



CITY OF
TUMWATER

**PLANNING COMMISSION
MEETING AGENDA**

**Online via Zoom and In Person at
Tumwater Fire Department
Headquarters, Training Room, 311 Israel
Rd. SW, Tumwater, WA 98501**

**Tuesday, July 22, 2025
7:00 PM**

1. Call to Order
2. Roll Call
3. Changes to Agenda
4. Commissioner's Reports
5. Director's Report
6. Public Comment
7. 2025 Comprehensive Plan Periodic Update – Future Land Use Maps
8. 2025 Comprehensive Plan Periodic Update – Housing Displacement Analysis and Comprehensive Plan Recommendations
9. Next Meeting Date - 08/26/2025
10. Adjourn

Meeting Information

The public are welcome to attend in person, by telephone or online via Zoom.

Watch Online

https://us02web.zoom.us/webinar/register/WN_qLMgU_SDRliem5TP92b-Ww

Listen by Telephone

Call (253) 215-8782, listen for the prompts, and enter the Webinar ID 831 9903 4222 and Passcode 640333.

Public Comment

The public is invited to attend the meeting and offer comment. The public may register in advance for this webinar to provide comment:

https://us02web.zoom.us/webinar/register/WN_qLMgU_SDRliem5TP92b-Ww

After registering, you will receive a confirmation email containing information about joining the webinar.

The public may also submit comments prior to the meeting by sending an email to:

cdd@ci.tumwater.wa.us. Please send the comments by 1:00 p.m. on the date of the meeting.

Comments are submitted directly to the Commission Members and will not be read individually into the record of the meeting.

If you have any questions, please contact Community Development Director, Brad Medrud at (360) 754-4180 or bmedrud@ci.tumwater.wa.us.

Post Meeting

Audio of the meeting will be recorded and later available by request, please email CityClerk@ci.tumwater.wa.us.

Accommodations

The City of Tumwater takes pride in ensuring that people with disabilities are able to take part in, and benefit from, the range of public programs, services, and activities offered by the City. To request an accommodation or alternate format of communication, please contact the City Clerk by calling (360) 252-5488 or email CityClerk@ci.tumwater.wa.us. For vision or hearing impaired services, please contact the Washington State Relay Services at 7-1-1 or 1-(800)-833-6384. To contact the City's ADA Coordinator directly, call (360) 754-4128 or email ADACoordinator@ci.tumwater.wa.us.

What is the Planning Commission?

The Tumwater Planning Commission is a citizen advisory commission that is appointed by and advisory to the City Council on the preparation and amendment of land use plans and implementing ordinances such as zoning. Actions by the Planning Commission are not final decisions; they are Commission recommendations to the City Council who must ultimately make the final decision. If you have any questions or suggestions on ways the Commission can serve you better, please contact the Community Development Department at (360) 754-4180.

Decorum Statement

Welcome to the Planning Commission meeting. We thank you for attending.

The City Council encourages community engagement in local government and provides a variety of ways to participate.

The Chair of the Planning Commission will be responsible for conducting orderly and efficient meetings within the scheduled time. To accomplish that, the Chair will maintain order and decorum and can regulate inappropriate debate, repetitious discussion, and disruptive behavior when needed.

The Chair will recognize those that wish to speak and may limit the time allowed for individual comments. City staff will record questions and comments during the meeting. If an issue or question cannot be addressed during the meeting, City staff will address the issue or respond to the question by following up with the individual.

We respectfully request that attendees refrain from disruptions during the meeting and comply with decorum rules.

Thank you for participating.

TO: Planning Commission
FROM: Dana Bowers, Associate Planner, and Brad Medrud, Director of Community Development
DATE: July 22, 2025
SUBJECT: 2025 Comprehensive Plan Periodic Update – Future Land Use Maps

1) Recommended Action:

This is a discussion item about the Future Land Use Maps Element for the 2025 Comprehensive Plan periodic update.

2) Background:

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

The updated Comprehensive Plan will address diversity, equity, and inclusion throughout the Plan. [2025 Comprehensive Plan Update | City of Tumwater, WA](#) contains links to guidance material and information about the update.

The intent of this work session is to discuss the draft future land use maps. Staff will present an interactive map tool featuring both the proposed land use designations and the conservation maps which show critical areas and other constraints to development. A link to the map tool is provided in the staff report. Neighborhood scale future land use maps, Future Land Use Changes Map, and Conservation Element maps have been included for commissioners review prior to the meeting if they cannot access the map tool.

4) Alternatives:

☐ None.

6) Attachments:

- A. Staff Report
- B. Land Use Element Maps
- C. Conservation Element Maps

STAFF REPORT

Date: July 22, 2025

To: Planning Commission

From: Dana Bowers, Associate Planner, and Brad Medrud, Community Development Director



2025 Comprehensive Plan Update – Future Land Use Map

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

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

Staff brought the Land Use Element to the Planning Commission meeting on June 24, 2025, for review. During this meeting, commissioners demonstrated interest in more information about the future land use map and how it connects to conservation lands.

The intent of the Planning Commission meeting on Tuesday, July 22, 2025, is to review the Future Land Use Map and peripheral conservation maps. These maps identify locations in Tumwater where environmental constraints and current land use set the direction for land use decisions. Included in this packet are the Future Land Use Map, Neighborhood Map, future land use by neighborhood maps, and conservation maps. Some of these maps are included as appendixes in other elements.

Questions

In preparation for the Tuesday, July 22, 2025, work session, the Planning Commission is asked to consider the following questions:

- Do the maps reflect how you think Tumwater should grow over the next 20 years?
- Do the maps align with community values regarding environmental preservation, vibrant economies, and livable neighborhoods?
- Are there areas that would benefit from a different use?
- Does the current designation restrict development that would otherwise move us toward meeting goals?

Staff will lead an exploration of the maps using an online tool to guide discussion of the changes and further recommendations.

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1 – Future Land Use Maps

The Land Use Maps represent the general future land use patterns intended for Tumwater within the 20-year planning period of the Comprehensive Plan. These future land use patterns are a graphic expression of the policies found in Part 1 of the Land Use Element – Goals, Policies, and Implementation Actions.

Future land use designations are different from zone districts found in TMC Title 18 Zoning. Future land use designations represent general types of land uses that the City would like to see develop in each area whereas zone districts provide specific regulations about what is allowed to be developed, at what form and scale with what setbacks and other features. Section 3 below provides information about the proposed zone updates to implement these future land use areas. Further details will be presented with the development code updates.

The 2025 Comprehensive Plan Update Interactive Future Land Use Map tool displays selected conservation and critical area data on an aerial base map. Proposed future land use designations can be viewed by sliding a bar from left to right across the screen. This tool will help the Planning Commission, and any community members compare the environmental constraints, current land use and future land use. The tool is provided as link below and is available for your review. Staff will use the tool on the screen during the meeting to guide discussions.

CPU 2025 Interactive Land Use Tool Link:

<https://experience.arcgis.com/experience/e8975a26b0094deab58c8b500c176194>

Reviewing other jurisdictions future land use maps can help us determine what we want to see in our city. Links to land use maps from other jurisdictions with similar characteristics as ours have been included as Appendix B. Most of these are cities with airports within their jurisdiction, whether owned and operated by the city or a different entity. They are also mostly small cities with a population between 19,000-30,000.

While Arlington has a similar population, their growth rate is not expected to be as high as Tumwater. Arlington is not currently facing capacity issues for housing with nearly 10,000 units

in surplus housing capacity. Where Arlington is expecting to approach capacity is in their employment targets, where they expect to have a surplus of just over 1,000 jobs in 2044.

Neighboring jurisdictions Olympia and Lacey, although similar, have different approaches to growth than Tumwater. Olympia has an established historic downtown and waterfront zones with concerns like sea level rise as noted in their draft element. A link to Olympia's draft land use maps is provided in the appendices. Lacey's map and draft element are not shared on their website at this time.

2 – Proposed Land Use Designation Updates

Proposed changes to land use designations for Tumwater are intended to meet state requirements to accommodate growth and to promote variety of residential densities and housing types while preserving existing housing stock. Increasing variety also decreases impacts to low income or racially disparate communities. While increasing density is a strategy to reduce sprawl and more efficiently meet the needs of all community members, staff are considering increases to strategic areas where infill will not vastly change the character of existing neighborhoods. Table 1 outlines the updated land use designations, zone districts, and densities.

Table 1. Update Land Use Designations and Implementing Zone Districts.

Land Use Designation	Implementing Zone District	Net Dwelling Units Per Acre
Residential Land Uses		
Residential/Sensitive Resource	RSR Residential/Sensitive Resource	Minimum: 2 Maximum: 4
Low Density Residential <i>(previously Single Family Low and Single Family Medium)</i>	LDR Low Density Residential	Minimum: 6 Maximum: 9
Medium Density Residential <i>(previously Multifamily Medium)</i>	MDR Medium Density Residential	Minimum: 10 Maximum: 19 ¹
High Density Residential <i>(previously Multifamily High)</i>	HDR High Density Residential	Minimum: 20 Maximum: None
Manufactured Home Park	MHP Manufactured Home Park	Minimum: 6 Maximum: 9
Commercial Land Uses		
General Commercial	GC General Commercial	Minimum: 40 Maximum: None
Neighborhood Commercial	NC Neighborhood Commercial	Minimum: 6 Maximum: 9

Land Use Designation	Implementing Zone District	Net Dwelling Units Per Acre
Mixed Use Land Uses		
Brewery District	BD Brewery District	Minimum: 8 to 30, depending on subdistrict ² Maximum: None
Capitol Boulevard Community	CBC Capitol Boulevard Community	Minimum: 30 Maximum: None
Mixed Use	MU Mixed Use	Minimum: 20 Maximum: None
New Market Historic District	HC Historic Commercial	Minimum: 10 Maximum: None
Tumwater Town Center	TC Town Center	Minimum: 20 to 30, depending on subdistrict ³ Maximum: None

3 – Map Updates

The largest updates to the map were to change the names of residential designations. Single-Family Low Density and Single-Family Medium Density designations were updated to the new Low Density Residential Designation. Multi-Family Medium was updated to Medium Density Residential and Multi-Family High Density was updated to High Density Residential.

The updates to the future land use map are listed below in Table 2. Several parcels had the same changes in different areas. They are labelled with the same identification code. One parcel was updated from public institutional to mixed use to reflect current use.

Table 2. Changes to the Future Land Use Map.

Identification Code	Previous Designation	New Designation	Reason	Source
SFL-LDR	Single Family Low Density	Low Density Residential	More diversity of housing types	State requirement
SFM-LDR	Single Family Medium Density	Low Density Residential	More diversity of housing types, increased density	State requirement
MFM -MDR	Multi-Family Medium Density	Medium Density Residential	More diversity of housing types, increased density	State requirement
MFH – HDR	Multi-Family High Density	High Density Residential	More diversity of housing types, increased density	State requirement

Identification Code	Previous Designation	New Designation	Reason	Source
PI-MU	Public Institutional	Mixed Use	More compatible with current use	City Preference

D. Next Steps in the Review Process

Staff will continue to accept comments on the Land Use Element from community members and Planning Commission until August 8, 2025. The Land Use Element will then be reviewed by City Council at a work session on August 26, 2025.

Next staff will complete all of the elements of the Comprehensive Plan, the SEPA review and initial state review, and prepare the Comprehensive Plan update ordinance.

The expected public review schedule for the ordinance will be:

- October 28, 2025 – Planning Commission Comprehensive Plan update ordinance briefing
- November 10, 2025 – Joint City Council-Planning Commission Comprehensive Plan update ordinance work session
- November 24, 2025 – Planning Commission Comprehensive Plan update ordinance work session
- December 9, 2025 – Planning Commission Comprehensive Plan update ordinance public hearing
- January 13, 2026 – Joint City Council – Planning Commission Comprehensive Plan update ordinance work session
- January 27, 2026 – City Council Comprehensive Plan update ordinance work session
- February 18, 2026 – City Council Comprehensive Plan update ordinance consideration

Appendix A – Example Future Land Use Maps & Land Use Elements

Arlington

Future Land Use Map:

<https://www.arlingtonwa.gov/DocumentCenter/View/7006/Land-Use-Map-PDF>

Land Use Element:

<https://www.arlingtonwa.gov/DocumentCenter/View/12620/Book-2---Land-Use-Book-Supporting-Analysis>

SeaTac

Future Land Use Map:

<https://www.seatacwa.gov/home/showpublisheddocument/38633/638712576526830000>

Camas

<https://storymaps.arcgis.com/stories/274d727e9ab44a26920810d5ad007369>

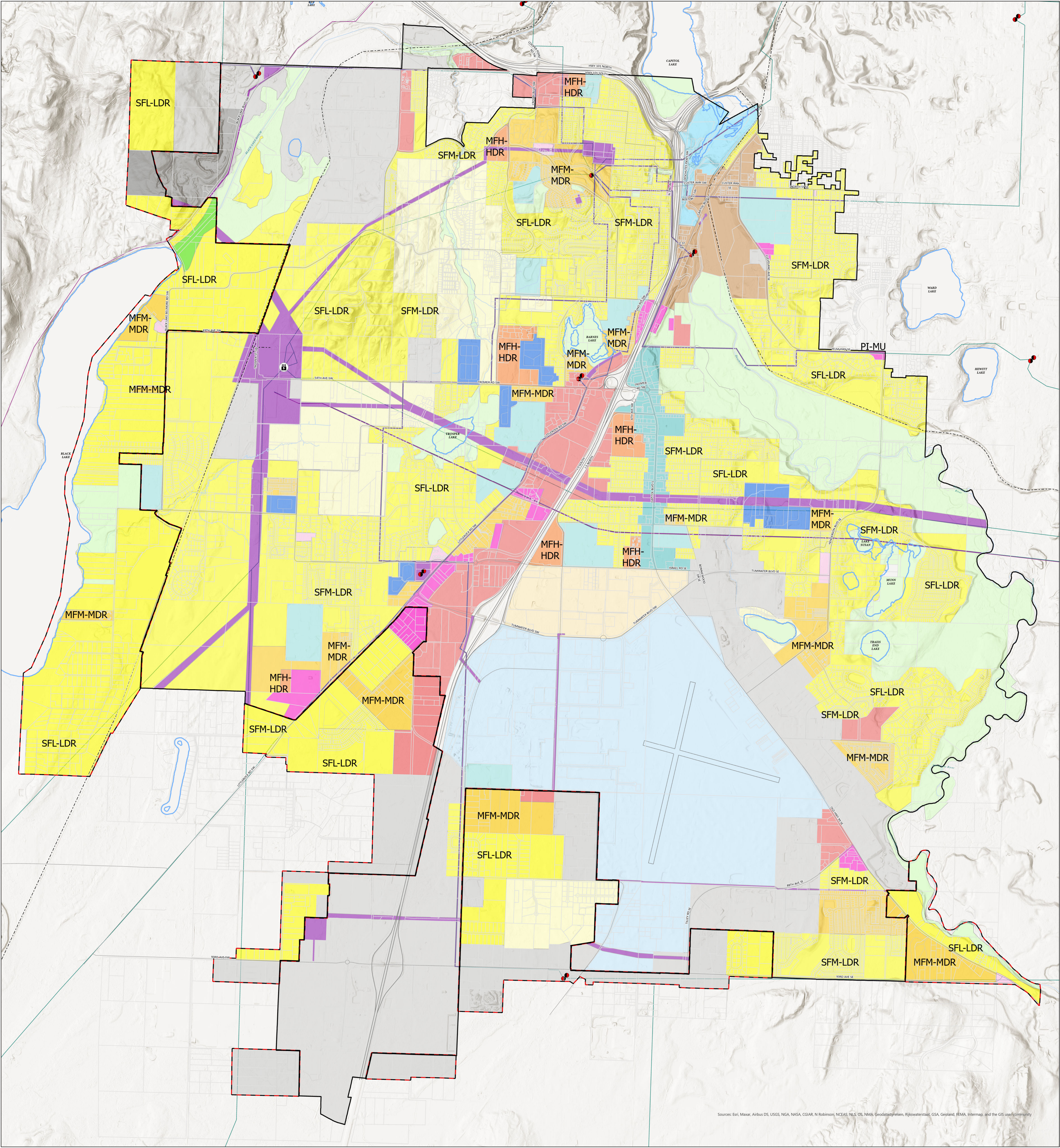
Olympia

Future Land Use Map:

https://www.codepublishing.com/WA/Olympia/compplan/pdfs/2018_Future_Land_Use_Map_Ord7156.pdf

