable units. Review of existing policies and overlapping engagement describes possible impacts from the significant decrease in the availability of affordable rental units for extremely low-income and very-low-income households, coupled with a general lack of social safety nets. We made connections to feedback we heard in both the survey and affinity group discussions that some of these impacts spiked during/post the COVID pandemic. For some folks, like households with a member in the military, it is not easy to move out of the area in search of more affordable housing. Folks on fixed incomes or social security for example do not have the same opportunity to shift brackets and find that their options for quality affordable housing have narrowed. This aligns with the general understanding from the literature purporting that a lack of affordable rental options for the lowest income brackets heightens the risk of displacement.

Housing Displacement Risk Policy Analysis

The City of Lacey has comprehensively reviewed its existing Housing Element and related policies within its Comprehensive Plan, utilizing criteria consistent with the Department of Commerce's guidance on Racially Disparate Impacts. This evaluation sought to identify policies supporting housing goals or potentially contributing to inequitable outcomes. The analysis reveals a general split, with many of Lacey's housing policies categorized as "supportive" or "approaching" their intended objectives.

Lacey's "supportive" policies are actively working to foster housing growth and affordability. These include initiatives designed to increase residential densities, promote infill development, and ensure a sufficient supply of housing that is affordable across all income levels and meets unique housing needs. Furthermore, these policies emphasize critical partnerships with external agencies, recognizing their role in enhancing overall housing affordability and preventing displacement and homelessness. These represent strong foundational efforts in the city's housing strategy.

However, policies classified as "approaching" suggest areas where Lacey can further strengthen its impact. While generally supporting housing growth, these policies could be refined to more effectively address overall affordability and integrate robust anti-displacement strategies. The goal is to provide housing equitably to all income brackets, particularly those historically excluded or displaced. For instance, a specific policy (Policy C under Goal 3 in the Central Planning Area) has been identified for clarification. Proposed revisions aim to ensure that development standards for middle housing options are sensitive to existing neighborhoods and align with broader city priorities, such as climate resilience, while remaining clear and unambiguous.

In sum, Lacey's current housing goals and policies demonstrate an awareness of housing displacement and include efforts to mitigate disproportionate impacts. To build upon these existing strengths and solidify its commitment to equitable housing, the City should actively explore and implement additional policies that foster stronger community partnerships. These collaborations are crucial for proactively preventing displacement and cultivating a truly supportive environment for both current and future residents of Lacey.

Priority Policy Recommendations

This report outlines key strategies for the City of Lacey to augment its current efforts in preventing racially disparate housing impacts, increasing the availability of deeply affordable housing, and mitigating displacement, particularly economic displacement.

Strengthening Community Partnerships and Expanding Capacity

To achieve greater success, the City can significantly enhance its existing work and policies by fostering stronger community connections and partnerships with local organizations. Such collaborations effectively expand the capacity of city staff, allowing for more comprehensive outreach, program delivery, and specialized support. Supplemental efforts and social services, extending beyond the scope of housing policy alone, are also evident for Lacey's housing initiatives to reach their full potential and address the multifaceted needs of its diverse population.

Comprehensive Plan Updates and Policy Refinements

The upcoming update to Lacey's Comprehensive Plan presents a critical opportunity to refine existing policies and introduce new ones to address current gaps. Several policies within the Housing Element of the current Comprehensive Plan could benefit from minor edits to clarify their intent, remove vague language, establish stronger connections to other Comprehensive Plan elements, or eliminate potentially exclusive language. Specific proposed edits for numerous policies are detailed in the Final Existing Comprehensive Plan Policy Evaluation Framework Appendix.

Addressing Policy Gaps and New Program Development

To tackle significant policy gaps, new policies and programs are required. Foremost among these is the need for policies that preserve existing and naturally affordable housing units. This is crucial for preventing economic displacement and enabling residents to remain within their established communities. Concurrently, dedicated efforts are necessary to protect manufactured housing communities and to avoid displacement within these vital affordable housing sectors. Furthermore, there is a clear need for affordable housing for lower-wage earners, ensuring that individuals working in Lacey can also afford to reside within the city. Beyond housing, cultural displacement can be mitigated through increased placemaking efforts and the preservation of existing community events, businesses, religious institutions, and other facilities important to Lacey's diverse cultural groups.

Prioritizing Housing Action Plan Implementation

Finally, the City's Housing Action Plan (HAP) contains numerous actions that Lacey should continue to implement by advancing them to the Planning Commission. Policies from the HAP that scored highly in the Policy Evaluation Matrix should be considered priority initiatives for immediate implementation, as they directly align with the City's housing goals and address identified deficiencies.

Implementation Capacity & Limitations

Achieving the desired outcomes of these initiatives—namely, effectiveness, sustainability, and broad community benefit—will necessitate significant financial resources and dedicated staff time.

Financial Constraints

The primary limitation in successfully executing these housing programs is likely financing. Navigating city political processes and securing the funding for recommended programs will be a considerable challenge. City staff will require augmented capacity to actively pursue and secure diverse financial resources, including competitive grants, funds from regional or state programs, and other potential sources. Without robust and consistent funding streams, the reach and impact of these initiatives will be significantly constrained.

Staffing and Administrative Demands

Implementing many revised Housing Element policies, existing HAP actions, and newly developed policy recommendations will place substantial demands on city staff. This includes the considerable time required to collaborate with community partners in drafting and creating new ordinances to update the city's development regulations. Additionally, significant staff effort will be necessary to present and work with the Planning Commission and City Council through the review and approval processes for these ordinances. Beyond legislative development, the recommended policies will also require considerable ongoing staff time to identify, cultivate, and maintain strong community partnerships and collaborative efforts with local organizations, essential for these housing initiatives' effective delivery and long-term success.

Conclusion

Overall, the analysis points towards the need for prioritizing unique housing needs among low-income, workforce, and senior housing; identifying creative ways to support and maintain homeownership, especially among lower-income households (e.g. manufactured home parks), and ensuring that attention on the cliff between low-income affordability and homelessness does not exacerbate toward the latter.

OLYMPIA – PHYSICAL DISPLACEMENT

While a range of housing types exist in Olympia, its displacement risk is uniquely characterized by the loss of existing low-income homeownership alongside a significant challenge in providing affordable rental units for very-low-income households.

According to available data Olympia's population experienced:

- A significant **increase in racial and ethnic diversity** among residents between 2010 – 2023;
- A **decrease in cost-burdened renter households** but an **increase in cost-burdened and severely cost-burden homeowner households** between 2015 – 2019 and 2017 – 2021
- A slight increase in affordable units for extremely-low income households, but a **significant decrease in the availability of affordable rental units for very-low-income households** (earning between 30% and 50% AMI).
- A notable **increase in low-income renters** (50%-80% AMI) and a **decrease in low-income and extremely low-income** homeowners between 2015-2019 and 2017-2021
- An **increase in overall homeowner households**

The trends may suggest that low-income households who are already homeowners, may not be able to keep pace with increasing costs to sustain homeownership and stay in place as seen in the dramatic increase of cost-burdened homeowners.

Interestingly, the increase of low-income renters is a relatively complicated trend to interpret when comparing against the other data points. While inconclusive, it is possible that efforts to increase and retain low-income renters is working positively, especially where renter households have become less cost burdened. Conversely, it is possible that once homeowners have been economically forced to become renters, thus putting a strain on the availability of rental units.

While inconclusive, the engagement data paints an interesting picture around how the market has handled the availability of single-family homes. Some point to the mixed quality of converting these properties to rental units, while others remark that the once naturally-occurring affordable homes are falling into disrepair or being redeveloped entirely into units that cater to higher-income earning residents and visitors.

Some relevant remarks from individual and group engagement include:

- *... in my case, I'm in the "family home" with a failing roof. It's too big for just me. There is enough room to create 2 separate living units. This would allow me to remain here. There's also off-street, discreet parking space for a tiny home/RV. I'd happily leverage what I have to create more space for others in need of housing. Not everyone needs a BIG space.*
- *The lack of single family homes for people to rent, rent to own and even buy. The quality of houses in Olympia has significant differed maintenance, which often causes health hazards to those who rent*

- *In Olympia, housing displacement has manifested through the conversion of single-family homes into high-end rentals and Airbnb properties.*

Housing Displacement Risk Policy Analysis

A segment of Olympia's housing policies is identified as "supportive" of housing goals. These include policies that encourage the adaptive reuse of non-residential buildings for housing purposes, support the provision of affordable housing by minimizing regulatory barriers and streamlining review processes, and actively work to prevent physical obstacles that could isolate new developments from existing neighborhoods.

However, most of Olympia's housing-related policies are categorized as "approaching" their objectives. While these policies aim to increase the overall housing supply within Olympia, they possess opportunities for strengthening. Enhancements could include more explicit measures to address racially disparate impacts, the integration of targeted anti-displacement strategies, and proactive efforts to prevent housing exclusion, particularly by prioritizing historically marginalized populations.

Several policies within the Comprehensive Plan are identified as "challenging" housing goals due to their potential to create unintended negative consequences. These policies often require additional design or architectural features in new housing or seek to preserve existing neighborhood "character." Such policies may inadvertently restrict housing production and limit housing choices, potentially contributing to affordability issues. To mitigate these challenges, proposed edits are detailed in the Final Existing Comprehensive Plan Policy Evaluation Framework Appendix, advocating for removing vague language and introducing greater flexibility to foster increased housing production and housing diversity.

Priority Policy Recommendations

The City of Olympia should consider prioritizing the implementation of these high-scoring HAP policies and other highly rated policies from the Policy Evaluation Matrix. Advancing these initiatives to the Planning Commission would align with city priorities and address current deficiencies in Olympia's housing policy framework.

New Policy Recommendations

To enhance housing affordability and equity, the following new policy initiatives are recommended:

- **Protection and Preservation of Manufactured Home Communities:** Implement policies to safeguard and preserve manufactured home communities. This is crucial for retaining a vital source of affordable housing within the city.
- **Encouraging Retention and Maintenance of Existing Affordable Housing:** Develop additional measures to incentivize the retention and maintenance of existing affordable housing units.

Particular emphasis should be placed on high-opportunity neighborhoods or areas with historical segregation patterns to promote equitable access to housing.

High-Scoring Housing Action Plan (HAP) Policies

An analysis of the City's existing Housing Action Plan (HAP) policies revealed several high-impact strategies that align to overcome housing barriers:

- Evaluation of Home Fund Relationship: Assess the relationship between Olympia's Home Fund and the county's home fund to ensure alignment and effectiveness in meeting shared housing goals.
- Expanding Residential Tenant Improvement Allowances: Broaden the allowance for residential tenant improvements without triggering additional land use review requirements. This can encourage the maintenance and upgrading of existing housing stock.
- Allowing Single Room Occupancy (SRO) Housing: Permit Single Room Occupancy (SRO) housing in all multifamily zones. This policy diversifies housing options and can provide more affordable solutions for individuals.

Implementation Capacity & Limitations

The City has already expended considerable political capital enacting multi-part strategies to address housing affordability. Though these efforts may need to continue for a long period to see definitive progress, politics will need to match the necessary longevity of these programs to see significant results. Changes in leadership or shifts in City funding for programming could erode support for existing implementation efforts that are having a net positive effect.

The City has done a good job of identifying specific barriers to ease displacement pressure. The Housing Action Plan actions collectively represent quite a lot of staff time or consultant time, but quite a number of them can also be seen as making progress against displacement pressures as well.

Conclusion

Overall, the analysis points towards the need for encouraging the retention and maintenance of existing affordable housing stock; expand allowances of residential tenant improvements and use creative policy approaches to encourage the appropriate matching of resident characteristic and lived experience to possible housing types, such as manufactured home communities or Accessory Dwelling Units.

TUMWATER – ECONOMIC DISPLACEMENT

Tumwater's economic displacement risk is characterized by the reciprocal relationship of subtle loss of low and middle-income renters with a significant lack of affordable housing for the lowest-income segments of the population.

According to available data Tumwater's population experienced:

- **Little to no change in relative racial and ethnic diversity** among residents between 2010 – 2023;
- A relative **decrease in cost-burdened households** for renters and homeowners between 2015 – 2019 and 2017 – 2021
- A relative **decrease in the availability of affordable rental units for very-low-income households** (earning between 30% and 50% AMI).
- A **general decrease across most income categories for renters and homeowners** except for above median income households between 2015-2019 and 2017-2021
- An **increase in overall homeowner households** and a **slight decrease in renters**.

While Tumwater's population has grown through the last census cycles, the data shows that the largest demographic increase has been of above-median income residents. Research shows that when a population has an increase in higher earning residents that it can potentially increase demand and upward pressure on housing prices. Importantly, these pressures can exacerbate financial burden on lower-income residents and accelerate economic displacement.

Tumwater does not seem to portray a situation with widespread affordability crisis with signs of stability across the spectrum. However, attention should be focused on the stark distinction of those that are not experiencing stability. Among all groups, residents earning 30% - 50% of Area Median Income are both increasing and struggling to find affordable units. As pressures continue the risk becomes that the affordability gap may become pulled in opposite directions leaving long-term residents having to navigate the unstable housing landscape.

To protect against these risks exacerbating, there is an opportunity to focus efforts on preserving naturally occurring affordable housing such as mobile home parks. Similarly, strategies for new development can work to ensure that the scale of housing prices do not outpace the general population's ability to keep up. The economic displacement risk has the potential to increase without protections for Tumwater's long-term vulnerable residents.

Housing Displacement Risk Policy Analysis

Many of Tumwater's housing policies are classified as "supportive" or "approaching" their stated objectives. These policies generally foster housing growth, ensure the provision of necessary services to support residential development, aim to mitigate displacement, provide support for transitional and supportive housing, and address the needs of other populations with unique housing requirements. Policies categorized as "approaching" encourage various housing types to

meet diverse demands. However, these policies could be strengthened to more effectively prevent displacement, explicitly address housing affordability and availability across different income brackets, and safeguard historically marginalized populations from disproportionate impacts.

Only one policy appears twice within the plan and is identified as "challenging." This policy, focused on protecting residential areas through aggressive code enforcement to prevent undesirable activities and uses, risks exacerbating displacement or disproportionately affecting lower-income and historically marginalized groups.

A comparative analysis with other jurisdictions indicates that the language used in Tumwater's Housing Action Plan (HAP) policies is not as robust as it could be. The upcoming update and incorporation of HAP goals and actions into the 2025 Comprehensive Plan (CUP) Housing Element presents a critical opportunity to strengthen policy language. Incorporating more definitive terms, such as "require" instead of "encourage," would enhance the enforceability and impact of these policies, leading to more substantial progress in achieving housing goals and mitigating displacement.

Priority Policy Recommendations

The City of Tumwater should prioritize implementing these high-scoring HAP policies and other highly rated policies from the Policy Evaluation Matrix. Advancing these initiatives to the Planning Commission would align with city priorities and address current deficiencies in Tumwater's housing policy framework.

- **Community Land Trust Program for Mobile Home Communities:** Establish a program modeled after a Community Land Trust to support and preserve mobile home communities. This aims to secure long-term affordability and stability for residents within these vital housing sectors.
- **Support Program for Private, Local, Small-Scale Ownership of Mobile Home Communities:** Implement a city program to support private, local, small-scale ownership of mobile home communities. This initiative seeks to leverage the existing mobile home housing stock and actively work towards preserving current affordable housing options.
- **Increased Staffing for Accessory Dwelling Unit (ADU) Processing:** Augment staffing capacity within relevant departments to expedite the processing of Accessory Dwelling Unit (ADU) permits. This measure aims to reduce administrative costs and streamline the development of diverse housing types.
- **High-Scoring Housing Action Plan (HAP) Policies -** An analysis of the City's existing Housing Action Plan (HAP) policies revealed several high-impact strategies that align with displacement mitigation objectives:
 - **"Notice of Intent to Sell" Ordinance for Multifamily Developments:** Implement an ordinance requiring property owners to provide advance notice of their intent to sell

- multifamily developments. Such a policy can allow residents and community organizations to explore preservation options.
- Program for Preserving and Maintaining Manufactured Home Parks: Establish a dedicated program to preserve and maintain healthy and viable manufactured home parks. This initiative, with some details integrated into the new recommendations, is crucial for protecting an existing source of affordable housing.
 - Mixed-Income Housing Development: Prioritize policies that encourage the integration of market-rate and low-income housing within new developments. This approach aims to prevent the concentration of low-income housing in specific areas, fostering more diverse and integrated communities.

Implementation Capacity & Limitations

Prioritizing Mobile Home Park Preservation

While all Housing Action Plan (HAP) policies represent a foundational step, the most significant impact on displacement mitigation will be achieved through focused efforts on preserving existing mobile home parks (MHPs) as a critical source of affordable housing stock. This approach leverages an already established and often more affordable housing type. Successful implementation will necessitate sustained education and communication efforts to clearly articulate the rationale behind this focus, thereby strengthening existing political support for MHPs within the City.

Resource Implications for Policy Implementation

The successful implementation of many revised Housing Element policies, remaining HAP actions, and new policy recommendations for Tumwater will require significant staff time and resources. This includes collaborating with community partners to develop necessary ordinances for updating the city's development regulations. Furthermore, considerable staff engagement will be required for review and approval processes with the Planning Commission and City Council.

Beyond ordinance development, recommended policies will demand substantial staff capacity to identify, cultivate, and maintain robust community partnerships and collaborative efforts with local organizations. To ensure these programs' effectiveness, sustainability, and broad reach, city staff will also require additional capacity to actively pursue diverse funding avenues, including grants, regional, and state programs.

Conclusion

Tumwater faces a significant risk of economic displacement, driven by a severe shortage of affordable rental housing, especially for extremely low and very low-income households, and an increase in severely cost-burdened homeowners. This is evidenced by a complete loss of rental units affordable to very low-income families and declining numbers of lower-income renters, while higher-income residents are increasing, driving up housing costs. Although current housing policies

are generally supportive, they lack robust language to prevent displacement and ensure affordability. Key recommendations include preserving mobile home communities, regulating short-term rentals, and streamlining Accessory Dwelling Unit (ADU) development. Implementing these changes will require substantial resources and staff capacity to address the critical housing needs of the city's most vulnerable residents.

YELM – ECONOMIC & PHYSICAL DISPLACEMENT

Unlike the commonly interpreted definition of physical displacement, Yelm's greatest risk comes from its pressure to meet the demand for suburbanization. Above-median income populations make up the largest increase income type and as folks look to redevelop land effectively, it has the risk of impacting highly vulnerable population groups disproportionately.

According to available data Yelm's population experienced:

- Little to **no change in relative racial and ethnic diversity** among residents between 2010 – 2023;
- A relative **increase of severely cost-burdened renter households** and a **significant decrease in cost-burdened homeowner households** between 2015–2019 and 2017–2021
- Little to **no observable change** in the availability of affordable rental units
- Relative **decrease of very-low and low income renters** and a **significant increase in above median income homeowners** 2015-2019 and 2017-2021
- Significant **decrease overall of renters and homeowners** households

As Yelm's overall population has grown, it's land use is being forced to shift from being a meaningfully rural city to one that is beginning to serve young families as a suburb community. Above-median income earning families appear to be moving to Yelm and redeveloping existing land for housing; a trend referenced explicitly by some during the engagement process.

During the engagement process, the team also ensured to focus on households with a member in the military to best describe the respective situations. Military households desire improved coordination of housing services, primarily where the VA lacks capacity and efficiency. Moreover, as folks anticipate improved city infrastructure, they hope that there can be options to support military and veteran households throughout the civilian community.

Housing Displacement Risk Policy Analysis

Yelm's housing policies generally support housing goals, including policies that encourage diverse residential growth, efficient permit processing, allow various residential uses and types that provide for diverse housing needs, and increase funding for affordable housing or reduce barriers to home ownership. Policies indicated as "approaching" could be improved primarily by considering affordability for all income groups and prioritizing those that have been historically marginalized. Still, they generally encourage housing growth, the maintenance of existing housing stock, and the

provision of housing near transit and other services. There aren't any policies identified as "challenging."

Priority Policy Recommendations

These recommended policies, both new and those within the existing HAP, represent critical steps for Yelm to proactively address economic displacement and ensure housing stability for its residents.

