Housing Displacement Analysis and Comprehensive Plan Recommendations for the cities of Lacey, Olympia, Tumwater, and Yelm

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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 Commerce[3], 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 Commerce[4] include:

[3] Department of Commerce (2023). Guidance to Address Racially Disparate Impacts. https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege

[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) tool[5]. 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 stand tool for national demographic data. The survey has evolved over time and is typically based on a 90% confidence interval serving as one of the most reliable data points available for this work.

What These Sources can Cannot Tell Us

As described in the Department of Commerce's Affordable Housing Planning Resources, The RDI Data Toolkit was most recently updated in November 2023 for jurisdictions completing periodic comprehensive updates in 2024 and 2025.

The currently available RDI Data Toolkit that can be accessed online currently only limits ACS Community Survey Data through 2020 and CHAS data date ranges through 2010-2014 and 2015-2019. As a result, the consultant team directly accessed and utilized the most recently available CHAS data through HUD for 2017-2021. The database was culled to ensure that the corresponding tables were pulled for Lacey, Olympia, Tumwater, and Yelm.

[6] Department of Commerce (2023). Guidance to Address Racially Disparate Impacts. https://deptofcommerce.app.box.com/s/1l217l98jattb87qobtw63pkplzhxege

As the data pulled represents a snapshot in time for the corresponding date range it is difficult to pinpoint the current status of any one metric. Let alone the limitation that the most current and recent date range extends through 2021.

As a result, the consultant team used a comparative analysis across the windows to determine and interpret trends rather than provide absolute results.

The CHAS data, which were publicly available at the time of this report's publication, have some limitations. The 2017-2021 data set represents a synthesis of data from that period and does not tell us much about the effects of COVID-19 or any policy actions undertaken since 2021.

As identified in feedback from jurisdictional staff, conducted community engagement, and academic research the real and perceived impacts of the COVID-19 pandemic on housing instability were significant. We strongly recommend jurisdictions contextualize the analysis in this report for what folks know and understand about the pandemic.

Unfortunately, it is likely only very recently that there is a reasonable data range since the onset of the pandemic to begin understanding the explicit implications on housing displacement, racially disparate impacts, and housing exclusion. Without that window of data, this report is not able to make any strong correlations between the two.

Each jurisdiction is responsible for their respective responses to the updates required by the amended HB1220 (2021). As mentioned in the executive summary, this report should be utilized as a supplementary document to support jurisdictions in this effort. This report should not be considered and/or submitted as a direct response to the statutory requirements without additional deliberation from jurisdictional staff.

COMMUNITY ENGAGEMENT

Affinity Groups

Uncommon Bridges coordinated four (4) affinity group conversations to gather community stakeholders to discuss housing displacement risk in Lacey, Olympia, Tumwater, and Yelm. Affinity group topics included:

1) Manufactured housing communities,

2) Communities of low-wage workers,

3) Military families and households, and;

4) Accessory dwelling units.

Multi-Media Survey

A key aspect of this project involves assessing community insight, perceptions, and lived experiences around livability, affordability, and displacement impacts in Olympia, Lacey, Tumwater, and Yelm. A

robust data collection effort, including multi-lingual outreach via community anchors, focus groups, and an open-access multi-modal survey resulting in 167 responses, sought to engage those frequently involved and new perspectives and experiences not included in past policy and housing assessments conducted in the region.

POLICY EVALUATION & CRITERIA

To assess and evaluate policy options and recommendations, we completed a policy evaluation using two sets of criteria: displacement-specific and locality-specific. The displacement-specific criteria were based on the Department of Commerce's categories of displacement: economic, physical, and cultural. Through discussions with city staff, audits of the city's Housing Needs Assessments, and stakeholder feedback, we identified additional criteria to evaluate better potential policies and recommendations based on the jurisdiction's unique needs.

Criteria Evaluation Method and Scoring

Policies were evaluated using criteria and scored using the following scale. The scores were then totaled to calculate an overall impact score for each policy option.

- **Yes, positive impact (+2):** The policy option has a positive impact and directly addresses the criterion.
- **Somewhat positive impact (+1):** The policy option has a somewhat positive impact, or indirectly addresses the criterion.
- **Neutral/ No impact (+0):** The policy option does not directly address the criterion, but may benefit other housing priorities for the jurisdiction.
- **Negative impact (-1):** The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some options may have a negative impact on one element of the scoring criteria, it does not mean that they are bad options overall. For example, encouraging redevelopment may increase housing supply overall and reduce long-term displacement pressures, but also increase physical displacement pressures in the short-term.

We used the following criteria for all jurisdictions in this report as a common set.

- **Racially Disparate Impacts**: Does this policy prevent racially disparate impacts or work to repair past harm?
- **Economic Displacement**: Does this policy help prevent or mitigate economic displacement?
- **Physical Displacement**: Does this policy help prevent or mitigate physical displacement?
- **Cultural Displacement**: Does this policy help prevent or mitigate cultural displacement?
- **Housing Exclusion**: Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?
- **Implementation Considerations**: Does the city have the staff and resources necessary to implement this policy effectively?

In addition to these, each jurisdiction had its own unique (yet sometimes related and similar) policy evaluation criteria.

Lacey

- Does this policy encourage or remove barriers to providing affordable housing?
- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?
- Does this policy increase the overall housing supply?
- Does this policy reduce housing costs?

Olympia

- Does this policy incentivize and support the development of affordable and deeply affordable housing, including supportive housing?
- Does this policy increase the housing supply, including middle housing and ADUs?
- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?

Tumwater

- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?
- Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?
- Does this policy incentivize or reduce barriers to developing diverse housing types, including smaller homes?

Yelm

- Does this policy encourage the preservation of naturally occurring affordable housing, such as manufactured home parks and other existing affordable units?
- Does this policy incentivize or reduce barriers to developing diverse housing types, including smaller homes?
- Does this policy incentivize and support the development of affordable and deeply affordable housing?

IDENTIFYING POLICY RECOMMENDATIONS

After analyzing the critical issues in each jurisdiction and the challenges of housing displacement, we compiled a comprehensive inventory of potential policies and programs to address these concerns. The list also included each city's respective Housing Action Plan policies to better reflect existing

programs and policies, show how these contribute to or detract from anti-displacement goals, and help the cities prioritize future implementation actions of their HAP.

Existing Conditions of Displacement Risk

OVERVIEW

In addition to the data analyzed from the identified databases, the team also conducted a comprehensive literature review to expand understanding on what other factors contribute towards risk of displacement. Summarized below, this research was considered as part of the holistic evaluation of data analysis to develop recommendations.

What Types of Housing Policies Contribute to Housing Displacement?

In reviewing a swath of peer reviewed journals from the last decade, the consultant team identified eight key trends in response to the contributing policies and conditions for housing displacement nationally.

Property owners have significantly more protection under the law than renters do.
A lack of anti-discriminatory legal protection for renters using programs such as the Housing Choice Voucher Program makes it difficult to find landlords in more affluent communities who accept such vouchers, leading to displacement through residential self-segregation by socio-economic class.[7]

Even when protections for renters exist, a lack of awareness keeps renters in the dark about their rights.
A lack of information sharing and public understanding about housing protection eligibility, such as that implemented during COVID-19, enables property owners to coerce renters into arrangements against their best interests[8]

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.

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[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) tool[17]. Measuring the phenomena of displacement, gentrification, and racialized disparities in housing exclusion is complex, the RDI tool guides jurisdictions to consider five primary indicators as "supportive" metrics towards this analysis. The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD) and is presented in four-year ranges.

[14] Rutan et al., "Suburbanization of Eviction," 166.

[15] DeLuca and Rosen, "Housing Insecurity," 348.

[16] Matthew Desmond and Carl Gershenson, "Who Gets Evicted? Assessing Individual, Neighborhood, and Network Factors," *Social Science Research* 62 (2017): 365.

[17] The RDI toolkit is designed for use by the Department of Commerce (Commerce) in its support of local jurisdiction efforts to meet the requirements of the Growth Management Act (GMA). The toolkit compiles statistics relevant to a jurisdiction's analysis of racially disparate impacts in its community.

This analysis compares RDI data points from 2015-2019 and 2017-2021. Additionally, demographic data was pulled from the American Community Survey.

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of their income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

Racial Diversity

Housing displacement risk is generally understood to increase as a population becomes more racially and ethnically diverse. The U.S. Census Bureau collects data on race and ethnicity, classifying individuals into distinct categories for these estimates. Race is recognized as a social identity historically tied to oppression, while ethnicity refers to groups sharing common ancestry, language, or dialect. Respondents to the Census self-identify their race from six options (White, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Other) and can select one or more options. They also identify as either Hispanic or Latino or Not Hispanic or Latino, with "Hispanic or Latino" defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

The table above shows the change in racial and ethnic diversity across the four cities between 2010 and 2023, using the US Census American Community Survey 5-Year Estimate data.

Change in # of Residents by Race & Ethnicity	Lacey	Olympia	Tumwater	Yelm
American Indian and Alaska Native	-54	+2	-154	+89
Asian	+1,437	+924	+608	-132
Black or African American	+1,345	+345	+755	+279
Hispanic or Latino (of any race)	+4,126	+3,099	+1,484	+908
Native Hawaiian and Other Pacific Islanders	+658	+421	+106	+468
Other Race	-44	+132	+470	+0
Two or more races	+2,908	+2,617	+1,786	+604
White	+6,278	+2,335	+4,630	+2,216
Net Pop Change 2010 - 2023	+16,654	+9,875	+9,685	+4,432

Cost Burden

Housing displacement risk is a critical concern, fundamentally linked to how much households spend on housing relative to their income, and the availability of affordable rental units, particularly for those with lower incomes. A household is considered to be experiencing a "cost burden" if its monthly housing expenses exceed 30% of its income, which can severely impact its ability to meet other essential needs like food, healthcare, and education. This burden is further categorized: "not cost-burdened" (under 30%), "cost-burdened" (30-50%), and "severely cost-burdened" (over 50%).

An analysis of data between 2015-2019 and 2017-2021 reveals concerning trends in cost burden across Lacey, Olympia, Tumwater, and Yelm. For renters, the picture is mixed and, in some cases, challenging. Overall, while the number of non-cost-burdened homeowners is increasing across all cities, the growth of non-cost-burdened renter households is significantly slower, and in some areas, even declining.

The tables below show the change in the cost-burdened populations across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets, representing a difference in the data between the years 2015-2019 and 2017-2021.

Change in # Households by Cost-Burdened Status: Renters	Lacey	Olympia	Tumwater	Yelm
Not Cost Burdened	+110	-655	+100	-35
Cost-Burdened (30-50%)	+65	-305	-65	-30
Severely Cost-Burdened (>50%)	+200	+15	-105	+45
Not Calculated	-30	-75	+11	+5

Change in # Households by Cost-Burdened Status: Homeowners	Lacey	Olympia	Tumwater	Yelm
Not Cost Burdened	+765	+840	+355	+435
Cost-Burdened (30-50%)	+370	+145	-175	-59
Severely Cost-Burdened (>50%)	+185	+190	+45	+50
Not Calculated	+45	+5	-10	+0

Rental Affordability

A housing unit is officially deemed affordable if its gross housing costs constitute less than 30% of a household's income. Across all four cities—Lacey, Olympia, Tumwater, and Yelm—there is a scarcity of rental housing options suitable for very low-income households, defined as those earning between 30% and 50% of the Area Median Income (AMI). The data used for these assessments, specifically estimates of the number of rental housing units affordable to households within various income ranges, comes from the HUD Comprehensive Housing Affordability Strategy (CHAS) datasets. These estimates are derived from self-reported housing costs, which inherently reflect any housing subsidies or other benefits households might utilize. It is important to note that a rental unit designated as affordable for an extremely low-income household (less than 30% of AMI) may not necessarily be occupied by a household within that specific income bracket. The rental unit affordability estimates exclude housing units that lack complete kitchen or plumbing facilities, vacant units not explicitly listed for rent or sale, and group quarter units.

The table below shows the change in vacant affordable units across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets, representing a difference in the data between 2015-2019 and 2017-2021.

Change in # of Rental Units by Affordability Rating	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	+0	+25	+0	+0
Very-Low Income (30-50% AMI)	-90	-110	-45	+0
Low-Income (50-80% AMI)	+40	+10	+10	+0
Moderate-Income (80%-100% AMI)	+150	+75	+5	+0

Income

While all four cities are seeing growth in renter and homeowner households with above median incomes, the high cost of housing is outpacing wage gains, leading to high housing cost burdens.