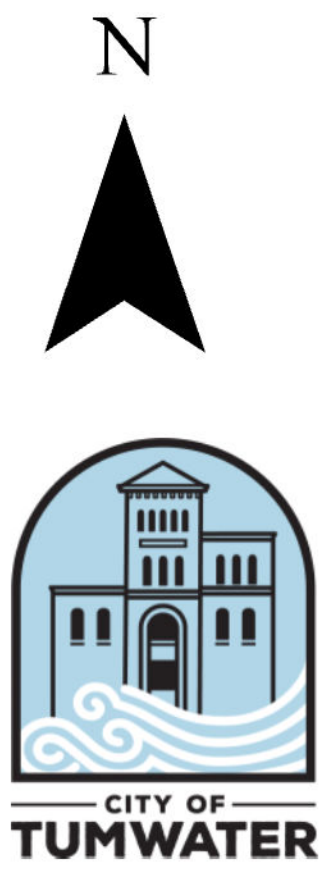
Land Use and Urban Design:

<https://www.codepublishing.com/WA/Olympia/?compplan/OlympiaCP04.html#04.1>



Future Land Use Changes - Draft 7/16/2025

0 0.25 0.5 1 Miles



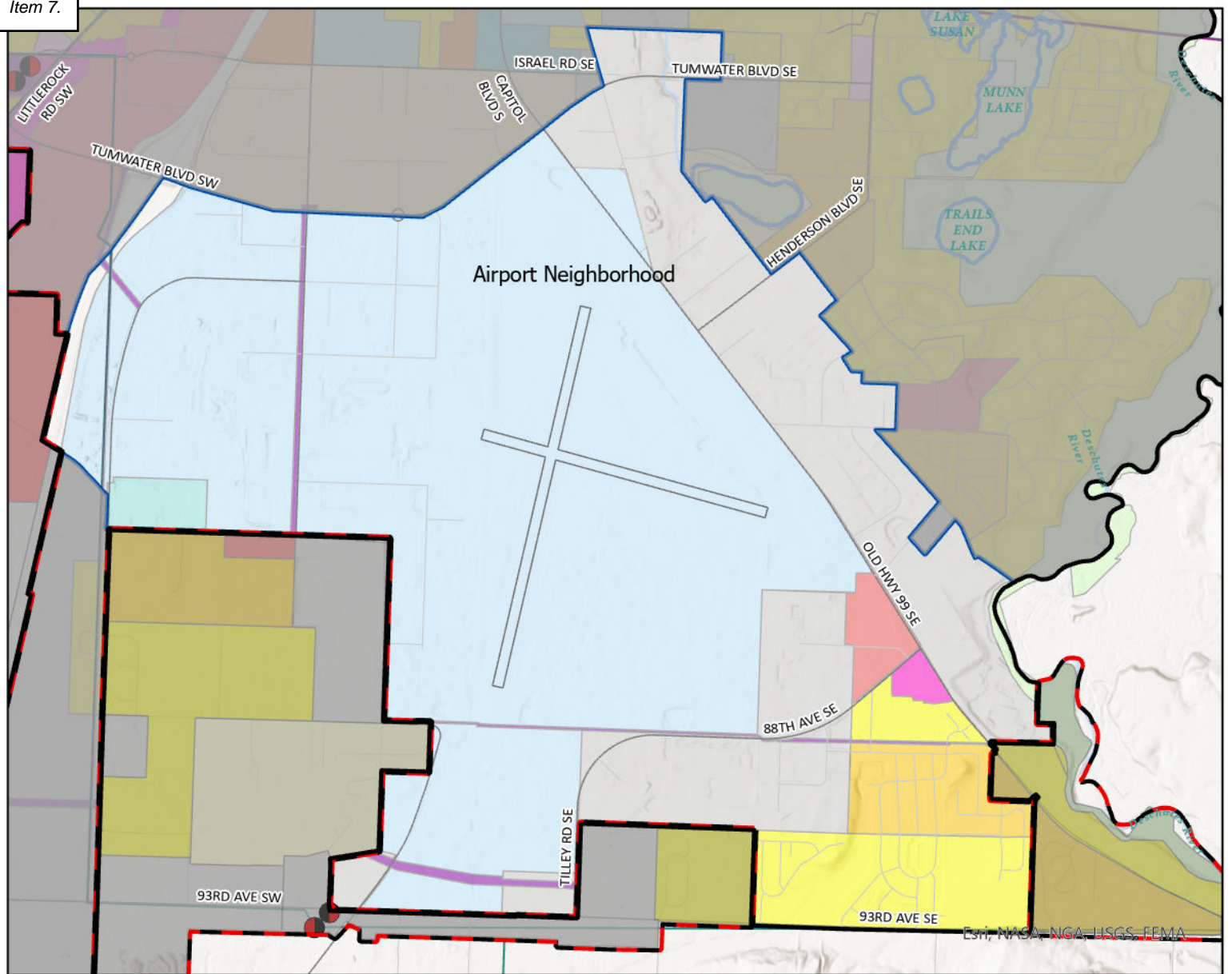
Land Use Changes		
Identification Code	Previous Designation	New Designation
SFL-LDR	Single Family Low Density	Low Density Residential
SFM-LDR	Single Family Medium Density	Low Density Residential
MFM-MDR	Multi-Family Medium Density	Medium Density Residential
MFH-HDR	Multi-Family High Density	High Density Residential
PI-MU	Public Institutional	Mixed Use

- Land Use Designations**
- Airport Related Industrial
 - Brewery District
 - Capitol Boulevard Community
 - Manufactured Home Park
 - New Market Historic District
 - Tumwater Town Center
 - Residential/Sensitive Resource
 - Low Density Residential
 - Medium Density Residential
 - High Density Residential

- Land Use Designations**
- ARI
 - BD
 - CBC
 - MHP
 - NMHD
 - TTC
 - RSR
 - LDR
 - MDR
 - HDR

- Transportation**
- Freeways and Highways
 - Arterial and Collector
 - Residential
 - Railroads
 - Airport
 - Runway

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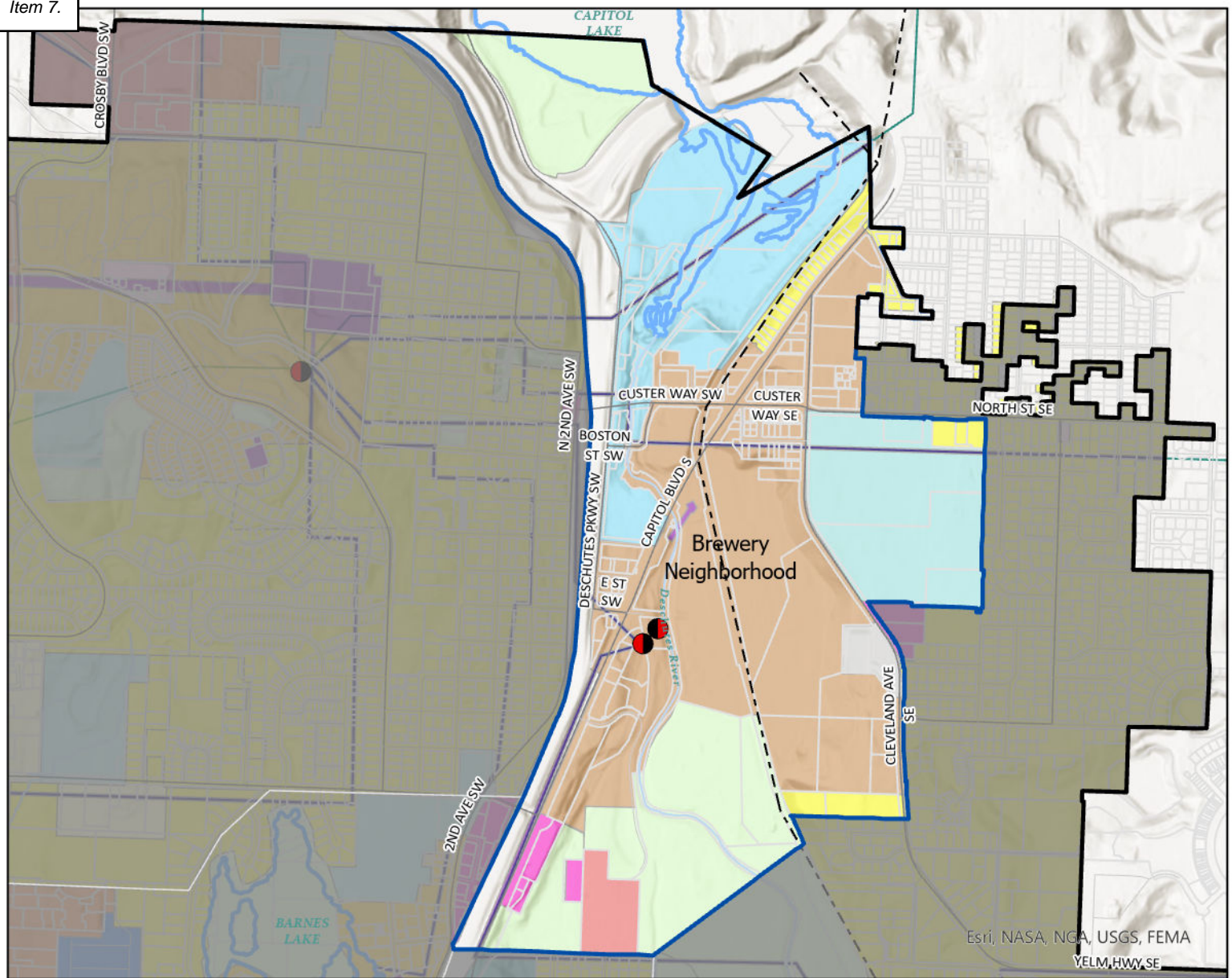
Airport Neighborhood Future Land Use

0 0.17 0.35 0.7 Miles



- | | |
|--------------------------------|-------------------------|
| Airport Related Industrial | Mixed Use |
| Capitol Boulevard Community | Neighborhood Commercial |
| Tumwater Town Center | General Commercial |
| Residential/Sensitive Resource | Utilities |
| Low Density Residential | Light Industrial |
| Medium Density Residential | Tumwater UGA |
| High Density Residential | City Limits |
| Parks/Open Space | |
| Public Institutional | |

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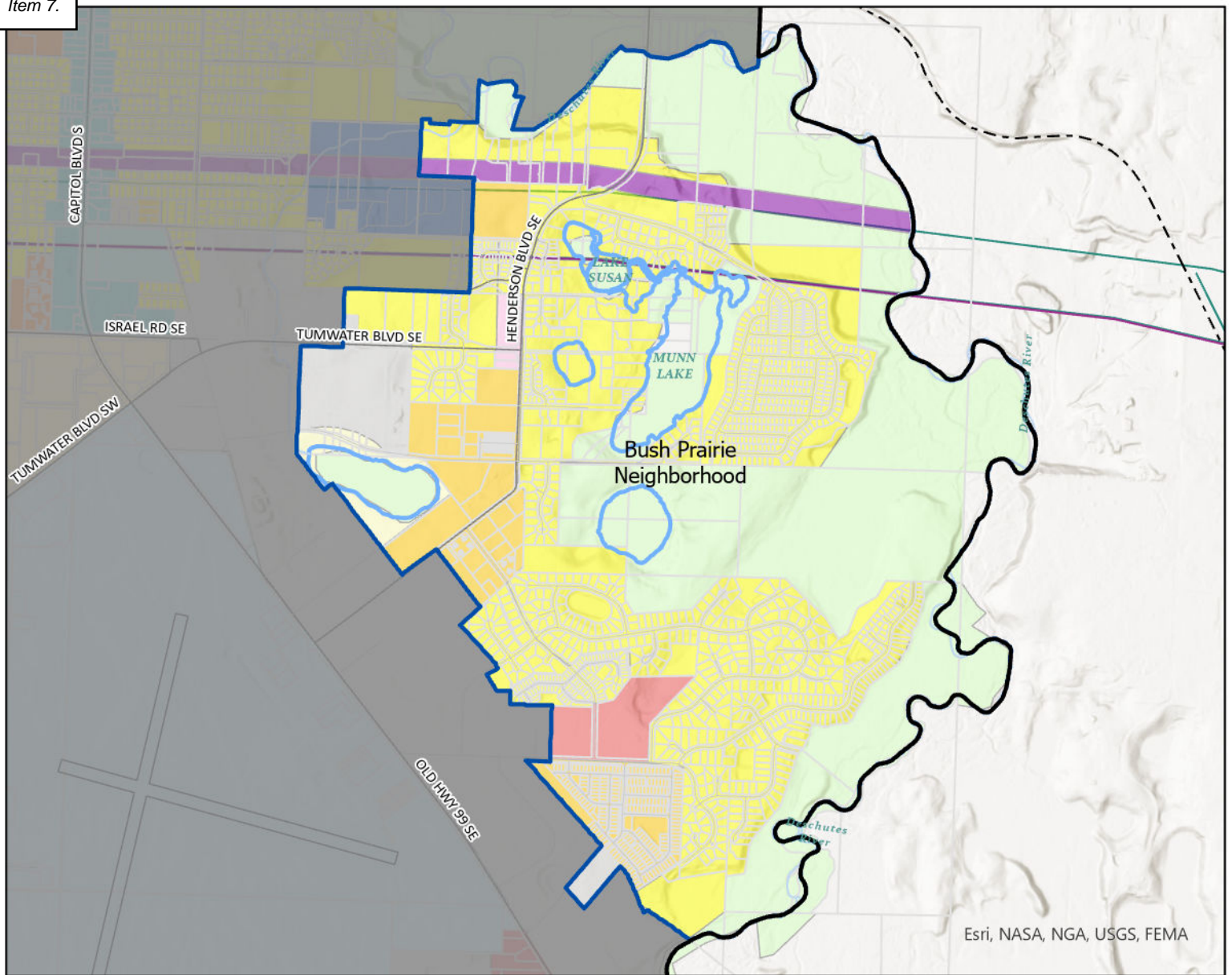
Brewery District Future Land Use



- | | |
|--------------------------------|-------------------------|
| Brewery District | Public Institutional |
| Capitol Boulevard Community | Mixed Use |
| Manufactured Home Park | Neighborhood Commercial |
| New Market Historic District | General Commercial |
| Residential/Sensitive Resource | Utilities |
| Low Density Residential | Light Industrial |
| Medium Density Residential | City Limits |
| High Density Residential | |
| Parks/Open Space | |