- **Protection and Preservation of Manufactured Home Communities:** Policies should be developed and implemented to ensure manufactured home communities' long-term viability and affordability. This is critical for preserving a significant source of accessible housing for many residents at risk of displacement.
- **Regulation of Short-Term Rental Programs:** Measures should be adopted to minimize converting long-term housing units into transient short-term rentals. This preserves the existing housing stock for permanent residents and prevents further reduction of available affordable housing options.
- **High-Scoring Housing Action Plan (HAP) Policies -** An evaluation of the City's existing Housing Action Plan (HAP) policies identified several high-impact strategies that align to prevent economic displacement:
 - **Partnerships with Affordable Housing Developers and Support Organizations:** The City should prioritize and strengthen partnerships with low-income housing developers, the Housing Authority of Thurston County, and other relevant organizations. These collaborations are essential for developing and supporting housing solutions for low-income individuals, the workforce, seniors, and other populations with unique housing needs.
 - **Leveraging Federal Resources for Affordable Housing:** The City should actively pursue and utilize federal funding mechanisms, including Community Development Block Grants (CDBG) and Section 108 loans, to secure resources for affordable housing initiatives.
 - **Offering Density Bonuses for Low-Income Housing:** Implementing density bonuses for developments that include low-income housing units incentivizes the creation of more affordable housing options, directly combating the factors that lead to economic displacement.

Implementation Capacity & Limitations

Implementing effective housing programs, particularly those providing direct housing or rental assistance to low- and very-low-income populations, presents significant challenges for small towns

and jurisdictions such as Yelm. These challenges primarily revolve around such initiatives' funding, assembly, and administration.

Smaller municipalities' limited financial and administrative capacities often hinder their ability to secure the capital for substantial housing projects or ongoing rental assistance programs.

Furthermore, the complexities inherent in program design, inter-agency coordination, and sustained operational oversight can prove difficult to manage without dedicated resources and specialized expertise. Despite these hurdles, establishing such housing infrastructure is critical for adequately addressing the housing needs of vulnerable residents and mitigating issues like economic and physical displacement.

Conclusion

Yelm's existing Housing Action Plan strategies point to policies that generally support housing goals, including policies that encourage diverse residential growth and allow various residential uses and types to provide for diverse housing needs. Given the likeliness that both population growth will continue to increase and contend with the limitations of the existing Urban Growth Area (UGA), the City will need to continue its acute focus on building relationships with developers and builders to ensure that local housing needs are met and not overlooked.

Strategies to consider include the incentivizing of low-income housing to developers through density bonuses and to disincentivize corporate owners from buying existing affordable homes in the community. Moreover, ongoing opportunities to strengthen relationships with the VA and other supports for military families may also be appropriate.

CONCLUSION

Addressing housing displacement is crucial for fostering strong, connected communities. If left unaddressed, displacement can lead to increased homelessness and heightened socioeconomic disparities. Our report includes tailored policy recommendations that cater to each city's specific needs and capabilities. These suggestions include a variety of strategies, such as adjusting zoning laws to support diverse housing options, providing tenant protection initiatives, enhancing financial assistance programs, and improving cooperation among local agencies.

We acknowledge that there are deeper layers of analysis that could help answer questions that emerge through this report. We anticipate that in addition to utilizing this information to support each cities' comprehensive plan updates, the jurisdictions may choose to identify more nuanced trends within their communities. Suggestions include:

- Neighborhood analysis of displacement pressures
- Multi-variate analysis of intersecting demographics with income and housing status
- Local historical research
- Additional regional correlation and trends

In conclusion, tackling housing displacement requires a collaborative approach that brings together governmental bodies, community organizations, and private sector partners. By embracing our recommendations and prioritizing housing stability, Lacey, Olympia, Tumwater, and Yelm can move toward building more equitable, inclusive, and resilient communities.

APPENDIX

- A. Housing Displacement Academic Field Scan Memo
- B. Existing Comp Plan Evaluation Tables
- C. Comp Plan Recommendations Matrix
- D. Engagement Raw Data & Analyses

MEMORANDUM

Date: October 17, 2024
To: Planning and Community Development Departments of the Cities of Lacey, Olympia, Tumwater, and Yelm
From: Ariam Ford, AICP, Equity & Engagement Lead, Uncommon Bridges
Subject: Housing Displacement Academic Field Scan

Purpose

The following document is a synthesis of the latest peer reviewed journals from the last decade that responds to the lines of questioning set out within the Housing Displacement Analysis project for the cities of Lacey, Olympia, Tumwater, and Yelm, including:

- What past housing policies resulted in resident displacement?
- What types of current housing policies create the risk of resident displacement?
- What groups and communities are at the greatest risk of housing displacement?

What past housing policies resulted in resident displacement?

- 1. Property owners have significantly more protection under the law than renters do.** The de facto imbalance of power between landlords and tenants creates situations where the wellbeing of renters becomes secondary to financial profit with little to no regulation. For example, the Housing Choice Voucher Program provides choices to renters beyond government housing projects, however the lack of protection under anti-discriminatory law makes it difficult for renters to find landlords who accept vouchers, opening the door for residential self-segregation by socio-economic class (Besbris et al. 2024, 210).
- 2. Even when protections for renters exist, a lack of information can be exploited by property managers to coerce renters to act against their own interests.** The housing-specific COVID-19 programs are a prime example of protections put in place that many renters didn't realize they were eligible for (Besbris et al. 2024, 212).
- 3. Policies to improve housing stability in the US most often exacerbate housing insecurity for renters.** That is because US housing policy has a legacy of protecting, preferring, and subsidizing for homeownership and homeowners. Little is done for rent-burdened renters to alleviate displacement risk other than advocating for them to buy homes, a distant possibility for most (DeLuca, Stefanie, and Eva Rosen 2022, 345).
- 4. Driven by macro-level increases in income inequality, neighborhoods are becoming more segregated by income.** Contrastingly, racial integration is increasing, especially in U.S. cities (Chapple et al. 2017, 10).
- 5. The definition of displacement is not universal.** Caused by investment or divestment, displacement takes many forms - direct, indirect, physical, economic, or exclusionary (Chapple et al. 2017, 27).

6. **The conversion of public housing projects into mixed-income communities drives housing displacement for low-income households.** Despite the opportunity intentionally designed into mixed-income, multifamily public housing projects, only one-fifth of original project residents return to experience those benefits (Lee and Evans 2020, 6).
7. **Market corrections and global events do little to overcome the effects of racism and socio-economic discrimination on housing displacement.** While major events such as Covid-19 may create housing uncertainty across all demographics and identities, low-income people of color remain the most likely to experience housing displacement (Lee and Evans 2020, 18).
8. **Quantitative efforts to measure displacement underrepresent the plight of disadvantaged populations by not considering lived experience.** To counter this, displacement studies must include user generated, geographically tracked content to truly understand the state of gentrification risk in a community (Chapple and Zuk 2016, 115).

What types of current housing policies create the risk of resident displacement?

1. Government aid delivery is notoriously slow but critical when trying to implement policies designed to reduce housing displacement. **Nesting housing aid into existing, successful, and well-known programs creates a waterfall effect by increasing household disposable income** and thereby decreasing the percentage of total income a household spends on housing (Besbris et al. 2024, 212).
2. **Governments should take a holistic and comprehensive approach to mapping the overlap of government aid programs in their communities.** Only 1 in 4 households eligible for rental assistance actually receives it. There are opportunities to “nest” housing-specific policies within existing and more consistent government programs to boost successful delivery (Besbris et al. 2024, 208).
3. **Housing relief is most expediently and directly delivered via a landlord or property manager.** Government aid can oftentimes fail to provide timely relief for even those who qualify for assistance (Besbris et al. 2024, 217).
4. **To reduce housing displacement risk, governments should focus on increasing household financial stability and reducing socioeconomic inequities within Suburban communities.** Today, most low-income Americans live in the inner suburbs, where evictions are increasing faster than in urban areas. (Rutan et al. 2023, 164)
5. **To fight a growing trend of suburban corporate landlord conglomerates, governments should work to support, subsidize, and grow the amount of local small businesses that provide rental housing while incentivizing them to pass on savings to renters.** Local property owners are more likely to provide support and relief to renters in financial distress, while corporate landlords are more likely to immediately resort to eviction. (Rutan et al. 2023, 166)
6. **Code enforcement and condemnation can be a policy-driven displacement factor without a comprehensive plan to support displaced tenants.** Low-income households may reside in substandard conditions, and in cases where a property owner is unable or refuses to make improvements, tenants may be forced to vacate (Lee and Evans 2020, 3).

7. **Policies restricting housing development contribute to displacement risk.** Increasing housing supply makes housing more affordable, and housing affordability is directly correlated to an individual's housing cost burden, an indicator of displacement risk (Been, Gould Ellen, and O'Regan 2019, 4).
8. **New housing is required to achieve the displacement risk reduction benefits of housing stock filtering.** When new housing is built and priced higher, older housing is pushed down into a lower price range, creating additional housing availability for lower-income households. This concept is at odds with the commonly accepted drivers of gentrification and neighborhood change (Been, Gould Ellen, and O'Regan 2019, 6).

What groups and communities are at the greatest risk of housing displacement?

1. **Suburban poverty is ripe for displacement.** With less public transit, poorer households must spend more money to get around. They have limited access to non-profit services typically concentrated in cities, and confront a municipal infrastructure less suited to deliver holistic social services support (Rutan et al. 2023, 166).
2. **Residential mobility amongst the poor is variable, unplanned, and typically involuntary.** Eviction filings doubled between 2000 and 2016 (DeLuca, Stefanie, and Eva Rosen 2022, 348).
3. **Households in mobile homes are over twice as likely to live in poverty.** Half of all mobile homes in the US are in urban areas. There are 1.7 million mobile home renter households and 5.3 million mobile homeowners in the US (DeLuca, Stefanie, and Eva Rosen 2022, 348).
4. **Mobile home closures should be treated as mass evictions, which are primary indicators of displacement risk.** Those who own their trailers but don't have the means to move them to another location face an additional loss, leading to not only displacement but also the loss of a valuable household asset (Lee and Evans 2020, 6).
5. **Older people, African Americans, and Latinos are overrepresented across most types of displacement** (Lee and Evans 2020, 9).
6. **Households with children are at an increased risk of displacement.** A Milwaukee study found that renters with two children have an 11.7% chance of being evicted and a 9.5% chance with one child (Desmond and Gershenson 2017, 8).
7. **Renters who experience job loss are more likely to be evicted.** A Milwaukee study found that renters who lost their jobs were twice as likely to be evicted (Desmond and Gershenson 2017, 8).
8. **Community character change, or gentrification, is not necessarily an indicator of displacement.** A Milwaukee study found no significant difference in eviction risk between those living in racially or economically transitioning neighborhoods and those who live in homogenous communities (Desmond and Gershenson 2017, 9).
9. **Having a more affluent support system is not necessarily a buffer to experiencing housing displacement, but decreasing poverty shocks amongst those in your social networks will decrease displacement risk.** A Milwaukee study found that while renters in social networks with others experiencing poverty shocks are more likely to experience

eviction, having a more affluent social network did not decrease a renter's risk of eviction (Desmond and Gershenson 2017, 8).

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Existing Comprehensive Plan Policy Evaluation Framework

For the cities of Olympia, Lacey, Tumwater, and Yelm

Evaluation Method.....	1
Olympia	2
Lacey	10
Tumwater	25
Yelm	43

Evaluation Method

With the passage of [HB 1220 in 2021](#), jurisdictions are required to make adequate provisions for housing for all economic segments of the community. This includes identifying “*local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing.*”

The following evaluation table assesses the existing Comprehensive Plan’s goals and policies for impacts for racially disparate impacts, including displacement and exclusion, in the Housing Element and residential goals and policies in the Land Use Element. The evaluation used the following criteria in evaluating each goal and policy, consistent with the Department of Commerce’s Racially Disparate Impacts guidance:

- **Supportive:** The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.
- **Approaching:** The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.
- **Challenging:** The policy may challenge the jurisdiction’s ability to meet the identified housing needs. The policy’s benefits and burdens should be reviewed to optimize the ability to meet the policy’s objectives while improving the equitable distribution of benefits and burdens imposed by the policy.
- **Not Applicable (NA):** The policy does not impact the jurisdiction’s ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.

All Goals and policies in the Housing Element were included in this evaluation. For the Land Use Element, only residential-use related policies were evaluated.

Olympia

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Land Use Element			
PL6.1	<p>Establish and periodically update a design review process and design criteria consistent with the goals and policies in the Comprehensive Plan for:</p> <ul style="list-style-type: none"> ● Commercial and mixed use development adjacent to freeways and public streets ● Other highly-visible, non-residential development, such as the Port of Olympia, campus developments, and master planned developments ● Multifamily residential development and manufactured housing parks ● Detached homes on smaller lots (less than 5,000 square feet) and in older neighborhoods (pre-1940) ● Properties listed on a Historic Register or located within a designated historic district 	Approaching	The policy could address that the design review process should be reviewed and updated to ensure a streamlined review process and sufficient housing production to meet capacity goals.
PL6.4	Require multi-family housing to incorporate architectural forms and features common to nearby housing; to include porches, balconies, bay windows and similar details; to have entries oriented to streets or a courtyard, and include accessible open space; and to be reduced in size near lower density residential districts.	Challenging	Additional restrictions on multi-family housing types can result in less affordable rents. While design standards are not necessarily negative—they can ensure liveable spaces—this policy should be updated to balance both design and affordability goals, allowing flexibility to

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
			ensure housing production and choices.
PL8.4	Avoid height bonuses and incentives that interfere with landmark views.	Challenging	Limiting density for aesthetic reasons can result in lower housing capacity. However, this may be an acceptable compromise as long as the housing and affordability considerations are planned for elsewhere. To avoid subjective views being used as a tool for limiting housing development, this policy should be updated to specify or map viewsheds are most important to preserve through code provisions.
PL11.2	Provide incentives for housing in commercial districts near transit stops.	Approaching	Providing housing near jobs can be helpful in preventing displacement while reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability as well.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
GL14	Olympia's neighborhoods provide housing choices that fit the diversity of local income levels and lifestyles. They are shaped by thorough public planning processes that involve community members, neighborhoods, and city officials.	Approaching	While this policy does address housing for the different income levels, it should be expanded to clearly call-out low income groups and prioritize housing for historically marginalized groups.
PL14.2	Concentrate housing into three high-density Neighborhoods: Downtown Olympia, Pacific/Martin/Lilly Triangle; and the area surrounding Capital Mall. Commercial uses directly serve high-density neighborhoods and allow people to meet their daily needs without traveling outside their neighborhood. High-density neighborhoods are highly walkable. At least one-quarter of the forecasted growth is planned for downtown Olympia.	Approaching	While this policy does address the city's housing needs and demands, it does not address reducing displacement and affordability pressures.
PL14.3	Preserve and enhance the character of existing Low-density Neighborhoods. Disallow medium or high-density development in existing Low-density Neighborhood areas except for Neighborhood Centers.	Challenging	Language that aims to preserve low-density, single-family neighborhood "character" can often be used as a proxy for prohibiting more diverse housing choices. Instead of "character," this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing types such as middle housing.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
PL14.4	In low-density Neighborhoods, allow medium-density Neighborhood Centers that include civic and commercial uses that serve the neighborhood. Neighborhood centers emerge from a neighborhood public process.	Approaching / Supporting	Depending on how inclusive the Neighborhood Center identification and engagement process is, this policy would support anti-displacement through placemaking and housing, or it may cause further displacement.
Housing Element			
GL16	The range of housing types and densities are consistent with the community's changing population needs and preferences.	Approaching	While the policy acknowledges different community and population needs, it could be improved by incorporating affordability and anti-displacement language.
PL16.2	Adopt zoning that allows a wide variety of compatible housing types and densities.	Approaching	The policy intends to allow a variety of housing types. However, "compatible" is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.
PL16.3	Allow 'clustering' of housing compatible with the adjacent neighborhood to preserve and protect environmentally sensitive areas.	Approaching	This goal would allow parcels that would be undevelopable under strict application of the zoning code to be developable. However, "compatibility" could be further defined to ensure the building types used are not exclusionary.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
PL16.4	Disperse low and moderate-income and special needs housing throughout the urban area.	Approaching	While this policy seeks to ensure lower income households are not isolated to certain parts of the city, it could be enhanced to go further by allowing and fostering capacity rather than focusing on dispersion.
PL16.5	Support affordable housing throughout the community by minimizing regulatory review risks, time and costs and removing unnecessary barriers to housing, by permitting small dwelling units accessory to single-family housing, and by allowing a mix of housing types.	Supportive	This policy supports housing growth and affordability.
PL16.6	Promote home ownership, including by allowing manufactured homes on individual lots, promoting preservation of manufactured home parks and allowing these parks in multi-family and commercial areas, all subject to design standards ensuring compatibility with surrounding housing and land uses.	Approaching	This policy could be improved by better defining compatibility. Consider identifying whether compatibility is driven by architectural massing or design styles.
PL16.7	Allow single-family housing on small lots, but prohibit reduced setbacks abutting conventional lots.	Approaching	Allowing smaller homes on smaller lots reduces land costs. "Conventional lots" is unclear however.
PL16.8	Encourage and provide incentives for residences above businesses.	Supportive	Incentivizing residences over businesses creates flexibility and a variety of units.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
PL16.9	In all residential areas, allow small cottages and townhouses, and one accessory housing unit per home -- all subject to siting, design and parking requirements that contribute to neighborhood character.	Approaching	While allowing cottages and townhouses supports housing and affordability goals, “neighborhood character” is vague and could be tied to exclusionary housing practices.
PL16.10	Require effective, but not unreasonably expensive, building designs and landscaping to blend multi-family housing into neighborhoods.	Challenging	Requiring additional standards for multi-family housing types ultimately hinders affordability.
PL16.11	Require that multi-family structures be located near a collector street with transit, or near an arterial street, or near a neighborhood center, and that they be designed for compatibility with adjacent lower density housing; and be 'stepped' to conform with topography.	Approaching	Requiring multi-family housing to be located near transit or neighborhood centers increases their accessibility, but this policy could be expanded to include multi-family housing throughout the city to increase the number of housing units. This policy could also be improved by better defining compatibility.
PL16.12	Require a mix of single-family and multi-family structures in villages, mixed residential density districts, and apartment projects when these exceed five acres; and use a variety of housing types and setbacks to transition to adjacent low-density areas.	Approaching	Requiring a mix of single- and multi-family housing types could support housing growth and affordability, but it does not address reducing displacement and affordability pressures. This policy could be better improved by specifying the “mix” of housing.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
PL16.13	Encourage adapting non-residential buildings for housing.	Supportive	Adapting non-residential buildings for housing supports housing growth and affordability.
PL16.14	Provide annual information on affordable homeownership and rentals in the City, including the operative definitions of affordable housing, criteria to qualify for local, state, and federal housing assistance, data on current levels of market-rate and affordable housing, demand for market-rate and affordable housing, and progress toward meeting market-rate and affordable housing goals.	Supportive	Reviewing affordability and funding opportunities to increase housing annually is supportive of housing growth and affordability.
Downtown and other Neighborhoods - Neighborhoods			
GL20	Development maintains and improves neighborhood character and livability.	Approaching	This policy could be improved by specifying what “neighborhood character” means, as the term is vague and could be tied to exclusionary housing practices.
PL20.1	Require development in neighborhoods to be of a type, scale, orientation, and design that maintains or improves the character, aesthetic quality, and livability of the neighborhood.	Challenging	This policy could be improved by specifying “character”, which is vague and could be tied to exclusionary housing practices. This policy does not directly address housing affordability or supply. Requiring additional standards could ultimately hinder affordability.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
20.2	Unless necessary for historic preservation, prohibit conversion of housing in residential areas to commercial use; instead, support redevelopment and rehabilitation of older neighborhoods to bolster stability and allow home occupations (except convalescent care) that do not degrade neighborhood appearance or livability, nor create traffic, noise or pollution problems.	Approaching	This policy preserves housing in residential areas, but it could increase displacement risk as it does not address protecting residents from potential displacement or racially disparate impacts that may result from the redevelopment and rehabilitation of older neighborhoods.
20.3	Allow elder care homes and seniors-only housing and encourage child care services everywhere except industrial areas; but limit hospice care to multi-family and commercial districts.	Approaching	This policy addresses housing supply and affordability by allowing housing for the elderly. It could be more equitably applied to residential zones, rather than only being allowed in multi-family and commercial districts.
PL20.4	Support development and public improvements consistent with healthy and active lifestyles.	Supportive	This policy could be improved by prioritizing investment in neighborhoods that have historically experienced a lack of investment.
PL20.5	Prevent physical barriers from isolating and separating new developments from existing neighborhoods.	Supportive	This policy supports housing growth, affordability, and the integration of new developments.