The Washington Department of Commerce's RDI tool utilizes Area Median Income (AMI) to account for regional variations in labor and housing markets. AMI represents the midpoint of an area's income distribution, with half of households earning above and half earning below this figure. The Growth Management Act mandates that jurisdictions address the housing needs of families across the entire income spectrum. Income data and housing affordability estimates are derived from the U.S. Department of Housing and Urban Development's Comprehensive Housing Affordability Strategy (CHAS) data. Household income estimates are categorized into bins based on AMI, adjusted for household size:

- Extremely Low Income (<30% of AMI)
- Very Low Income (30%−50% of AMI)
- Low Income (50%−80% of AMI)
- Moderate Income (80%−100% of AMI)
- Above Median Income (>100% of AMI)

Overall, while there's an evident increase in higher-income households (both renters and homeowners) across all four cities, the data also highlights shifts in lower-income brackets that could impact housing displacement risk, especially given the general trend of housing costs outpacing wage gains.

The tables below show the change in population income levels across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets representing a difference in the data between 2015-2019 and 2017-2021.

Change in # Households by Income Status: Renters	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	-160	-110	-240	+15
Very-Low Income (30-50% AMI)	-235	-180	-85	-60
Low-Income (50-80% AMI)	-475	+225	-20	-15
Moderate-Income (80%-100% AMI)	+535	-85	-15	+35
Above Median Income (>100%)	+680	+730	+305	+20

Change in # Households by Income Status: Homeowners	Lacey	Olympia	Tumwater	Yelm
Extremely-Low Income (<30% AMI)	+250	-90	-145	-10
Very-Low Income (30-50% AMI)	+15	+40	+60	-65
Low-Income (50-80% AMI)	-255	-130	-90	+5
Moderate-Income (80%-100% AMI)	-150	+25	-10	-90
Above Median Income (>100%)	1495	+1345	+400	+585

Tenure/Homeownership

Housing displacement risk generally increases when homeownership rates decline. Tenure refers to the distribution of homeowners and renter households across a region.

The tables below show the change in renter and owner households across the four cities based on HUD Comprehensive Housing Affordability Strategy (CHAS) datasets, representing a difference in the data between 2015-2019 and 2017-2021.

Change in # of Households	Lacey	Olympia	Tumwater	Yelm
Renters	+345	+590	-60	-715

Change in # of Households	Lacey	Olympia	Tumwater	Yelm
Homeowners	+1365	+1190	+225	-640

Age

Older populations face a higher risk of housing displacement. Across Lacey, Olympia, Tumwater, and Yelm, there's a noticeable trend of aging populations, although the specific population changes by age vary significantly among the cities. The document presents data from 2010 to 2023, using the US Census American Community Survey 5-Year Estimate, to illustrate these shifts in age distribution.

While there's variation, the detectable trend of aging populations, particularly in cities like Olympia and Yelm, which saw significant shifts in individual age ranges, suggests an increasing proportion of residents are more vulnerable to housing displacement.

The table below shows the change in age distribution across the four cities between 2010 and 2023, using the US Census American Community Survey 5-Year Estimate data.

% Change in Population by Age	Lacey	Olympia	Tumwater	Yelm
Under 5 years	-0.90%	+0.00%	-1.10%	-4.00%
5 to 9 years	+0.00%	-1.80%	+0.70%	+2.00%
10 to 14 years	-0.80%	-1.00%	-1.60%	-2.20%
15 to 19 years	+0.00%	+0.90%	-3.90%	-1.20%

20 to 24 years	-0.10%	-5.10%	+0.90%	+4.20%
25 to 29 years	+0.30%	+0.70%	+0.60%	-1.80%
30 to 34 years	+0.00%	+2.70%	+1.00%	+1.30%
35 to 39 years	+0.00%	+0.70%	+0.60%	-0.10%
40 to 44 years	+1.30%	+0.30%	+1.60%	-0.80%
45 to 49 years	-0.10%	-0.60%	-0.90%	+0.20%
50 to 54 years	-1.90%	-2.00%	-1.90%	+1.20%
55 to 59 years	-2.10%	-0.90%	-1.00%	+0.80%
60 to 64 years	+1.50%	-0.10%	+2.50%	+2.00%
65 to 69 years	+2.30%	+1.30%	+2.00%	-0.30%
70 to 74 years	+1.10%	+3.50%	+1.10%	+2.20%
75 to 79 years	-0.10%	+1.80%	+0.30%	-0.20%
80 to 84 years	-0.30%	+0.00%	+0.40%	-1.10%
85 years and over	-0.30%	-0.60%	-0.80%	-1.60%

WHAT ARE COMMUNITY STAKEHOLDERS SAYING?

The project team undertook an extensive and collaborative outreach process to gain a locally rooted understanding of housing goals and displacement risks. We connected with planning staff, residents, and housing advocates across sectors to better understand the housing challenges facing the area.

The project team aggregated and synthesized the stakeholder feedback across all engagement touchpoints to distill the main takeaways into the following themes for consideration.

- Cities should identify ways to monitor renter income verification, establish local ordinances to enforce attainable income verification, and identify and address price fixing.
- Cities should use creative zoning overlays and innovative land use policies to classify and protect mobile home communities and other types of affordable housing.
- Zoning should balance commercial development with opportunities for affordable housing.
- Cities should create a program to support upgraded utilities and infrastructure and promote incentives for property owners to improve their properties, including multifamily, single-family, accessory, and mobile homes. Tenants forced to relocate due to substandard maintenance (condemned properties) should receive support to relocate to a nearby affordable housing option effectively.
- Affordable housing and homelessness prevention programs should work closely together as they share the same clientele.
- Military service providers, including VAs, volunteer groups, bases, centers, and cities, should ensure their programs are adequately staffed with the most current information regarding housing and support benefits for military families and households.
- Cities should promote educational programs that explain to homeowners and potential buyers the long-term investment opportunity of ADUs and the financial plan required to pursue a build.
- Permitting processes to develop new affordable housing should continue to be simplified and streamlined.
- Cities could support residents, including current residents of manufactured home communities, by forming cooperatives or community land trusts (CLTs) to be prepared to exercise the right of first refusal and manage properties independently.
- Cities should create a program to support private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management and disincentivize corporate owners from buying land on which manufactured home communities are located.
- Cities should take steps to minimize the amount of potential long-term housing being used for short-term transient rentals (Airbnb).

- Cities should work with community groups to coordinate a one-stop shop for housing benefit explanations and application support.
- Cities should promote an educational campaign to private landlords about legal requirements and renter income qualifications for those on supplemental income.
- Cities should offset the impacts of increased taxes and tax increment financing, as they are seen to contribute to unaffordability for renters and low-income households by increasing the cost of living as new upscale developments are built.
- Cities should consider rent control options and develop and enforce adequate tenant protections (eviction proceedings, rent increase management, etc.).
- Cities should balance suburban development with investment in affordable housing in urban centers.
- Cities should ensure robust transportation is available to residents and minimize the land used for parking over housing.
- Urban renewal efforts should include the protection of existing affordable housing units.

Relevance for Analysis

Takeaways from the individual sources of data input: research, data indicators, and engagement were considered holistically

It is important to also recognize the validity of each of these sources of information. Across the various points of engagement, we heard from members of our community that are rarely offered such a prominent and direct line to our planning processes. Diverse, real, and engaged voices contributed to the findings of this analysis through written, audio & video recording, and facilitated points of engagement. This feedback should be read in the context that they are direct feedback from community stakeholders based on their viewpoints, level of understanding, and lived experience with housing.

Final policy recommendations are not solely based on any single point of feedback; as we aim to integrate the perspectives into what is possible within the confines of individual city capacity for implementation.

City Displacement Risk Profiles & Recommendations

OVERVIEW

This section examines the issues of displacement at the city level, analyzing key indicators such as increased housing cost burdens on both renters and homeowners, the diminishing availability of affordable rental units for low-income households, and significant shifts in demographic composition. Furthermore, this section will review current housing policies and provide priority policy recommendations to mitigate economic displacement and foster a more equitable housing environment.

LACEY – ECONOMIC & CULTURAL DISPLACEMENT

Lacey's economic pressures make it stand out as a prominent risk type. However, careful attention will be needed to ensure that these pressures do not disproportionately impact its increasingly diverse population of residents.

According to available data Lacey's population experienced:

- A significant **increase in racial and ethnic diversity** among residents between 2010 – 2023;
- A substantial **increase in severely cost-burdened households** for both renters and homeowners between 2015–2019 and 2017-2021
- **A decrease in the availability of affordable rental units** for and very-low-income (earning between 30% and 50% AMI) households.
- A relative **decrease in renters earning less than 80% AMI** but an **increase in low-income homeowners** between 2015-2019 and 2017-2021
- An **increase in overall homeowner households**

Considering the above trends, the data shows that while Lacey's population grew overall, people from non-white racial and ethnic backgrounds are working and living in Lacey. Given that historical research tell us that racially and ethnically diverse households are more likely to experience displacement, it is important to understand what is driving these communities to Lacey and understand the broader spectrum of cultural needs.

This is an important detail because as households become increasingly cost-burdened, families that are already living on the edge of their means must make difficult choices about where to allocate their income. Across the region, folks engaged for this process often remarked often how they see housing instability quickly teetering on to risk of homelessness for folks that must look for alternative ways to stay afloat; a reminder that "*displacement can happen to anybody*".

Over the same period, we can see that, income and wages are not keeping pace with the rising cost of living, leading to a decline in real income and purchasing power, meaning more people are cost burdened. Concerningly, this trend appears to impact both renters and homeowners alike – the latter of which might be vulnerable to economic displacement if housing costs, such as property taxes, continue to climb.

As real earnings decrease, so to have the availability of affordable units. Review of existing policies and overlapping engagement describes possible impacts from the significant decrease in the availability of affordable rental units for extremely low-income and very-low-income households, coupled with a general lack of social safety nets. We made connections to feedback we heard in both the survey and affinity group discussions that some of these impacts spiked during/post the COVID pandemic. For some folks, like households with a member in the military, it is not easy to move out of the area in search of more affordable housing. Folks on fixed incomes or social security for example do not have the same opportunity to shift brackets and find that their options for quality affordable housing have narrowed. This aligns with the general understanding from the literature purporting that a lack of affordable rental options for the lowest income brackets heightens the risk of displacement.

Housing Displacement Risk Policy Analysis

The City of Lacey has comprehensively reviewed its existing Housing Element and related policies within its Comprehensive Plan, utilizing criteria consistent with the Department of Commerce's guidance on Racially Disparate Impacts. This evaluation sought to identify policies supporting housing goals or potentially contributing to inequitable outcomes. The analysis reveals a general split, with many of Lacey's housing policies categorized as "supportive" or "approaching" their intended objectives.

Lacey's "supportive" policies are actively working to foster housing growth and affordability. These include initiatives designed to increase residential densities, promote infill development, and ensure a sufficient supply of housing that is affordable across all income levels and meets unique housing needs. Furthermore, these policies emphasize critical partnerships with external agencies, recognizing their role in enhancing overall housing affordability and preventing displacement and homelessness. These represent strong foundational efforts in the city's housing strategy.

However, policies classified as "approaching" suggest areas where Lacey can further strengthen its impact. While generally supporting housing growth, these policies could be refined to more effectively address overall affordability and integrate robust anti-displacement strategies. The goal is to provide housing equitably to all income brackets, particularly those historically excluded or displaced. For instance, a specific policy (Policy C under Goal 3 in the Central Planning Area) has been identified for clarification. Proposed revisions aim to ensure that development standards for middle housing options are sensitive to existing neighborhoods and align with broader city priorities, such as climate resilience, while remaining clear and unambiguous.

In sum, Lacey's current housing goals and policies demonstrate an awareness of housing displacement and include efforts to mitigate disproportionate impacts. To build upon these existing strengths and solidify its commitment to equitable housing, the City should actively explore and implement additional policies that foster stronger community partnerships. These collaborations are crucial for proactively preventing displacement and cultivating a truly supportive environment for both current and future residents of Lacey.

Priority Policy Recommendations

This report outlines key strategies for the City of Lacey to augment its current efforts in preventing racially disparate housing impacts, increasing the availability of deeply affordable housing, and mitigating displacement, particularly economic displacement.