0 0.1 0.2 0.4 Miles

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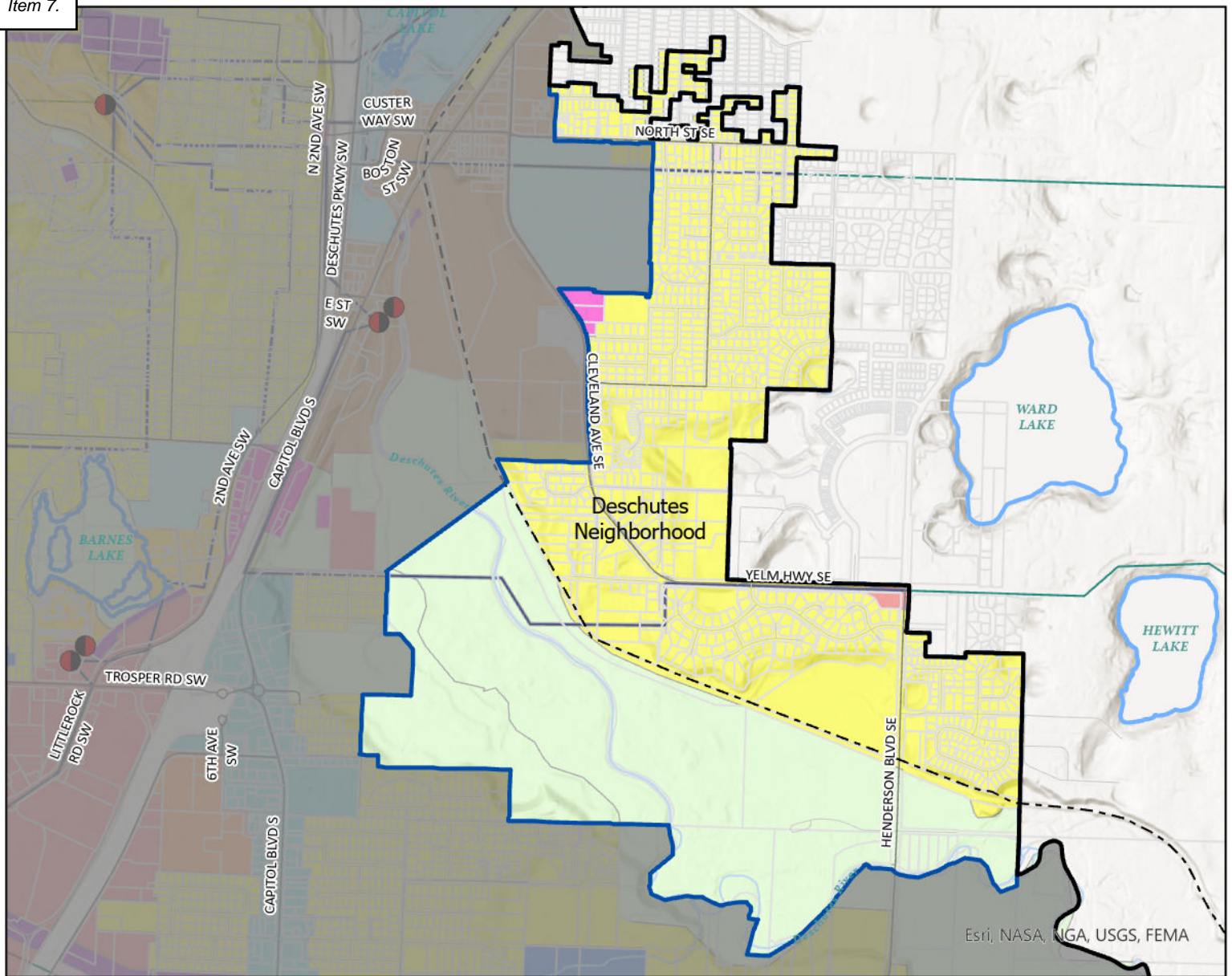
Bush Prairie Future Land Use



- | | |
|--------------------------------|-------------------------|
| Airport Related Industrial | Parks/Open Space |
| Capitol Boulevard Community | Public Institutional |
| Manufactured Home Park | Neighborhood Commercial |
| Tumwater Town Center | General Commercial |
| Residential/Sensitive Resource | Utilities |
| Low Density Residential | Light Industrial |
| Medium Density Residential | City Limits |
| High Density Residential | |

0 0.13 0.25 0.5 Miles

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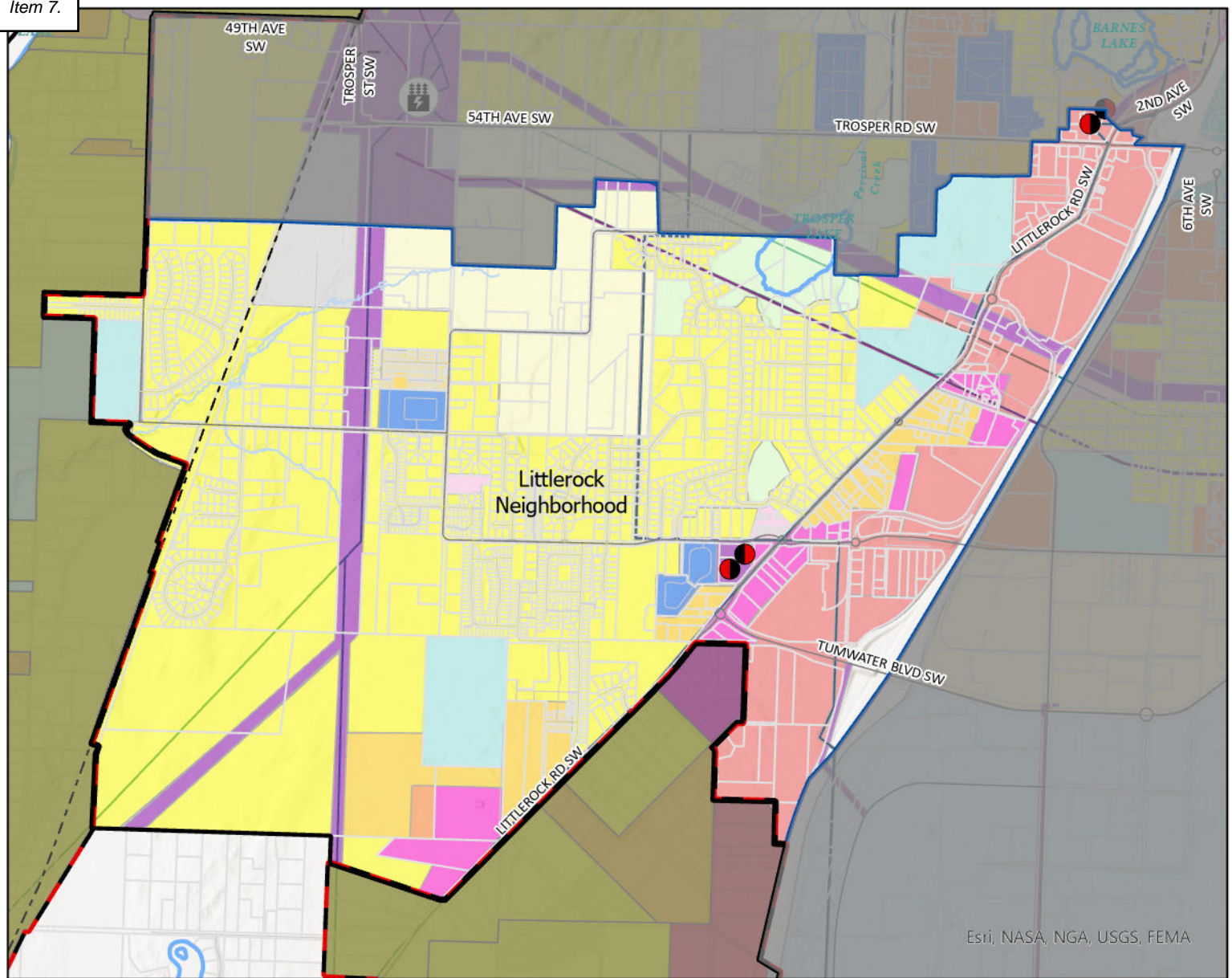
Deschutes Future Land Use



- | | |
|------------------------------|-------------------------|
| Brewery District | Public Institutional |
| Capitol Boulevard Community | Mixed Use |
| Manufactured Home Park | Neighborhood Commercial |
| New Market Historic District | General Commercial |
| Low Density Residential | Utilities |
| Medium Density Residential | Light Industrial |
| High Density Residential | City Limits |
| Parks/Open Space | |

0 0.13 0.25 0.5 Miles

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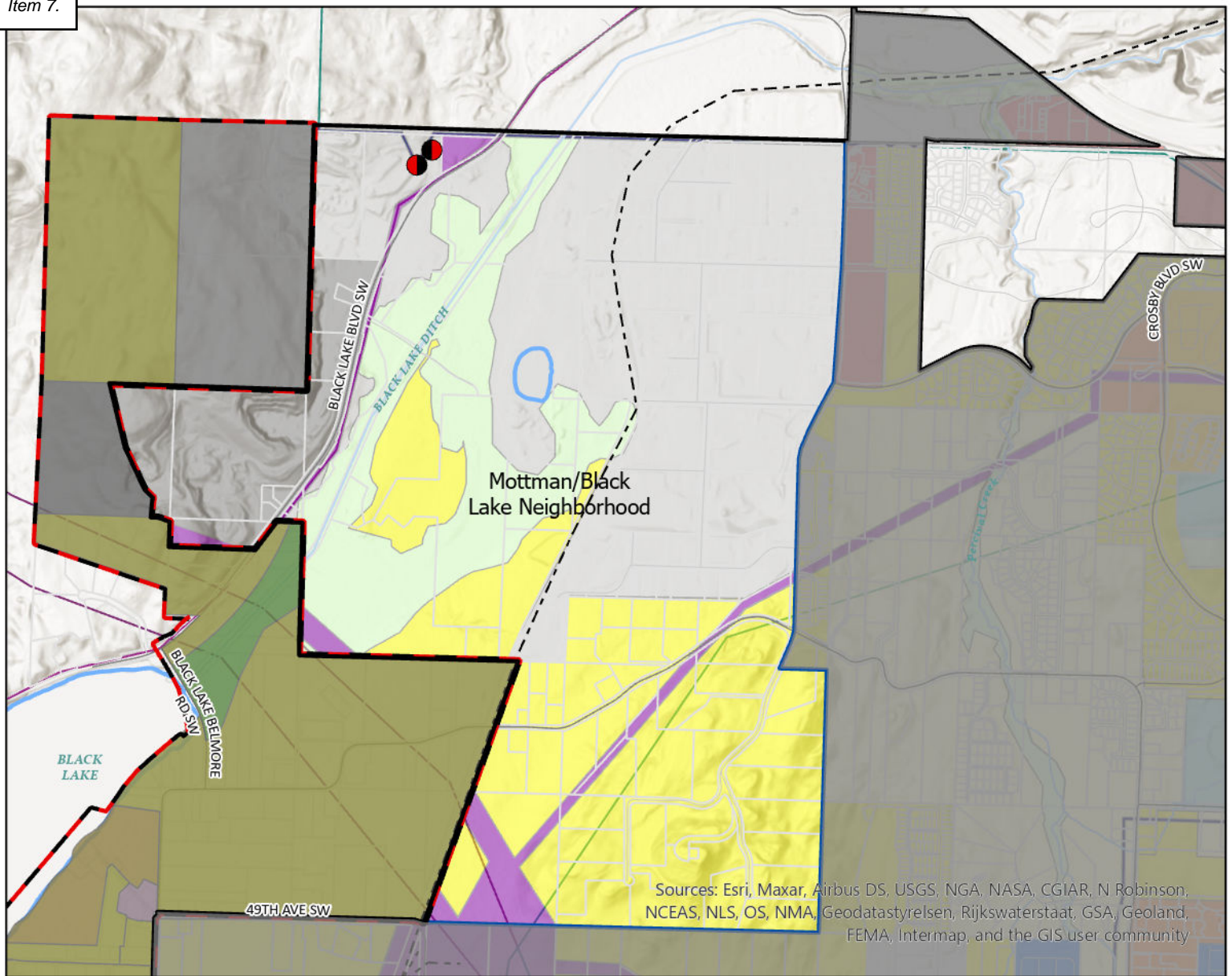
Littlerock Future Land Use



- | | |
|--------------------------------|-------------------------|
| Airport Related Industrial | Public Institutional |
| Capitol Boulevard Community | Mixed Use |
| Manufactured Home Park | Neighborhood Commercial |
| Tumwater Town Center | General Commercial |
| Residential/Sensitive Resource | Utilities |
| Low Density Residential | Light Industrial |
| Medium Density Residential | Tumwater UGA |
| High Density Residential | City Limits |
| Parks/Open Space | |

0 0.15 0.3 0.6 Miles

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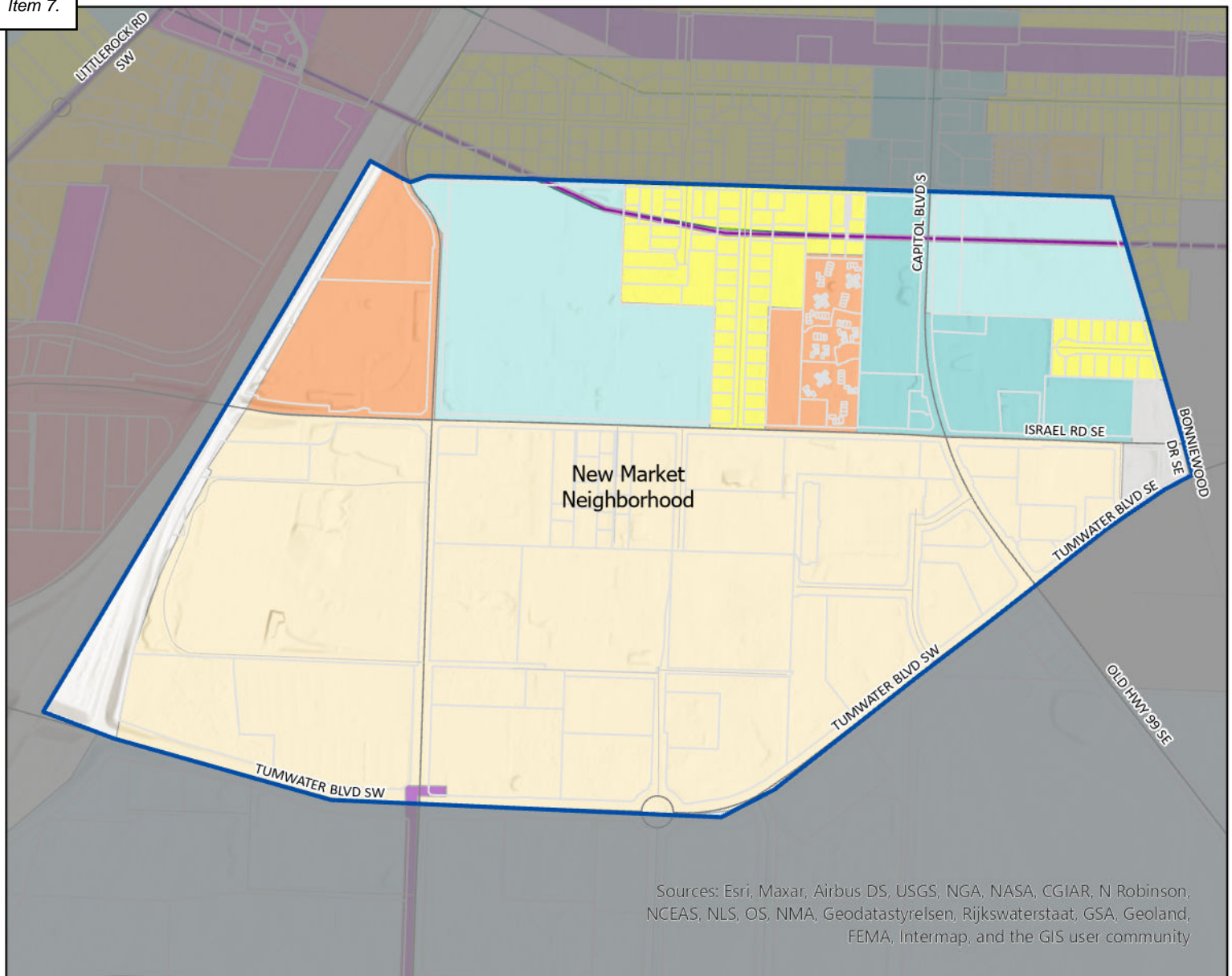
0 0.1 0.2 0.4 Miles