Lacey

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Planning Areas - Central			
Goal 2	Maintain quality and function of existing residential areas in the Central Planning Area.	Approaching	This policy could be improved by specifying what “quality and function” means, as the terms are vague and could be tied to exclusionary housing practices, and by addressing how this policy would prevent exclusion, disproportionate impacts, or displacement.
Policy A	Acknowledge historical character and value of the Lacey Historic Neighborhood as a unique housing resource. Continue to require special development standards for Lacey Historic Neighborhood that recognize and preserve historical values and neighborhood character while allowing reasonable infill and development.	Approaching	This policy allows for infill and housing development in the Historic Neighborhood, but could be improved by defining what “reasonable” infill and development means, as well as “neighborhood character”, as the term is vague and could be tied to exclusionary housing practices.
Policy B	Acknowledge character and value of older residential neighborhoods adjacent to the Central Business District as an affordable housing resource.	Supportive	This policy addresses housing supply and affordability, but should better define “character”.
Policy C	Develop and implement a subarea plan for the Golf Club Road neighborhood.	Approaching	This policy could be improved by focusing on housing affordability and avoiding disproportionate impacts to vulnerable communities.
Goal 3	Provide opportunities for infill in the Central Planning Area.	Supportive	This policy is supportive of housing growth and affordability, but could be strengthened to consider

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
			potential racially disparate impacts.
Policy A	Maintain the liberal policy on accessory residential units while maintaining quality and character of neighborhood through performance standards and design review.	Approaching	While allowing ADUs supports housing growth and affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices.
Policy B	Provide opportunities for duplexes, triplexes and quadraplexes to locate in lower density neighborhoods as infill mechanisms which enhance neighborhood character by requiring exceptional and rigorous design requirements.	Approaching	While allowing duplexes, triplexes, and quadraplexes supports housing growth and affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices. “Exceptional and rigorous design requirements” can be leveraged to maintain high-cost housing types, unattainable to those from lower incomes or historically marginalized communities.
Policy C	Provide opportunities for single-family cluster housing on smaller lot sizes than the underlying zone with exceptional and rigorous design requirements to maintain quality and character of neighborhood areas.	Approaching	While allowing cluster housing on smaller lots may reduce land costs and support housing affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices. Requiring “rigorous design requirements” could ultimately hinder affordability.
Planning Areas – Horizons Planning Area			

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Goal 1	Continue to encourage the development of a range of residential types, providing opportunity for high density residential development along arterials with transitions to existing low density residential development.	Approaching	This policy is supportive of housing growth and affordability, but could be strengthened to expand high density housing throughout the city and to consider affordability as well.
Policy A	Undeveloped property along College, Yelm, Ruddell, and Rainier Road should be zoned for moderate or high density residential development.	Approaching	This policy is supportive of housing growth, but could be strengthened to consider potential racially disparate impacts.
Policy B	Support infill development in higher density areas primarily around existing neighborhood centers, recognized nodes, and urban corridor areas.	Supportive	Providing housing near jobs and neighborhood centers can be helpful in preventing displacement while reducing overall community impacts such as traffic. The policy could be expanded to consider affordability as well.
Policy C	Encourage a full range of higher density residential uses, including single-family zero lot line developments, townhouse units, mixed residential use, planned residential developments and multifamily apartments.	Supportive	This policy is supportive of housing growth.
Policy D	Pay careful attention to blend different land use types to minimize potential land use conflicts while maintaining walkability as a priority.	NA	
Planning Areas – Lakes Planning Area			
Goal 3	Maintain existing moderate and high density housing opportunities along major arterials with convenient access to transit where no impact to environmentally sensitive areas will occur.	Approaching	Providing housing near transit can be helpful in reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability and anti-displacement as well.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy A	Maintain areas for medium density development opportunities along Ruddell Road.	Approaching	This policy is supportive of housing growth, but could be expanded to allow high density housing or address anti-displacement in this area.
Planning Areas – Pleasant Glade Planning Area			
Goal 2	Provide opportunities for moderate and high density housing along major arterials with convenient access to potential transit, designating “urban reserve areas”, and annexing areas for public use where appropriate.	Approaching	Providing housing near transit can be helpful in reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability and anti-displacement as well.
Policy A	Maintain existing areas for moderate and high density development opportunities along arterials of Sleater Kinney and 15th Avenue, contingent on provisions for public sewer.	Supportive	This policy is supportive of housing growth, but could be expanded to address anti-displacement in this area.
Policy B	Study and analyze designating the northwest portion of the planning area as an “urban reserve area” or “urban holding area” until sewer service can be extended.	Supportive	This policy is supportive of housing growth that is supported by adequate public facilities and infrastructure.
Policy C	Consider the annexation of the Greg J. Cuoio Community Park property for the future completion for public access.	NA	
Planning Areas – Seasons Planning Area			
Goal 3	Over the long term, encourage development of a range of residential types, with emphasis on providing additional moderate and high density opportunities.	Approaching	This policy addresses the city’s housing needs and growth, but does not address affordability.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy A	Maintain areas along Marvin Road for moderate density development as sewer becomes available. Review areas along Mullen, Yelm Highway, and 58th for moderate density development as sewer becomes available. Moderate and High Density zones should be planned to provide transitions to existing low density residential development.	Approaching	This policy supports housing growth but could be strengthened by considering impacts on vulnerable populations and racially disparate impacts.
Policy B	Encourage a full range of residential uses when adequate facilities and services are available to serve them.	Approaching	This policy supports housing growth but could be strengthened by considering impacts on vulnerable populations and racially disparate impacts.
Policy C	Pay careful attention to creating effective transitions between new developments of moderate density and existing low density development.	Challenging	Requiring additional standards for multi-family housing types may ultimately hinder housing affordability.
Housing Element			
Goal 1	Have a sufficient number of single-family dwelling units, multifamily units, and group and special need housing to provide a selection of rental and home ownership affordable housing opportunities for all persons.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability.
Policy A	Provide opportunities for development of all housing types to accommodate future needs for each type of housing.	Supportive / Approaching	While supportive, this policy will need to be updated to meet HB 1220 guidance on specific household income brackets. However, providing housing across all income segments reduces displacement risk and enables housing opportunities to all, regardless of income.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy B	Monitor the market and available land in the urban growth boundary to provide sufficient area zoned to meet the demand for various types of housing.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability.
Policy C	Encourage a wide variety of housing from low to high income in range to allow placement and mobility within the housing market.	Supportive	This policy is supportive of providing housing for all needs. It could be improved by prioritizing the provision of housing for low-moderate incomes and considering potential displacement impacts. This policy will need to be updated to meet HB 1220 guidance on specific household income brackets.
Policy D	Promote preservation and improvement of existing single-family and multifamily units.	Approaching	This policy supports housing growth by preserving existing housing stock. It could be improved by considering anti-displacement.
Policy E	Support neighborhood revitalization through available grants from the State, Federal and local levels to maintain and improve infrastructure.	Approaching	This policy supports housing growth by pursuing grant funding, but could be strengthened by prioritizing affordable housing or improving infrastructure in vulnerable neighborhoods. "Neighborhood revitalization" could be better defined, as it could lead to the displacement of historically marginalized populations.
Policy F	Support policies and programs to address the unique housing needs of the military population, including active duty, reserves, dependents and contractors.	Supportive	This policy is supportive of providing housing for all needs. It could be improved by addressing potential displacement impacts.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Goal 2	Achieve a balanced community with each planning area accommodating a fair share of housing needs for all persons.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability. It could be improved by addressing potential disproportionate impacts.
Policy A	Consider requirements and incentives designed to result in a balanced, increased supply of affordable housing in all parts of the City for very low, low and moderate income households.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.
Policy B	Consider programs that include mandatory requirements for new developments targeting individual planning areas until housing goals for target groups are achieved.	Approaching	This policy supports housing growth by pursuing grant funding, but could be strengthened by specifying anti-displacement goals and prioritizing vulnerable populations or those with special housing needs.
Goal 3	Work with regional agencies and bodies to implement affordable housing techniques consistently and on a regional scale.	Supportive	This policy is supportive of housing growth and affordability.
Policy A	A myriad of affordable housing strategies should be implemented by all surrounding jurisdictions in Thurston County to meet housing needs on a regional scale for very low, low and moderate income households.	Supportive	This policy is supportive of housing growth and affordability.
Policy B	Public and nonprofit agencies, such as the Housing Authority with expertise in housing practices and special needs, should be a major partner in inclusionary programs.	Supportive	This policy is supportive of housing growth and affordability.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy C	The Housing Authority, or other agencies, should take a lead role where its expertise and function lend itself to best accomplish program objectives. Lead responsibility might include such tasks as qualifying households by income bracket, monitoring target objectives, administration of an affordable housing trust, taking ownership of dedicated lots and units, contracting for the development of units, monitoring the sale and resale controls of designated public units, and other related tasks.	Supportive	This policy is supportive of housing growth and affordability.
Goal 4	Achieve housing that is compatible and harmonious with existing neighborhood character while allowing infill and providing for environmental sensitivity.	Approaching	Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices. Instead of “character,” this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing types such as middle housing.
Policy A	When designating areas for infill and zoning classifications, consider and place emphasis on the composition of the neighborhood, housing need, available infrastructure, principals of walkability and healthy communities.	Approaching	This policy is supportive of housing growth, but could be strengthened to address reducing displacement and affordability pressures.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy B	<p>When implementing infill projects in designated areas, require design of infill projects that:</p> <ul style="list-style-type: none"> ● Meet the housing needs of the planning area considering variety and choice. ● Integrate successfully into the existing residential environment considering form based concepts and healthy community objectives. ● Provide a form, look and feel and social functionality that will add to the character, desirability and value of the surrounding neighborhood. 	Approaching	<p>This policy is supportive of housing growth, but could be strengthened to address reducing displacement and affordability pressures. Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices.</p>
Policy C	<p>Continue to utilize design review guidelines for all residential developments.</p>	Approaching	<p>The policy intends to ensure new development is integrated with the rest of the city, but additional design requirements could ultimately hinder the development of affordable housing.</p>
Goal 5	<p>Provide a variety of housing opportunities for those with special needs.</p>	Supportive	<p>This policy supports housing growth and could be strengthened to address affordability.</p>
Policy A	<p>Provide opportunities for development of various types of group housing.</p>	Supportive	<p>This policy supports housing growth and could be strengthened to address affordability.</p>

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy B	Ensure a full range of housing and facilities for the accommodation of persons with special needs exist within each planning area, with consideration for promotion of housing in those planning areas providing the most services for such individuals.	Supportive	This policy supports housing growth and could be strengthened to address affordability.
Policy C	Design group homes and facilities for special populations so that they are integrated, compatible, and harmonious with surrounding land uses.	Approaching	The policy intends to allow housing for a variety of needs. However, “compatible” is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.
Policy D	Enforce all requirements of the International Building Code that addresses the Americans with Disabilities Act and the Fair Housing amendments.	Approaching	This policy supports housing for all needs. It could be strengthened by addressing housing affordability.
Goal 6	Work cooperatively with local jurisdictions, nonprofits and religious organizations to reduce homelessness and find ways for providing emergency and transitional shelter to serve the identified needs of this population.	Supportive	This policy addresses housing exclusion for individuals experiencing homelessness.
Policy A	Based upon identified need, provision of facilities and services should be addressed by all local jurisdictions with fair share commitment reflected in local budgets.	Approaching	This policy supports services for all needs, but does not directly address ways to increase housing supply or affordability, or to mitigate racially disparate impacts.
Policy B	Provide the opportunity to accommodate innovative strategies that will include emergency and	Supportive	This policy addresses housing exclusion for individuals experiencing homelessness.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
	transitional housing for the homeless population.		
Policy C	Ensure location and use of emergency and transitional housing considers, and is successfully integrated into, the surrounding neighborhood without impact to other land use activities.	Approaching	This policy addresses the provision of housing for individuals experiencing homelessness, but could better specify what it means to be integrated into the surrounding neighborhood without impact to other land use activities. Requiring additional standards for transitional and emergency housing types may ultimately hinder their development and affordability.
Policy D	Maintain and expand linkages with the business, religious and nonprofit communities as partners in ending homelessness.	Approaching	This policy addresses provisions for individuals experiencing homelessness, but could be more specific in outlining what the city's role may be.
Policy E	An emphasis in City policy will be to reflect the Continuum of Care approach, which emphasizes supporting self-sufficiency and transitional housing programs rather than stop gap measures which fail to break the cycle of homelessness.	Approaching	This policy addresses housing exclusion for individuals experiencing homelessness. It could be improved by addressing housing affordability for those who are transitioning out of homelessness.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy F	The City supports an increased role in meeting the problems of homelessness from the private sector through funds, in-kind, and volunteer support and will evaluate its funding decisions partially on the basis of other funding sources. The City will use its resources to leverage support for homeless services from the state and federal government and other funding sources.	Approaching	This policy addresses housing exclusion for individuals experiencing homelessness. It could be improved by better, more inclusive language, and the city could consider playing a larger role to supplement the efforts of the private sector.
Policy G	As much as practical, consider the needs of the intended uses and site facilities to provide convenient access to the services the population will require.	Approaching	This policy aims to provide services necessary for various housing needs. It could be improved by prioritizing historically disadvantaged communities or vulnerable populations.
Policy H	Continue to review and monitor participation and experience in programs that support the homeless population, assess effectiveness in meeting the needs of Lacey’s homeless individuals, and provide opportunities for programs that can better serve this demographic.	Supportive	This policy addresses strategies to meet the needs of individuals experiencing homelessness. It could be expanded to include housing considerations in addition to the programs mentioned.
Policy I	Particular priority will be provision of services to minors without family resources and families with children. The City will place its highest priority on assisting homeless children and families with children and victims of domestic violence and other special needs groups.	Supportive	This policy addresses a particularly vulnerable subset of individuals experiencing homelessness. It could be expanded to include housing considerations in addition to the services mentioned.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Policy J	As long as there is a demonstrated need for temporary transitional housing and the tent city program continues to operate in a fashion that is compatible with adjacent land uses, Lacey should consider continued support of the opportunity for local churches to administer to the home- less by hosting a tent city.	Approaching	This policy aims to provide transitional or temporary housing for houseless individuals. It could be improved by removing vague language around “compatibility”, which could hinder the provision of housing for houseless individuals.
Goal 7	Identify and support a central contact to provide a help response for the homeless and citizens at risk of becoming homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.
Policy A	Support Lacey’s community partners in improving the community’s response to the needs of the homeless with identification of a referral point of contact for people to find services. This can include a service like the 211 referral line.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potential displacement, or to assist those who are experiencing homelessness.
Policy B	Support homeless persons or those at risk of becoming homeless by identifying referrals that can put people in contact with the organizations that provide the services that they need.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.
Policy C	Make technical assistance documents available to citizens and jurisdictional staff on the 211 referral line and related social services so more people will be aware of community resources and where individuals can find help. Distribution of information to publicize the 211 services should include internet information, distribution at relevant community meetings, contact phone numbers,	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potential displacement, or to assist those who are experiencing homelessness.

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
	and informational flyers to community service and religious faith-based organizations.		
Policy D	Continue to take a regional perspective in addressing homelessness in the Thurston County community through support and participation in the Thurston County Home Consortium that provides coordinated planning, activities and evaluations that address homelessness.	Supportive	This policy addresses providing housing and services for individuals experiencing homelessness through increased coordination with other regional jurisdictions.
Policy E	As supported programs formulate future budgets or experience budget growth, promote a sharpened focus on addressing priority issues identified for Lacey’s homeless demographic.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.
Policy F	As Lacey reviews programs asking for support through the Housing Consortium, support should be prioritized based upon a program reflecting the goals and priorities identified in this Housing Element.	Approaching	This policy could be improved by including equity, racially disparate impacts, and anti-displacement as priorities of the housing element or this policy.
Goal 8	Strive for no net increase in the number of homeless people identified in future homeless census counts by focusing on proactive intervention.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.
Policy A	Look for opportunities to strengthen outreach and engagement activities that will facilitate enrollment in treatment and service programs of	Supportive	This policy addresses support for houseless individuals, specifically to

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
	individuals who are homeless or at risk of becoming homeless.		prevent homelessness and potentially displacement.
Policy B	Promote programs designed to ensure that persons returning to the community from institutional or other sheltered settings (including foster care) do not become homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement. It could be improved by including efforts to increase housing affordability for these individuals.
Policy C	Encourage the use of effective prevention interventions, ranging from family strengthening and high-risk youth programs to specific discharge planning.	Supportive	This policy addresses disparate impacts and potential displacement through preventative strategies.
Goal 9	Achieve maximum utilization of public buildings for use in the public interest by scheduling secondary uses and activities at times facilities are not being utilized for primary functions.	Approaching	This policy could be improved by specifying what activities are in the public interest, especially in terms of supportive housing services or emergency shelter.
Policy A	Review opportunities for shared use of public facilities where it will not conflict with primary use of the structure and associated activities.	Approaching	This policy could be improved by specifying what activities are in the public interest, especially in terms of supportive housing services or emergency shelter.
Policy B	When designing new public buildings and planning expansions of existing buildings, consider design to serve dual roles in providing a full range of public services, including emergency shelter, meal services, and other services that might be needed.	Supportive	This policy supports housing services and emergency shelter.

Tumwater

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
LU-2.3	Encourage innovative land use management techniques such as density bonuses, cluster housing, zero-lot-line development, planned unit developments, and transfer of development rights to create vibrant centers, corridors, and neighborhoods while accommodating growth.	Supportive	This policy is supportive of housing growth and affordability. It could be expanded to consider anti-displacement.
LU-4.3	Continue to allow manufactured housing on individual lots within the City, as well as within mobile and manufactured home parks, to encourage affordable housing.	Supportive	This policy is supportive of housing growth and affordability.
LU-4.4	Permit implementing regulations to experiment in new forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems such as density, diversity, equitability, and affordability can be achieved.	Approaching	This policy intends to create development regulations that encourage diverse, affordable, and equitable housing types with high quality amenities. It could be rewritten to improve clarity.
LU-4.5	Encourage higher density residential uses in order to provide affordable housing. These uses should blend with the existing character of the community.	Approaching	The policy intends to allow housing for a variety of needs. However, “character” is vague and can be leveraged to maintain high-cost housing types that are unattainable to those with lower incomes or from historically marginalized communities.

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
LU-4.6	Increase housing types and densities in corridors and centers to meet the needs of a changing population.	Supportive	Increasing housing types and densities is supportive of housing growth, especially in areas with jobs and services.
LU-4.7	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.	Approaching	The policy intends to allow housing for a variety of needs. However, extensive design guidelines can be leveraged to maintain high-cost housing types that are unattainable to those with lower incomes or from historically marginalized communities.
GOAL LU-9	Identify what conditions should be applied to development in residential areas.	Approaching	The policy intends to ensure new development is integrated with the rest of the city, but additional requirements, especially in terms of design, could ultimately hinder the development of affordable housing.
LU-9.1	Protect residential developments from excessive noise, odors, dirt, glare, and other nuisances emanating from commercial and industrial uses.	NA	
LU-9.2	Allow for multi-family residential development in the zoning code. Consideration should be given to encouraging this type of development near centers of community services.	Approaching	Allowing multi-family developments in the zoning code is supportive of housing growth, especially in areas with jobs and services. It could be improved by prioritizing housing for historically disadvantaged communities or vulnerable populations.

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
LU-9.3	Integrate design features of existing natural systems into the layout and siting of new residential dwelling units. Preserve trees and significant ecological systems, whenever possible and practical.	Approaching	This policy would bring health benefits from additional greenery and shade, but could ultimately hinder the development of affordable housing.
LU-9.4	Permit experimentation in development regulations with newer forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems can be achieved.	Approaching	Flexible standards for diverse housing types would support housing growth, but this policy should include emphasis on providing housing for low income or historically marginalized populations.
LU-9.5	Do not permit private residential gated communities.	Supportive	This policy helps prevent exclusive residential communities.
LU-9.6	Promote nearby access to healthy food for residential developments.	Approaching	This policy does not directly help the city increase housing supply, but helps increase food security for residential developments, but could be expanded to prioritize promoting access to healthy foods in historically marginalized and low-income communities.
Housing Element, Comprehensive Plan			
GOAL H-1	To conserve and improve the existing city housing stock and quality of life of neighborhoods.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures.
H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.	Supportive	Preserving and improving existing affordable housing stock can help reduce displacement pressures and increase housing supply.