Strengthening Community Partnerships and Expanding Capacity

To achieve greater success, the City can significantly enhance its existing work and policies by fostering stronger community connections and partnerships with local organizations. Such collaborations effectively expand the capacity of city staff, allowing for more comprehensive outreach, program delivery, and specialized support. Supplemental efforts and social services, extending beyond the scope of housing policy alone, are also evident for Lacey's housing initiatives to reach their full potential and address the multifaceted needs of its diverse population.

Comprehensive Plan Updates and Policy Refinements

The upcoming update to Lacey's Comprehensive Plan presents a critical opportunity to refine existing policies and introduce new ones to address current gaps. Several policies within the Housing Element of the current Comprehensive Plan could benefit from minor edits to clarify their intent, remove vague language, establish stronger connections to other Comprehensive Plan elements, or eliminate potentially exclusive language. Specific proposed edits for numerous policies are detailed in the Final Existing Comprehensive Plan Policy Evaluation Framework Appendix.

Addressing Policy Gaps and New Program Development

To tackle significant policy gaps, new policies and programs are required. Foremost among these is the need for policies that preserve existing and naturally affordable housing units. This is crucial for preventing economic displacement and enabling residents to remain within their established communities. Concurrently, dedicated efforts are necessary to protect manufactured housing communities and to avoid displacement within these vital affordable housing sectors. Furthermore, there is a clear need for affordable housing for lower-wage earners, ensuring that individuals working in Lacey can also afford to reside within the city. Beyond housing, cultural displacement can be mitigated through increased placemaking efforts and the preservation of existing community events, businesses, religious institutions, and other facilities important to Lacey's diverse cultural groups.

Prioritizing Housing Action Plan Implementation

Finally, the City's Housing Action Plan (HAP) contains numerous actions that Lacey should continue to implement by advancing them to the Planning Commission. Policies from the HAP that scored highly in the Policy Evaluation Matrix should be considered priority initiatives for immediate implementation, as they directly align with the City's housing goals and address identified deficiencies.

Implementation Capacity & Limitations

Achieving the desired outcomes of these initiatives—namely, effectiveness, sustainability, and broad community benefit—will necessitate significant financial resources and dedicated staff time.

Financial Constraints

The primary limitation in successfully executing these housing programs is likely financing. Navigating city political processes and securing the funding for recommended programs will be a considerable challenge. City staff will require augmented capacity to actively pursue and secure diverse financial resources, including competitive grants, funds from regional or state programs, and other potential sources. Without robust and consistent funding streams, the reach and impact of these initiatives will be significantly constrained.

Staffing and Administrative Demands

Implementing many revised Housing Element policies, existing HAP actions, and newly developed policy recommendations will place substantial demands on city staff. This includes the considerable time required to collaborate with community partners in drafting and creating new ordinances to update the city’s development regulations. Additionally, significant staff effort will be necessary to present and work with the Planning Commission and City Council through the review and approval processes for these ordinances. Beyond legislative development, the recommended policies will also require considerable ongoing staff time to identify, cultivate, and maintain strong community partnerships and collaborative efforts with local organizations, essential for these housing initiatives’ effective delivery and long-term success.

Conclusion

Overall, the analysis points towards the need for prioritizing unique housing needs among low-income, workforce, and senior housing; identifying creative ways to support and maintain homeownership, especially among lower-income households (e.g. manufactured home parks), and ensuring that attention on the cliff between low-income affordability and homelessness does not exacerbate toward the latter.

OLYMPIA – PHYSICAL DISPLACEMENT

While a range of housing types exist in Olympia, its displacement risk is uniquely characterized by the loss of existing low-income homeownership alongside a significant challenge in providing affordable rental units for very-low-income households.

According to available data Olympia's population experienced:

- A significant **increase in racial and ethnic diversity** among residents between 2010 – 2023;
- A **decrease in cost-burdened renter households** but an **increase in cost-burdened and severely cost-burden homeowner households** between 2015 – 2019 and 2017 – 2021
- A slight increase in affordable units for extremely-low income households, but a **significant decrease in the availability of affordable rental units for very-low-income households** (earning between 30% and 50% AMI).
- A notable **increase in low-income renters** (50%-80% AMI) and a **decrease in low-income and extremely low-income** homeowners between 2015-2019 and 2017-2021
- An **increase in overall homeowner households**

The trends may suggest that low-income households who are already homeowners, may not be able to keep pace with increasing costs to sustain homeownership and stay in place as seen in the dramatic increase of cost-burdened homeowners.

Interestingly, the increase of low-income renters is a relatively complicated trend to interpret when comparing against the other data points. While inconclusive, it is possible that efforts to increase and retain low-income renters is working positively, especially where renter households have become less cost burdened. Conversely, it is possible that once homeowners have been economically forced to become renters, thus putting a strain on the availability of rental units.

While inconclusive, the engagement data paints an interesting picture around how the market has handled the availability of single-family homes. Some point to the mixed quality of converting these properties to rental units, while others remark that the once naturally-occurring affordable homes are falling into disrepair or being redeveloped entirely into units that cater to higher-income earning residents and visitors.

Some relevant remarks from individual and group engagement include:

- *… in my case, I'm in the "family home" with a failing roof. It's too big for just me. There is enough room to create 2 separate living units. This would allow me to remain here. There's also off-street, discreet parking space for a tiny home/RV. I'd happily leverage what I have to create more space for others in need of housing. Not everyone needs a BIG space.*
- *The lack of single family homes for people to rent, rent to own and even buy. The quality of houses in Olympia has significant differed maintenance, which often causes health hazards to those who rent*

- *In Olympia, housing displacement has manifested through the conversion of single-family homes into high-end rentals and Airbnb properties.*

Housing Displacement Risk Policy Analysis

A segment of Olympia's housing policies is identified as "supportive" of housing goals. These include policies that encourage the adaptive reuse of non-residential buildings for housing purposes, support the provision of affordable housing by minimizing regulatory barriers and streamlining review processes, and actively work to prevent physical obstacles that could isolate new developments from existing neighborhoods.

However, most of Olympia's housing-related policies are categorized as "approaching" their objectives. While these policies aim to increase the overall housing supply within Olympia, they possess opportunities for strengthening. Enhancements could include more explicit measures to address racially disparate impacts, the integration of targeted anti-displacement strategies, and proactive efforts to prevent housing exclusion, particularly by prioritizing historically marginalized populations.

Several policies within the Comprehensive Plan are identified as "challenging" housing goals due to their potential to create unintended negative consequences. These policies often require additional design or architectural features in new housing or seek to preserve existing neighborhood "character." Such policies may inadvertently restrict housing production and limit housing choices, potentially contributing to affordability issues. To mitigate these challenges, proposed edits are detailed in the Final Existing Comprehensive Plan Policy Evaluation Framework Appendix, advocating for removing vague language and introducing greater flexibility to foster increased housing production and housing diversity.

Priority Policy Recommendations

The City of Olympia should consider prioritizing the implementation of these high-scoring HAP policies and other highly rated policies from the Policy Evaluation Matrix. Advancing these initiatives to the Planning Commission would align with city priorities and address current deficiencies in Olympia's housing policy framework.

New Policy Recommendations

To enhance housing affordability and equity, the following new policy initiatives are recommended:

- Protection and Preservation of Manufactured Home Communities: Implement policies to safeguard and preserve manufactured home communities. This is crucial for retaining a vital source of affordable housing within the city.
- Encouraging Retention and Maintenance of Existing Affordable Housing: Develop additional measures to incentivize the retention and maintenance of existing affordable housing units.

Particular emphasis should be placed on high-opportunity neighborhoods or areas with historical segregation patterns to promote equitable access to housing.

High-Scoring Housing Action Plan (HAP) Policies

An analysis of the City's existing Housing Action Plan (HAP) policies revealed several high-impact strategies that align to overcome housing barriers:

- Evaluation of Home Fund Relationship: Assess the relationship between Olympia's Home Fund and the county's home fund to ensure alignment and effectiveness in meeting shared housing goals.
- Expanding Residential Tenant Improvement Allowances: Broaden the allowance for residential tenant improvements without triggering additional land use review requirements. This can encourage the maintenance and upgrading of existing housing stock.
- Allowing Single Room Occupancy (SRO) Housing: Permit Single Room Occupancy (SRO) housing in all multifamily zones. This policy diversifies housing options and can provide more affordable solutions for individuals.

Implementation Capacity & Limitations

The City has already expended considerable political capital enacting multi-part strategies to address housing affordability. Though these efforts may need to continue for a long period to see definitive progress, politics will need to match the necessary longevity of these programs to see significant results. Changes in leadership or shifts in City funding for programming could erode support for existing implementation efforts that are having a net positive effect.

The City has done a good job of identifying specific barriers to ease displacement pressure. The Housing Action Plan actions collectively represent quite a lot of staff time or consultant time, but quite a number of them can also be seen as making progress against displacement pressures as well.

Conclusion

Overall, the analysis points towards the need for encouraging the retention and maintenance of existing affordable housing stock; expand allowances of residential tenant improvements and use creative policy approaches to encourage the appropriate matching of resident characteristic and lived experience to possible housing types, such as manufactured home communities or Accessory Dwelling Units.

TUMWATER – ECONOMIC DISPLACEMENT

Tumwater's economic displacement risk is characterized by the reciprocal relationship of subtle loss of low and middle-income renters with a significant lack of affordable housing for the lowest-income segments of the population.

According to available data Tumwater's population experienced:

- **Little to no change in relative racial and ethnic diversity** among residents between 2010 – 2023;
- A relative **decrease in cost-burdened households** for renters and homeowners between 2015 – 2019 and 2017 – 2021
- A relative **decrease in the availability of affordable rental units for very-low-income households** (earning between 30% and 50% AMI).
- A **general decrease across most income categories for renters and homeowners** except for above median income households between 2015-2019 and 2017-2021
- An **increase in overall homeowner households** and a **slight decrease in renters.**

While Tumwater's population has grown through the last census cycles, the data shows that the largest demographic increase has been of above-median income residents. Research shows that when a population has an increase in higher earning residents that it can potentially increase demand and upward pressure on housing prices. Importantly, these pressures can exacerbate financial burden on lower-income residents and accelerate economic displacement.

Tumwater does not seem to portray a situation with widespread affordability crisis with signs of stability across the spectrum. However, attention should be focused on the stark distinction of those that are not experiencing stability. Among all groups, residents earning 30% - 50% of Area Median Income are both increasing and struggling to find affordable units. As pressures continue the risk becomes that the affordability gap may become pulled in opposite directions leaving long-term residents having to navigate the unstable housing landscape.

To protect against these risks exacerbating, there is an opportunity to focus efforts on preserving naturally occurring affordable housing such as mobile home parks. Similarly, strategies for new development can work to ensure that the scale of housing prices do not outpace the general population's ability to keep up. The economic displacement risk has the potential to increase without protections for Tumwater's long-term vulnerable residents.

Housing Displacement Risk Policy Analysis

Many of Tumwater's housing policies are classified as "supportive" or "approaching" their stated objectives. These policies generally foster housing growth, ensure the provision of necessary services to support residential development, aim to mitigate displacement, provide support for transitional and supportive housing, and address the needs of other populations with unique housing requirements. Policies categorized as "approaching" encourage various housing types to

meet diverse demands. However, these policies could be strengthened to more effectively prevent displacement, explicitly address housing affordability and availability across different income brackets, and safeguard historically marginalized populations from disproportionate impacts.

Only one policy appears twice within the plan and is identified as "challenging." This policy, focused on protecting residential areas through aggressive code enforcement to prevent undesirable activities and uses, risks exacerbating displacement or disproportionately affecting lower-income and historically marginalized groups.

A comparative analysis with other jurisdictions indicates that the language used in Tumwater's Housing Action Plan (HAP) policies is not as robust as it could be. The upcoming update and incorporation of HAP goals and actions into the 2025 Comprehensive Plan (CUP) Housing Element presents a critical opportunity to strengthen policy language. Incorporating more definitive terms, such as "require" instead of "encourage," would enhance the enforceability and impact of these policies, leading to more substantial progress in achieving housing goals and mitigating displacement.

Priority Policy Recommendations

The City of Tumwater should prioritize implementing these high-scoring HAP policies and other highly rated policies from the Policy Evaluation Matrix. Advancing these initiatives to the Planning Commission would align with city priorities and address current deficiencies in Tumwater's housing policy framework.