Mottman/Black Lake Future Land Use



- Manufactured Home Park
- Residential/Sensitive Resource
- Low Density Residential
- Medium Density Residential
- High Density Residential
- Parks/Open Space
- Public Institutional
- General Commercial
- Utilities
- Heavy Industrial
- Light Industrial
- Tumwater UGA
- City Limits

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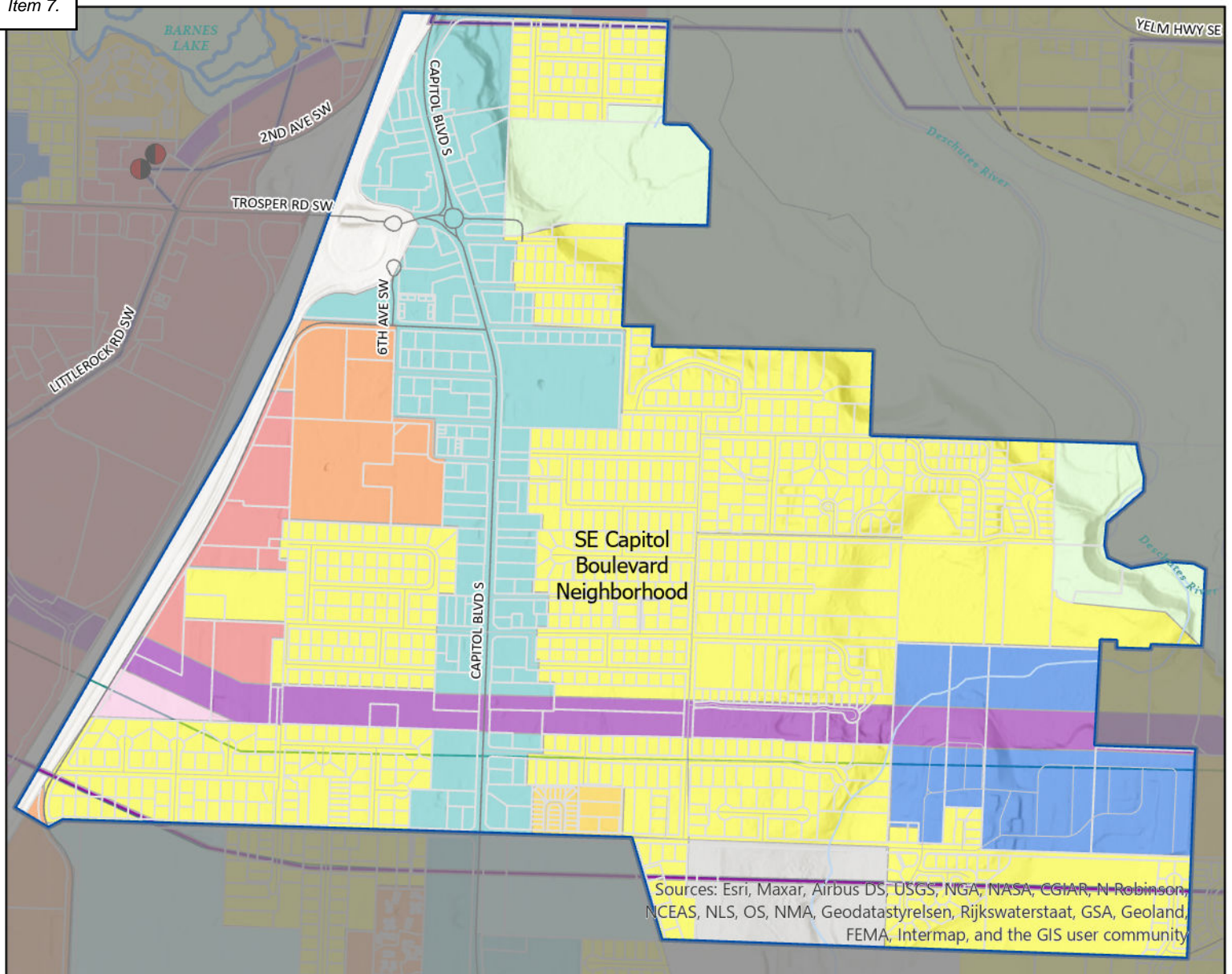
New Market Future Land Use



- Airport Related Industrial
- Capitol Boulevard Community
- Tumwater Town Center
- Low Density Residential
- Medium Density Residential
- High Density Residential
- Public Institutional
- Mixed Use
- Neighborhood Commercial
- General Commercial
- Utilities
- Light Industrial
- City Limits

0 0.05 0.1 0.2 Miles

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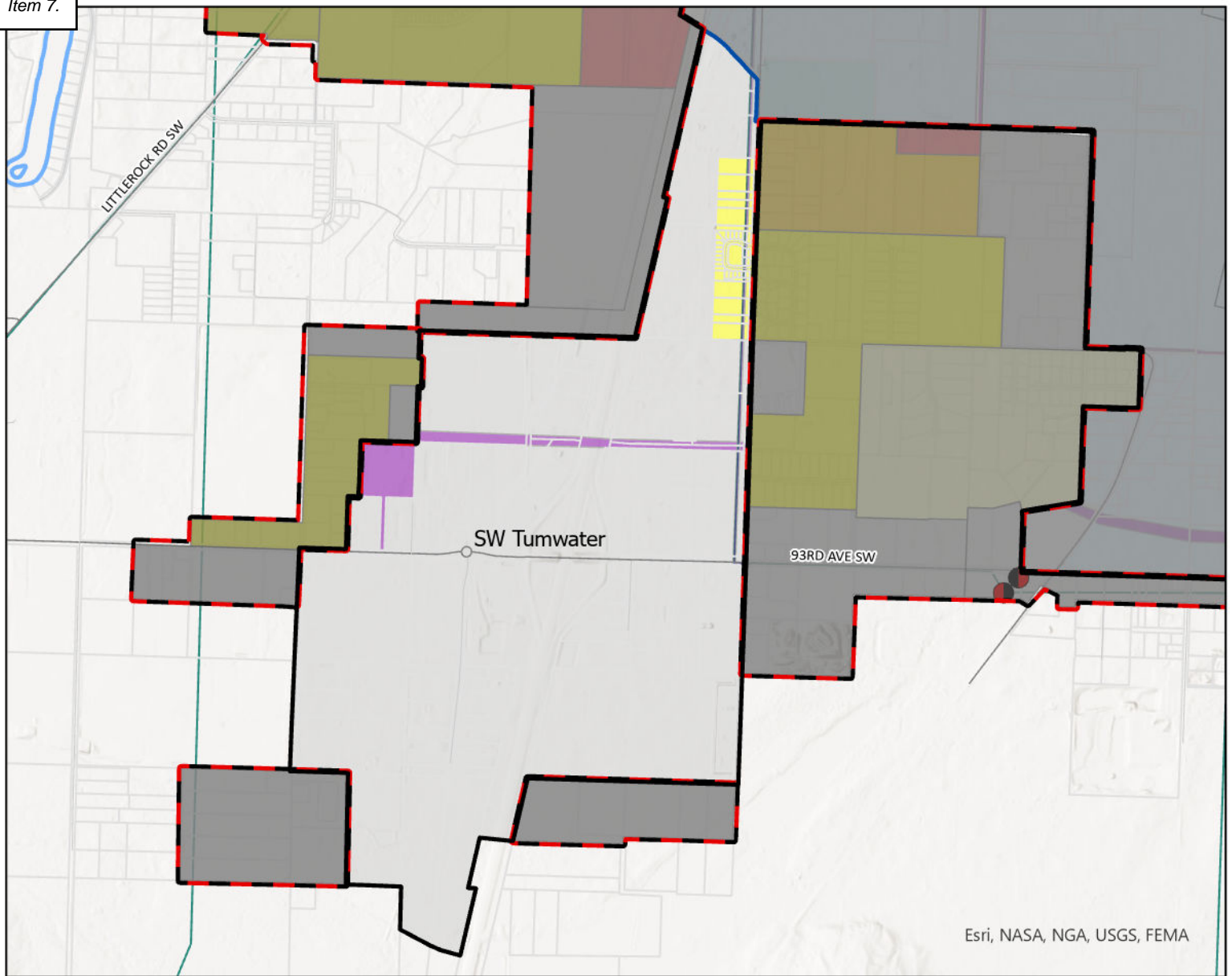
SE Capitol Boulevard Future Land Use

0 0.07 0.15 0.3 Miles



- Capitol Boulevard Community
- Manufactured Home Park
- Low Density Residential
- Medium Density Residential
- High Density Residential
- Parks/Open Space
- Public Institutional
- Mixed Use
- Neighborhood Commercial
- General Commercial
- Utilities
- Light Industrial
- City Limits

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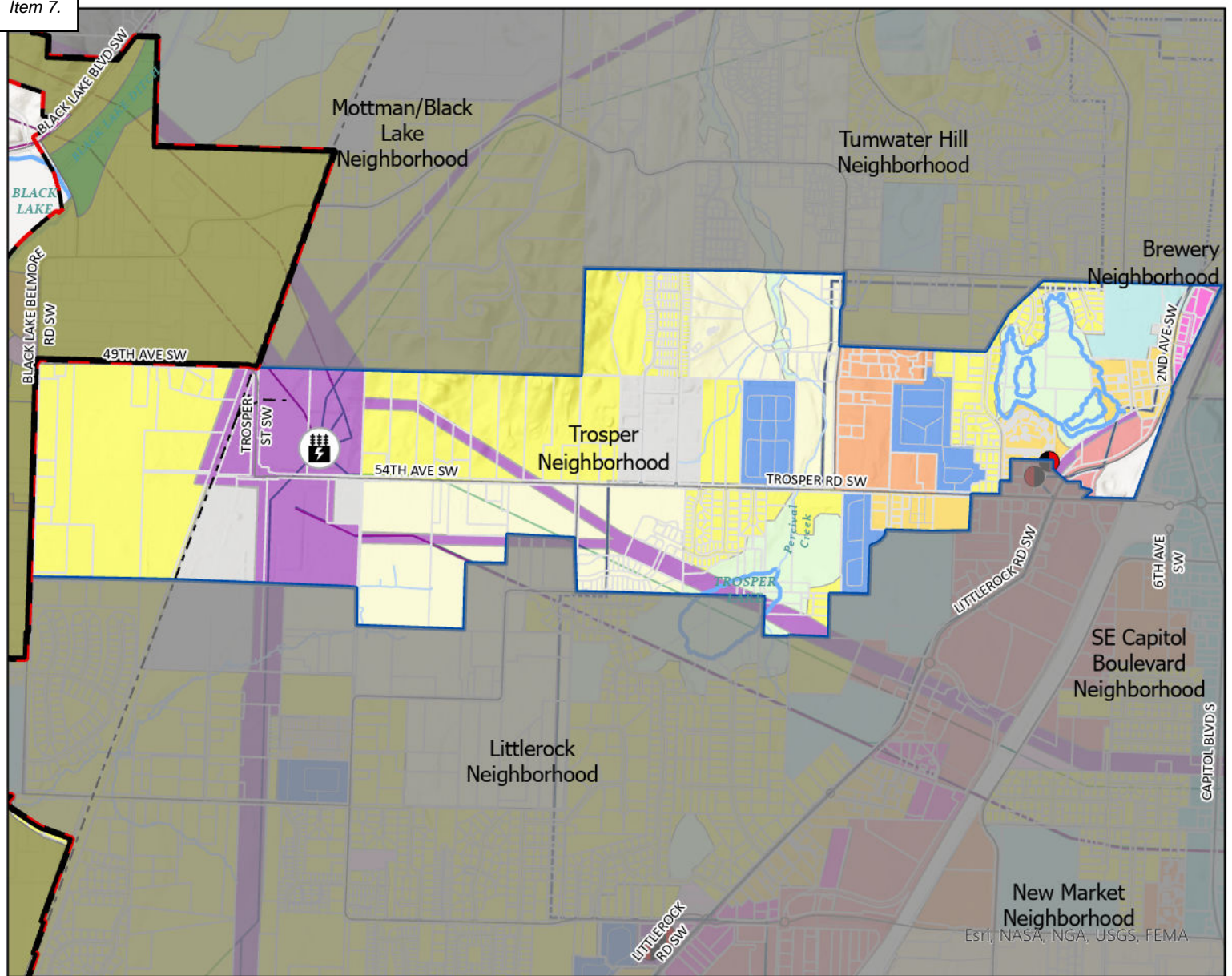
SW Tumwater Future Land Use

0 0.13 0.25 0.5 Miles



- Airport Related Industrial
- Low Density Residential
- Public Institutional
- Utilities
- Light Industrial
- Tumwater UGA
- City Limits

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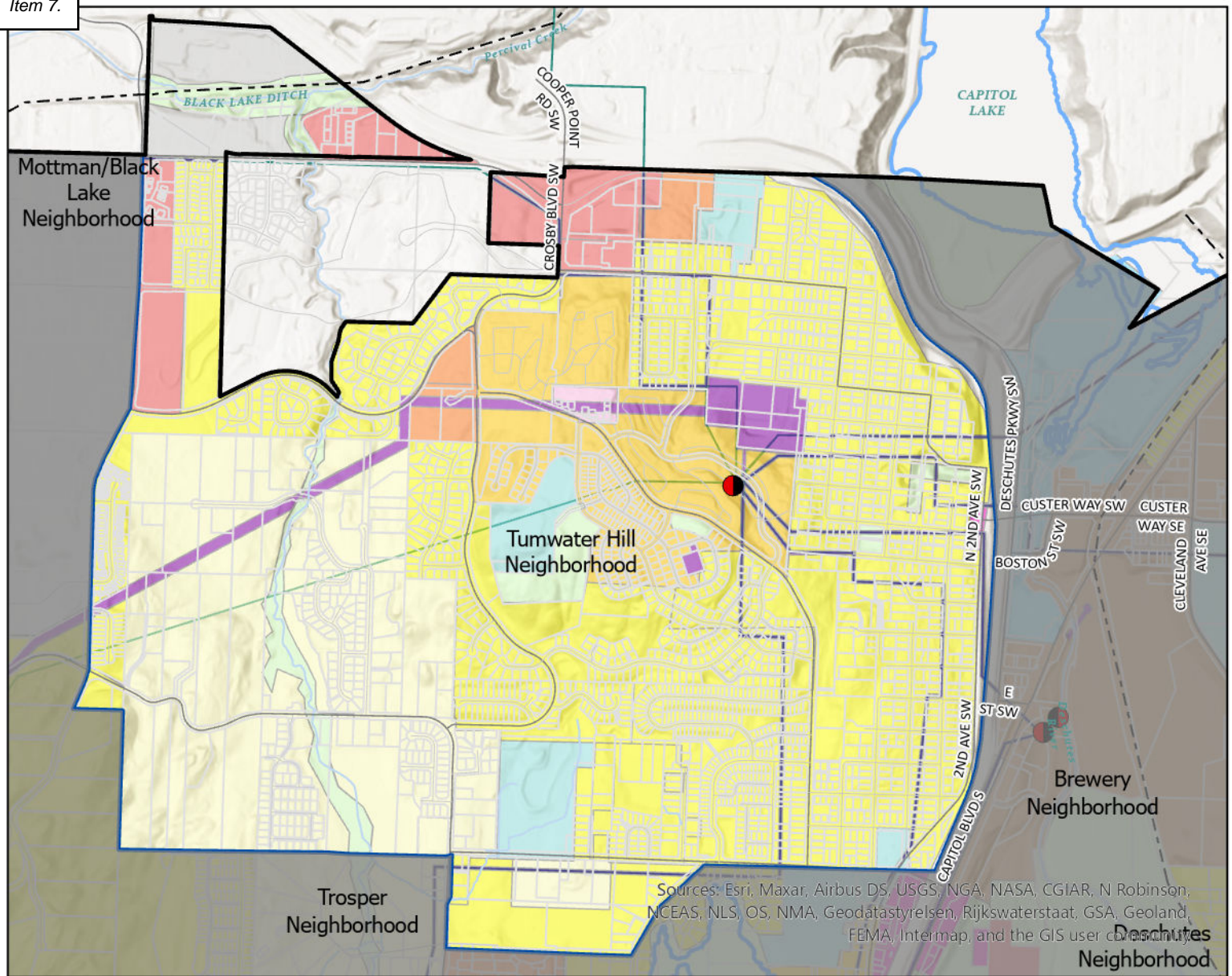
Trosper Future Land Use