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
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.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures and increase housing supply. Special care should be taken to ensure vulnerable populations are displaced through rehabilitation of housing.
H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.	Approaching	“Revitalization” of neighborhoods could lead to displacement. This policy should be expanded to include anti-displacement language.
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.	Approaching	Including affordable housing policies that prioritize anti-displacement, affordability, and equity in the comprehensive plan and development regulations supports housing growth.
H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.	Approaching	Improving infrastructure to better serve communities is supportive of housing growth, but “improve community surroundings” is vague and could lead to displacement or disproportionate impacts to historically marginalized communities. This policy should consider displacement impacts.
H-1.5	Encourage and facilitate economic development as an important part of provision of housing by providing jobs.	Approaching	Providing jobs does not provide housing in itself, but increasing employment opportunities near housing

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
H-2.2	Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.	Approaching	Providing opportunities for diverse housing types and incomes is important. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
H-2.2.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned land.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
GOAL H-3	To provide adequate, affordable housing for residents of all income groups, including sufficient housing affordable to	Supportive	Providing affordable housing advances housing growth. This goal should be updated to consider

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
	low and moderate-income groups.		affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Approaching	This policy would help the city provide additional housing using innovative methods but could be improved by considering how these innovative plans could increase affordability of housing and prevent displacement.
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.	Supportive	Preserving existing affordable housing stock like manufactured homes reduces displacement risk and maintains affordable housing supply.
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.	Approaching	Retrofitting existing affordable housing stock reduces displacement risk and maintains affordable housing supply. However, this is phrased as retrofitting unfit structures for use as transitional or affordable housing, rather than retrofitting <i>existing</i> transitional or affordable housing, which could create disproportionate impacts if only buildings in need of repair are designated for

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
			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.	Supportive	Allowing for additional housing with sufficient infrastructure through land use planning and code changes contributes to housing growth.
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.	Supportive	Providing affordable housing advances housing growth and affordability. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Supportive	Providing sufficient land for housing advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Supportive	Pursuing opportunities to increase transitional housing for families supports housing for vulnerable communities and could help mitigate displacement. This policy could be expanded to prioritize low income families or those from historically marginalized communities.

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
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.	Supportive	This policy is supportive of housing growth and affordability. It could be expanded to include anti-displacement measures in the “target areas”.
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.	Supportive	This policy is supportive of housing affordability and preventing displacement, by expanding collaboration with neighboring jurisdictions to provide affordable housing and resources to support individuals experiencing homelessness.
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.	Supportive	Providing opportunities for housing for all needs advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
H-4.1	Support the inclusion of living opportunities for families with children throughout the city.	Supportive	Providing opportunities for housing for families with children advances housing growth. This goal should be updated to prevent displacement of these households.
H-4.2	Support and encourage a variety of housing types and price	Supportive	Providing opportunities for housing for all needs

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
	ranges through appropriate policies and regulations.		advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Supportive	Setting maximum lot sizes increases the land available for new residential development. This policy could be expanded to reference diverse housing types affordable for all income levels.
H-4.2.2	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.	Approaching	This policy could be strengthened to require homeowner associations to not prevent affordable or diverse housing types or require strict design requirements that may hinder affordability.
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.	Supportive	This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220, and to prevent potential displacement of existing residents.
H-5.1	Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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)	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
			affordability concerns and housing by income bracket to meet the requirements of HB 1220.
H-5.1.2	Continue joint planning with Thurston County to plan for future growth in Tumwater.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.
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.	Supportive	This policy would allow the city to have an accurate determination of land available for new housing.
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.	NA	
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.	Supportive	Increasing diverse housing types is supportive of housing growth, especially in areas with jobs and services.
H-6.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Challenging	This policy is at a high risk of having a disproportionate impact on lower income and historically marginalized communities, resulting in greater displacement.
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
			to meet the requirements of HB 1220.
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.	Supportive	Providing land for a mix of housing advances housing growth. This goal should be updated to consider displacement and affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Supportive	This policy is supportive of housing growth. Ensuring clear and predictable standards for housing and building codes supports housing production goals. Strict design requirements can be leveraged to maintain high-cost housing types, unattainable to those from lower incomes or historically marginalized communities.
H-6.3	Support increasing housing opportunities along urban corridors and centers.	Supportive	Increasing housing supply is supportive of housing growth, especially in areas with jobs and services.
H-6.4	Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.	Approaching	Ensuring that neighborhoods encourage active transportation is important for inclusive communities. However, this goal could be edited to pay special attention to underserved neighborhoods.
H-6.4.1	Continue to involve Intercity Transit in Tumwater's development review process.	NA	

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
H-6.5	Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.	Supportive	Ensuring clear and predictable standards for housing and building codes supports housing production goals.
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.	Supportive	Ensuring clear and predictable standards for housing and building codes supports housing production goals.
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.	Approaching	“Compatible” as it relates to design is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.
H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.	Approaching	This policy may help prevent residential displacement, but may also provide a barrier to increasing housing diversity and affordability in existing neighborhoods.
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.	Approaching	The policy intends to allow a variety of housing types. However, “compatible” is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.
H-7.2	Assure housing will be well maintained and safe.	Supportive	Ensuring housing is well-maintained and safe is supportive of housing goals, but should prioritize low

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
			income or other historically marginalized communities.
H-7.3	Enhance the appearance of and maintain public spaces in residential areas.	NA	
H-7.4	Promote community involvement to achieve neighborhood improvement.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.
GOAL H-8	To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.	Approaching	This policy could be strengthened by addressing affordability and to prevent displacement of existing residents.
H-8.1	Support the stability of established residential neighborhoods.	Approaching	This policy may help prevent residential displacement, but may also provide a barrier to increasing housing diversity and affordability in existing neighborhoods.
H-8.2	Assure housing will be well maintained and safe.	Supportive	Ensuring housing is well-maintained and safe is supportive of housing goals, but should prioritize low income or other historically marginalized communities.
H-8.2.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Challenging	This policy is at a high risk of having a disproportionate impact on lower income and historically marginalized communities, resulting in greater displacement.
H-8.3	Enhance the appearance of and maintain public spaces in residential areas.	NA	
H-8.4	Promote community involvement to achieve neighborhood improvement.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
H-8.4.1	Encourage neighborhood meetings to discuss community issues as situations and concerns arise.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.
H-8.5	Encourage home ownership for Tumwater residents.	Approaching	Encouraging homeownership helps mitigate displacement, but should prioritize opportunities for low and middle incomes.
GOAL H-9	To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability. It could be improved by preventing the potential displacement of those with special housing needs.
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.	Supportive	This policy is supportive of providing housing for all needs throughout the city. It could be improved by preventing the potential displacement of those with special housing needs.
H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.	Supportive	This policy addresses support for housing for individuals experiencing homelessness, and could help mitigate displacement.
H-9.3	Support and plan for assisted housing opportunities using federal, state, or local aid.	Supportive	This policy addresses pursuing funding to support assisted housing opportunities which could mitigate displacement and increase the amount of affordable housing in the city.

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
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.	Supportive	This policy addresses services to support populations with special needs to help mitigate displacement.
H-9.5	Encourage alternative housing strategies for homeless youth, which may include Host Homes.	Supportive	This policy addresses the provision of housing for homeless youth.
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.	Approaching	The policy intends to allow a variety of housing types. However, "neighborhood character" is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.
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.	Approaching	Encouraging diverse and innovative design could ultimately hinder housing affordability or supply by requiring additional, subjective design standards.
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.	Approaching	Design standards intend to integrate new housing developments with existing ones, but can be leveraged to maintain high-cost housing types, which are unattainable to those from lower incomes or historically marginalized communities.
H-10.2.1	Continue to implement multi-family housing design standards.	Approaching	Design standards intend to integrate new housing developments with existing ones, but can be leveraged to maintain high-cost

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
			housing types, which are unattainable to those from lower incomes or historically marginalized communities.
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.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure.
H-11.1	Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure. It should also prioritize affordability.
H-11.2	Reference utility plans and the impact of housing decisions on capital improvements planning.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure. It should also prioritize equity in the provision of services.
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.	Supportive	Providing housing near transit supports housing supply goals and reduces impacts to transportation and provides access to jobs.
GOAL H-12	To encourage urban growth within the city limits with gradual phasing outward from the urban core.	Approaching	This policy could be improved by addressing affordability and encouraging increased density throughout the city.
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	Approaching	This policy supports housing growth, but could better address affordability and anti displacement, especially related to the redevelopment of

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
	urban sprawl and associated public service costs.		underdeveloped property to ensure people are not displaced.
H-12.1.1	Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.	Supportive	This policy supports housing growth and affordability.
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.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure.
H-12.1.3	Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.	Supportive	This policy supports housing growth. It could be improved by addressing affordability.
H-12.1.4	Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.	NA	Consider moving to Land Use Element
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.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.
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.	Supportive	Preserving existing affordable housing stock reduces displacement risk.
H-13.1.1	Encourage manufactured housing park district zoning to locate near transit services.	Supportive	Providing access to services such as transit reduces community

Goal, Policy, or Regulation	Text	Potential Impact	Reason / Recommendation
			vulnerabilities and dependence on car travel, especially for vulnerable community members such as elderly and youth.
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.	Supportive	Renters and lower income communities often have higher risk and vulnerabilities to natural hazards and events. Ensuring that zoning does not push manufactured home parks into high-risk areas reduces displacement and threats to community member safety.

Yelm

Goal, Policy, or Regulation	Text	Evaluation	Reason
Land Use Element, Comprehensive Plan			
Policy 3.3	Adopt two categories of residential single family land use to meet community needs: <ul style="list-style-type: none"> ● Single Family - 4 units per acre; and ● Single Family - 6 units per acre. 	Dependent on Land Capacity Analysis	While these density levels should support middle and multifamily housing, whether this supports housing and displacement goals depends on the buildable lands analysis and forecasted unit need by income band.
Policy 3.4	Adopt two categories of residential multifamily land use to meet community needs: <ul style="list-style-type: none"> ● Multifamily - Medium Density — 6 units per acre; and ● Multifamily - High Density — 16 units per acre. 	Dependent on Land Capacity Analysis	While these density levels should support middle and multifamily housing, whether this supports housing and displacement goals depends on the buildable lands analysis and forecasted unit need by income band.
Policy 3.5	Adopt a mixed use development category which allows both residential and commercial uses suitable for planned developments on larger parcels and which provides for a variety of land uses, more efficient use of open space, and more cost effective public infrastructure.	Approaching	While supporting mixed uses does provide housing near commercial services, this policy does not address affordability or displacement risks.
Policy 4.4	Adopt development regulations that accommodate “live-work” structures (where citizens can live and work within the same structure).	Supportive	Allowing live-work structures creates both housing and economic opportunities for community members who wish to start a business, but cannot afford a home and a commercial space.
Policy 4.6	Adopt development regulations that allow permits to be	Supportive	Streamlining permit processes reduces barriers to housing production to

Goal, Policy, or Regulation	Text	Evaluation	Reason
	processed in a timely and efficient manner.		meet housing supply deficits and reduce building costs.
Goal 5	Encourage diverse residential growth.	Supportive	Allowing diverse housing types and growth allows housing supply to meet the shifting housing needs of households.
Policy 5.2	Adopt development standards that allow duplexes, townhouses, and accessory dwelling units within residential areas. These are intended to increase the variety of housing in the community and aid in achieving an overall urban density.	Supportive	Allowing housing diversity supports overall goals of providing different housing types to address different household needs.
Policy 5.3	Adopt development regulations that encourage mixed use subdivisions.	Supportive	Allowing housing diversity supports overall goals of providing different housing types to address different household needs.
Goal 10	Create vibrant centers, corridors, and neighborhoods while accommodating growth.	NA	
Policy 10.1	Promote a greater mix of uses and densities to support efficient provision of services.	Supportive	Allowing housing and land use diversity supports overall goals of providing different housing types to address different household needs.
Goal 11	Create safe and vibrant neighborhoods with places that build community and encourage active transportation.	Approaching	Ensuring that neighborhoods are safe and encourage active transportation is important for inclusive communities. However, this goal could be edited to take special attention to underserved neighborhoods.

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 11.1	Plan at the neighborhood level to increase housing density and diversity while preserving neighborhood character and quality of life.	Approaching	While local-level planning can result in inclusive and grassroots actions, the element of “preserving neighborhood character” can sometimes be used as an argument for continuing exclusionary housing types and disputing zoning changes that seek to allow more housing diversity.
Policy 11.2	Plan for land use patterns that provide most neighborhood residents an array of basic services within a half mile or 20 minute walk from home.	Supportive	Providing retail and services within a half-mile walkshed encourages community resilience and reduces dependency on vehicular transportation, which can be a large cost factor for households.
Policy 11.3	Encourage appropriately scaled home-based business and live/work opportunities in neighborhoods.	Supportive	Allowing live-work structures creates both housing and economic opportunities for community members who wish to start a business, but cannot afford a home and a commercial space.
Goal 12	Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation.	Supportive	Reducing the overall land and infrastructure investment while also expanding residential buildable lands supports housing supply goals.

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 12.1	Mitigate the additional cost of development in centers and corridors by making public infrastructure investment that adds value, safety and public enjoyment for the entire community and that result in appropriate public return on investment when adjacent properties are developed. Allow for latecomers and other methods of repayment for government outlay for infrastructure.	Approaching	While this policy does facilitate housing growth, it could be enhanced by including affordability considerations.
Housing Element, Comprehensive Plan			
Goal 1	Encourage a variety of housing types, densities and a range of affordable housing within Yelm and its Urban Growth Area.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing.
Policy 1.1	Allow a variety of housing types within the residential and mixed use designations to promote a range of housing alternatives within the community. This may include but not be limited to: government assisted housing, housing for low-income families, manufactured housing, multi-family housing, and group or foster homes.	Supportive	Ensuring access to affordable housing types—including manufactured home types and group homes—is essential to reducing displacement risks among vulnerable community members.
Policy 1.2	Allow accessory dwelling units in all residential land use categories subject to development standards and design criteria.	Supportive	Accessory Dwelling Units provide opportunities for aging in place and adapting existing housing stock and residential land uses to meet the changing housing needs of households.
Policy 1.3	Encourage opportunities for a range of housing costs to enable housing for all segments of the population.	Supportive / Approaching	While supportive, this policy will need to be updated to meet HB 1220 guidance on specific household income

Goal, Policy, or Regulation	Text	Evaluation	Reason
			brackets. However, providing housing across all income segments reduces displacement risk and enables housing opportunities to all, regardless of income.
Policy 1.4	Encourage the provision of adequate affordable building sites through appropriate zoning, infrastructure, and other development regulations.	Supportive	Regularly reviewing and ensuring zoning, development regulations, and infrastructure support housing at different affordability levels supports anti-displacement efforts.
Policy 1.5	Review development regulations to ensure that a range of housing types is available throughout Yelm.	Supportive	Allowing and reducing barriers to housing types through development regulations is essential to enabling affordable housing options.
Policy 1.6	Review development regulations to ensure residents can safely walk throughout Yelm.	Supportive	Not all community members have consistent access to vehicles, including vulnerable populations such as youth and elderly. Providing walkable residential neighborhoods promotes inclusion and positive health outcomes.
Policy 1.7	Monitor the need for special needs housing and increase opportunities for such housing.	Supportive	Providing housing for special needs reduces displacement and homelessness risk among community members with special needs.
Policy 1.8	Consider density increase incentives to promote a variety of housing types, mixed uses, range of housing costs, affordability, and increased special needs housing.	Supportive	Providing a wide range of housing types and densities—at different affordability levels—provides options

Goal, Policy, or Regulation	Text	Evaluation	Reason
Goal 2	Meet the county wide planning policy to ensure a fair share of affordable housing.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.
Policy 2.1	Encourage a variety of housing types in the residential designations to assure choice, opportunity, and availability of a fair share of affordable housing throughout Yelm, its UGA, and adjacent areas of Thurston County.	Supportive	Providing housing diversity and sufficient housing options reduces displacement risk and encourages affordability.
Policy 2.2	Participate with other jurisdictions and Thurston County in a regional process to monitor Fair Share Affordable Housing targets within the County.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.
Goal 3	Conserve and improve the existing housing stock and neighborhoods.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures.
Policy 3.1	Maintain up-to-date development regulations for building, housing, mechanical, and other design standards.	Supportive	Ensuring clear and predictable standards to housing and building codes supports housing production goals.
Policy 3.2	Require owners of unsafe dwelling units to correct significant problems and encourage the maintenance of existing structures consistent with the standards of the neighborhood.	Approaching	Ensuring housing is safe and habitable is important. Rehabilitation, however, can also result in physical displacement pressures as existing households may be forced to move or incur high costs of repair. Such support should involve connecting households with alternatives or incentive programs to reduce these risks.

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 3.3	Support rehabilitation efforts for substandard housing.	Approaching	Ensuring housing is safe and habitable is important. Rehabilitation, however, can also result in physical displacement pressures as existing households may be forced to move or incur high costs of repair. Such support should involve connecting households with alternatives or incentive programs to reduce these risks.
Policy 3.4	Encourage and facilitate local economic development as an important element of improving housing conditions by providing economic opportunity.	Approaching	While economic development is an important step for ensuring housing growth and conditions—particularly when it comes to local financing—such growth should not result in the rapid displacement of community members through rising costs.
Policy 3.5	Encourage local community groups, churches, and businesses to provide voluntary assistance with maintain existing structures for the elderly, low income, and those with special needs.	Approaching	While encouraging local groups is beneficial, this policy would be strengthened through active support and connecting these groups with funding to do so.
Goal 4	Promote energy efficient housing to reduce the overall costs of home ownership.	Supportive	Reducing barriers to home ownership, especially when aimed at historically marginalized or vulnerable community members, could reduce displacement pressures.
Policy 4.1	Support programs that make existing structures more energy efficient.	NA	

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 4.2	Periodically review the energy efficiency development regulations to ensure that they are up-to-date.	NA	
Policy 4.3	Promote residential subdivision designs that maximize solar heating opportunities.	NA	
Goal 5	Provide sufficient housing for low- and moderate-income households within each jurisdiction.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.
Policy 5.1	Provide sufficient housing for low- and moderate-income households.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.
Policy 5.2	Provide tenants and landlords information about housing rights and responsibilities.	Supportive	Ensuring awareness on housing rights can empower tenants and ensure safe housing.
Policy 5.3	Incentivize developers to set aside a percentage of multifamily housing units for low- and moderate-income buyers and renters.	Supportive	Providing incentives for less than market rate housing provides opportunities for community members to remain the community as prices increase, and provides opportunities for new community members to live in the City.

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 5.4	Support efforts to provide funding for shared-equity policies — via community land trust or down-payment assistance models — to make buying housing of all types affordable.	Supportive	Providing programs to control the variable costs of land could create long lasting affordable housing opportunities for community members, particularly those from vulnerable groups or lower incomes.
Goal 6	Provide sufficient service-enriched housing for homeless and high-risk populations.	Supportive	Allowing shelters and other types of emergency housing reduces displacement pressures, and provides services to respond to and prevent households from experiencing homelessness.
Policy 6.1	Allow shelters, group homes, transitional housing, and permanent housing with social services in development regulations in locations where these facilities have access to transit, parks, and other amenities.	Supportive	Allowing shelters and other types of emergency housing reduces displacement pressures, and provides services to respond to and prevent households from experiencing homelessness.
Goal 7	Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity.	Supportive	Allowing housing density and diversity across neighborhoods gives the community means and options to avoid displacement pressures.
Policy 7.1	Review and amend residential development regulations to provide opportunity for the mix and density of housing needed to meet the needs of changing demographics, use land wisely, and support nearby transit and businesses.	Approaching	Providing housing near transit supports housing supply goals and reduces impacts to transportation and provides access to jobs. However, this policy could be further expanded to call out affordability goals as well.