- Community Land Trust Program for Mobile Home Communities: Establish a program modeled after a Community Land Trust to support and preserve mobile home communities. This aims to secure long-term affordability and stability for residents within these vital housing sectors.
- Support Program for Private, Local, Small-Scale Ownership of Mobile Home Communities: Implement a city program to support private, local, small-scale ownership of mobile home communities. This initiative seeks to leverage the existing mobile home housing stock and actively work towards preserving current affordable housing options.
- Increased Staffing for Accessory Dwelling Unit (ADU) Processing: Augment staffing capacity within relevant departments to expedite the processing of Accessory Dwelling Unit (ADU) permits. This measure aims to reduce administrative costs and streamline the development of diverse housing types.
- High-Scoring Housing Action Plan (HAP) Policies - An analysis of the City's existing Housing Action Plan (HAP) policies revealed several high-impact strategies that align with displacement mitigation objectives:
    - "Notice of Intent to Sell" Ordinance for Multifamily Developments: Implement an ordinance requiring property owners to provide advance notice of their intent to sell

multifamily developments. Such a policy can allow residents and community organizations to explore preservation options.

- Program for Preserving and Maintaining Manufactured Home Parks: Establish a dedicated program to preserve and maintain healthy and viable manufactured home parks. This initiative, with some details integrated into the new recommendations, is crucial for protecting an existing source of affordable housing.
- Mixed-Income Housing Development: Prioritize policies that encourage the integration of market-rate and low-income housing within new developments. This approach aims to prevent the concentration of low-income housing in specific areas, fostering more diverse and integrated communities.

Implementation Capacity & Limitations

Prioritizing Mobile Home Park Preservation

While all Housing Action Plan (HAP) policies represent a foundational step, the most significant impact on displacement mitigation will be achieved through focused efforts on preserving existing mobile home parks (MHPs) as a critical source of affordable housing stock. This approach leverages an already established and often more affordable housing type. Successful implementation will necessitate sustained education and communication efforts to clearly articulate the rationale behind this focus, thereby strengthening existing political support for MHPs within the City.

Resource Implications for Policy Implementation

The successful implementation of many revised Housing Element policies, remaining HAP actions, and new policy recommendations for Tumwater will require significant staff time and resources. This includes collaborating with community partners to develop necessary ordinances for updating the city's development regulations. Furthermore, considerable staff engagement will be required for review and approval processes with the Planning Commission and City Council.

Beyond ordinance development, recommended policies will demand substantial staff capacity to identify, cultivate, and maintain robust community partnerships and collaborative efforts with local organizations. To ensure these programs' effectiveness, sustainability, and broad reach, city staff will also require additional capacity to actively pursue diverse funding avenues, including grants, regional, and state programs.

Conclusion

Tumwater faces a significant risk of economic displacement, driven by a severe shortage of affordable rental housing, especially for extremely low and very low-income households, and an increase in severely cost-burdened homeowners. This is evidenced by a complete loss of rental units affordable to very low-income families and declining numbers of lower-income renters, while higher-income residents are increasing, driving up housing costs. Although current housing policies

are generally supportive, they lack robust language to prevent displacement and ensure affordability. Key recommendations include preserving mobile home communities, regulating short-term rentals, and streamlining Accessory Dwelling Unit (ADU) development. Implementing these changes will require substantial resources and staff capacity to address the critical housing needs of the city's most vulnerable residents.

YELM – ECONOMIC & PHYSICAL DISPLACEMENT

Unlike the commonly interpreted definition of physical displacement, Yelm's greatest risk comes from its pressure to meet the demand for suburbanization. Above-median income populations make up the largest increase income type and as folks look to redevelop land effectively, it has the risk of impacting highly vulnerable population groups disproportionately.

According to available data Yelm's population experienced:

- Little to **no change in relative racial and ethnic diversity** among residents between 2010 – 2023;
- A relative **increase of severely cost-burdened renter households** and a **significant decrease in cost-burdened homeowner households** between 2015–2019 and 2017–2021
- Little to **no observable change** in the availability of affordable rental units
- Relative **decrease of very-low and low income renters** and a **significant increase** in **above median income homeowners** 2015-2019 and 2017-2021
- Significant **decrease overall of renters and homeowners** households

As Yelm's overall population has grown, it's land use is being forced to shift from being a meaningfully rural city to one that is beginning to serve young families as a suburb community. Above-median income earning families appear to be moving to Yelm and redeveloping existing land for housing; a trend referenced explicitly by some during the engagement process.

During the engagement process, the team also ensured to focus on households with a member in the military to best describe the respective situations. Military households desire improved coordination of housing services, primarily where the VA lacks capacity and efficiency. Moreover, as folks anticipate improved city infrastructure, they hope that there can be options to support military and veteran households throughout the civilian community.

Housing Displacement Risk Policy Analysis

Yelm's housing policies generally support housing goals, including policies that encourage diverse residential growth, efficient permit processing, allow various residential uses and types that provide for diverse housing needs, and increase funding for affordable housing or reduce barriers to home ownership. Policies indicated as "approaching" could be improved primarily by considering affordability for all income groups and prioritizing those that have been historically marginalized. Still, they generally encourage housing growth, the maintenance of existing housing stock, and the

provision of housing near transit and other services. There aren't any policies identified as "challenging."

Priority Policy Recommendations

These recommended policies, both new and those within the existing HAP, represent critical steps for Yelm to proactively address economic displacement and ensure housing stability for its residents.

- Protection and Preservation of Manufactured Home Communities: Policies should be developed and implemented to ensure manufactured home communities' long-term viability and affordability. This is critical for preserving a significant source of accessible housing for many residents at risk of displacement.
- Regulation of Short-Term Rental Programs: Measures should be adopted to minimize converting long-term housing units into transient short-term rentals. This preserves the existing housing stock for permanent residents and prevents further reduction of available affordable housing options.
- High-Scoring Housing Action Plan (HAP) Policies - An evaluation of the City's existing Housing Action Plan (HAP) policies identified several high-impact strategies that align to prevent economic displacement:
    - Partnerships with Affordable Housing Developers and Support Organizations: The City should prioritize and strengthen partnerships with low-income housing developers, the Housing Authority of Thurston County, and other relevant organizations. These collaborations are essential for developing and supporting housing solutions for low-income individuals, the workforce, seniors, and other populations with unique housing needs.
    - Leveraging Federal Resources for Affordable Housing: The City should actively pursue and utilize federal funding mechanisms, including Community Development Block Grants (CDBG) and Section 108 loans, to secure resources for affordable housing initiatives.
    - Offering Density Bonuses for Low-Income Housing: Implementing density bonuses for developments that include low-income housing units incentivizes the creation of more affordable housing options, directly combating the factors that lead to economic displacement.

Implementation Capacity & Limitations

Implementing effective housing programs, particularly those providing direct housing or rental assistance to low- and very-low-income populations, presents significant challenges for small towns

and jurisdictions such as Yelm. These challenges primarily revolve around such initiatives' funding, assembly, and administration.

Smaller municipalities' limited financial and administrative capacities often hinder their ability to secure the capital for substantial housing projects or ongoing rental assistance programs. Furthermore, the complexities inherent in program design, inter-agency coordination, and sustained operational oversight can prove difficult to manage without dedicated resources and specialized expertise. Despite these hurdles, establishing such housing infrastructure is critical for adequately addressing the housing needs of vulnerable residents and mitigating issues like economic and physical displacement.

Conclusion

Yelm's existing Housing Action Plan strategies point to policies that generally support housing goals, including policies that encourage diverse residential growth and allow various residential uses and types to provide for diverse housing needs. Given the likeliness that both population growth will continue to increase and contend with the limitations of the existing Urban Growth Area (UGA), the City will need to continue its acute focus on building relationships with developers and builders to ensure that local housing needs are met and not overlooked.

Strategies to consider include the incentivizing of low-income housing to developers through density bonuses and to disincentivize corporate owners from buying existing affordable homes in the community. Moreover, ongoing opportunities to strengthen relationships with the VA and other supports for military families may also be appropriate.

CONCLUSION

Addressing housing displacement is crucial for fostering strong, connected communities. If left unaddressed, displacement can lead to increased homelessness and heightened socioeconomic disparities. Our report includes tailored policy recommendations that cater to each city's specific needs and capabilities. These suggestions include a variety of strategies, such as adjusting zoning laws to support diverse housing options, providing tenant protection initiatives, enhancing financial assistance programs, and improving cooperation among local agencies.

We acknowledge that there are deeper layers of analysis that could help answer questions that emerge through this report. We anticipate that in addition to utilizing this information to support each cities' comprehensive plan updates, the jurisdictions may choose to identify more nuanced trends within their communities. Suggestions include:

- Neighborhood analysis of displacement pressures
- Multi-variate analysis of intersecting demographics with income and housing status
- Local historical research
- Additional regional correlation and trends

In conclusion, tackling housing displacement requires a collaborative approach that brings together governmental bodies, community organizations, and private sector partners. By embracing our recommendations and prioritizing housing stability, Lacey, Olympia, Tumwater, and Yelm can move toward building more equitable, inclusive, and resilient communities.

APPENDIX

A. Housing Displacement Academic Field Scan Memo
B. Existing Comp Plan Evaluation Tables
C. Comp Plan Recommendations Matrix
D. Engagement Raw Data & Analyses

MEMORANDUM

Date: October 17, 2024
To: Planning and Community Development Departments of the Cities of Lacey, Olympia, Tumwater, and Yelm
From: Ariam Ford, AICP, Equity & Engagement Lead, Uncommon Bridges
Subject: Housing Displacement Academic Field Scan

Purpose

The following document is a synthesis of the latest peer reviewed journals from the last decade that responds to the lines of questioning set out within the Housing Displacement Analysis project for the cities of Lacey, Olympia, Tumwater, and Yelm, including:

- What past housing policies resulted in resident displacement?
- What types of current housing policies create the risk of resident displacement?
- What groups and communities are at the greatest risk of housing displacement?

What past housing policies resulted in resident displacement?

1. **Property owners have significantly more protection under the law than renters do.** The de facto imbalance of power between landlords and tenants creates situations where the wellbeing of renters becomes secondary to financial profit with little to no regulation. For example, the Housing Choice Voucher Program provides choices to renters beyond government housing projects, however the lack of protection under anti-discriminatory law makes it difficult for renters to find landlords who accept vouchers, opening the door for residential self-segregation by socio-economic class (Besbris et al. 2024, 210).
2. **Even when protections for renters exist, a lack of information can be exploited by property managers to coerce renters to act against their own interests.** The housing-specific COVID-19 programs are a prime example of protections put in place that many renters didn't realize they were eligible for (Besbris et al. 2024, 212).
3. **Policies to improve housing stability in the US most often exacerbate housing insecurity for renters.** That is because US housing policy has a legacy of protecting, preferring, and subsidizing for homeownership and homeowners. Little is done for rent-burdened renters to alleviate displacement risk other than advocating for them to buy homes, a distant possibility for most (DeLuca, Stefanie, and Eva Rosen 2022, 345).
4. **Driven by macro-level increases in income inequality, neighborhoods are becoming more segregated by income.** Contrastingly, racial integration is increasing, especially in U.S. cities (Chapple et al. 2017, 10).
5. **The definition of displacement is not universal.** Caused by investment or divestment, displacement takes many forms - direct, indirect, physical, economic, or exclusionary (Chapple et al. 2017, 27).

6. **The conversion of public housing projects into mixed-income communities drives housing displacement for low-income households.** Despite the opportunity intentionally designed into mixed-income, multifamily public housing projects, only one-fifth of original project residents return to experience those benefits (Lee and Evans 2020, 6).
7. **Market corrections and global events do little to overcome the effects of racism and socio-economic discrimination on housing displacement.** While major events such as Covid-19 may create housing uncertainty across all demographics and identities, low-income people of color remain the most likely to experience housing displacement (Lee and Evans 2020, 18).
8. **Quantitative efforts to measure displacement underrepresent the plight of disadvantaged populations by not considering lived experience.** To counter this, displacement studies must include user generated, geographically tracked content to truly understand the state of gentrification risk in a community (Chapple and Zuk 2016, 115).

What types of current housing policies create the risk of resident displacement?