- | | | | |
|--|--------------------------------|--|-------------------------|
| | Capitol Boulevard Community | | Mixed Use |
| | Manufactured Home Park | | Neighborhood Commercial |
| | Tumwater Town Center | | General Commercial |
| | Residential/Sensitive Resource | | Utilities |
| | Low Density Residential | | Heavy Industrial |
| | Medium Density Residential | | Light Industrial |
| | High Density Residential | | Tumwater UGA |
| | Parks/Open Space | | City Limits |
| | Public Institutional | | |

0 0.13 0.25 0.5 Miles

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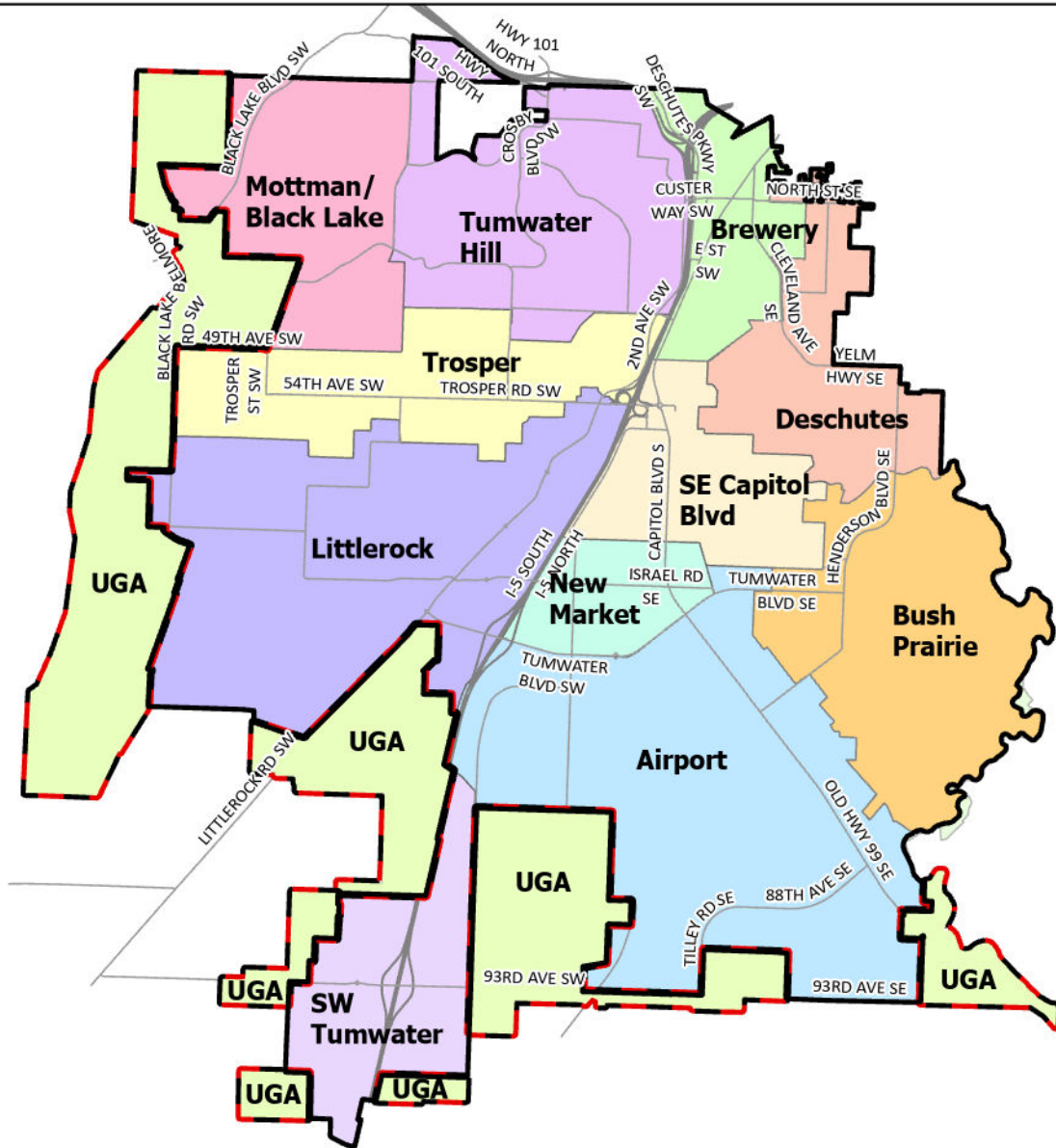
Tumwater Hill Future Land Use

0 0.1 0.2 0.4 Miles



- | | |
|--------------------------------|-------------------------|
| Brewery District | Public Institutional |
| Manufactured Home Park | Mixed Use |
| New Market Historic District | Neighborhood Commercial |
| Residential/Sensitive Resource | General Commercial |
| Low Density Residential | Utilities |
| Medium Density Residential | Light Industrial |
| High Density Residential | City Limits |
| Parks/Open Space | |

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Neighborhoods of Tumwater

0 0.4 0.8 1.6 Miles



City Limits

UGA

Airport

Brewery

Bush Prairie

Deschutes

Littlerock

Mottman/Black Lake

New Market

SE Capitol Boulevard

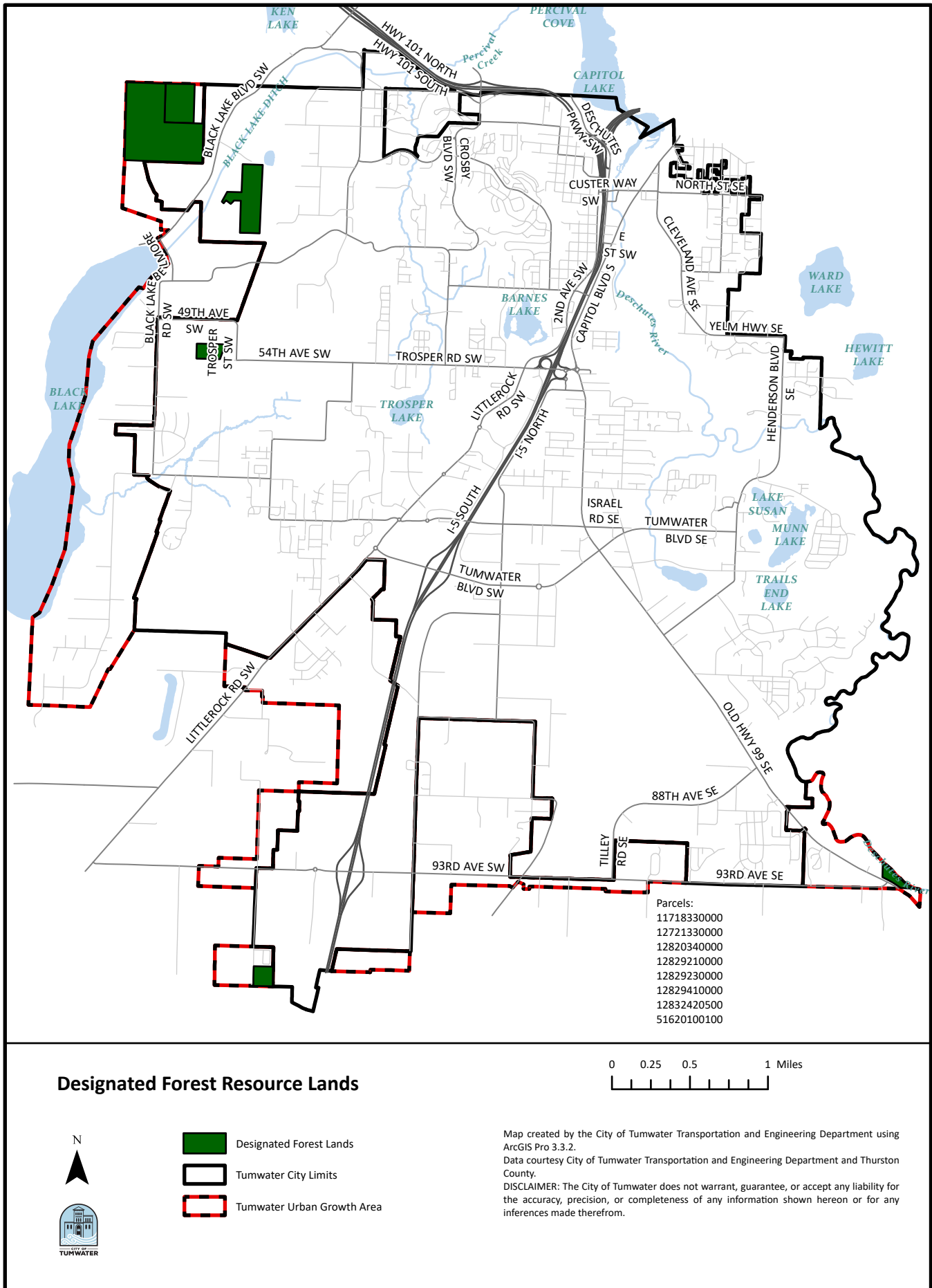
SW Tumwater

Trosper

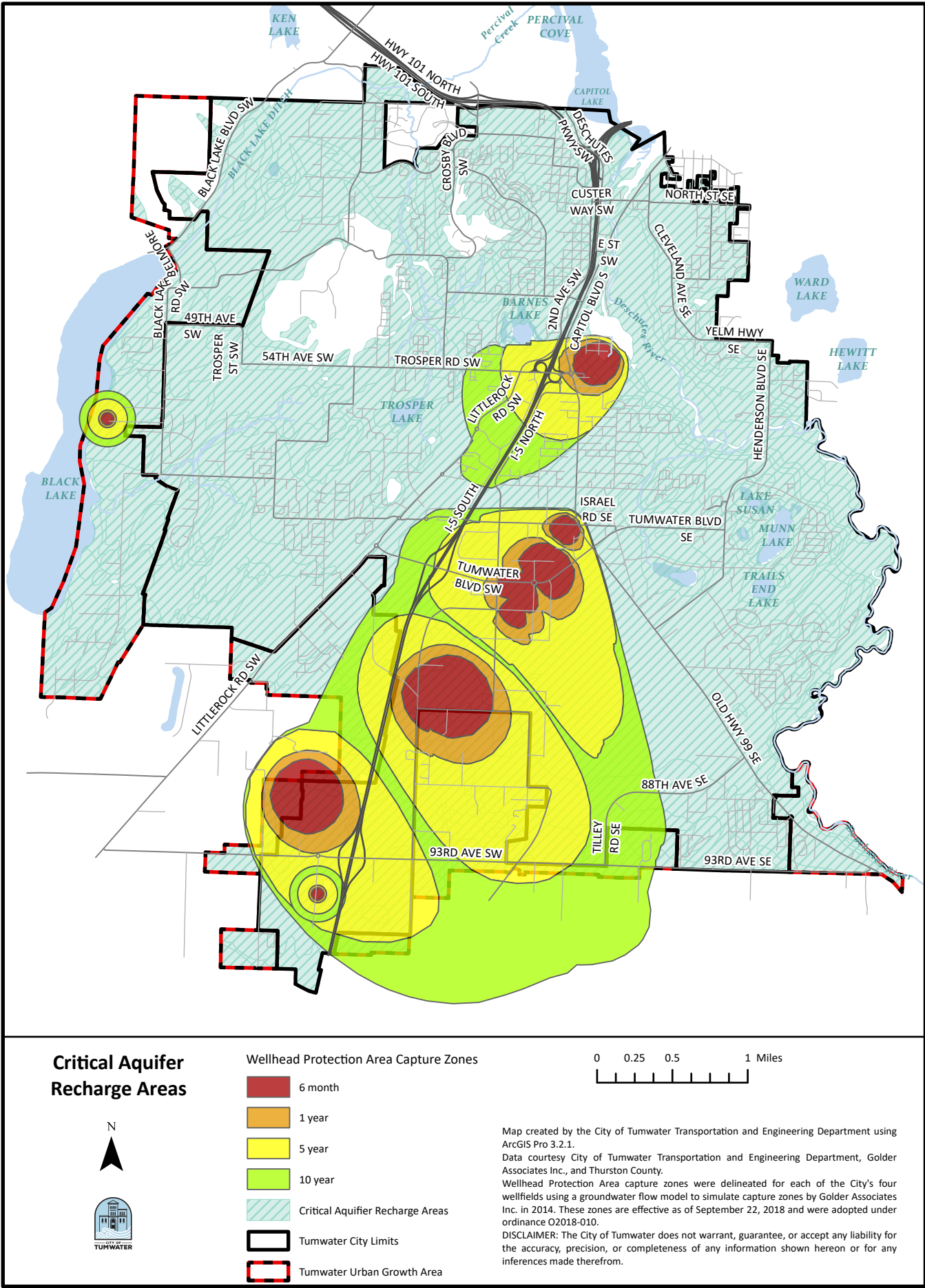
Tumwater Hill

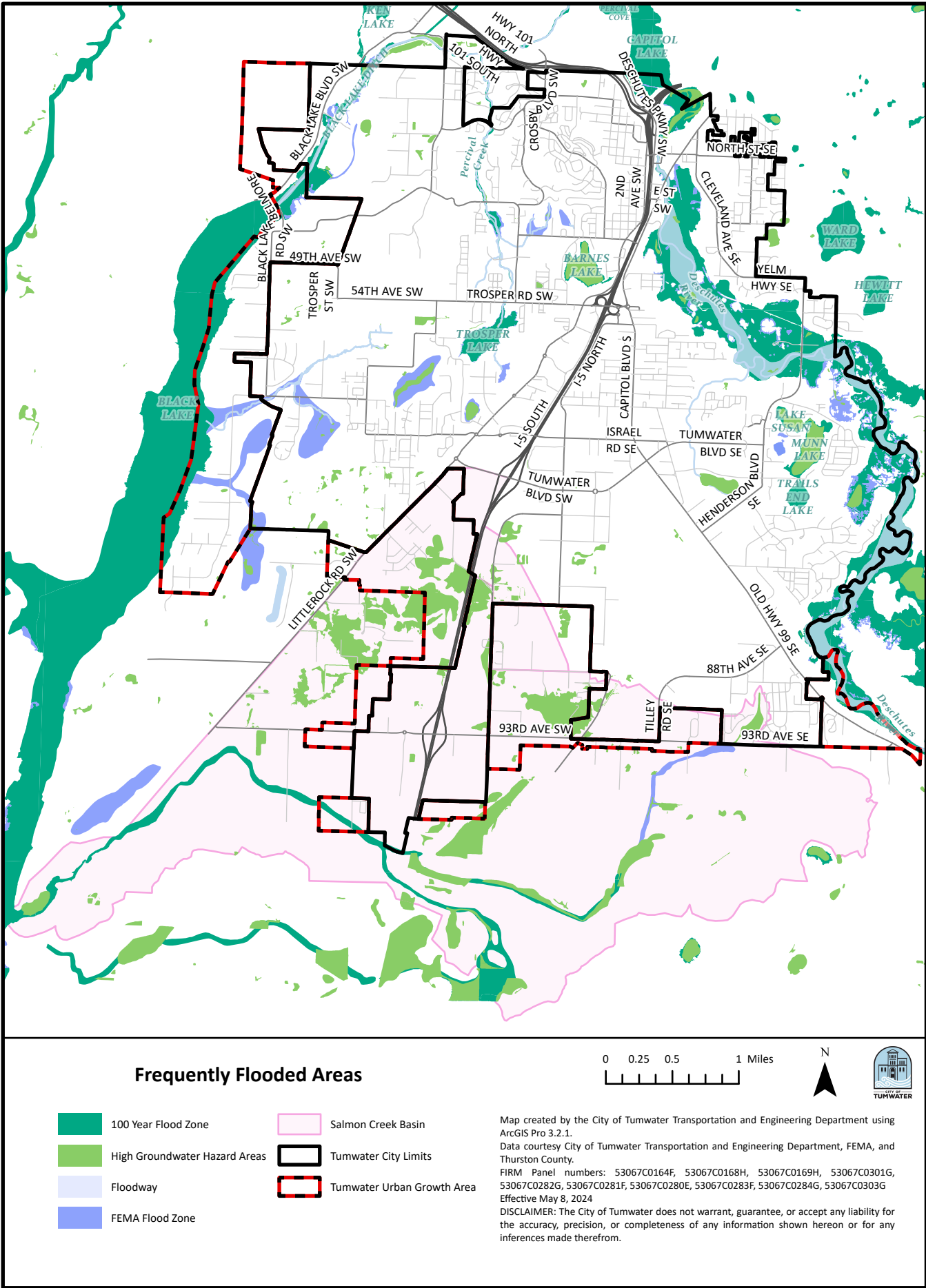
Map created by the City of Tumwater Community Development Department using ArcGIS Pro 3.4.3.