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 7.2	Allow densification by providing for accessory dwelling units, small houses on small lots, attached housing types or appropriately scaled multifamily buildings, cottage housing, and village cohousing developments in development regulations.	Supportive	Allowing more diverse housing types that support affordability goals, such as smaller houses on smaller lots, also mitigates displacement pressures from increasing land costs and greater demand than supply.
Goal 8	Encourage the construction, weatherization and operation of homes to boost energy efficiency.	Supportive	Preserving existing housing stock through energy upgrades reduces costs by extending the useful life of the unit.
Policy 8.1	Prioritize home weatherization funds to preserve affordable housing.	Supportive	Preserving existing affordable housing stock, without increasing renter costs, reduces displacement pressures from aging buildings and increasing maintenance needs.
Policy 8.2	Support regional efforts to engage landlords and property managers in energy efficiency efforts.	Supportive	Supporting easier upgrades can maintain naturally affordable housing units from going into disrepair and being redeveloped into newer, less affordable housing options.
Policy 8.3	Support the efforts of local financial institutions to facilitate affordable financing of energy upgrades.	Supportive	Supporting easier upgrades can maintain naturally affordable housing units from going into disrepair and being redeveloped into newer, less affordable housing options.
Policy 8.4	Support regional efforts to conduct energy audits of large power consumers to identify efficiency improvements, such as RESNET's Home Energy Rating System.	NA	

Goal, Policy, or Regulation	Text	Evaluation	Reason
Goal 9	Increase housing amid urban corridors and centers to meet the needs of a changing population.	Approaching	Providing housing opportunities in key centers and corridors fosters housing near jobs and opportunities. This goal could be expanded to consider affordability needs as well.
Policy 9.1	Review regulations that stymie or prevent housing development near or within urban corridors and centers.	Supportive	Addressing barriers to housing supply development ensures supply can meet demands, especially in areas with jobs and services.
Policy 9.2	Remove barriers or “right-size” regulations to achieve goals.	Supportive	Reviewing and removing regulatory barriers to housing supports housing supply and streamlines review processes.
Policy 9.3	Identify priority areas ripe for housing development that will meet multiple goals.	Approaching	This goal aims to increase housing supply. However, it should not come at the cost of displacing historically marginalized households.
Policy 9.4	Examine ways to encourage smaller, affordable housing units through the fee structure, especially in centers, corridors or adjacent to neighborhood service hubs.	Supportive	Allowing and encouraging more diverse housing types that are more affordable support affordability and anti-displacement objectives.
Policy 9.5	Reduce impact fees for those projects located where there is less impact.	Supportive	Targeting reduce the burden to build housing would support housing unit construction
Policy 9.6	Use tax exemptions, such as Special Valuation, or other financing tools to make projects financially feasible.	Supportive	Providing flexibility to support housing construction supports housing supply goals.

Goal, Policy, or Regulation	Text	Evaluation	Reason
Policy 9.7	Identify opportunities to aggregate properties where housing density is needed to achieve community goals and make multifamily projects feasible to build and finance.	Supportive	Allowing flexibility to support multifamily housing construction supports anti-displacement by providing diverse housing types.

City of Lacey

Policy Evaluation Matrix
 This matrix evaluates the impact of various policy options on displacement pressures and housing objectives. Scores are based on the scale to the right. The scores were then totaled to calculate an overall impact score for each policy option. The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.

Does the policy reduce displacement pressures or advance housing objectives?	
Yes, positive impact (+2)	The policy option has a positive impact and directly addresses the criterion.
Somewhat positive impact (+1)	The policy option has a somewhat positive impact, or indirectly addresses the criterion.
Neutral/No impact (+0)	The policy option does not directly or indirectly address the criterion, but may benefit other
Negative Impact (-1)	The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some

Number/Ref.	Policy Recommendation	COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria					LACEY-SPECIFIC CRITERIA					Score (out of 20)	Explanation. The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.	
		Racially Disparate Impacts: Does this policy prevent racially disparate impacts or work to repair past harm?	Economic Displacement: Does this policy help prevent or mitigate economic displacement?	Physical Displacement: Does this policy help prevent or mitigate physical displacement?	Cultural Displacement: Does this policy help prevent or mitigate cultural displacement?	Housing Exclusion: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?	Does this policy encourage or remove barriers to providing affordable housing?	Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?	Does this policy increase overall housing supply?	Does this policy reduce housing costs?			
New Policy Recommendations														
	Strengthen partnerships with local organizations to increase collaboration and coordination in providing affordable housing and reducing displacement pressures.	1	1	1	1	1	2	1	2	0	0	10	This policy would advance housing goals but wouldn't have a direct impact on specific actions to address displacement or affordable housing, as it relates primarily to increasing collaboration and coordination.	
	Explore ways to monitor renter income verification, which may include establishing local ordinances to enforce attainable income verification, and identify and address price fixing.	1	1	1	1	1	1	0	1	0	1	8	This policy would help address affordability, potential racially disparate impacts, and allow for more fair avenues for renters to verify income, but wouldn't directly impact the supply of affordable housing or prevent displacement.	
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	2	0	2	0	1	14	This policy would help preserve existing affordable housing and manufactured housing, but would not directly impact affordability, housing supply, or address racially disparate impacts.	
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	2	1	1	2	0	1	13	This policy would help preserve existing affordable housing and manufactured housing to ensure it is well-maintained, but would not directly address economic displacement, the provision of affordable housing or additional housing, or housing costs.
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	2	1	2	1	0	15	This policy would primarily help reduce displacement pressures and increase the supply of affordable housing.	
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	0	1	0	1	0	2	1	7	This policy would help increase the overall housing supply, and may reduce housing costs and indirectly address displacement.	
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties independently and be prepared to exercise the right of first refusal.	2	2	2	2	2	2	0	2	2	0	2	16	This policy would address displacement, preserve existing affordable units, and help reduce housing costs.
	Create a program to support the private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	2	1	2	2	0	1	16	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Minimize the amount of potential long-term housing that is used for short-term transient rentals (e.g., Air BnBs).	1	2	1	2	2	2	1	1	2	2	2	16	This policy would address displacement, preserve existing affordable units, and help reduce housing costs.
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	2	2	2	1	2	0	0	1	14	This policy would address displacement and help prevent racially disparate impacts.
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	1	1	2	1	1	2	1	1	0	0	1	10	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	0	1	1	1	2	1	0	2	1	9	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.
	Develop opportunities and strategies that enable residents to age in place.	1	2	2	1	1	2	1	0	1	0	1	11	This policy supports housing for older residents to be able to continue living in their community. It could support other housing goals like affordability as well.
	Develop rent control policies to prevent displacement, such as requiring 180 days notice for rent increases or capping rent increases at a certain percentage.	2	2	2	1	2	2	1	0	2	0	2	14	This policy would prevent displacement, particularly economic and physical, and would support other housing goals like affordability and preventing housing exclusion.
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	2	2	2	1	2	2	1	1	17	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan														
Lacey's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Lacey prioritize future implementation actions of their HAP. The														
1.a.	Donate or lease surplus or underutilized jurisdiction-owned land to developers that provide low-income housing.	2	2	1	1	2	2	0	2	2	2	2	16	
1.b.	Require Planned Residential Developments (PRDs)/Planned Unit Developments (PUDs) for low-density development and include standards for including low-income housing.	2	2	0	1	2	2	2	2	0	2	1	14	
1.c.	Adopt a "Notice of Intent to Sell" ordinance for multifamily developments.	2	2	2	2	2	2	2	2	2	1	2	19	
1.d.	Provide funding for the Housing Authority of Thurston County and other non-profit organizations to buy income-restricted units proposed to be converted to market rate housing.	2	2	2	2	2	2	1	2	2	0	2	17	
1.e.	As part of comprehensive plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	1	0	0	0	1	2	0	0	0	0	0	4	
1.f.	Provide funding for renovating and maintaining existing housing that serves low-income households or residents with disabilities.	2	2	2	2	2	2	1	2	2	1	2	18	
1.g.	Allow manufactured home parks in multifamily and commercial areas.	2	2	2	2	2	2	2	2	2	1	2	19	
1.h.	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	2	1	2	2	1	2	18	
1.i.	Define income-restricted housing as a different use from other forms of housing in the zoning code.	0	1	0	0	0	2	0	2	0	0	0	5	
1.l.	Require low-income housing units as part of new developments.	2	2	1	1	2	2	2	2	0	0	2	14	
1.m.	Fund development projects that increase low-income housing through grants or loans.	2	2	1	2	2	2	1	2	0	2	2	16	
1.n.	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	2	1	2	2	2	2	19	
1.o.	Enhance enforcement of property maintenance codes to keep housing in good repair.	2	2	1	1	1	1	1	1	2	0	0	11	
1.p.	Partner with low-income housing developers (such as Habitat for Humanity) to expand homeownership opportunities.	2	2	1	1	2	2	1	2	0	0	2	13	
2.a.	Provide displaced tenants with relocation assistance.	1	2	2	2	1	1	1	1	0	0	0	10	
2.b.	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job training.	2	0	2	1	0	1	0	0	2	0	0	8	
2.c.	Rezoned manufactured home parks to a manufactured home park zone to promote their preservation.	2	2	2	2	2	2	2	2	2	1	2	19	
2.d.	Adopt a "right to return" policy.	2	2	2	2	2	2	2	2	2	0	0	15	
2.e.	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	2	1	2	2	1	0	0	14	
2.f.	Establish a down payment assistance program.	2	2	2	1	2	2	1	2	0	0	2	14	
2.g.	Identify and implement appropriate tenant protections that improve household stability.	2	2	2	2	2	1	2	2	0	0	1	16	
3.a.	Allow third-party review of building permits for development projects.	0	0	0	0	0	2	0	2	1	1	0	6	
3.b.	Develop a plan for adapting vacant commercial space into housing.	2	1	0	1	1	1	2	0	2	2	2	12	
3.c.	Expand allowance of residential tenant improvements without triggering land use requirements.	2	1	2	0	2	1	1	2	1	0	0	12	
3.f.	Identify strategically placed but underdeveloped properties and determine what barriers exist to developing desired housing types.	2	2	1	2	2	1	2	-1	2	2	2	15	
3.i.	Lower transportation impact fees for multifamily developments near frequent transit service routes.	1	2	1	1	1	1	1	0	1	1	1	10	
3.k.	Allow deferral of impact fee payments for desired unit types.	0	0	0	0	0	1	1	2	0	1	1	6	
3.l.	Simplify land use designation maps in the comprehensive plan to help streamline the permitting process.	1	0	0	0	0	2	0	1	0	2	0	6	
3.m.	Integrate or adjust floor area ratio standards.	0	0	0	0	0	1	1	0	1	1	1	4	
3.n.	Maximize use of SEPA threshold exemptions for residential and infill development.	0	0	0	0	0	2	1	0	1	1	1	5	
3.o.	Consult with Washington State Department of Transportation as part of the SEPA review process to reduce appeals based on impacts to the transportation element for residential, multifamily, or mixed-use projects.	0	0	0	0	0	1	1	0	0	0	1	3	
4.a.	Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, etc.).	0	1	0	1	2	0	1	0	2	1	1	8	
4.b.	Allow more housing types in commercial zones.	2	1	0	2	1	1	2	0	1	1	1	11	
4.c.	Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	2	2	2	2	2	1	2	2	2	2	1	17	
5.a.	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	1	1	1	1	1	14	
5.b.	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	1	0	0	0	0	0	7	
5.c.	Identify and develop partnerships with organizations that provide or support low-income, workforce, and senior housing as well as other populations with unique housing needs.	2	2	2	2	2	2	1	2	2	2	2	19	
5.d.	Establish a rental registration program to improve access to data and share information with landlords.	0	0	0	0	0	1	0	0	0	0	0	1	
6.a.	Develop a comprehensive funding strategy for affordable housing that addresses both sources of funding and how the funds should be spent.	1	1	1	1	1	1	1	1	0	1	1	9	
6.b.	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2	1	1	1	2	2	0	2	2	2	16	
6.c.	Establish an affordable housing sales tax.	1	2	1	1	1	1	2	0	2	2	2	14	
6.d.	Establish a regional housing trust fund to provide dedicated funding for low-income housing.	2	1	1	1	1	2	1	2	0	2	2	14	
6.e.	Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit.	0	-1	0	0	0	0	1	0	0	0	0	0	

City of Olympia

Policy Evaluation Matrix
 unique to each jurisdiction and scored based on the scale to the right. The scores were then tallied to calculate an overall impact score for each policy option. The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.

Does the policy reduce displacement pressures or advance housing objectives?	
Yes, positive impact (+2)	The policy option has a positive impact and directly addresses the criterion.
Somewhat positive impact (+1)	The policy option has a somewhat positive impact, or indirectly addresses the criterion.
Neutral/No impact (+0)	The policy option does not directly or indirectly address the criterion, but may benefit other
Negative impact (-1)	The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some

Number/ Ref.	Policy Recommendation	COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria					OLYMPIA-SPECIFIC CRITERIA					Explanation: The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.	Score
		Racially Disparate Impacts: Does this policy prevent racially disparate impacts or work to repair past harm?	Economic Displacement: Does this policy help prevent or mitigate economic displacement?	Physical Displacement: Does this policy help prevent or mitigate physical displacement?	Cultural Displacement: Does this policy help prevent or mitigate cultural displacement?	Housing Exclusion: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?	Does this policy incentivize and support the development of affordable and deeply affordable housing, including supportive?	Does this policy increase housing supply, including middle housing and ADUs?	Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?			
New Policy Recommendations													
	Explore ways to monitor renter income verification, which may include establishing local ordinances to enforce attainable income verification, and identify and address price fixing.	1	1	1	1	0	1	1	0	1	7	This policy would help address affordability, potential racially disparate impacts, and allow for more fair avenues for renters to verify incomes, but wouldn't directly impact the supply of affordable housing or prevent displacement.	7
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	1	1	1	2	13	This policy would help preserve existing affordable housing and manufactured housing to ensure it is well-maintained, but would not directly address economic displacement, the provision of affordable housing or additional housing, or housing costs.	13
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	1	0	2	1	2	0	7	This policy would help increase the overall housing supply, and may reduce housing costs and indirectly address displacement.	7
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties independently and be prepared to exercise the right of first refusal.	2	2	2	2	2	1	2	0	2	15	This policy would address displacement, preserve existing affordable units, and help reduce housing costs.	15
	Create a program to support the private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	1	1	0	2	14	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.	14
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	2	2	2	1	0	1	14	This policy would address displacement and help prevent racially disparate impacts.	14
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	1	1	2	1	2	2	1	0	0	10	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.	10
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	0	1	1	2	1	2	0	8	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.	8
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	2	2	1	0	0	2	13	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.	13
Housing Action Plan													
Olympia's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Olympia prioritize future implementation actions of													
	Define income-restricted housing as a different use from other forms of housing in the zoning code.	0	1	0	0	0	2	1	0	2	6		6
1.e.	Encourage the LOTT Clean Water Alliance to discuss lower hook-up fees and other incentives for low income affordable housing as part of their cost of service study.	1	1	0	0	1	2	1	0	0	6		6
1.f.	Partner with low-income housing developers to expand homeownership opportunities.	2	1	2	2	2	0	1	0	1	12		12
1.g.	Provide funding for non-profit organizations to buy income-restricted units proposed to be converted to market rate housing.	2	2	2	2	2	-1	2	0	2	13		13
1.h.	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	-1	2	0	2	13		13
1.i.	As part of comprehensive plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	1	1	1	1	1	2	1	0	1	9		9
1.k.	Require low-income housing units as part of new developments.	1	2	0	0	1	2	1	0	0	6		6
1.l.	Adopt a "Notice of Intent to Sell" ordinance for multifamily developments.	2	2	1	2	2	0	1	0	1	11		11
1.m.	Allow mobile or manufactured home parks (MHPs) in multifamily and commercial areas.	0	2	2	0	1	2	1	2	2	12		12
1.n.	Require Planned Residential Developments (PRDs)/Planned Unit Developments (PUDs) for low-density development and include standards for including low-income housing.	1	1	0	1	2	2	2	2	0	11		11
1.o.	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	1	1	0	2	14		14
1.p.	Enhance enforcement of property maintenance codes to keep housing in good repair.	0	0	1	0	0	1	0	0	2	4		4
1.q.	Provide displaced tenants with relocation assistance.	1	1	2	1	1	0	0	0	0	6		6
2.c.	Consider a Tenant Opportunity to Purchase (TOPO) Ordinance	2	2	2	2	2	1	0	0	2	13		13
2.e.	Partner with local trade schools to provide innovation and retrofit services for low-income households as part of on-the-job-training.	2	2	2	2	2	1	0	0	2	13		13
2.f.	Explore barriers and policies that can increase access to housing for formally incarcerated individuals.	2	0	0	0	2	1	0	0	0	5		5
2.g.	Establish a down payment assistance program.	2	1	1	2	1	2	0	0	0	7		7
2.g.	Adopt a "right to return" policy	1	0	2	1	2	0	0	0	0	7		7
2.h.	Rezone manufactured home parks to a manufactured home park zone to promote their preservation.	1	2	2	2	2	2	0	0	2	13		13
2.i.	Consult with Washington State Department of Transportation (DOT) as part of the SEPA review process to reduce impacts based on impacts to the transportation element for residential, multifamily, or mixed-use projects.	0	0	0	0	0	0	0	1	0	1		1
3.j.	Make use of SEPA threshold exemptions for residential and infill development.	0	0	0	0	0	2	2	2	0	4		4
3.k.	Complete a subarea plan for the Capital Mall High Density Neighborhood area.	0	0	0	0	0	2	1	2	0	5		5
3.s.	Develop a plan for adapting vacant commercial space into housing.	0	1	1	1	1	0	2	1	2	6		6
3.t.	Expand allowance of residential tenant improvements without triggering land use requirements.	2	2	2	2	2	2	1	0	2	15		15
3.u.	Identify strategically placed but underdeveloped properties and determine what barriers exist to developing desired housing types.	0	1	0	0	0	2	1	2	0	6		6
3.v.	Increase minimum residential densities.	0	1	0	0	0	1	1	2	0	6		6
3.w.	Integrate or adjust floor area ratio standards.	0	1	0	0	0	1	1	2	0	6		6
4.g.	Allow more housing types in commercial zones.	0	1	1	1	1	0	1	2	0	6		6
4.h.	Allow single-room occupancy (SRO) housing in all multifamily zones.	2	2	0	1	2	2	2	2	1	14		14
4.i.	Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	2	1	1	1	1	2	1	2	1	11		11
4.j.	Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	2	0	13		13	
6.d.	Develop a (regional) comprehensive funding strategy for affordable housing that addresses both sources of funding and how the funds should be spent.	2	2	2	2	2	2	2	1	1	15		15
6.e.	Use value capture (e.g., consider tax increment financing) to capture the value of city investments that increase private investment in neighborhoods, especially in areas with planned or existing transit.	2	2	1	1	2	2	2	0	1	12		12
6.f.	Establish an affordable housing loan program.	2	2	1	1	2	1	2	1	0	12		12
6.g.	Establish a regional housing trust fund to provide dedicated funding for low-income housing.	2	2	2	2	2	0	2	2	2	16		16
6.h.	Establish an affordable housing property tax levy to provide affordable housing for very low-income households.	2	2	1	2	2	1	1	0	1	12		12

Scoring explanations are not included for Olympia's Housing Action Plan policies as these have already been adopted. However, the scores may be useful to help the City prioritize future work.

City of Tumwater

Policy Evaluation Matrix

jurisdiction and scored based on the scale to the right. The scores were then tallied to calculate an overall impact score for each policy option. The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.