1. Government aid delivery is notoriously slow but critical when trying to implement policies designed to reduce housing displacement. **Nesting housing aid into existing, successful, and well-known programs creates a waterfall effect by increasing household disposable income** and thereby decreasing the percentage of total income a household spends on housing (Besbris et al. 2024, 212).
2. **Governments should take a holistic and comprehensive approach to mapping the overlap of government aid programs in their communities.** Only 1 in 4 households eligible for rental assistance actually receives it. There are opportunities to "nest" housing-specific policies within existing and more consistent government programs to boost successful delivery (Besbris et al. 2024, 208).
3. **Housing relief is most expediently and directly delivered via a landlord or property manager.** Government aid can oftentimes fail to provide timely relief for even those who qualify for assistance (Besbris et al. 2024, 217).
4. **To reduce housing displacement risk, governments should focus on increasing household financial stability and reducing socioeconomic inequities within Suburban communities.** Today, most low-income Americans live in the inner suburbs, where evictions are increasing faster than in urban areas. (Rutan et al. 2023, 164)
5. **To fight a growing trend of suburban corporate landlord conglomerates, governments should work to support, subsidize, and grow the amount of local small businesses that provide rental housing while incentivizing them to pass on savings to renters.** Local property owners are more likely to provide support and relief to renters in financial distress, while corporate landlords are more likely to immediately resort to eviction.(Rutan et al. 2023, 166)
6. **Code enforcement and condemnation can be a policy-driven displacement factor without a comprehensive plan to support displaced tenants.** Low-income households may reside in substandard conditions, and in cases where a property owner is unable or refuses to make improvements, tenants may be forced to vacate (Lee and Evans 2020, 3).

7. **Policies restricting housing development contribute to displacement risk.** Increasing housing supply makes housing more affordable, and housing affordability is directly correlated to an individual's housing cost burden, an indicator of displacement risk (Been, Gould Ellen, and O'Regan 2019, 4).
8. **New housing is required to achieve the displacement risk reduction benefits of housing stock filtering.** When new housing is built and priced higher, older housing is pushed down into a lower price range, creating additional housing availability for lower-income households. This concept is at odds with the commonly accepted drivers of gentrification and neighborhood change (Been, Gould Ellen, and O'Regan 2019, 6).

What groups and communities are at the greatest risk of housing displacement?

1. **Suburban poverty is ripe for displacement.** With less public transit, poorer households must spend more money to get around. They have limited access to non-profit services typically concentrated in cities, and confront a municipal infrastructure less suited to deliver holistic social services support (Rutan et al. 2023, 166).
2. **Residential mobility amongst the poor is variable, unplanned, and typically involuntary.** Eviction filings doubled between 2000 and 2016 (DeLuca, Stefanie, and Eva Rosen 2022, 348).
3. **Households in mobile homes are over twice as likely to live in poverty.** Half of all mobile homes in the US are in urban areas. There are 1.7 million mobile home renter households and 5.3 million mobile homeowners in the US (DeLuca, Stefanie, and Eva Rosen 2022, 348).
4. **Mobile home closures should be treated as mass evictions, which are primary indicators of displacement risk**. Those who own their trailers but don't have the means to move them to another location face an additional loss, leading to not only displacement but also the loss of a valuable household asset (Lee and Evans 2020, 6).
5. **Older people, African Americans, and Latinos are overrepresented across most types of displacement** (Lee and Evans 2020, 9).
6. **Households with children are at an increased risk of displacement.** A Milwaukee study found that renters with two children have an 11.7% chance of being evicted and a 9.5% chance with one child (Desmond and Gershenson 2017, 8).
7. **Renters who experience job loss are more likely to be evicted.** A Milwaukee study found that renters who lost their jobs were twice as likely to be evicted (Desmond and Gershenson 2017, 8).
8. **Community character change, or gentrification, is not necessarily an indicator of displacement.** A Milwaukee study found no significant difference in eviction risk between those living in racially or economically transitioning neighborhoods and those who live in homogenous communities (Desmond and Gershenson 2017, 9).
9. **Having a more affluent support system is not necessarily a buffer to experiencing housing displacement, but decreasing poverty shocks amongst those in your social networks will decrease displacement risk.** A Milwaukee study found that while renters in social networks with others experiencing poverty shocks are more likely to experience

eviction, having a more affluent social network did not decrease a renter's risk of eviction (Desmond and Gershenson 2017, 8).

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Existing Comprehensive Plan Policy Evaluation Framework

For the cities of Olympia, Lacey, Tumwater, and Yelm

Evaluation Method 1
Olympia 2
Lacey 10
Tumwater 25
Yelm 43

Evaluation Method

With the passage of HB 1220 in 2021, jurisdictions are required to make adequate provisions for housing for all economic segments of the community. This includes identifying *"local policies and regulations that result in racially disparate impacts, displacement, and exclusion in housing."*

The following evaluation table assesses the existing Comprehensive Plan's goals and policies for impacts for racially disparate impacts, including displacement and exclusion, in the Housing Element and residential goals and policies in the Land Use Element. The evaluation used the following criteria in evaluating each goal and policy, consistent with the Department of Commerce's Racially Disparate Impacts guidance:

- **Supportive**: The policy is valid and supports meeting the identified housing needs. The policy is needed and addresses identified racially disparate impacts, displacement and exclusion in housing.
- **Approaching**: The policy can support meeting the identified housing needs but may be insufficient or does not address racially disparate impacts, displacement, and exclusion in housing.
- **Challenging**: The policy may challenge the jurisdiction's ability to meet the identified housing needs. The policy's benefits and burdens should be reviewed to optimize the ability to meet the policy's objectives while improving the equitable distribution of benefits and burdens imposed by the policy.
- **Not Applicable (NA)**: The policy does not impact the jurisdiction's ability to meet the identified housing needs and has no influence or impact on racially disparate impacts, displacement, or exclusion.

All Goals and policies in the Housing Element were included in this evaluation. For the Land Use Element, only residential-use related policies were evaluated.

Olympia

Goal, Policy, or Regulation	Text	Evaluation	Reason / Recommendation
Land Use Element			
PL6.1	Establish and periodically update a design review process and design criteria consistent with the goals and policies in the Comprehensive Plan for: • 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 Neighbor- hood 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 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.
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 char- acter while allowing infill and providing for environmental sensitivity.	**Approaching**	Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices. Instead of “character,” this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing types such as middle housing.
Policy A	When designating areas for infill and zoning classifications, consider and place emphasis on the composition of the neighborhood, housing need, available infrastructure, principals of walk-ability 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	When implementing infill projects in designated areas, require design of infill projects that: ● 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 *existing* 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: • 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: • 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

Policy recommendations were evaluated with the shared Commerce indicators and the criteria unique to each jurisdiction and scored based on the scale to the right. The scores were then totalled 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 postive impact (+1)	The policy option has a somewhat positive impact, or indirectly addresses the criterion.
Neutral/No impact (+0)	The policy option does not directly or indirectly address the criterion, but may benefit other
Negative impact (-1)	The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some

Number/Ref.	Policy Recommendation	**COMMERCE INDICATORS** Each city's policies were evaluated using this common set of criteria						**LACEY-SPECIFIC CRITERIA**					
		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?	**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													
	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	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	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	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 indepently and be prepared to exercise the right of first refusal.	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	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	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	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	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	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	2	1	0	1	0	1	11	This policy supports housing for older residents to be able to continue living in their community. It could support other housing goals like affordability as well.
	Develop rent control policies to prevent displacement, such as requiring 180 days notice for rent increases or capping rent increases at a certain percentage.	2	2	2	1	2	1	0	2	0	2	14	This policy would prevent displacement, particularly economic and physical, and would support other housing goals like affordability and preventing housing exclusion.
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	2	2	1	2	2	1	1	17	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan	Lacey's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Lacey prioritize future implementation actions of their HAP. The												**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.**
1.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	
1.b	Require Planned Residential Developments (PRDs)/Planned Unit Developments (PUDs) for low-density development and include standards for including low-income housing.	2	2	0	1	2	2	2	0	2	1	14	
1.c	Adopt a "Notice of Intent to Sell" ordinance for multifamily developments.	2	2	2	2	2	2	2	2	1	2	19	
1.d	Provide funding for the Housing Authority of Thurston County and other non-profit organizations to buy income-restricted units proposed to be converted to market rate housing.	2	2	2	2	2	1	2	2	0	2	17	
1.e	As part of comprehensive plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low- income households	1	0	0	0	1	2	0	0	0	0	4	
1.f	Provide funding for renovating and maintaining existing housing that serves low-income households or residents with disabilities.	2	2	2	2	2	1	2	2	1	2	18	
1.g	Allow manufactured home parks in multifamily and commercial areas	2	2	2	2	2	2	2	2	1	2	19	
1.h	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	1	2	2	1	2	18	
1.j	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	
1.l	Require low-income housing units as part of new developments.	2	2	1	1	2	2	2	0	0	2	14	
1.m.	Fund development projects that increase low- income housing through grants or loans.	2	2	1	2	2	1	2	0	2	2	16	
1.n	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	1	2	2	2	2	19	
1.o	Enhance enforcement of property maintenance codes to keep housing in good repair.	2	2	1	1	1	1	1	2	0	0	11	
1.p	Partner with low-income housing developers (such as Habitat for Humanity) to expand homeownership opportunities.	2	2	1	1	2	1	2	0	0	2	13	
2.a	Provide displaced tenants with relocation assistance.	1	2	2	2	1	1	1	0	0	0	10	
2.b	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the-job-training.	2	0	2	0	1	1	0	2	0	0	8	
2.c	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	
2.d	Adopt a "right to return" policy.	2	2	2	2	2	2	1	2	0	0	15	
2.e	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	1	2	2	1	0	0	14	
2.f	Establish a down payment assistance program.	2	2	2	1	2	1	2	0	0	2	14	
2.g	Identify and implement appropriate tenant protections that improve household stability.	2	2	2	2	2	1	2	2	0	1	16	
3.b	Allow third-party review of building permits for development projects.	0	0	0	0	0	2	2	1	1	0	6	
3.c	Develop a plan for adapting vacant commercial space into housing.	2	1	0	1	1	1	2	0	2	2	12	
3.d	Expand allowance of residential tenant improvements without triggering land use requirements.	2	1	2	0	2	1	1	2	1	0	12	
3.f	Identify strategically placed but underdeveloped properties and determine what barriers exist to developing desired housing types.	2	2	1	2	2	1	2	-1	2	2	15	
3.i	Lower transportation impact fees for multifamily developments near frequent transit service routes.	1	2	1	1	1	1	1	0	1	1	10	
3.k	Allow deferral of impact fee payments for desired unit types.	0	0	0	0	1	1	2	0	1	1	6	
3.l	Simplify land use designation maps in the comprehensive plan to help streamline the permitting process.	1	0	0	0	0	2	1	0	2	0	6	
3.m	Integrate or adjust floor area ratio standards.	0	0	0	0	0	1	1	0	1	1	4	
3.n	Maximize use of SEPA threshold exemptions for residential and infill development.	0	0	0	0	0	2	1	0	1	1	5	
3.o	Consult with Washington State Department of Transportation as part of the SEPA review process to reduce appeals based on impacts to the transportation element for residential, multifamily, or mixed-use projects.	0	0	0	0	0	1	1	0	0	1	3	
4.a.	Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, etc.).	0	1	0	1	2	0	1	0	2	1	8	
4.b.	Allow more housing types in commercial zones.	2	1	0	2	1	1	2	0	1	1	11	
4.c.	Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	2	2	2	2	1	1	2	2	2	1	17	
5.a	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	1	1	1	1	14	
5.b.	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	1	0	0	0	0	7	
5.c.	Identify and develop partnerships with organizations that provide or support low-income, workforce, and senior housing as well as other populations with unique housing needs.	2	2	2	2	2	1	2	2	2	2	19	
5.d.	Establish a rental registration program to improve access to data and share information with landlords.	0	0	0	0	0	1	0	0	0	0	1	
6.a.	Develop a comprehensive funding strategy for affordable housing that addresses both sources of funding and how the funds should be spent.	1	1	1	1	1	1	1	0	1	1	9	
6.b.	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2	1	1	2	2	2	0	2	2	16	
6.c.	Establish an affordable housing sales tax.	1	2	1	1	1	2	2	0	2	2	14	
6.d.	Establish a regional housing trust fund to provide dedicated funding for low-income housing.	2	1	1	1	2	1	2	0	2	2	14	
6.e.	Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit.	0	-1	0	0	0	1	0	0	0	0	0	

City of Olympia

Policy Evaluation Matrix

Policy recommendations were evaluated with the shared COMMERCE indicators and the criteria unique to each jurisdiction and scored based on the scale to the right. The scores were then totalled 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 postive impact (+1)	The policy option has a somewhat positive impact, or indirectly addresses the criterion.
Neutral/No impact (+0)	The policy option does not directly or indirectly address the criterion, but may benefit other
Negative Impact (-1)	The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some