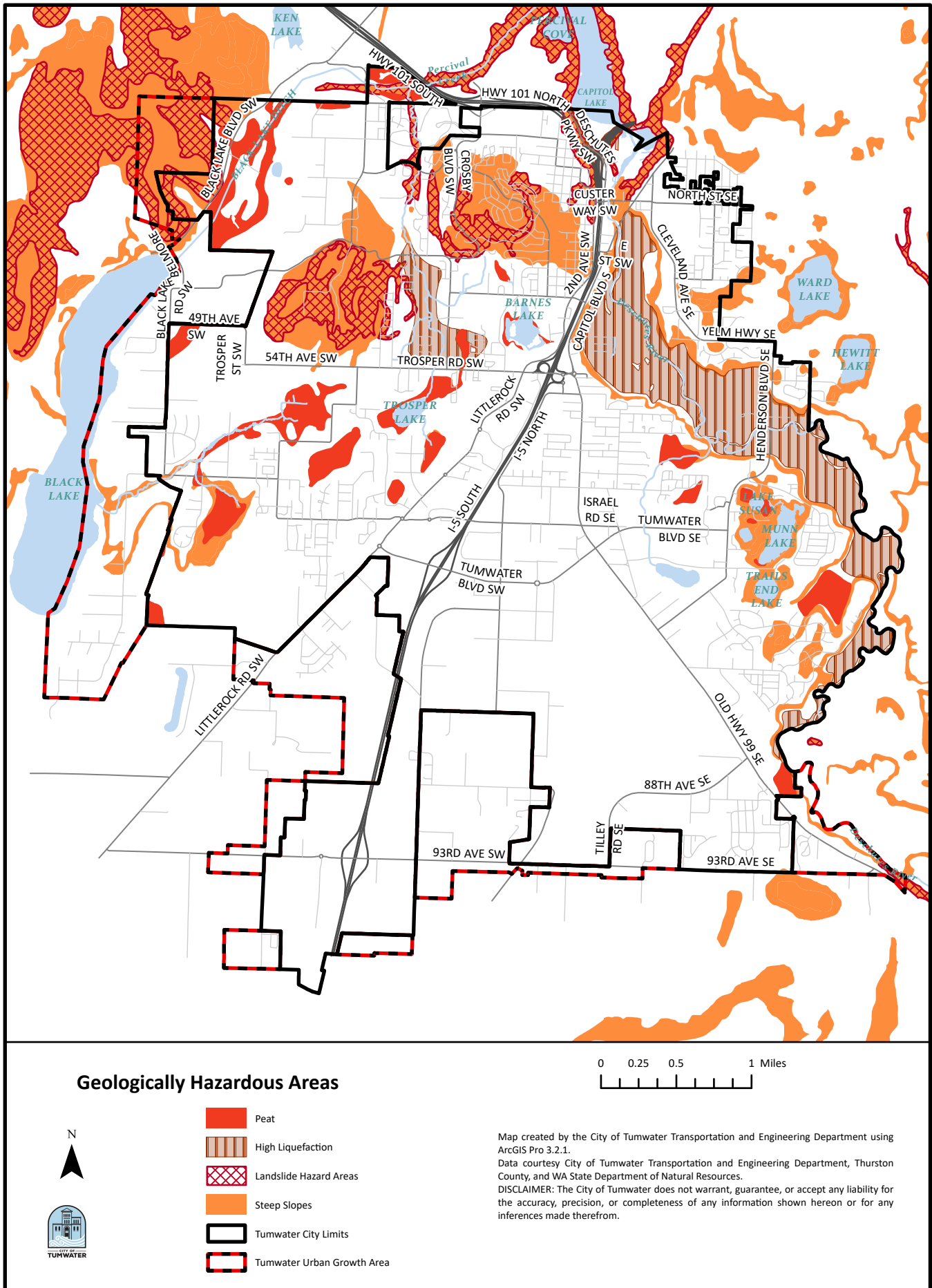
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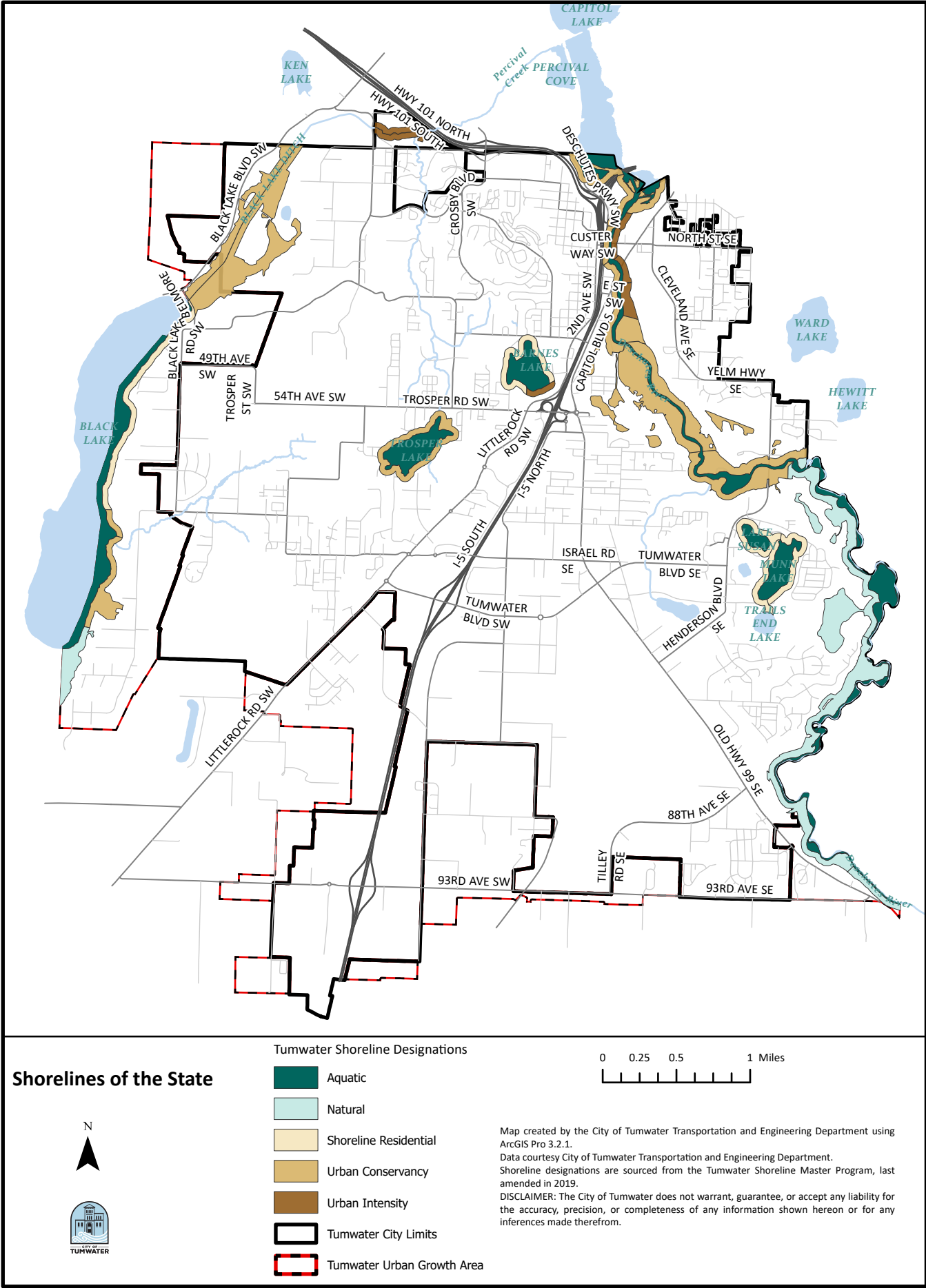


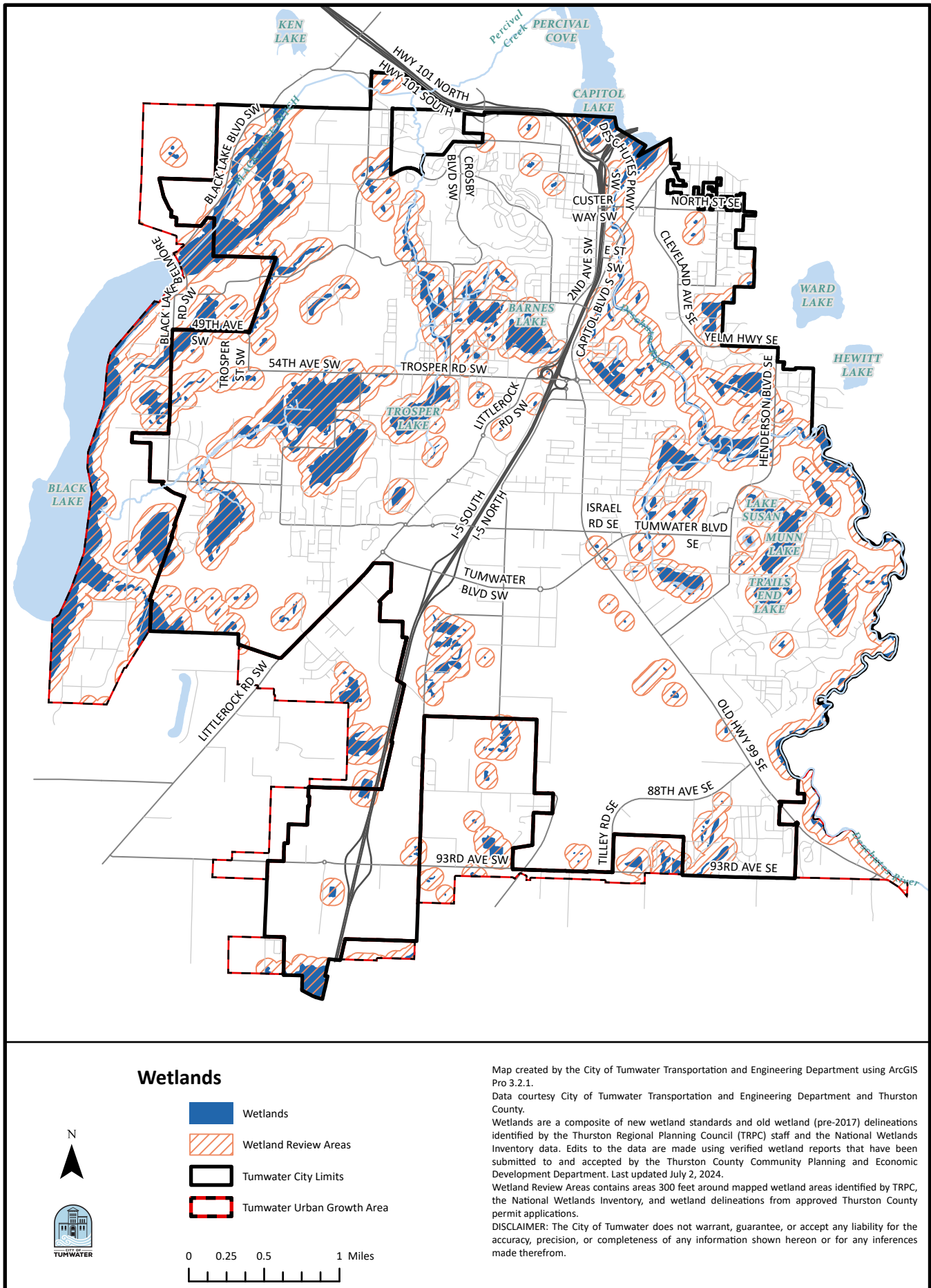












TO: Planning Commission
 FROM: Erika Smith-Erickson, Housing and Land Use Planner
 DATE: July 22, 2025
 SUBJECT: 2025 Comprehensive Plan Periodic Update – Housing Displacement Analysis and Comprehensive Plan Recommendations

1) Recommended Action:

No action requested. This is an opportunity to discuss the Housing Displacement Analysis that was completed by Uncommon Bridges and BHC Consultants for the Cities of Olympia, Lacey, Yelm, and Tumwater.

2) Background:

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

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

The intent of this Planning Commission work session is to discuss the City's approach to meeting the state requirements to address racially disparate impacts and discuss the Housing Displacement Analysis and the findings for the City of Tumwater and what actions the consultants recommend for Tumwater to avoid or mitigate displacement.

Staff will explain why a displacement analysis was required, how the results were incorporated into the draft housing element, and how Tumwater can continue to address and mitigate displacement.

4) Alternatives:

☐ None.

6) Attachments:

- A. Uncommon Bridges Housing Displacement Analysis
- B. Final Report Technical Annex
- C. Final Policy Recommendation Evaluation Matrix
- D. Housing Displacement Analysis PowerPoint

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

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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 Guidance ⁶. 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 standard 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

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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, principles 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	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.
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.
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.
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.