Does the policy reduce displacement pressures or advance housing objectives?	
Yes, positive impact (+2)	The policy option has a positive impact and directly addresses the criterion.
Somewhat positive impact (+1)	The policy option has a somewhat positive impact, or indirectly addresses the criterion.
Neutral/No impact (+0)	The policy option does not directly or indirectly address the criterion, but may benefit other
Negative impact (-1)	The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some

Number/ Ref.	Policy Recommendation	COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria					TUMWATER-SPECIFIC CRITERIA Additional criteria was created unique (yet sometimes related and similar) to each city in order to support their diverse housing goals					Score(out of 20)	Explanation. The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.
		Racially Disparate Impacts: Does this policy prevent racially disparate impacts or work to repair past harm?	Economic Displacement: Does this policy help prevent or mitigate economic displacement?	Physical Displacement: Does this policy help prevent or mitigate physical displacement?	Cultural Displacement: Does this policy help prevent or mitigate cultural displacement?	Housing Exclusion: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?	Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?	Does this policy incentivize and support the development of affordable and deeply affordable housing?	Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?	Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?		
New Policy Recommendations													
	Explore ways to monitor renter income verification, which may include establishing local ordinances to enforce attainable income verification, and identify and address price fixing.	1	1	1	1	0	0	1	1	0	0	6	This policy would help address affordability, potential racially disparate impacts, and allow for more fair avenues for renters to verify incomes, but wouldn't directly impact the supply of affordable housing or prevent displacement.
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	1	2	2	0	0	14	This policy would help preserve existing affordable housing and manufactured housing, but would not directly impact affordability, housing supply, or address racially disparate impacts.
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	0	2	2	2	1	15	This policy would help preserve existing affordable housing and manufactured housing to ensure it is well-maintained, but would not directly address economic displacement, the provision of affordable housing or additional housing, or housing costs.
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	1	1	2	0	0	14	This policy would primarily help reduce displacement pressures and increase the supply of affordable housing.
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	1	0	1	0	1	2	2	8	This policy would help increase the overall housing supply, and may reduce housing costs and indirectly address displacement.
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties independently and be prepared to exercise the right of first refusal.	2	2	2	2	2	0	2	2	1	0	15	This policy would address displacement, preserve existing affordable units, and help reduce housing costs.
	Create a program to support the private ownership of mobile home communities and private rental units by local, family-owned operators with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	1	2	1	0	0	14	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	1	1	0	0	1	0	0	9	This policy would address displacement and help prevent racially disparate impacts.
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	2	1	2	1	0	0	0	0	0	0	6	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	1	2	0	2	1	1	2	2	12	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	1	2	0	0	1	1	0	11	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan													
Tumwater's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Tumwater prioritize future implementation actions of their HAP. The policies with the highest housing and establish a process for accepting or coordinating the acceptance of land donations from others this action.													
1.a.	Where a Planned Unit Development is used for residential development, consider requiring a portion of the housing be low-residential development.	2	2	1	1	2	2	0	2	2	1	15	
1.b.	Adopt a 'Notice of Intent to Sell' ordinance for multifamily developments.	2	2	0	1	2	2	0	1	0	1	11	
1.c.	Provide funding for the Housing Authority of Thurston County and other non-profit organizations to buy income-restricted units proposed to be converted to market rate housing.	2	2	2	2	2	2	2	1	2	0	17	
1.d.	As part of Comprehensive Plan and development code changes include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	1	1	1	1	1	2	0	0	0	0	7	
1.e.	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	1	2	2	1	0	16	
1.f.	Encourage low-income housing units as part of new developments.	2	2	1	1	2	2	0	2	0	2	14	
1.g.	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	1	2	2	2	0	2	17	
1.h.	Extend public water and sewer to unserved areas to allow infill development in underdeveloped areas.	1	2	1	1	2	1	0	1	2	1	12	
1.i.	Have developers provide tenants displaced by redevelopment with relocation assistance.	1	2	2	2	1	1	0	0	0	0	9	
2.a.	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training.	2	0	2	0	1	2	0	2	0	2	10	
2.b.	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	2	2	1	1	0	0	13	
2.c.	Support down payment assistance programs for homeownership and programs that assist people entering the rental market.	2	2	2	1	2	1	0	1	0	0	11	
2.d.	Develop a technical assistance or education program for small landlords.	0	0	0	0	0	1	0	0	0	0	1	
2.f.	Assist non-profits in the process of acquiring mobile home parks to turn them into public trusts so that lot rental fees can be controlled.	2	2	2	2	2	1	2	2	0	2	17	
2.g.	Fund an energy assistance program for rental housing/make landlords do upgrades when the unit is sold.	2	1	1	1	2	1	2	0	2	0	12	
3.d.	Continue to look for place-making opportunities along urban corridors.	0	0	0	2	0	2	0	0	0	0	4	
3.e.	Mix market rate and low-income housing to avoid creating areas of concentrated low-income housing. Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	2	2	2	2	2	2	1	1	1	2	17	
4.a.	Strategically allow live-work units in nonresidential zones.	2	1	1	2	2	1	2	1	2	2	16	
4.b.	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	0	1	1	2	15	
5.a.	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	1	0	1	0	0	8	
5.b.	Partner with a public or private developer to build a townhouse or row house demonstration project.	0	0	0	0	0	1	0	1	0	1	3	
5.f.	Track data on affordable housing at the regional level.	0	0	0	0	0	2	0	0	0	0	2	
6.a.	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2	1	1	2	1	2	1	2	2	15	
6.c.	Establish an affordable housing sales tax.	1	2	1	1	2	0	2	0	2	1	11	
6.d.	Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit.	0	-1	0	0	0	1	0	0	1	1	2	
6.e.	Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives.	1	2	1	1	1	1	2	2	1	1	13	

Scoring explanations are not included for Lacey's Housing Action Plan policies as these have already been adopted. However, the scores may be useful to help the City prioritize future work.

City of Yelm

Policy Evaluation Matrix
 jurisdiction and scored based on the scale to the right. The scores were then tallied to calculate an overall impact score for each policy option. The score does not necessarily reflect a policy is better than another when it comes to addressing different forms of displacement, but rather demonstrates which policies may have the largest impact on reducing displacement pressures.

Does the policy reduce displacement pressures or advance housing objectives?	
Yes, positive impact (+2)	The policy option has a positive impact and directly addresses the criterion.
Somewhat positive impact (+1)	The policy option has a somewhat positive impact, or indirectly addresses the criterion.
Neutral/No impact (+0)	The policy option does not directly or indirectly address the criterion, but may benefit other
Negative Impact (-1)	The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some

Number/Ref.	Policy Recommendation	COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria					YELM-SPECIFIC CRITERIA			Explanation		
		Racially Disparate Impacts: Does this policy prevent racially disparate impacts or work to repair past harm?	Economic Displacement: Does this policy help prevent or mitigate economic displacement?	Physical Displacement: Does this policy help prevent or mitigate physical displacement?	Cultural Displacement: Does this policy help prevent or mitigate cultural displacement?	Housing Exclusion: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?	Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?	Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?		Does this policy incentivize and support the development of affordable and deeply affordable housing?	Score(out of 15)
New Policy Recommendations												
	Explore ways to monitor renter income verification, which may include establishing local ordinances to enforce attainable income verification, and identify and address price fixing.	1	1	1	1	0	1	2	0	2	9	This policy would help address affordability, potential racially disparate impacts, and allow for more fair avenues for renters to verify incomes, but wouldn't directly impact the supply of affordable housing or prevent displacement.
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	2	2	0	2	15	This policy would help preserve existing affordable housing and manufactured housing, but would not directly impact affordability, housing supply, or address racially disparate impacts.
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	2	1	0	2	13	This policy would help preserve existing affordable housing and manufactured housing to ensure it is well-maintained, but would not directly address economic displacement, the provision of affordable housing or additional housing, or housing costs.
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	2	1	0	1	12	This policy would primarily help reduce displacement pressures and increase the supply of affordable housing.
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	1	0	1	1	2	1	7	This policy would help increase the overall housing supply, and may reduce housing costs and indirectly address displacement.
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties independently and be prepared to exercise the right of first refusal.	2	2	2	2	2	2	0	2	1	15	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Create a program to support the private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	2	1	0	2	15	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Minimize the amount of potential long-term housing that is used for short-term transient rentals (e.g., AirBnBs).	1	2	1	2	2	2	1	2	0	12	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly address racially disparate impacts or incentivize the development of deeply affordable housing.
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	2	2	2	1	1	0	12	This policy would address displacement, preserve existing affordable units, and help prevent racially disparate impacts.
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	1	1	2	2	2	2	1	0	0	8	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	0	1	1	2	0	2	1	8	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	2	2	1	2	0	0	13	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan												
Yelm's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Yelm prioritize future implementation actions of their HAP. The policies with the highest total score may be as part of comprehensive plan and development code changes, include an evaluation of the impact												
	1 such changes will have on housing affordability, especially for low-income households.	0	0	0	0	0	0	0	0	0	0	
	2 Allow third-party review of building permits for development projects.	0	0	0	0	0	2	1	2	1	6	
	3 Mix market rate and low-income housing to avoid creating areas of concentrated low-income housing.	1	1	0	0	0	2	1	2	1	10	
	4 Allow accessory dwelling units (ADUs) in all residential zones.	0	1	1	1	1	0	2	2	1	8	
	5 Allow single-room occupancy (SRO) housing in all multifamily zones.	2	2	0	2	2	2	0	2	2	13	
	6 Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	2	2	0	13	
	7 Allow more housing types in commercial zones	2	1	0	1	1	0	1	0	2	9	
	8 Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, small houses on small lots).	0	1	0	1	1	2	0	2	2	7	
	1 Identify and develop partnerships with organizations that provide or support low-income, workforce, and senior housing as well as other populations with unique housing needs.	2	2	2	2	2	2	1	2	1	16	
	2 Partner with low-income housing developers (such as Habitat for Humanity, HomeFirst) to expand homeownership opportunities.	2	2	2	2	2	2	1	1	2	16	
	3 Use Community Development Block Grant (CDBG), Section 108 loans and other federal resources for affordable housing.	2	2	2	2	2	2	1	2	2	16	
	4 Encourage local community groups, churches, and businesses to provide voluntary assistance with maintaining existing structures for the elderly, low-income, and those with special needs.	1	2	0	2	2	2	1	2	1	12	
	5 Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives.	1	2	1	1	1	1	2	1	2	12	
	6 Work with the Thurston County Regional Housing Council considering issues specifically related to funding a regional response to homelessness and affordable housing, and coordination of existing funding programs.	1	2	2	2	2	2	1	1	2	14	
	1 Offer density bonuses for low-income housing.	0	1	0	0	0	1	0	2	2	6	
	2 Discuss lower hookup fees and other incentives for low-income affordable housing.	2	1	1	1	1	2	0	2	2	13	
	3 Offer developers density and/or height incentives for desired unit types.	0	0	0	0	1	1	0	2	2	6	
	4 Review fees/regulations to identify housing cost reductions.	1	1	0	0	0	1	1	2	2	10	
	5 Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	0	1	1	12	
	6 Reduce parking requirements for residential uses, including for multifamily developments near frequent transit routes.	0	2	0	0	0	1	0	2	1	7	
	2 Lower transportation impact fees for multifamily developments near frequent transit service routes.	0	1	1	0	0	1	0	2	0	5	
	3 Develop partnership with InterCity Transit to expand bus routes to additional areas of the city.	1	1	1	1	1	0	2	0	0	6	
	4 Expand the multifamily tax exemption to make it available in all transit corridors.	0	1	0	0	0	1	0	1	0	6	
	1 Define income-restricted housing as a different use from other forms of housing in the zoning code.	2	2	2	2	2	2	2	1	0	15	
	2 Explore barriers and policies that can increase access to housing for formally incarcerated individuals.	2	0	1	1	2	2	1	0	2	12	
	3 Monitor the need for special housing and increase opportunities for such housing.	1	0	1	1	1	2	1	0	2	8	

Scoring explanations are not included for Lacey's Housing Action Plan policies as these have already been adopted. However, the scores may be useful to help the City prioritize future work.



Housing Displacement Analysis for Lacey, Olympia, Tumwater, and Yelm: Community Outreach

ONLINE SURVEY PRELIMINARY SYNTHESIS OF FINDINGS

01/15/2024

Table of Contents

<i>Housing Displacement Analysis for Lacey, Olympia, Tumwater, and Yelm: Community Outreach</i>	1
Online Survey Preliminary Synthesis of Findings	1
<i>Introduction</i>	1
<i>Process</i>	1
<i>Synthesis of Preliminary Findings</i>	5

Introduction

A key aspect of this project involves assessing community insight, perceptions, and lived experiences around the impacts of livability, affordability, and displacement in Olympia, Lacey, Tumwater and Yelm. A robust data collection effort, including multi-lingual outreach via community anchors, focus groups, and an open-access multi-modal survey, sought to engage both those who have been frequently engaged as well as new perspectives and experiences not included in past policy and housing assessments conducted in the region.

Process

Uncommon Bridges developed two key approaches to gathering community input on housing accessibility and displacement pressures in the four participating cities: a series of affinity-based facilitated focus groups, and an open-access, multi-modal online survey distributed through community anchors and partner cities.

Multi-Modal Online Survey

The online survey was designed through a multi-modal platform, VideoAsk. VideoAsk allows questions to be posed through a captioned video/audio message. This increases access by having clear, verbal positioning of the topic and questions, allowing more access across a range of educational, literacy, and information processing spectra. Three open-ended questions were presented by video in both English and Spanish. Respondents had the option to respond by text, video, or audio, with the option to review their responses before submitting. Video and audio responses were limited to three minutes in length; there was no limit on text-based responses.

A primary landing page provided a project overview, clarity about how input will be used, regulatory compliance details, and some contextual framing of housing displacement.

The Survey itself allowed users to select English or Spanish to submit their responses. The questions posed were as follows:

English Language Version	Spanish Language Version
<p>The cities of Olympia, Yelm, Tumwater, and Lacey are collaborating to tackle housing displacement and exclusion.</p> <p>They aim to analyze local policies that have caused social and racial disparities in housing. The three main types of displacement are:</p> <p>Physical: Forced moves due to eviction, foreclosure, or poor housing. Economic: Rising rents and property costs pushing families out. Cultural: Loss of community identity as services and institutions disappear.</p> <p>Regulations like HB 1220 now require cities to promote housing equity. As they update their Comprehensive Plans for 2025, the Cities will incorporate anti-displacement strategies informed by community input, aiming for a fairer and more inclusive housing policy.</p>	<p>Las ciudades de Olympia, Yelm, Tumwater y Lacey están unidos en la pelea contra el desplazamiento de las viviendas familiares.</p> <p>Juntos, intentan analizar cómo las iniciativas locales en estas ciudades han causado desigualdades entre diferentes grupos sociales y raciales en la vivienda.</p> <p>Las maneras principales de el desplazamiento son:</p> <p>Desplazamiento físico: Ocurre cuando alguien recibe una orden de desalojo, ejecución hipotecaria, o hay una falta de viviendas dignas.</p> <p>Desplazamiento económico: Ocurre cuando hay un gran aumento en el costo de la renta y el costo causa el desplazamiento de familias.</p>

<p>Your voices matter. The insights gathered will shape the future of housing policies for a fairer, more inclusive community for all.</p> <p>For our first question, please tell us, have YOU seen housing displacement show up in your community?</p>	<p>Desplazamiento cultural: Ocorre cuando hay una perdida en la identidad cultural de la comunidad mientras desaparecen servicios y instituciones.</p> <p>Leyes en el estado de Washington como HB 1220 requieren que las ciudades promueven iniciativas de viviendas que son justas y dirigidas a proteger contra el desplazamiento de familias. Ahora que las ciudades se preparan para revisar y actualizar sus planes generales, buscan participacion de las comunidades para informar las estrategias que protegen contra el desplazamiento de hogar. Incorporando las voces de la comunidad nos ayudará a crear protecciones de viviendas que son mas justas y inclusivas.</p> <p>Tus voz es importante, y la información que compartes ayudaran a informar como se hacen las leyes y iniciativas de vivienda para asegurar una comunidad inclusiva para todos.</p> <p>Para nuestra primera pregunta, cuentanos si ha visto el desplazo de vivienda en su comunidad? Como ha pasado?</p>
<p>Next, Are there policies or practices in your community that you think increase displacement risk?</p>	<p>Para nuestra proxima pregunta, dinos si cree que hay leyes o practicas que aumenta el riesgo de desplazamiento?</p>
<p>Finally, In your experience, who in your community has been displaced or is most at risk of displacement?</p>	<p>Finalmente, en tu experiencia, quienes en su comunidad esta a riesgo de ser desplazado de su hogar?</p>

Compensation

Participants who completed the survey in its entirety were eligible for a \$25 gift card. Amazon Gift Cards were selected for their variety of use options, and due to the low fees which allowed for a maximum budget for community participant compensation.

Distribution

The Survey was distributed by email and through targeted flyers posted at identified locations in the four participating cities.

The City partners distributed the survey through the platforms they deemed most appropriate, including email lists, social media, and direct outreach.

Uncommon Bridges produced suggested outreach language in English and Spanish, a printable flyer in English and Spanish with a QR code, and shortened direct link (using bit.ly) to aid in ease of access to the survey.

Uncommon Bridges identified key community organizations to assist in email outreach:

- Timberland Library – branches in each participating city
- Virgil Clarkson Lacey Senior Center
- Evergreen College Veterans Resource Center
- Disabled American Veterans Ch 41
- Community Action Council
- Thurston County Food Bank
- Rebuilding Together Thurston County
- CIELO
- Hispanic Roundtable

Digital Access

To increase the accessibility of these surveys and mitigate the digital divide, Uncommon Bridges employed two strategies: (1) development of a tech support guide in Spanish and English, and (2) specific community partners to serve as a community location to provide access support.

All community organizations assisting with outreach were provided the Tech Support that they might opt to use to assist their respective audiences in participating in the survey.

Two key community partners agreed to provide digital access support to interested community participants: The Timberland Library (Lacey, Tumwater, Yelm and Olympia branch locations), and the Lacey Senior Center.

The Libraries were provided the printable flyers and tech support sheets. They offered Chromebooks with A/V capabilities that could be used by community members during any regular library hours.

The Senior Center identified two volunteers who were oriented to the project, and who hosted open hours at the Center on Tuesdays and Thursdays to assist tech-limited seniors in completing the survey.

Sample Outreach Language:

The four unique cities of **Olympia, Tumwater, Yelm, and Lacey** are coming together to identify and study local policies and regulations that have resulted in racially disparate impacts, displacement, and exclusion in housing for their residents.

No one understands the challenges of housing affordability better than those who face them daily. That's why we're inviting impacted and at-risk community members to share their story through a video or audio recording (up to 2 min), or written message via an easy-to-use online portal, available **in English and Spanish**. *These insights will directly inform the policy recommendations we make to local leaders, ensuring they reflect the true needs of our communities.*

For these valuable contributions, participants will receive a **\$25 gift card** while funds last.

Can you help participants share their story? I am reaching out today to connect with those who can help get the word out or provide technical assistance to people whose perspectives deserve to be included in this review of local housing policies. This might include:

- Putting up a flyer (attached)
- Sending an email message (option for email copy attached)
- Acting as a technical assistance site (community members may be referred to your location - tech assistance guide attached)

If you have any questions, please reach out to
Em Piro (Project Associate) at em@uncommonbridges.com or call 206-865-5210, or
Charlotte Jernick (Project Manager) at charlotte@uncommonbridges.com or call 206.971.6030 x114.

Thank you for helping make a meaningful impact in our South Sound region!

Data Integrity

In an effort to ensure that as many responses as possible reflected the local community, a password was introduced to discourage bots and AI responses. Data was also closely reviewed to filter automated responses and responses submitted from outside the South Sound region.

Synthesis of Preliminary Findings

Are people observing displacement?	Policies or practices increasing displacement risk	Who has been displaced, or is at highest risk?
------------------------------------	--	--

Overwhelmingly (>95%) Yes	Increase in cost of living	Communities of color
Observations that displacement has increased in recent years	Rent increases	Indigenous communities
Changes to economy are cited as a major factor	Poorly maintained rental housing	Manufactured home residents
Specifically in predominantly Black neighborhoods	Lack of affordable housing	Disability
Downtown Olympia	Increasing costs of building	Access to living wage
Specifically highlighting long-term residents being pushed out of housing	Gentrification: land and neighborhood improvements – “urban revitalization” – coinciding with luxury development and increased cost of living	Low income households
Relatives sharing a household (ex: adult children moving in with parents)	Increases in property tax	Single mothers, women and children
	Zoning laws	Seniors
	Rise of Air BnB listings	African American and Hispanic communities and households
	UGA expansion that prioritizes suburban development over affordable housing	Young people not in high-paying jobs
	Zoning for density has also led to an increase in luxury development	LGBTQ+ populations
	Lack of rent stabilization	
	Tax Increment Financing leading to influx of upscale businesses and development	
	Tax abatement programs for luxury developers	
	Permitting and cost requirements of developing affordable housing, especially in a SFH	
	Inaccessible social services	
	Speculative development	

	Zoning that limits affordable housing development	
	Building renovations	

Quotes:

When we went to city council meetings, they talked about numbers—property values, economic growth. But they never talked about us. It felt like our culture, our lives, and our stories didn't matter in the face of development.