Number/ Ref.	Policy Recommendation	COMMERCE INDICATORS Each city's policies were evaluated using this common set of criteria: 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?	OLYMPIA-SPECIFIC CRITERIA: Does this policy incentivize and support the development of affordable and deeply affordable housing, including supportive?	Does this policy increase housing supply, including middle housing and ADUs?	Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?	Score(out	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	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	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	0	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	2	1	2	0	2	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	1	1	0	2	14	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	2	2	2	1	0	1	14	This policy would address displacement and help prevent racially disparate impacts.
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	1	1	2	1	2	2	1	0	0	10	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	0	1	1	2	1	2	0	8	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	2	2	1	0	0	2	13	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan	Olympia's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contributeto or detract from anti-displacement goals, in order to help Olympia prioritize future implementation actions of											**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.	Define income-restricted housing as a different use from other forms of housing in the zoning code.	0	1	0	0	0	2	1	0	2	6	
1.f.	Encourage the LOTT Clean Water Alliance to discuss lower hook-up fees and other incentives for low income affordable housing as part of their cost of service study.	1	1	0	0	1	2	1	0	0	6	
1.g.	Partner with low-income housing developers to expand homeownership opportunities.	2	1	2	2	2	0	1	1	1	12	
1.h.	Provide funding for non- profit organizations to buy income-restricted units proposed to be converted to market rate housing.	2	2	2	2	2	-1	2	0	2	13	
1.i.	Provide funding for low- income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	-1	2	0	2	13	
1.k.	As part of comprehensive plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	1	1	1	1	1	2	1	0	1	9	
1.l.	Require low-income housing units as part of new developments.	1	2	0	0	-1	1	1	0	0	6	
1.m.	Adopt a "Notice of Intent to Sell' ordinance for multifamily developments.	2	2	1	2	0	2	2	1	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	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	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	2	14	
1.q.	Enhance enforcement of property maintenance codes to keep housing in good repair.	0	0	1	0	0	1	0	0	2	4	
2.c.	Provide displaced tenants with relocation assistance.	1	1	2	1	1	0	0	0	0	6	
2.d.	Consider a Tenant Opportunity to Purchase (TOPO) Ordinance	2	2	2	2	2	1	0	0	2	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	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	0	5	
2.g.	Establish a down payment assistance program.	2	1	1	1	2	0	0	0	0	7	
2.h.	Adopt a "right to return" policy	1	0	2	1	2	1	0	0	0	7	
2.i.	Rezone manufactured home parks to a manufactured home park zone to promote their preservation.	1	2	2	2	2	2	0	0	2	13	
3.l	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	0	1	0	1	
3.q	Make use of SEPA threshold exemptions for residential and infill development.	0	0	0	0	0	2	0	2	0	4	
3.r	Complete a subarea plan for the Capital Mall High Density Neighborhood area.	0	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	0	8	
3.t	Expand allowance of residential tenant improvements without triggering land use requirements.	2	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	0	2	1	2	0	6	
3.v	Increase minimum residential densities.	0	1	0	0	1	1	1	2	0	6	
3.w	Integrate or adjust floor area ratio standards.	0	1	0	0	1	1	1	2	0	6	
4.g.	Allow more housing types in commercial zones.	0	1	1	1	0	1	0	2	0	6	
4.h.	Allow single-room occupancy (SRO) housing in all multifamily zones.	2	2	0	1	2	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	1	11	
4.j.	Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	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	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	1	12	
6.f.	Establish an affordable housing loan program.	2	2	1	1	2	1	2	1	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	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	1	12	

City of Tumwater

Policy Evaluation Matrix

This matrix lists the policy recommendations identified for the housing analysis for the jurisdiction and scored based on the scale to the right. The scores were then totalled 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 postive 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 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.
New Policy Recommendations													
	Explore ways to monitor renter income verification, which may include establishing local ordinances to enforce attainable income verification, and identify and address price fixing.	1	1	1	1	0	0	1	1	0	0	6	This policy would help address affordability, potential racially disparate impacts, and allow for more fair avenues for renters to verify incomes, but wouldn't directly impact the supply of affordable housing or prevent displacement.
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	1	2	2	0	0	14	This policy would help preserve existing affordable housing and manufactured housing, but would not directly impact affordability, housing supply, or address racially disparate impacts.
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	0	2	2	2	1	15	This policy would help preserve existing affordable housing and manufactured housing to ensure it is well-maintained, but would not directly address economic displacement, the provision of affordable housing or additional housing, or housing costs.
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	1	1	2	0	0	14	This policy would primarily help reduce displacement pressures and increase the supply of affordable housing.
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	1	0	1	0	1	2	2	8	This policy would help increase the overall housing supply, and may reduce housing costs and indirectly address displacement.
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties 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 operations with on-site management, and disincentivize corporate owners from buying homes in the community.	2	2	2	2	2	1	2	1	0	0	14	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	1	1	0	0	1	0	0	9	This policy would address displacement and help prevent racially disparate impacts.
	Create and promote an educational program to provide private landlords with information on legal requirements and renter income qualifications for those on supplemental income.	2	1	2	1	0	0	0	0	0	0	6	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	1	2	0	2	1	1	2	2	12	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.
	Encourage the retention and maintenance of existing affordable housing, espacially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	1	2	0	0	1	1	0	11	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan	Tumwater's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Tumwater prioritize future implementation actions of their HAP. The policies with the highest												**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.**
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	1	2	2	2	0	17	
1.e.	As part of Comprehensive Plan and development code changes, include an evaluation of the impact such changes will have on housing affordability, especially for low-income households.	1	1	1	1	1	2	0	0	0	0	7	
1.f.	Provide funding for low-income and special needs residents to purchase housing through community land trusts.	2	2	2	2	2	1	2	2	1	0	16	
1.h.	Encourage low-income housing units as part of new developments.	2	2	1	1	2	2	0	2	0	2	14	
1.j	Establish a program to preserve and maintain healthy and viable manufactured home parks.	2	2	2	2	2	1	2	2	0	2	17	
1.m	Extend public water and sewer to unserved areas to allow infill development in underdeveloped areas.	1	2	1	1	2	1	0	1	2	1	12	
2.a.	Have developers provide tenants displaced by redevelopment with relocation assistance.	1	2	2	2	1	1	0	0	0	0	9	
2.b.	Partner with local trade schools to provide renovation and retrofit services for low-income households as part of on-the- job-training.	2	0	2	0	1	1	2	0	2	0	10	
2.c	Adopt short-term rental regulations to minimize impacts on long-term housing availability.	2	2	2	2	1	2	1	1	0	0	13	
2.d	Support down payment assistance programs for homeownership and programs that assist people entering the rental market.	2	2	2	1	2	1	0	1	0	0	11	
2.f	Develop a technical assistance or education program for small landlords.	0	0	0	0	0	1	0	0	0	0	1	
2.g	Assist non-profits in the process of acquiring mobile home parks to turn them into public trusts so that lot rental fees can be controlled.	2	2	2	2	2	1	2	2	0	2	17	
2.h	Fund an energy assistance program for rental housing/make landlords do upgrades when the unit is sold.	2	1	1	1	2	1	2	0	2	0	12	
3.d	Continue to look for place- making opportunities along urban corridors.	0	0	0	2	0	2	0	0	0	0	4	
3.e	Mix market rate and low- income housing to avoid creating areas of concentrated low-income housing.	2	2	2	2	2	2	1	1	1	2	17	
4.a	Adopt a form-based code for mixed-use zones to allow more housing types and protect the integrity of existing residential neighborhoods.	2	1	1	2	2	1	2	1	2	2	16	
4.b	Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	0	0	2	2	15	
5.a	Conduct education and outreach around city programs that support affordable housing.	1	2	2	2	2	1	0	1	0	1	12	
5.b	Fund Housing Navigators to assist households, renters, homeowners, and landlords with housing issues.	2	0	1	1	2	1	0	1	0	0	8	
5.e	Partner with a public or private developer to build a townhouse or row house demonstration project.	0	0	0	0	0	1	0	1	0	1	3	
5.f	Track data on affordable housing at the regional level.	0	0	0	0	0	2	0	0	0	0	2	
6.b	Establish an affordable housing property tax levy to finance affordable housing for very low-income households.	2	2	1	1	2	2	0	2	1	2	15	
6.c	Establish an affordable housing sales tax.	1	2	1	1	1	2	0	2	0	1	11	
6.d	Capture the value of city investments (utilities, roads, etc.) that increase private investments in neighborhoods, especially in areas with planned or existing transit.	0	-1	0	0	0	1	0	0	1	1	2	
6.e	Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives.	1	2	1	1	1	1	2	2	1	1	13	

City of Yelm

Policy Evaluation Matrix

Policy recommendations were evaluated with the shared commerce indicators and the criteria unique to each jurisdiction and scored based on the scale to the right. The scores were then totalled 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 postive 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:** Does this policy prevent racially disparate impacts or work to repair past harm?	**Economic Displacement:** Does this policy help prevent or mitigate economic displacement?	**Physical Displacement:** Does this policy help prevent or mitigate physical displacement?	**Cultural Displacement:** Does this policy help prevent or mitigate cultural displacement?	**Housing Exclusion:** Does this policy prevent the exclusion of historically marginalized or other vulnerable populations from accessing safe and affordable housing appropriate for their needs?	Implementation Considerations: Does the city have staff and resources necessary to implement this policy effectively?	Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?	Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?	Does this policy incentivize and support the development of affordable and deeply affordable housing?	Score(out of 15)	**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	1	2	0	2	9	This policy would help address affordability, potential racially disparate impacts, and allow for more fair avenues for renters to verify incomes, but wouldn't directly impact the supply of affordable housing or prevent displacement.
	Consider creative zoning overlays or land use policies to classify and protect manufactured home communities.	1	2	2	2	2	2	2	0	2	15	This policy would help preserve existing affordable housing and manufactured housing, but would not directly impact affordability, housing supply, or address racially disparate impacts.
	Establish a program, partnering with local organizations where possible, to incentivize and assist mobile park owners with improving their properties and support upgraded utilities and infrastructure for these properties.	1	1	2	2	2	1	2	0	2	13	This policy would help preserve existing affordable housing and manufactured housing to ensure it is well-maintained, but would not directly address economic displacement, the provision of affordable housing or additional housing, or housing costs.
	Encourage collaboration between local organizations working to provide affordable housing and prevent homelessness.	2	2	2	2	2	1	0	0	1	12	This policy would primarily help reduce displacement pressures and increase the supply of affordable housing.
	Create and promote an educational program, partnering with local organizations where possible, to explain the long term investment opportunity of ADUs and the financial plan required to pursue building an ADU.	0	1	0	1	0	1	1	2	1	7	This policy would help increase the overall housing supply, and may reduce housing costs and indirectly address displacement.
	Encourage or support residents of mobile home communities in forming Community Land Trusts or other cooperatives so they can manage their properties indepently and be prepared to exercise the right of first refusal.	2	2	2	2	2	0	2	1	2	15	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	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	15	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly incentivize or reduce barriers to developing diverse housing types.
	Minimize the amount of potential long-term housing that is used for short-term transient rentals (e.g., AirBnBs).	1	2	1	2	2	1	2	0	1	12	This policy would address displacement, preserve existing affordable units, and help reduce housing costs, but would not directly address racially disparate impacts or incentivize the development of deeply affordable housing.
	Partner with local organizations to provide a program to assist residents with applications and explain housing benefits and other housing assistance programs.	2	2	2	2	2	1	1	0	0	12	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	0	0	8	This policy would help prevent physical displacement and housing exclusion, and may indirectly support other housing goals.
	Increase staff capacity to process ADU and other housing applications in a timely manner.	0	1	0	1	1	2	0	2	1	8	This policy would help increase the overall housing supply, which may in turn support other housing goals like affordability and anti-displacement.
	Encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.	2	2	2	2	2	1	2	0	0	13	This policy would help support many housing goals, like anti-displacement efforts, reducing racially disparate impacts and housing exclusion, preserving existing affordable housing units, and may help reduce housing costs and increase the overall housing supply.
Housing Action Plan	Yelm's Housing Action Plan policies that have not been completed yet are evaluated below to evaluate how these contribute to or detract from anti-displacement goals, in order to help Yelm prioritize future implementation actions of their HAP. The policies with the highest total score may be											**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.**
1	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.	0	0	0	0	0	0	0	0	0	0	
2	Allow third-party review of building permits for development projects.	0	0	0	0	0	2	1	2	1	6	
3	Mix market rate and low-income housing to avoid creating areas of concentrated low-income housing.	1	1	0	0	2	2	1	2	1	10	
4	Allow accessory dwelling units (ADUs) in all residential zones.	0	1	1	1	0	2	0	2	1	8	
5	Allow single-room occupancy (SRO) housing in all multifamily zones.	2	2	0	1	2	2	0	2	2	13	
6	Strategically allow live/work units in nonresidential zones.	2	2	2	2	2	1	0	2	0	13	
7	Allow more housing types in commercial zones	2	1	0	1	1	1	0	2	1	9	
8	Increase the types of housing allowed in low-density residential zones (duplexes, triplexes, small houses on small lots.).	0	1	0	1	2	0	0	2	1	7	
1	Identify and develop partnerships with organizations that provide or support low-income, workforce, and senior housing as well as other populations with unique housing needs.	2	2	2	2	2	1	2	1	2	16	
2	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	
3	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	
4	Encourage local community groups, churches, and businesses to provide voluntary assistance with maintaining existing structures for the elderly, low-income, and those with special needs.	1	2	0	2	2	1	2	0	2	12	
5	Encourage the Housing Authority of Thurston County to take greater advantage of State and Federal housing grants and tax incentives.	1	2	1	1	1	1	2	1	2	12	
6	Work with the Thurston County Regional Housing Council considering issues specifically related to funding a regional response to homelessness and affordable housing, and coordination of existing funding programs.	1	2	2	2	2	1	1	1	2	14	
1	Offer density bonuses for low-income housing.	0	1	0	0	0	1	0	2	2	6	
2	Discuss lower hook-up fees and other incentives for low-income affordable housing.	2	1	1	1	2	0	2	2	2	13	
3	Offer developers density and/or height incentives for desired unit types.	0	0	0	0	1	1	0	2	2	6	
4	Review fees/regulations to identify housing cost reductions.	1	1	0	0	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	
1	Reduce parking requirements for residential uses, including for multifamily developments near frequent transit routes.	0	2	0	0	1	1	0	2	1	7	
2	Lower transportation impact fees for multifamily developments near frequent transit service routes.	0	1	1	0	0	1	0	2	0	5	
3	Develop partnership with InterCity Transit to expand bus routes to additional areas of the city.	1	1	1	1	0	2	0	0	0	6	
4	Expand the multifamily tax exemption to make it available in all transit corridors.	0	1	0	0	1	1	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	
											0	