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
Lacey's housing policies were evaluated using the scoring system outlined below and the scores 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

		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.	
Number/Ref.	Policy Recommendation	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 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	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	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	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 indepenly 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. This policy would prevent displacement, particularly economic and physical, and would support other housing goals like affordability and preventing housing exclusion.
	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 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.
	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	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 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														
a.	Donate or lease surplus or underutilized jurisdiction-owned land to developers that provide low-income housing.	2	2	1	1	2	2	2	0	2	2	16		
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	0	2	1	14		
c.	Adopt a "Notice of Intent to Sell" ordinance for multifamily developments.	2	2	2	2	2	2	2	2	1	2	19		
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	0	2	17		
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	4		
f.	Provide funding for renovating and maintaining existing housing that serves low-income households or residents with disabilities.	2	2	2	2	2	1	2	2	1	2	18		
g.	Allow manufactured home parks in multifamily and commercial areas	2	2	2	2	2	2	2	2	1	2	19		
h.	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	2	18		
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	5		
j.	Require low-income housing units as part of new developments.	2	2	1	1	2	2	2	0	0	2	14		
m.	Fund development projects that increase low-income housing through grants or loans.	2	2	1	2	2	1	2	0	2	2	16		
n.	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	1	2	2	2	2	19		
o.	Enhance enforcement of property maintenance codes to keep housing in good repair.	2	2	1	1	1	1	1	2	0	0	11		
p.	Partner with low-income housing developers (such as Habitat for Humanity) to expand homeownership opportunities.	2	2	1	1	2	1	2	0	0	2	13		
q.	Provide displaced tenants with relocation assistance.	1	2	2	2	1	1	1	0	0	0	10		
r.	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	0	2	0	0	8		
s.	Rezone manufactured home parks to a manufactured home park zone to promote their preservation.	2	2	2	2	2	2	2	2	1	2	19		
t.	Adopt a "right to return" policy.	2	2	2	2	2	2	1	2	0	0	15		
u.	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	1	2	2	1	0	0	14		
v.	Establish a down payment assistance program.	2	2	1	2	2	1	2	0	0	2	14		
w.	Identify and implement appropriate tenant protections that improve household stability.	2	2	2	2	2	1	2	2	0	1	16		
x.	Allow third-party review of building permits for development projects.	0	0	0	0	0	2	0	2	1	0	6		
y.	Develop a plan for adapting vacant commercial space into housing.	2	1	0	1	1	1	2	0	2	2	12		
z.	Expand allowance of residential tenant improvements without triggering land use requirements.	2	1	2	0	2	1	1	2	1	0	12		
aa.	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	15		
ab.	Lower transportation impact fees for multifamily developments near frequent transit service routes.	1	2	1	1	1	1	1	0	1	1	10		
ac.	Allow deferral of impact fee payments for desired unit types.	0	0	0	0	0	1	1	2	0	1	6		
ad.	Simplify land use designation maps in the comprehensive plan to help streamline the permitting process.	1	0	0	0	0	2	1	0	2	0	6		
ae.	Integrate or adjust floor area ratio standards.	0	0	0	0	0	0	1	0	1	1	4		
af.	Maximize use of SEPA threshold exemptions for residential and infill development.	0	0	0	0	0	2	1	0	1	1	5		
ag.	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	1	3		
ah.	Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, etc.).	0	1	0	1	2	0	1	0	2	1	8		
ai.	Allow more housing types in commercial zones.	2	1	0	2	1	1	2	0	1	1	11		
aj.	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	1	17		
ak.	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	1	1	1	1	14		
al.	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	1	0	0	0	0	7		
am.	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	1	2	2	2	2	19		
an.	Establish a rental registration program to improve access to data and share information with landlords.	0	0	0	0	0	0	1	0	0	0	1		
ao.	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	0	1	1	9		
ap.	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2	1	1	2	2	2	0	2	2	16		
aq.	Establish an affordable housing sales tax.	1	2	1	1	2	1	2	0	2	2	14		
ar.	Establish a regional housing trust fund to provide dedicated funding for low-income housing.	2	1	1	1	1	2	1	2	0	2	14		
as.	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		

City of Olympia

Policy Evaluation Matrix
The following table provides a summary of the impact of each policy option on the various criteria used to evaluate displacement pressures. The scores are unique to each jurisdiction and scored 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

COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria											OLYMPIA-SPECIFIC CRITERIA			
Number/ Ref.	Policy Recommendation	Racially Disparate Impacts:	Economic Displacement:	Physical Displacement:	Cultural Displacement:	Housing Exclusion:	Implementation Considerations:	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?	Explanation.	Score/out		
		Does this policy prevent racially disparate impacts or work to repair past harm?	Does this policy help prevent or mitigate economic displacement?	Does this policy help prevent or mitigate physical displacement?	Does this policy help prevent or mitigate cultural displacement?	Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Does the city have staff and resources necessary to implement this policy effectively?				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.			

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.
	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	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.
	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	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 indepently and be prepared to exercise the right of first refusal.	2		2		2	2	1	2	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 operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2		2		2	2	1	1	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	2	1	1	0	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	2	1	0	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	2	1	2	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	1	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

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	2	1	0	2	6	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.
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	6	
1.f.	Partner with low-income housing developers to expand homeownership opportunities.	2	1		2	2	2	1	1	0	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	-1	2	0	2	13	
1.h.	Provide funding for low income and special needs residents to purchase housing through community land trusts.	2	2		2	2	-1	2	0	2	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	2	1	0	1	9	
1.k.	Require low-income housing units as part of new developments.	1	2		0	0	1	2	1	0	6	
1.l.	Adopt a "Notice of Intent to Self" ordinance for multifamily developments.	2	2		1	2	0	1	0	1	11	
1.n.	Allow mobile or manufactured home parks (MHP'S) in multifamily and commercial areas.	0	2		2	0	1	2	1	2	12	
1.o.	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	0	11	
1.p.	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2		2	2	2	1	1	0	14	
1.q.	Enhance enforcement of property maintenance codes to keep housing in good repair.	0	0		1	0	0	1	0	2	4	
2.c.	Provide displaced tenants with relocation assistance.	1	1		2	1	1	0	0	0	6	
2.d.	Consider a Tenant Opportunity to Purchase (TOPO) Ordinance	2	2		2	2	2	1	0	0	13	
2.e.	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training.	2	2		2	2	2	1	0	2	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	5	
2.g.	Establish a down payment assistance program.	2	1		1	1	2	0	0	0	7	
2.h.	Adopt a "right to return" policy	1	0		2	1	2	0	0	0	7	
2.i.	Rezzone manufactured home parks to a manufactured home park zone to promote their preservation.	1	2		2	2	2	0	0	2	13	
3.i.	Consult with Washington State Department of Transportation (DOT) 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	0	1	0	1	
3.j.	Make use of SEPA threshold exemptions for residential and infill development.	0	0		0	0	2	2	2	0	4	
3.r.	Complete a subarea plan for the Capital Mall High Density Neighborhood area.	0	0		0	0	2	1	2	0	5	
3.s.	Develop a plan for adapting vacant commercial space into housing.	0	1		1	1	0	2	1	2	8	
3.t.	Expand allowance of residential tenant improvements without triggering land use requirements.	2	2		2	2	2	1	0	2	15	
3.u.	Identify strategically placed but underdeveloped properties and determine what barriers exist to developing desired housing types.	0	1		0	0	2	1	2	0	6	
3.v.	Increase minimum residential densities.	0	1		0	0	1	1	2	0	6	
3.w.	Integrate or adjust floor area ratio standards.	0	1		0	0	1	1	2	0	6	
4.g.	Allow more housing types in commercial zones.	0	1		1	1	0	1	0	0	6	
4.h.	Allow single-room occupancy (SRO) housing in all multifamily zones.	2	2		0	1	2	2	2	1	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	2	1	0	2	11	
4.j.	Strategically allow live/work units in nonresidential zones.	2	2		2	2	2	0	2	0	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	1	2	1	1	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	1	2	0	12	
6.f.	Establish an affordable housing loan program.	2	2		1	1	2	1	2	0	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	16	
6.h.	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2		1	2	2	1	1	0	12	

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

		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.							
Number/ Ref.	Policy Recommendation	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 this 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?	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.	
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	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 indepently 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	0	0	0	0	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	2	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 impact on reducing displacement pressures are highlighted in green.														
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		
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	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	2	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	2	1	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	2	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	2	1	2	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		
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	0	2	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	2	0	2	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	0	1	0	1	1	3		
5.f.	Track data on affordable housing at the regional level.	0	0	0	0	0	0	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		

City of Yelm

Policy Evaluation Matrix

Each policy recommendation in this matrix was first assigned a positive, neutral, or negative impact on displacement pressures and then scored 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

		COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria						YELM-SPECIFIC CRITERIA					
Number/Ref.	Policy Recommendation	Racially Disparate Impacts:	Economic Displacement:	Physical Displacement:	Cultural Displacement:	Housing Exclusion:	Implementation Considerations:	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?	Explanation.	Score(out of 15)	
		Does this policy prevent racially disparate impacts or work to repair past harm?	Does this policy help prevent or mitigate economic displacement?	Does this policy help prevent or mitigate physical displacement?	Does this policy help prevent or mitigate cultural displacement?	Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Does the city have staff and resources necessary to implement this policy effectively?				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.		
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	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.	9	
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	2	2	0	2	This policy would help preserve existing affordable housing and manufactured housing, but would not directly impact affordability, housing supply, or address racially disparate impacts.	15	
	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	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	
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	1	0	0	1	This policy would primarily help reduce displacement pressures and increase the supply of affordable housing.	12	
	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	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 indepently and be prepared to exercise the right of first refusal.	2	2	2	2	2	0	2	1	2	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.	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	2	0	2	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.	15	
	Minimize the amount of potential long-term housing that is used for short-term transient rentals (e.g., AirBnBs).	1	2	1	2	2	1	2	0	1	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.	12	
	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	1	1	0	0	This policy would address displacement and help prevent racially disparate impacts.	12	
	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	1	0	0	0	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.	8	
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	0	1	1	2	0	2	1	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	2	0	0	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													
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	0	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	0	2	0		8	
	5 Allow single-room occupancy (SRO) housing in all multifamily zones.	2	2	0	2	2	2	2	2	2		13	
	6 Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	2	0	0		13	
	7 Allow more housing types in commercial zones	2	1	0	1	1	1	0	2	1		9	
	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	1		7	
	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	1	2	1	2		16	
	Partner with low-income housing developers (such as Habitat for Humanity, HomesFirst) to expand homeownership opportunities.	2	2	2	2	2	1	1	2	2		16	
	Use Community Development Block Grant (CDBG), Section 108 loans and other federal resources for affordable housing.	2	2	2	2	2	1	2	1	2		16	
	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	2	0	2		12	
	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	
	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	1	1	1	2		14	
	1 Offer density bonuses for low-income housing.	0	1	0	0	0	0	0	2	2		6	
	2 Discuss lower hook-up fees and other incentives for low-income affordable housing.	2	1	1	1	1	0	2	2	2		13	
	3 Offer developers density and/or height incentives for desired unit types.	0	0	0	0	0	1	0	2	0		6	
	4 Review fees/regulations to identify housing cost reductions.	1	1	0	1	1	2	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	
	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	1	1	0	0	2	0		5	
	3 Develop partnership with InterCity Transit to expand bus routes to additional areas of the city.	0	1	1	1	1	0	0	0	0		6	
	4 Expand the multifamily tax exemption to make it available in all transit corridors.	0	1	0	0	1	0	0	1	2		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	1	0	2		15	
	2 Explore barriers and policies that can increase access to housing for formally incarcerated individuals.	2	0	1	2	2	1	0	2	2		12	
	3 Monitor the need for special housing and increase opportunities for such housing.	1	0	1	1	2	1	0	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

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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 estan unidos en la pelea contra el desplazamiento de las viviendas familiares.</p> <p>Juntos, intentan analizar como 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 fisico: Ocurre cuando alguien recibe una orden de desalojo, ejecución hipotecaria, o hay una falta de viviendas dignas.</p> <p>Desplazamiento economico: 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: Ocurre 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

*Housing Displacement Analysis for Lacey, Olympia, Tumwater, and Yelm:
Community Outreach: Preliminary Survey Outcomes*

1/15/2024

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?
------------------------------------	----------------------------------------------------	------------------------------------------------

*Housing Displacement Analysis for Lacey, Olympia, Tumwater, and Yelm:
Community Outreach: Preliminary Survey Outcomes*

1/15/2024

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:

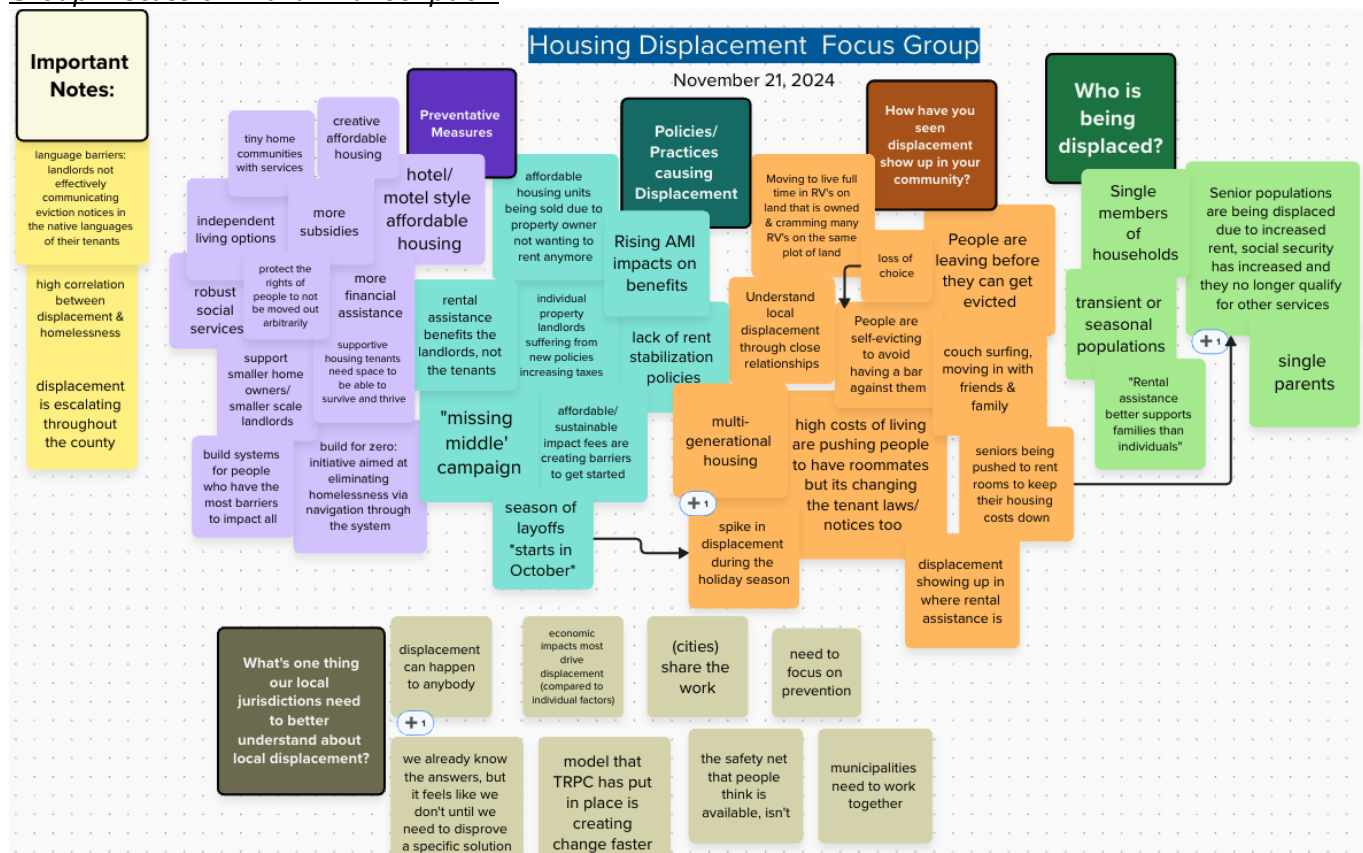
Preventative measures - In order to prevent displacement, there is a need to focus more heavily on prevention rather than react.