The story of housing displacement is a story of power and whose voices are heard. It's not just about homes; it's about belonging, dignity, and the right to exist in spaces we've built and called home for years.

I have also seen many community institutions such as restaurants and bars close down, some which are safe havens for folks with marginalized identities — an example of cultural displacement. Many people in my age range(30-40) from Olympia have moved to Centralia, Chehalis, Shelton in search of more affordable rent.

Olympia's policy of allowing unlimited density bonuses for developments that include affordable housing units has inadvertently increased displacement risk. Though this policy boost revenue generation but it also enable developers to build larger, more expensive projects that cater to affluent buyers.

Yelm's Urban Growth Area (UGA) expansion policies have heightened displacement risk by prioritizing suburban development over affordable housing and community needs.

December 12, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Affinity Groups

Accessory Dwelling Unit Affinity Group

On December 3rd, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of community members with direct lived or professional experience with Accessory Dwelling Units. Attendees to these meetings consisted of individuals that worked in construction and real estate trades as well as individuals who with own or live in accessory dwelling units. The group discussed ways in which ADU's may help in addressing displacement, issues that they have noticed affecting ADU construction and affordability, and how ADU's may help solve for other issues that the public faces with the Washington housing system.

COHORT ATTENDEES:

- Mary Barrett, Community Member
- Jessie Simmons, Olympia Master Builders
- Chris Lester, Thurston County Realtors
- Doug Mah, Thurston Chamber of Commerce
- Lisa Mikesell, Community Members

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

KEY THEMES

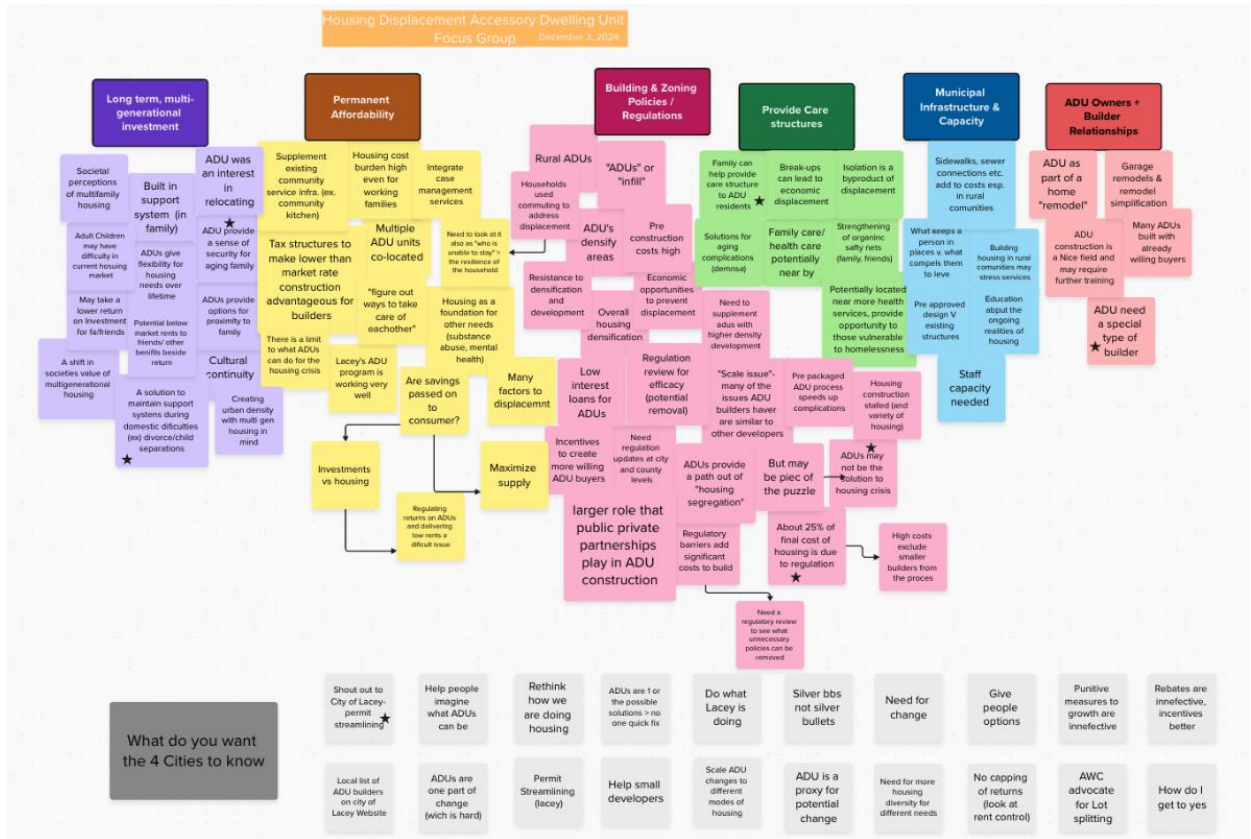
Uncommon Bridges led a discussion on ADUs which led to the facilitators identifying key themes and concerns of group members. Those concerns broadly fell under these categories:

- ADUs provide long term, multi-generational investment opportunities.
- Building and zoning polices/regulations are seen as significant hurdles to siting and developing more ADUs.
- ADUs can be a solution in the long-term elder care crisis as the American population ages.
- Municipal infrastructure and staff capacity may be reducing the speed of ADU permit review.
- ADU owner and builder relationships are more about collaboration and customization, and less marketing and mass production.

Within these themes the facilitators and the group discussed the most important ideas to share with the 4 participating cities.

- The City of Lacy has an effective and streamlined ADU process. Other cities maybe served to draw inspiration from this process.
- Lists of ADU builders on government websites could help connect builders to interested parties.
- Imaginative education materials around ADU uses are needed.
- ADUs are just one small part in addressing the housing crisis.
- The cities should investigate ways to streamline permit processes.
- The cities should find ways to help small developers.
- There is a deep need for more housing diversity.
- ADU affordability raises the conflict between affordability and owner returns.
- Usually, ADU owners need help paying off the loan so affordable construction costs are crucial.
- Rebates for ADU construction are ineffective for both owners and small builders.

Group Discussion Mural Transcription



ADUs Provide Long Term, Multi-Generational Investment

- Societal perceptions on=multifamily housing
- Adult children currently have difficulty finding housing currently
- Owners may take a lower ROI for renting to family/friends
- ADUs could provide a built-in support system
- ADUs give flexibility for housing needs over the lifetime*
- Many consider buying properties that could have future ADU builds located on them
- ADUs can create urban density with multi-generational household's mind

Permanent Affordability

- Supplement existing community service infrastructure
- Housing cost burden is high for everyone
- Tax structures should be reevaluated to make this more advantageous to builders
- Multiple ADUs collocated on a property
- Integrate case management services

Collocating services geared towards individuals that need supportive services

- Housing as a foundation for other needs
- There are many factors to displacement
- Maximize supply
- Are the savings to development passed on to the consumer
- Investment and housing can be conflicting interests
- Regulating ADUs and delivering low rents is a difficult issue

Building & Zoning Policies/Regulations Provide Significant Hurdles

- Rural ADUs need more attention
- Households used commuting to address rising rents (this is displacement)
- ADUs densify areas
- Preconstruction costs are high
- There need to be economic opportunities to prevent displacement
- Overall housing densification
- Need to supplement ADUs with higher density development
- Many of the issue ADU owners have are similar to large scale developers
- Potential low interest loans for ADU construction
- Regulation review for efficacy
- ADUs provide a path out of housing segregation
- Prepackaged ADU processes speed up complications
- About 25% of the final cost of housing is regulation
- Incentives to create more ADU buyers

Provide Care Structures

- Family can help provide care structures to ADU residents
- Solutions for ageing complications such as degenerative illnesses
- Interpersonal conflicts can also lead to vulnerable people being displaced
- Potentially located near more health services, providing opportunities to those more vulnerable to homelessness

Municipal infrastructure and capacity are an issue

- Sidewalks, sewer connection can be expensive in rural communities
- Building in rural communities may stress services
- Pre-approved design v existing structures
- Staff capacity needed

ADU owner and builder relationships provide an opportunity for collaboration

- ADU's could be part of a home "remodel"
- ADU construction is a Niche field and those offering construction services are few.
- Builder training for ADUs
- Many ADUs are built with already existing buyers

November 21, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Affinity Groups

Summary

On November 21st, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of with residents of the 4 member cities that represent low-income residents or housers in the area. This meeting covered concerns, perspectives, and potential solutions the participants had around displacement and housing in Olympia, Yelm, Tumwater, and Lacey. Themes discussed included preventative measures, policy and practice considerations, and who is being displaced.

COHORT ATTENDEES:

- Berenice Hartt Plazas, Thurston County Food Bank
- Kim Piper, Property Manager
- Eileen Dalton, SPS Habitat for Humanity
- KayVin Hill, Lived Experience Advisory Board, Thurston County
- Faith Foote, Sound Legal Aid
- Ron Baugh-Schlossberg, Sound Legal Aid

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

Uncommon Bridges led a discussion on housing displacement using a Mural Board to capture the comments from the cohort members. The group shared feedback and recommendations given their unique lived experience and perspective.

KEY THEMES

Participants shared their reflections, recommendations, and insights on the specific housing pressures they face, issues specific to low-income home communities, and what they would like cities to do to address these challenges. Key themes from the conversation are listed below.

- Displacement can happen to anybody.
- Economic impacts drive displacement.
- There are significant language barriers - landlords do not or cannot effectively communicate eviction notices and warnings.
- There is a high correlation between displacement and homelessness.
- Displacement is escalating throughout the county.
- Watch the model that Thurston Regional Planning Council has put in place is creating change faster to learn best practices.
- The perceived social safety net doesn't exist.
- We need a greater focus on houselessness prevention.
- There is a need for municipal collaboration on providing housing services.

Group Discussion

To construct key themes, our team organized and analyzed the following 4 main topics that emerged from the discussion:

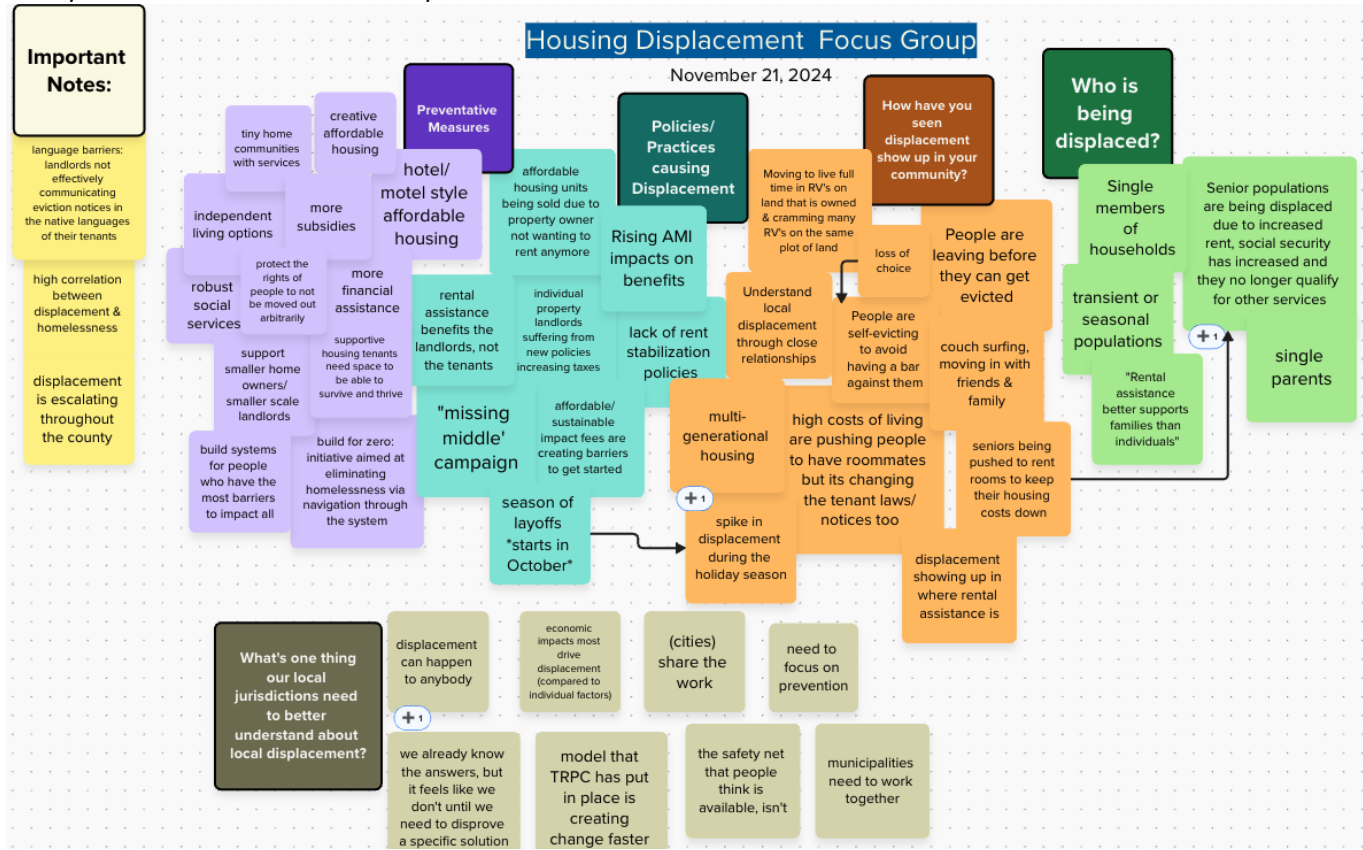
Preventative measures - In order to prevent displacement, there is a need to focus more heavily on prevention rather than react.

Policies causing Displacement - Participants identified a number of policies that create the conditions for displacement or actively make it worse.

How have you seen displacement in your community? - Participants shared ways in which they have experienced or viewed displacement happening in their lives.

Who is being displaced? - Participants shared their views of what characteristics make households vulnerable to displacement.

Group Discussion Mural Transcription



Preventative measures

- Hotel/motel style affordable housing
- More creative affordable housing
- Tiny home community with services
- Independent living options
- Robust social services
- Protect the rights of people to not be moved out arbitrarily
- More financial assistance
- Supportive housing tenants need space the be able to survive
- Build for zero: initiative aimed at eliminating homelessness via navigation through the system
- Build systems who have the most barriers to impact all.
- Support smaller homeowners/ small scale landlords
- Robust social services
- More subsidies

Policies and Practices causing displacement

- Affordable housing units being sold due to property owner not wanting to rent anymore

- Raising AMI has an impact on benefits
- Rental assistance benefits the land landlords, not the tenants
- Individual property landlords suffering from new policies increasing taxes
- Affordable sustainable impact fees impact fees are creating barriers to get started
- Season of layoffs starts in October

How have you seen displacement show up in your community?

- People leave before they get evicted
- Moving to live in RVs on land that is owned and cramming many RV's on same plot of land
- Understand local displacement patterns through relationship building
- People are self-evicting to avoid having an impact on their credit
- High costs of living leads people to have more roommates but buildings change their roommate allowances
- Spike in displacement during holiday season
- Multi-generational housing
- People have fewer options for where to live
- People couch surf (non-visible homelessness)

Who is Being Displaced?

- Single members of households
- Transient or seasonal populations
- Rental assistance better supports families than individuals
- Single parents
- Senior populations

November 21, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Manufactured Home Community Affinity Group

Summary

On November 21st, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of manufactured (or mobile) home stakeholders, including residents, property management, development, advocates, and civic leadership. The participants provided insights, feedback, and recommendations to the cities of Olympia, Tumwater, Lacey and Yelm regarding specific pressures and opportunities regarding housing for the updated Comprehensive Plan. Key themes that emerged from the discussion focused around the differing rates of displacement between small-scale operators and private equity firms as landowners, legal paths, physical and economic entrapment.

COHORT ATTENDEES:

- Stephen Becker, Senior Manufactured Home Community (SMHC) Resident
- Sharron Cornwall, property manager
- Donna Daniels, SMHC Resident
- Karen Gregerson, SMHC Resident
- Richard Gregerson, SMHC Resident
- Ed Hildreth, civic leader
- Diane Houston, SMHC Resident
- Kyle Taylor Lucas (Tulalip/Snohomish), MHC Resident
- Kathy McCormick, SMHC Resident
- Kevin McCrea, Property developer
- Dean Perryman, MHC Resident
- Anne Sadler, Association of Manufactured Homes
- Laura Scheffer, MHC Resident

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

Uncommon Bridges led a discussion using a Mural Board to capture the comments from the cohort members. The group shared feedback and recommendations on housing policy and what measures they would like to see incorporated into the comprehensive plan.

KEY THEMES

Participants shared their reflections, recommendations, and insights on the specific housing pressures they face, issues specific to manufactured home communities, and what they would like cities to do to address these challenges. Key themes from the conversation are listed below.

- Small-scale operators and private equity firms as landowners
- Land ownership options and barriers
- Legal paths and challenges
- Physical and economic entrapment
- Role of cities to respond to resident needs
- Availability of quality affordable housing
- Specific impacts and access to advocacy for communities of color

Group Discussion

To construct key themes, our team organized and analyzed the following 4 main topics that emerged from the discussion:

Land Ownership

- All residents shared how the increase in private equity ownership in recent years has led to rapidly rising costs of living in MHC. Some have explored community land trusts (CLTs) but find the setup and structure challenging with existing financial burdens and pressures. Participants reported that private equity firms openly reported fee-based capital gains.
- Residents noted that a preferred model is private ownership of the land by local, family-owned operations with on-site management. They found that establishing rapport with owners led to greater transparency, care for the parks, and tenancy continuity. Participants want cities to ease up local restrictions that make it difficult for local, family-owned landowners to manage parks. Cities could support residents in forming cooperatives or CLTs to be prepared to exercise right of first refusal and manage properties independently.

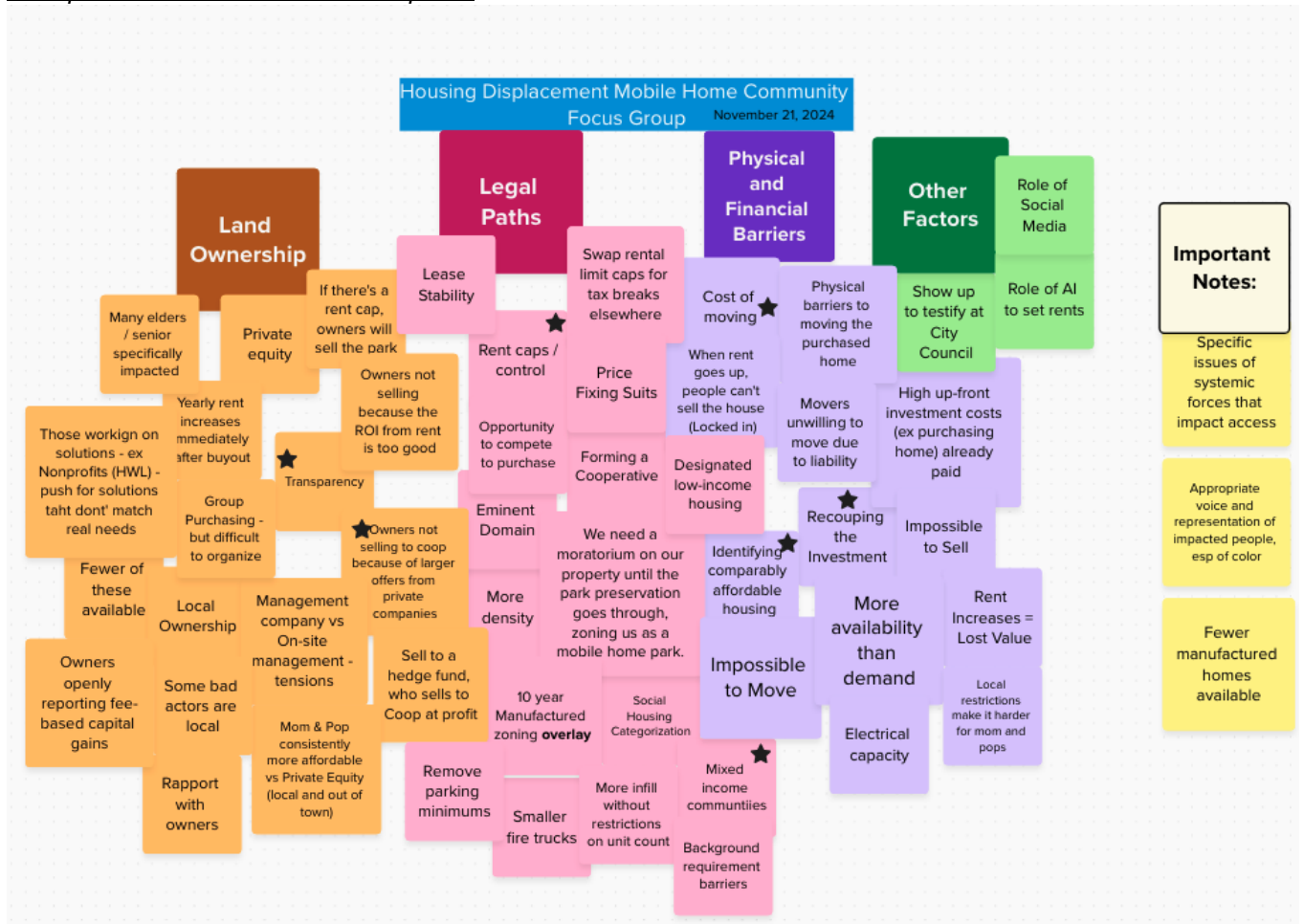
Legal Paths

- Participants shared the role that rent caps could play in managing rising costs and noted that this could increase the likelihood of landowners to sell the park. Discussion of group buying options pointed out that existing tenants have the right of first refusal, but this is often not recognized by landowners.
- Participants want cities to put moratoriums on properties as they transition through zoning changes, a 10-year manufactured zoning overlay, opportunity to compete to purchase, use of eminent domain as a means of preserving a manufactured home park from being redeveloped, low-income and social housing designations, mixed-income communities, and for cities to explore options around rent caps and tax breaks that disincentivize price gouging.