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
The cities of Olympia, Yelm, Tumwater, and Lacey are collaborating to tackle housing displacement and exclusion. They aim to analyze local policies that have caused social and racial disparities in housing. The three main types of displacement are: 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. 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.	Las cuidades de Olympia, Yelm, Tumwater y Lacey estan unidos en la pelea contra el desplazamiento de las viviendas familares. Juntos, intentan analizar como las iniciativas locales en estas ciudades han causado desigualdades entre diferentes grupos sociales y raciales en la vivienda. Las maneras principales de el desplazamiento son: Desplazamiento fisico: Ocurre cuando alguien recibe una orden de desalojo, ejecución hipotecaria, o hay una falta de viviendas dignas. Desplazamiento economico: Ocurre cuando hay un gran aumento en el costo de la renta y el costo causa el desplazamiento de familias.

Your voices matter. The insights gathered will shape the future of housing policies for a fairer, more inclusive community for all. For our first question, please tell us, have YOU seen housing displacement show up in your community?	Desplazamiento cultural: Ocurre cuando hay una perdida en la identidad cultural de la comunidad mientras desaparecen servicios y instituciones. 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 cuidades 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. 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. Para nuestra primera pregunta, cuentanos si ha visto el desplazo de vivienda en su comunidad? Como ha pasado?
Next, Are there policies or practices in your community that you think increase displacement risk?	Para nuestra proxima pregunta, dinos si cree que hay leyes o practicas que aumenta el riesgo de desplazamiento?
Finally, In your experience, who in your community has been displaced or is most at risk of displacement?	Finalmente, en tu experiencia, quienes en su comunidad esta a riesgo de ser desplazado de su hogar?

Compensation

Participants who completed the survey in its entirety were eligible for a $25 gift card. Amazon Gift Cards were selected for their variety of use options, and due to the low fees which allowed for a maximum budget for community participant compensation.

Distribution
The Survey was distributed by email and through targeted flyers posted at identified locations in the four participating cities.
The City partners distributed the survey through the platforms they deemed most appropriate, including email lists, social media, and direct outreach.

Uncommon Bridges produced suggested outreach language in English and Spanish, a printable flyer in English and Spanish with a QR code, and shortened direct link (using bit.ly) to aid in ease of access to the survey.

Uncommon Bridges identified key community organizations to assist in email outreach:

- Timberland Library – branches in each participating city
- Virgil Clarkson Lacey Senior Center
- Evergreen College Veterans Resource Center
- Disabled American Veterans Ch 41
- Community Action Council
- Thurston County Food Bank
- Rebuilding Together Thurston County
- CIELO
- Hispanic Roundtable

Digital Access
To increase the accessibility of these surveys and mitigate the digital divide, Uncommon Bridges employed two strategies: (1) development of a tech support guide in Spanish and English, and (2) specific community partners to serve as a community location to provide access support.

All community organizations assisting with outreach were provided the Tech Support that they might opt to use to assist their respective audiences in participating in the survey.

Two key community partners agreed to provide digital access support to interested community participants: The Timberland Library (Lacey, Tumwater, Yelm and Olympia branch locations), and the Lacey Senior Center.

The Libraries were provided the printable flyers and tech support sheets. They offered Chromebooks with A/V capabilities that could be used by community members during any regular library hours.

The Senior Center identified two volunteers who were oriented to the project, and who hosted open hours at the Center on Tuesdays and Thursdays to assist tech-limited seniors in completing the survey.

Sample Outreach Language:

> The four unique cities of **Olympia, Tumwater, Yelm, and Lacey** are coming together to identify and study local policies and regulations that have resulted in racially disparate impacts, displacement, and exclusion in housing for their residents.
>
> No one understands the challenges of housing affordability better than those who face them daily. That's why we're inviting impacted and at-risk community members to share their story through a video or audio recording (up to 2 min), or written message via an easy-to-use online portal, available **in English and Spanish**. *These insights will directly inform the policy recommendations we make to local leaders, ensuring they reflect the true needs of our communities.*
>
> For these valuable contributions, participants will receive a **$25 gift card** while funds last.
>
> ***Can you help participants share their story?*** I am reaching out today to connect with those who can help get the word out or provide technical assistance to people whose perspectives deserve to be included in this review of local housing policies. This might include:
>
> - Putting up a flyer (attached)
> - Sending an email message (option for email copy attached)
> - Acting as a technical assistance site (community members may be referred to your location - tech assistance guide attached)
>
> If you have any questions, please reach out to
> Em Piro (Project Associate) at em@uncommonbridges.com or call 206-865-5210, or
> Charlotte Jernick (Project Manager) at charlotte@uncommonbridges.com or call 206.971.6030 x114.
>
> Thank you for helping make a meaningful impact in our South Sound region!

Data Integrity

In an effort to ensure that as many responses as possible reflected the local community, a password was introduced to discourage bots and AI responses. Data was also closely reviewed to filter automated responses and responses submitted from outside the South Sound region.

Synthesis of Preliminary Findings

Are people observing displacement?	Policies or practices increasing displacement risk	Who has been displaced, or is at highest risk?

Overwhelmingly (>95%) Yes	Increase in cost of living	Communities of color
Observations that displacement has increased in recent years	Rent increases	Indigenous communities
Changes to economy are cited as a major factor	Poorly maintained rental housing	Manufactured home residents
Specifically in predominantly Black neighborhoods	Lack of affordable housing	Disability
Downtown Olympia	Increasing costs of building	Access to living wage
Specifically highlighting long-term residents being pushed out of housing	Gentrification: land and neighborhood improvements – "urban revitalization" – coinciding with luxury development and increased cost of living	Low income households
Relatives sharing a household (ex: adult children moving in with parents)	Increases in property tax	Single mothers, women and children
	Zoning laws	Seniors
	Rise of Air BnB listings	African American and Hispanic communities and households
	UGA expansion that prioritizes suburban development over affordable housing	Young people not in high-paying jobs
	Zoning for density has also led to an increase in luxury development	LGBTQ+ populations
	Lack of rent stabilization	
	Tax Increment Financing leading to influx of upscale businesses and development	
	Tax abatement programs for luxury developers	
	Permitting and cost requirements of developing affordable housing, especially in a SFH	
	Inaccessible social services	
	Speculative development	

	Zoning that limits affordable housing development	
	Building renovations	

Quotes:

When we went to city council meetings, they talked about numbers—property values, economic growth. But they never talked about us. It felt like our culture, our lives, and our stories didn't matter in the face of development.

The story of housing displacement is a story of power and whose voices are heard. It's not just about homes; it's about belonging, dignity, and the right to exist in spaces we've built and called home for years.

I have also seen many community institutions such as restaurants and bars close down, some which are safe havens for folks with marginalized identities — an example of cultural displacement. Many people in my age range(30-40) from Olympia have moved to Centralia, Chehailis, 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=f 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 Polices/Regulations Provide Significant Hurdles

- Rural ADUs need more attention
- Households used commuting to address rising rents (this is displacement)
- ADUs densify areas
- Preconstruction costs are high
- There need to be economic opportunities to prevent displacement
- Overall housing densification
- Need to supplement ADUs with higher density development
- Many of the issue ADU owners have are similar to large scale developers
- Potential low interest loans for ADU construction
- Regulation review for efficacy
- ADUs provide a path out of housing segregation
- Prepackaged ADU processes speed up complications
- About 25% of the final cost of housing is regulation
- Incentives to create more ADU buyers

Provide Care Structures

- Family can help provide care structures to ADU residents
- Solutions for ageing complications such as degenerative illnesses
- Interpersonal conflicts can also lead to vulnerable people being displaced
- Potentially located near more health services, providing opportunities to those more vulnerable to homelessness

Municipal infrastructure and capacity are an issue

- Sidewalks, sewer connection can be expensive in rural communities
- Building in rural communities may stress services
- Pre-approved design v existing structures
- Staff capacity needed

ADU owner and builder relationships provide an opportunity for collaboration

- ADU's could be part of a home "remodel"
- ADU construction is a Niche field and those offering construction services are few.
- Builder training for ADUs
- Many ADUs are built with already existing buyers

November 21, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Affinity Groups

Summary

On November 21st, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of with residents of the 4 member cities that represent low-income residents or housers in the area. This meeting covered concerns, perspectives, and potential solutions the participants had around displacement and housing in Olympia, Yelm, Tumwater, and Lacey. Themes discussed included preventative measures, policy and practice considerations, and who is being displaced.

COHORT ATTENDEES:

- Berenice Hartt Plazas, Thurston County Food Bank
- Kim Piper, Property Manager
- Eileen Dalton, SPS Habitat for Humanity
- KayVin Hill, Lived Experience Advisory Board, Thurston County
- Faith Foote, Sound Legal Aid
- Ron Baugh-Schlossberg, Sound Legal Aid

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

Uncommon Bridges led a discussion on housing displacement using a Mural Board to capture the comments from the cohort members. The group shared feedback and recommendations given their unique lived experience and perspective.

KEY THEMES

Participants shared their reflections, recommendations, and insights on the specific housing pressures they face, issues specific to low-income home communities, and what they would like cities to do to address these challenges. Key themes from the conversation are listed below.

- Displacement can happen to anybody.
- Economic impacts drive displacement.
- There are significant language barriers - landlords do not or cannot effectively communicate eviction notices and warnings.
- There is a high correlation between displacement and homelessness.
- Displacement is escalating throughout the county.
- Watch the model that Thurston Regional Planning Council has put in place is creating change faster to learn best practices.
- The perceived social safety net doesn't exist.
- We need a greater focus on houselessness prevention.
- There is a need for municipal collaboration on providing housing services.

