



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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November 17, 2025

City Council
C/O Brad Medrud
City of Tumwater
Community Development Director

Sent via electronic mail: BMedrud@ci.tumwater.wa.us

Re: Review of Tumwater Comprehensive Plan Amendments and Development Regulations

Dear Council Members,

Thank you for the opportunity to comment on the City of Tumwater's proposed comprehensive plan and development regulation amendments. Growth Management Services received the proposed amendments on October 13, 2025, and processed them with material identification number 2025-S-10994 and 2025-S-10995.

We do have comments concerning the following that should be addressed before the city adopts its comprehensive plan and development regulations.

1. Housing Element

- a. While the city has very strong housing policies promoting a variety of housing types, we recommend adding a policy specifically encouraging moderate density or infill housing consistent with [RCW 36.70A.070\(2\)\(b\)](#).

RCW 36.70A.070(2)(b) states (bold text added):

(b) Includes a statement of goals, policies, objectives, and mandatory provisions for the preservation, improvement, and development of housing, including single-family residences, and within an urban growth area boundary, moderate density housing options including, but not limited to, duplexes, triplexes, and townhomes;

- b. To demonstrate sufficient land capacity for housing needs of all income levels, consistent with [RCW 36.70A.070\(2\)\(c\)](#), we recommend looking at and evaluating the

assumptions for the amount of low-income housing proposed in the low- and moderate-density zones. While the [TCRP Planning for and Accommodating Housing Needs in Thurston County](#) report demonstrated that low-income housing may be built in low- or moderate-density zones, the analysis should only assume the amount of development likely to happen based on recent trends. If it is unlikely that Tumwater will see development of over 1,000 units at 0-80% AMI in these zones over the next twenty years, we recommend adjusting the land capacity assumptions in this step.

We also recommend providing a summary table or a quantitative summary of the emergency housing capacity analysis in Housing Element – Part 2 to more clearly demonstrate consistency with [RCW 36.70A.070\(2\)\(c\)](#).

- c. The housing element includes documentation of programs and actions needed to achieve housing availability, and local funding sources that the city has adopted to support affordable housing needs as required by [RCW 36.70A.070\(2\)\(d\)\(ii\)](#). We also recommend identifying gaps in local funding needed to achieve affordable housing needs. Guidance on this can be found in chapter 4 of [Guidance for Updating Your Housing Element](#) (pg. 60-62).
- d. While the City of Tumwater included anti-displacement policies in the draft housing element, we did not find identification of areas at higher risk of residential displacement, as required by [RCW 36.70A.070\(2\)\(g\)](#). We recommend including a displacement risk map – you may use [Commerce Draft Displacement Risk Map](#) – or include a discussion of areas that may be at risk of displacement your housing element.

2. Development Regulations:

ADUs:

- a. City code section 18.42.010.E appears to limit ADUs to “one family” which may be inconsistent with state law occupancy allowances. Please ensure that ADUs are defined to be consistent with the dwelling unit(s) located on the same lot as the single-family housing unit, duplex, triplex, townhome or other dwelling unit ([RCW 36.70A.696\(6\)](#)).
- b. City code sections 18.12.050.D and 18.14.050.D appear to limit lots to two units. Within urban growth areas, cities must allow at least two ADUs on all lots that meet the minimum lot size in zoning districts that allow for single-family homes ([RCW 36.70A.681\(1\)\(c\)](#)).

Middle Housing:

- a. City code section 17.112.040 requires a separate lot for each dwelling unit (except ADUs). Middle housing statute requires that tier 2 cities allow the option of 2-4 dwelling units per lot. We recommend updating the city code to clearly specify that 2-4 middle housing dwelling units per lot are allowed.
- b. In our review it appears the city only allows zero lot line development for townhouses. State statute requires that zero lot line development is allowed where the number of lots created are equal to the required unit density ([RCW 36.70A.635\(5\)](#)).
- c. In our review we did not find language specifying that no off-street parking is required within one-half mile walking distance of a major transit stop ([RCW 36.70A.635\(6\)\(d\)](#)). Please provide language that clarifies this allowance.

As a friendly reminder, notification and copies of adopted plans shall be submitted to Commerce within ten days after final adoption ([RCW 36.70A.106\(2\)](#)).

Again, we appreciate the work your proposed amendments represent, and we wish you success in meeting the goals of the Growth Management Act. We are available for technical assistance and, if requested, can attend upcoming meetings with your Planning Commission and/or Council. If you wish to discuss these comments, you may reach me at ted.vanegas@commerce.wa.gov or 360-280-0320.

Sincerely,

Ted Vanegas

Ted Vanegas
Senior Planner
Growth Management Services

cc:

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