Physical and Economic Entrapment

- Participants described their situation as “Impossible to move, Impossible to stay.” As landowners increase rents and underinvest in utilities such as electric, water, and waste management, the value of the property decreases and owners are locked in. Insurance companies prevent moving companies from relocating manufactured homes due to the associated risks.
- Participants want cities to support upgraded utilities and infrastructure and promote incentives for park owners to improve their properties.

Group Discussion Mural Transcription



Important Notes and Other Factors

Specific issues of systemic forces that impact access

- Appropriate voice and representation of impacted people, especially of color
- Fewer manufactured homes available
- Role of social media
- Role of AI to set rents

Show up to testify at City Council

Land Ownership:

- Many elders/seniors specifically impacted
- Private equity
- If there's a rent cap, owners will sell the park
- Yearly rent increases immediately after buyout
- Owners not selling because the ROI from rent is too good
- Those working on solutions – ex Nonprofits (HWL) – push for solutions that don't match the real needs
- Group purchasing – but difficult to organize
- Transparency (starred)
- Local ownership
- Management company vs On-site management - tensions
- Fewer of these available
- Some bad actors are local
- Owners not selling to coop because of larger offers from private companies (starred)
- Sell to a hedge fund, who sells to Coop at profit
- Some bad actors are local
- Mom and Pop consistently more affordable vs Private equity (local and out of town)
- Rapport with owners

Legal Paths:

- Lease stability
- Rent caps/control (starred)
- Swap rental limit caps for tax breaks elsewhere
- Price fixing suits
- Opportunity to compete to purchase
- Forming a cooperative
- Eminent domain
- We need a moratorium on our property until the park preservation goes through, zoning us as a mobile home park.

- 10-year manufactured zoning overlay
- Social housing categorization
- Remove parking minimums
- Smaller fire trucks
- More infill without restrictions on unit count
- Mixed income communities (starred)
- Background requirement barriers

Physical and Financial Barriers:

- Cost of moving (starred)
- Physical barriers to moving the purchased home
- When rent goes up, people can't sell the house (locked in)
- Movers unwilling to move due to liability
- High up-front investment costs (ex: purchasing a home) already paid
- Recouping the investment (starred)
- Identifying comparably affordable housing
- Impossible to sell
- More availability than demand
- Rent increases = lost value
- Impossible to move
- Local restrictions make it harder for mom and pops
- Electrical capacity

December 10, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Military Affinity Groups

Summary

On December 10th, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of military-connected households including veterans, dependents, and service providers. The participants provided insights, feedback, and recommendations to the cities of Olympia, Tumwater, Lacey and Yelm regarding specific pressures and opportunities regarding housing for the updated Comprehensive Plan. Key themes that emerged from the discussion focused around coordination of resources and tenant protections.

COHORT ATTENDEES:

- Michael Klos, Special Operations Veteran and Liaison With Disabled American Veterans Chapter 41
- Mohammad Mahis, Veteran US Army Combat Interpreter
- Thomas Mason, Disabled Desert Storm Veteran
- Katherine Jane Mitchell, Military Dependent
- Victoria Lin Vazquez, Military Dependent

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

Uncommon Bridges led a discussion using a Mural Board to capture the comments from the cohort members. The group shared feedback and recommendations on housing policy and what measures they would like to see incorporated into the comprehensive plan.

KEY THEMES

Participants shared their reflections, recommendations, and insights on the specific housing pressures they face, issues specific to military households, and what they would like cities to do to address these challenges. Key themes are listed below:

- The VA's coordination of housing services is lacking capacity and efficiency.
- There are intersecting factors that make finding housing as an active duty, veteran, or dependent (ex. Claiming both disability and veteran benefits for proof of income.)
- There is an inconsistency of benefit access across service members and their families
- The city should serve as convener of resources to support the gaps left by the VA and other support agencies.
- Tenant protections are needed to ensure military households can't be discriminated against for housing based on the non-traditional nature of their income source.
- Social isolation is a part of living in a civilian community as a military or veteran household, making transportation routes and transit options key during new construction.
- There is an opportunity to leverage private funding for military households to support affordable housing construction efforts. (i.e. Foundations)

To construct key themes, our team organized and analyzed the following 4 main topics that emerged from the discussion:

Coordination of Resources

- Participants emphasized breakdowns in resource and benefit awareness, availability, and accessibility. These breakdowns result in military benefit recipients being unable to access their benefits, declined housing, and a disproportionate burden upon military households when attempting to navigate benefits that support housing access.
- Participants recommended cities act as resource conveners, equip expert staff positions to support resource navigation, and establish stronger, more reciprocal relationships between municipalities and Veterans Associations.

Renter Protections

- Participants described experiences of being denied housing due to lack of awareness from landlords about military benefit structure, price fixing based on publicly available information about military compensation and housing allowances, age discrimination, and challenges connecting with property management representatives as the sector shifts to more corporate ownership.
- Participants recommended that cities identify ways to monitor income verification, establish local ordinances to enforce attainable income verification, and address price fixing.

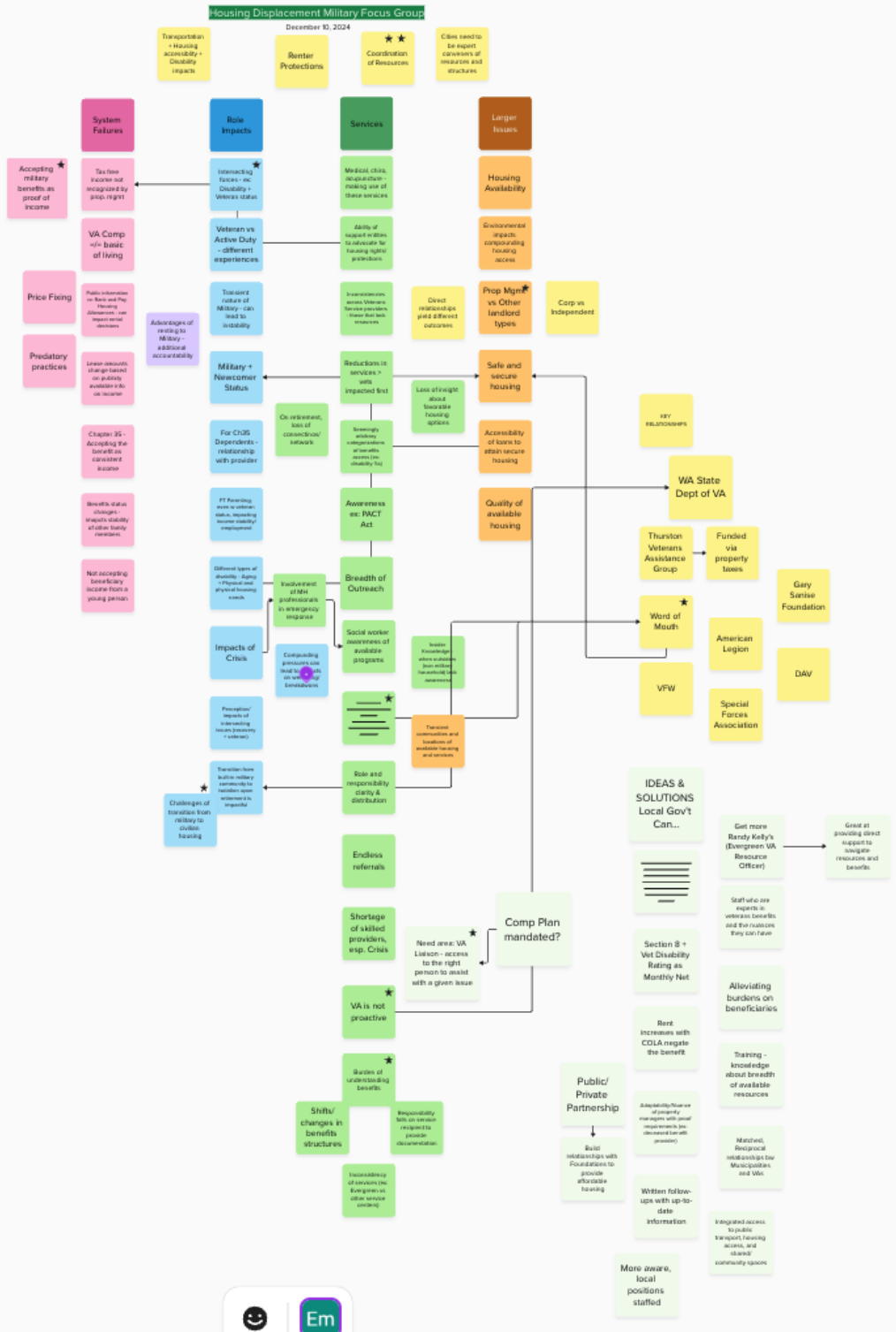
Provider Competence

- Participants shared their desires for service providers to serve as advocates when addressing barriers to housing, as well as the challenges they face working with providers, including misinformation about benefits, out-of-date information, difficulty connecting with knowledgeable service providers, referral loops, and overall lack of coordination between providers.
- Participants brainstormed trusted supports and providers during the meeting.
- Participants called on cities to establish reciprocal relationships with the Veterans Association specifically, where the VA supports the city in understanding the needs of the military community, and cities aid the VA in serving as housing advocates. They also suggested the city support professional positions with expertise in the nuances of navigating military benefits.

Comprehensive Approach

- Participants shared the specific impacts felt by intersecting factors, especially disability and veteran status. They recognized inconsistencies in how statuses are determined and the impact on benefits and housing access, as well as the importance of coordinated services that recognize the compounding impacts of physical and mental health, age, immigrant status. They shared the specific challenge when military households transition from active duty to veteran, and the experiences of social isolation. They highlighted the prominence of word of mouth as a key method of accessing housing and navigating benefits.
- Participants reiterated the importance of transportation, housing, and social services being factored together when planning for cities that are accessible for people of all mobilities and abilities.

Group Discussion Mural Transcription



High Level Themes:

- Transportation + Housing accessibility + Disability impacts
- Renter Protections
- Coordination of Resources (starred)
- Cities need to be expert conveners of resources and structures

System Failures:

- Tax-free income not recognized by property management
- Accepting military benefits as proof of income
- VA comp does not equal basic cost of living
- Price fixing
- Public information re: rank and pay, housing allowances – can impact rental decisions
- Predatory practices
- Lease amounts change based on publicly available info on income
- Chapter 35 – accepting the benefit as consistent income
- Benefit status changes – impacts stability of other family members
- Not accepting beneficiary income from a young person

Role Impacts:

- Intersecting forces – ex: disability + veteran status (starred)
- Veteran vs Active Duty – different experiences
- Transient nature of military – can lead to instability
- Military + Newcomer status
- For Ch35 dependents – relationship with provider
- FT Parenting, even with veteran status, impacting income stability/employment
- Different types of disability – ageing and physical, and physical housing needs
- Impact of crisis
- Perception/impacts of intersecting issues (recovery + veteran)
- Compounding pressures can lead to impacts on wellbeing/breakdowns
- Ex: Inaccurate information can feel devastating
- Transition from built-in military community to isolation upon retirement is impactful (starred)
- Challenges in transition from military to civilian housing (starred)

Services:

- Medical, chiro, acupuncture – making use of all these services
- Ability of support entities to advocate for housing rights/protections
- Inconsistencies across Veterans Service providers – those that lack resources
- Reductions in services > vets impacted first
- Seemingly arbitrary categorizations of benefits access (ex: disability percentages)
- On retirement, loss of connections/network
- Awareness ex: PACT Act
- Breadth of outreach
- Social worker awareness of available programs

- Involvement of MH professionals in emergency response
- Insider Knowledge - when outsiders (non-military households) lack awareness
- Impacts of miscommunication/lack of understanding impacts access to services (starred)
- Role and responsibility clarity & distribution
- Endless referrals
- Shortage of skilled providers, esp. Crisis
- VA is not proactive (starred)
- Burden of understanding benefits
- Shifts/changes in benefits structures
- Responsibility falls on service recipient to provide documentation
- Inconsistency of services (ex: Evergreen vs other service centers)

Larger Issues:

- Housing availability
- Environmental impacts compounding housing access
- Property management vs other landlord types (starred)
- Corp vs Independent
- Direct relationships yield different outcomes
- Safe and secure housing
- Accessibility of loans to attain secure housing
- Quality of available housing
- Transient communities and locations of available housing and services

Key Relationships:

- WA State Dept of VA
- Thurston Veterans Assistance Group
- Funded via property taxes
- Word of Mouth (starred)
- American Legion
- Veterans of Foreign Wars (VFW)
- Special Forces Association
- Disabled American Veterans
- Gary Sinise Foundation

Ideas & Solutions: Local Government Can...

- Need area: VA Liaison - access to the right person to assist with a given issue (starred)
- Comp plan mandated?
- Local/State Ordinance mandating property mgmt. companies to stop dismissing fixed income veterans 3x monthly rent gross income
- Section 8 + Vet Disability Rating as Monthly Net
- Rent increases with COLA negate the benefit
- Adaptability/Nuance of property managers with proof requirements (ex: deceased benefit provider)

- Written follow-ups with up-to-date information
- More aware, local positions staffed
- Public/Private Partnership
- Build relationships with Foundations to provide affordable housing
- Get more Randy Kelly's (Evergreen VA Resource Officer)
- Great at providing direct support to navigate resources and benefits
- Staff who are experts in veterans benefits and the nuances they can have
- Alleviating burdens on beneficiaries
- Training - knowledge about breadth of available resources
- Matched, Reciprocal relationships bw Municipalities and Vas
- Integrated access to public transport, housing access, and shared/community spaces

HOUSING ELEMENT: PART 2 – TECHNICAL INFORMATION – APPENDIX E: POLICY EVALUATION MATRIX

City of Tumwater

Does the policy reduce displacement pressures or advance housing objectives?

Policy Evaluation Matrix

Yes - 2	Somewhat - 1	Neutral/None - 0	Negative Impact - (-1)
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Number/Ref.	Policy Recommendation	COMMERCE INDICATORS					Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?	TUMWATER-SPECIFIC CRITERIA				Impact Score (out of 20)
		Racially Disparate Impacts: Does this policy prevent racially disparate impacts or work to repair past harm?	Displacement: Does this policy help prevent or mitigate economic displacement?	Displacement: Does this policy help prevent or mitigate physical displacement?	Displacement: Does this policy help prevent or mitigate cultural displacement?	Housing Exclusion: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?		Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?	Does this policy incentivize and support the development of affordable and deeply affordable housing?	Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?	Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?	
New Policies												
	Explore ways to monitor renter income verification, which may include establishing local ordinances to enforce attainable income verification, and identify and address price fixing.	1	1	1	1	0	0	1	1	0	0	6
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	1	2	2	0	0	14
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	0	2	2	2	1	15
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	1	1	2	0	0	14
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	1	0	1	0	1	2	2	8
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties independently and be prepared to exercise the right of first refusal.	2	2	2	2	2	0	2	2	1	0	15

City of Tumwater – Policy Evaluation Matrix

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	Create a program to support the private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	1	2	1	0	0	14	
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	1	1	0	0	1	0	0	9	
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	2	1	2	1	0	0	0	0	0	0	6	
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	1	2	0	2	1	1	2	2	12	
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	1	2	0	0	1	1	0	11	
Housing Action Plan													
1.a.	Donate or lease surplus or underutilized jurisdiction-owned land to developers that provide low-income housing and establish a process for accepting or coordinating the acceptance of land donations from others this action.	2	2	1	1	2	2	0	2	2	1	15	
1.b.	Where a Planned Unit Development is used for residential development, consider requiring a portion of the housing be low- residential development	2	2	0	1	2	2	0	1	0	1	11	
1.c.	Adopt a “Notice of Intent to Sell” ordinance for multifamily developments.	2	2	2	2	2	2	2	1	2	0	17	

City of Tumwater – Policy Evaluation Matrix

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1.d.	Provide funding for the Housing Authority of Thurston County and other non-profit organizations to buy income-restricted units proposed to be converted to market rate housing.	2	2	2	2	2	1	2	2	2	0	17	
1.e.	As part of Comprehensive Plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	1	1	1	1	1	2	0	0	0	0	7	
1.f.	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	1	2	2	1	0	16	
1.h.	Encourage low-income housing units as part of new developments.	2	2	1	1	2	2	0	2	0	2	14	
1.j	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	1	2	2	0	2	17	
1.m	Extend public water and sewer to unserved areas to allow infill development in underdeveloped areas.	1	2	1	1	2	1	0	1	2	1	12	
2.a.	Have developers provide tenants displaced by redevelopment with relocation assistance.	1	2	2	2	1	1	0	0	0	0	9	
2.b.	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training.	2	0	2	0	1	1	2	0	2	0	10	
2.c	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	1	2	1	1	0	0	13	
2.d	Support down payment assistance programs for homeownership and programs that assist people entering the rental market.	2	2	2	1	2	1	0	1	0	0	11	
2.f	Develop a technical assistance or education program for small landlords.	0	0	0	0	0	1	0	0	0	0	1	

City of Tumwater – Policy Evaluation Matrix

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2.g	Assist non-profits in the process of acquiring mobile home parks to turn them into public trusts so that lot rental fees can be controlled.	2	2	2	2	2	1	2	2	0	2	17	
2.h	Fund an energy assistance program for rental housing/make landlords do upgrades when the unit is sold.	2	1	1	1	2	1	2	0	2	0	12	
3.d	Continue to look for place- making opportunities along urban corridors.	0	0	0	2	0	2	0	0	0	0	4	
3.e	Mix market rate and low- income housing to avoid creating areas of concentrated low-income housing.	2	2	2	2	2	2	1	1	1	2	17	
4.a	Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	2	1	1	2	2	1	2	1	2	2	16	
4.b	Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	0	0	2	2	15	
5.a	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	0	1	0	1	12	
5.b	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	1	0	1	0	0	8	
5.e	Partner with a public or private developer to build a townhouse or row house demonstration project.	0	0	0	0	0	1	0	1	0	1	3	
5.f	Track data on affordable housing at the regional level.	0	0	0	0	0	2	0	0	0	0	2	
6.b	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2	1	1	2	2	0	2	1	2	15	
6.c	Establish an affordable housing sales tax.	1	2	1	1	1	2	0	2	0	1	11	
6.d	Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit.	0	-1	0	0	0	1	0	0	1	1	2	
6.e	Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives.	1	2	1	1	1	1	2	2	1	1	13	