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 to 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

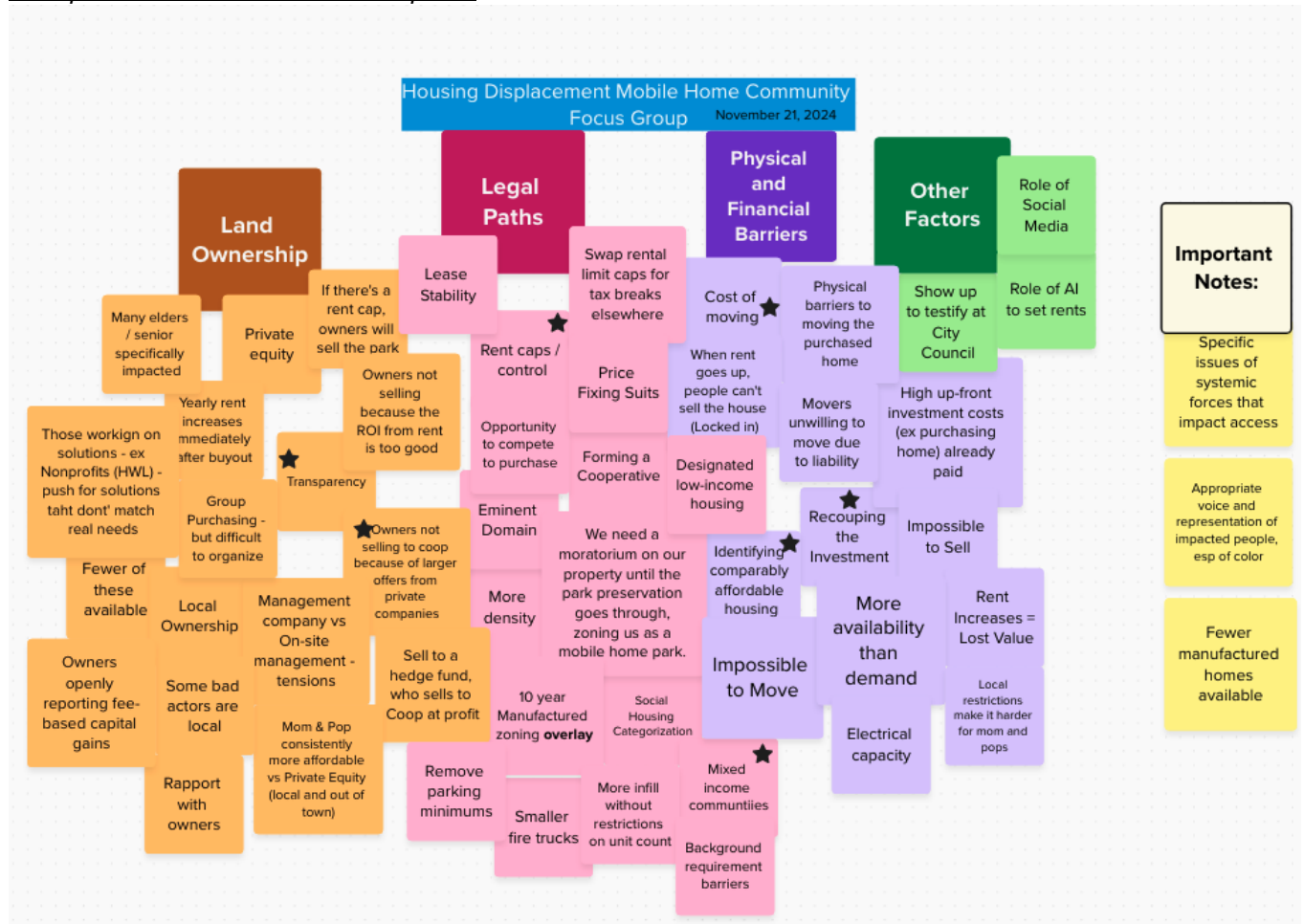
- All residents shared how the increase in private equity ownership in recent years has led to rapidly rising costs of living in MHC. Some have explored community land trusts (CLTs) but find the setup and structure challenging with existing financial burdens and pressures. Participants reported that 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.

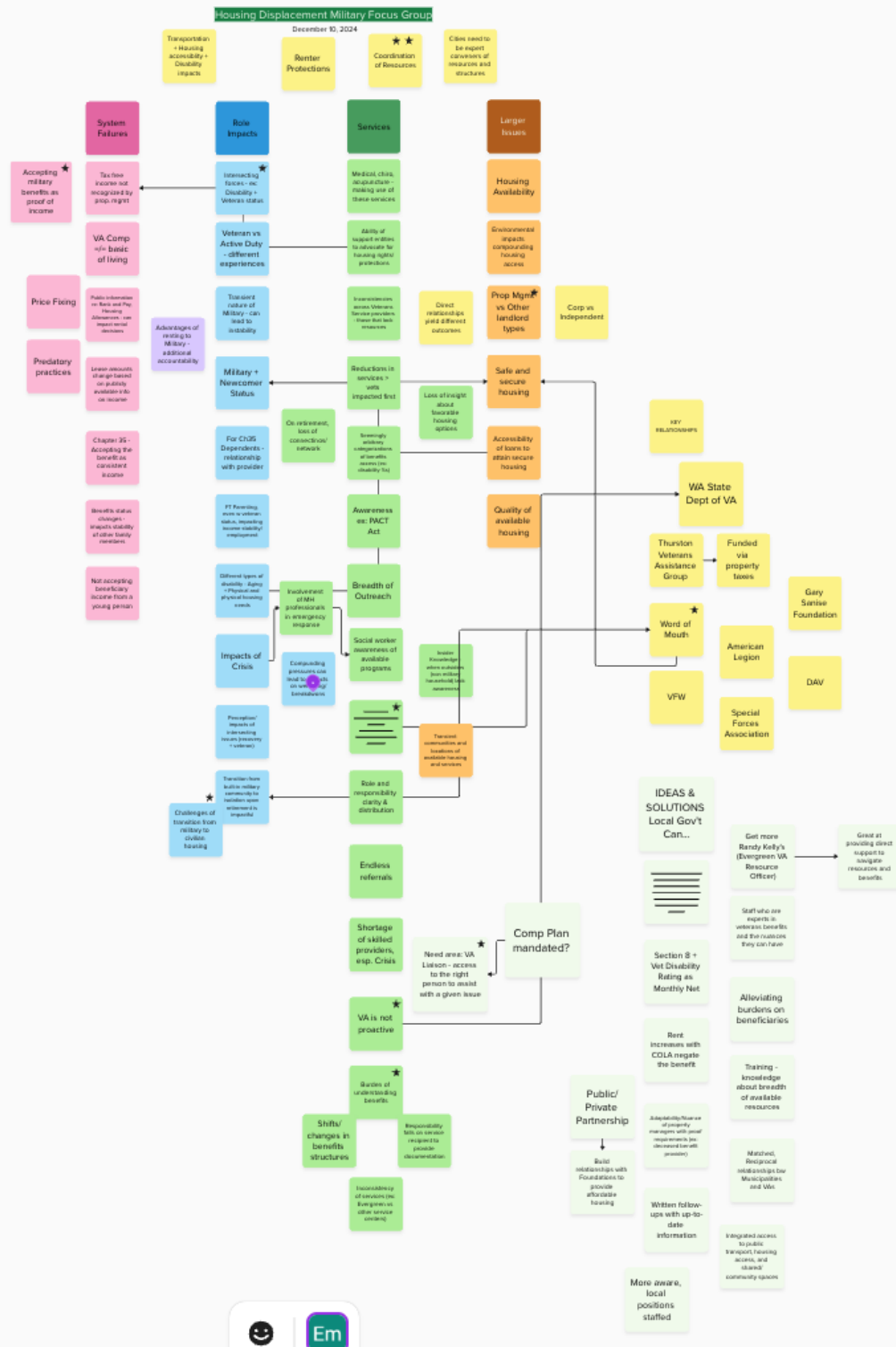
Provider Competence

- 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

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

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).

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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	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>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	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.	NA
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	Focus medium or high-density development in Neighborhood Centers of low-density neighborhoods.

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
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.	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.
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.	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.

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	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	This policy supports housing near commercial services. It could better address affordability.	NA
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.	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: Renters	2017-2021	2015-2019	Difference
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 (≤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.

City of Tumwater

Policy Evaluation Matrix
jurisdiction and scored 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.

The list also includes each cities' respective Housing Action Plan policies that have not been completed yet to

Number/ Ref.	Policy Recommendation	Racially Disparate Impacts:		Economic Displacement:		Physical Displacement:		Cultural Displacement:		Housing Exclusion:		Implementation Considerations:		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?		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.
		Does this policy prevent racially disparate impacts or work to repair past harm?	Does this policy help prevent or mitigate economic displacement?	Does this policy help prevent or mitigate physical displacement?	Does this policy help prevent or mitigate cultural displacement?	Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Does the city have staff and resources necessary to implement this policy effectively?																
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								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	2	1	2	2	2	2	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	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	2	1	2	1	2	2	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	0	1	2	0							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 indeperntly and be prepared to exercise the right of first refusal.	2	2	2	2	2	2		0	2	2	2	1								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 operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	2	1	2	1	2	2	1	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	2	1	2	1	0	0	0	0	1	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	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	0	2	1	1	2	1							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	2	1	2		0	2		0		1							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																							
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	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	2	0	1	0	1	0							11		
1.c.	Adopt a "Notice of Intent to Sell" ordinance for multifamily developments.	2	2	2	2	2	2	2	2	2	1	2	2	2							17		
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	2	2	2	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	1	1	1	1	1	2	0	0	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	2	1	2	2	2	2	1	0							16		
1.h.	Encourage low-income housing units as part of new developments.	2	2	1	1	2	2	2	0	2	2	0	2	2							14		
1.j.	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	2	1	2	2	2	2	0	0							17		
1.m.	Extend public water and sewer to unserved areas to allow infill development in underdeveloped areas.	1	2	1	1	2	2	1	0	2	1	2	2	1							12		
2.a.	Have developers provide tenants displaced by redevelopment with relocation assistance.	1	2	2	2	2	1	1	0	0	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	2	1	2	0	1	2	0	2	2							10		
2.c.	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	2	1	2	2	1	2	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	2	1	0	0	1	0	0	0							11		
2.f.	Develop a technical assistance or education program for small landlords.	0	0	0	0	0	0	1	0	0	0	0	0	0							1		
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	2	1	2	2	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	1	2	1	2	2	0	2	2	0							12		
3.d.	Continue to look for place- making opportunities along urban corridors.	0	0	0	2	2	0	2	0	0	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	2	1	2	1	2	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	2	1	2	2	1	2	2	2							16		
4.b.	Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	2	1	0	0	0	2	2	2							15		
5.a.	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	2	1	0	0	1	0	0	1							12		
5.b.	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	2	1	0	0	1	0	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	0	1	0	0	1	0	0	1							3		
5.f.	Track data on affordable housing at the regional level.	0	0	0	0	0	0	2	0	0	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	2	1	2	2	1							15		
6.c.	Establish an affordable housing sales tax.	1	2	1	1	1	2	0	2	2	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	0	1	0	0	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	1	2	2	2	2	1	1							13		

2025 Comprehensive Plan Update Housing Displacement Risk Analysis

UNCOMMON BRIDGES BHC CONSULTANTS

*Balancing Nature and Community:
Tumwater's Path to Sustainable Growth*



Planning Commission Work Session, July 29, 2025

Discussion



- What is Displacement?
- Housing Displacement Analysis
- Process & Engagement Emphasis
- Tumwater's local displacement risk
- Next steps



Displacement- What is it?

When a household is forced to move from its community because of conditions beyond its control.

- Physical displacement: Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality
- Economic displacement: Households are compelled to move by rising rents or costs of homeownership like property taxes
- Cultural displacement: Residents are compelled to move because the people and institutions that make up their cultural community have left the area

Background

The Growth Management Act requires that Tumwater's Comprehensive Plan contain a Housing Element that identifies local policies, regulations, and areas that result in racially disparate impacts, displacement, and exclusion in housing

Definitions

Housing displacement: is when a household is forced to move from its community because of conditions beyond its control

Racially Disparate Impacts: When policies, practices, rules or other systems result in a disproportionate impact on one or more racial groups

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”

* Complete set of requirements may be found under RCW 36.70A.070(2)



Indicators

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



Discussion

What types of displacement affects Tumwater?

- **Physical displacement:** Households are directly forced to move for reasons such as eviction, foreclosure, natural disaster or deterioration in housing quality
- **Economic displacement:** Households are compelled to move by rising rents or costs of homeownership like property taxes
- **Cultural displacement:** Residents are compelled to move because the people and institutions that make up their cultural community have left the area



Analysis

The analysis, completed by contractors Uncommon Bridges and BHC Consultants, answers the following questions for Tumwater:

- Who is at risk of housing displacement?
- How do we measure local housing displacement?
- What policies may help us to reduce the risks of housing displacement?

Analysis Process

Data collection and inputs for the analysis included:

- Academic Background Research
- Local Policy Review
- Displacement Indicator Data Analysis
- Public Engagement
- Policy Recommendations

Data – Racial Diversity

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



Data- Affordable units

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



Data – Age

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%



Review Criteria – All Jurisdictions (Part 1)

Consultants reviewed the current Housing Element, Land Use Element, and Housing Action Plan against the following criteria:

- **Prevent or Repair Harm:** 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?



Review Criteria – All Jurisdictions (Part 2)

- **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



Tumwater Specific 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?



Public Engagement

**4**

Planning Staff Meetings

4

Affinity Group Roundtables

167

Survey Responses

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



Affinity Group Roundtables

Affinity Group Roundtables were held among manufactured housing communities, communities of low-wage workers, military families & households, and accessory dwelling unit households

Affinity Group Insights (Part 1)

- 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



Affinity Group Insights (Part 12)

- 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

Policy Review – Tumwater

Assets

- Manufactured Home Park zoning
- Higher density homes after HB 1110
- Housing Action Plan shows the City has begun work to implement anti-displacement policies

Challenges

- Maintaining housing affordability
- Revive market for affordable housing developers
- Adaptive reuse of buildings
- Weak language



Tumwater Policy Recommendations

**Community
land trust
program**

*For mobile
home
communities*

**Mobile home
ownership**

*At the private,
local, small
scale to
preserve
existing
affordable
stock*

**Streamline
ADU
processing**

*With increased
staffing
capacity and
attention*



Next Steps

- Staff incorporated suggested policies and language amendments into the draft Housing Element
- Identify, develop, and maintain community partnerships and collaboration with other jurisdictions, developers, and service providers
- Pursue funding for programs and draft initiatives identified in the Comprehensive Plan Update and Housing Action Plan

Project Web Site

Balancing Nature & Community

Tumwater's Path to Sustainable Growth

Every ten years, the City is required by the state to conduct a periodic update of its Comprehensive Plan and related development regulations to ensure that they comply with the Growth Management Act and respond to changes in the City.

GET INVOLVED	+
PROJECT SCHEDULE	+
PUBLIC ENGAGEMENT	+
CITY MEETINGS	+
DRAFT ELEMENTS	+
GUIDANCE DOCUMENTS	+
CITY PRESENTATIONS	+
CITY PUBLIC ENGAGEMENT	+
CITY STAFF REPORTS	+

All documents related to the periodic update are on the [City's periodic update webpage](#), including:

- Information on all meetings
- State guidance materials
- Drafts of the Elements as they are prepared
- Staff reports and presentations



Submitting Comments or Questions

Written comments or questions are welcome at any time during the periodic update process

- Update website: [2025 Comprehensive Plan Update](#)
- Periodic update email: compplan@ci.tumwater.wa.us
- City of Tumwater contact:
Community Development Department
555 Israel Road SW
Tumwater, WA 98501
Phone: 360-754-4180
Email: compplan@ci.tumwater.wa.us