Group Discussion

To construct key themes, our team organized and analyzed the following 4 main topics that emerged from the discussion:

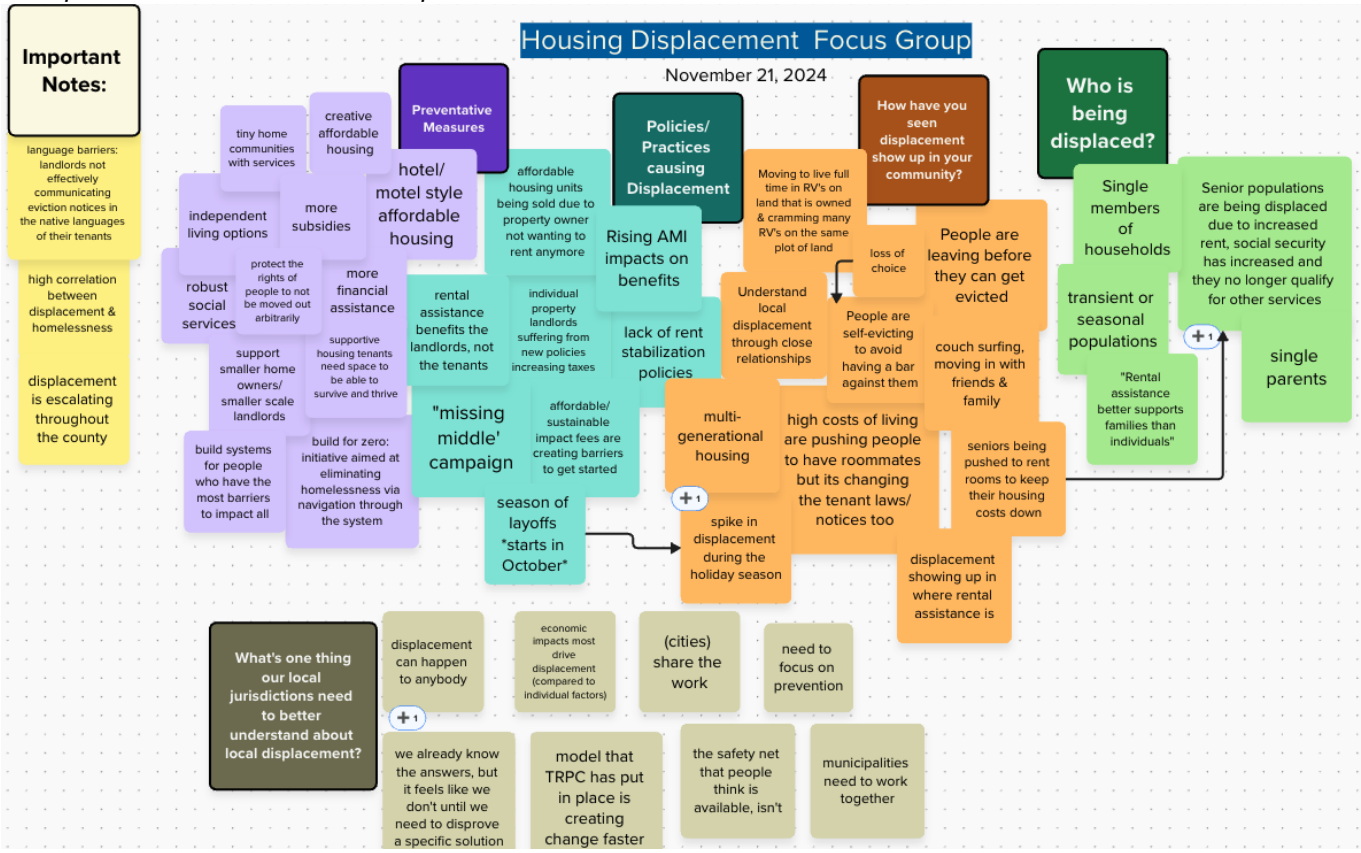
Preventative measures - In order to prevent displacement, there is a need to focus more heavily on prevention rather than react.

Policies causing Displacement - Participants identified a number of policies that create the conditions for displacement or actively make it worse.

How have you seen displacement in your community? - Participants shared ways in which they have experienced or viewed displacement happening in their lives.

Who is being displaced? - Participants shared their views of what characteristics make households vulnerable to displacement.

Group Discussion Mural Transcription



Preventative measures

- Hotel/motel style affordable housing
- More creative affordable housing
- Tiny home community with services
- Independent living options
- Robust social services
- Protect the rights of people to not be moved out arbitrarily
- More financial assistance
- Supportive housing tenants need space the be able to survive
- Build for zero: initiative aimed at eliminating homelessness via navigation through the system
- Build systems who have the most barriers to impact all.
- Support smaller homeowners/ small scale landlords
- Robust social services
- More subsidies

Policies and Practices causing displacement

- Affordable housing units being sold due to property owner not wanting to rent anymore

- Raising AMI has an impact on benefits
- Rental assistance benefits the land landlords, not the tenants
- Individual property landlords suffering from new policies increasing taxes
- Affordable sustainable impact fees impact fees are creating barriers to get started
- Season of layoffs starts in October

How have you seen displacement show up in your community?

- People leave before they get evicted
- Moving to live in RVs on land that is owned and cramming many RV's on same plot of land
- Understand local displacement patterns through relationship building
- People are self-evicting to avoid having an impact on their credit
- High costs of living leads people to have more roommates but buildings change their roommate allowances
- Spike in displacement during holiday season
- Multi-generational housing
- People have fewer options for where to live
- People couch surf (non-visible homelessness)

Who is Being Displaced?

- Single members of households
- Transient or seasonal populations
- Rental assistance better supports families than individuals
- Single parents
- Senior populations

November 21, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Manufactured Home Community Affinity Group

Summary

On November 21st, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of manufactured (or mobile) home stakeholders, including residents, property management, development, advocates, and civic leadership. The participants provided insights, feedback, and recommendations to the cities of Olympia, Tumwater, Lacey and Yelm regarding specific pressures and opportunities regarding housing for the updated Comprehensive Plan. Key themes that emerged from the discussion focused around the differing rates of displacement between small-scale operators and private equity firms as landowners, legal paths, physical and economic entrapment.

COHORT ATTENDEES:

- Stephen Becker, Senior Manufactured Home Community (SMHC) Resident
- Sharron Cornwall, property manager
- Donna Daniels, SMHC Resident
- Karen Gregerson, SMHC Resident
- Richard Gregerson, SMHC Resident
- Ed Hildreth, civic leader
- Diane Houston, SMHC Resident
- Kyle Taylor Lucas (Tulalip/Snohomish), MHC Resident
- Kathy McCormick, SMHC Resident
- Kevin McCrea, Property developer
- Dean Perryman, MHC Resident
- Anne Sadler, Association of Manufactured Homes
- Laura Scheffer, MHC Resident

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

Uncommon Bridges led a discussion using a Mural Board to capture the comments from the cohort members. The group shared feedback and recommendations on housing policy and what measures they would like to see incorporated into the comprehensive plan.

KEY THEMES

Participants shared their reflections, recommendations, and insights on the specific housing pressures they face, issues specific to manufactured home communities, and what they would like cities to do to address these challenges. Key themes from the conversation are listed below.

- Small-scale operators and private equity firms as landowners
- Land ownership options and barriers
- Legal paths and challenges
- Physical and economic entrapment
- Role of cities to respond to resident needs
- Availability of quality affordable housing
- Specific impacts and access to advocacy for communities of color

Group Discussion

To construct key themes, our team organized and analyzed the following 4 main topics that emerged from the discussion:

Land Ownership

- All residents shared how the increase in private equity ownership in recent years has led to rapidly rising costs of living in MHC. Some have explored community land trusts (CLTs) but find the setup and structure challenging with existing financial burdens and pressures. Participants reported that private equity firms openly reported fee-based capital gains.
- Residents noted that a preferred model is private ownership of the land by local, family-owned operations with on-site management. They found that establishing rapport with owners led to greater transparency, care for the parks, and tenancy continuity. Participants want cities to ease up local restrictions that make it difficult for local, family-owned landowners to manage parks. Cities could support residents in forming cooperatives or CLTs to be prepared to exercise right of first refusal and manage properties independently.

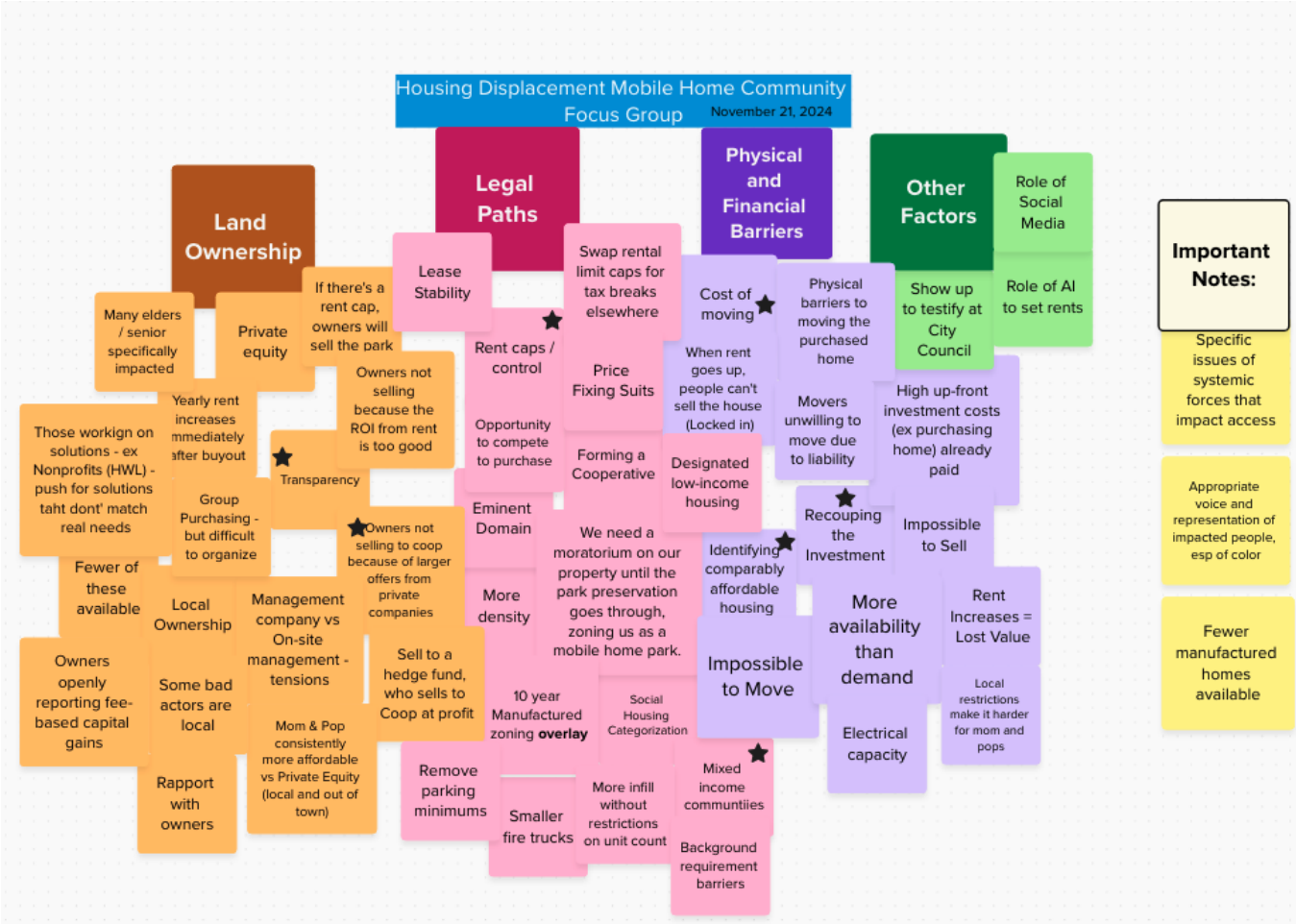
Legal Paths

- Participants shared the role that rent caps could play in managing rising costs and noted that this could increase the likelihood of landowners to sell the park. Discussion of group buying options pointed out that existing tenants have the right of first refusal, but this is often not recognized by landowners.
- Participants want cities to put moratoriums on properties as they transition through zoning changes, a 10-year manufactured zoning overlay, opportunity to compete to purchase, use of eminent domain as a means of preserving a manufactured home park from being redeveloped, low-income and social housing designations, mixed-income communities, and for cities to explore options around rent caps and tax breaks that disincentivize price gouging.

Physical and Economic Entrapment

- Participants described their situation as “Impossible to move, Impossible to stay.” As landowners increase rents and underinvest in utilities such as electric, water, and waste management, the value of the property decreases and owners are locked in. Insurance companies prevent moving companies from relocating manufactured homes due to the associated risks.
- Participants want cities to support upgraded utilities and infrastructure and promote incentives for park owners to improve their properties.

Group Discussion Mural Transcription



Important Notes and Other Factors

Specific issues of systemic forces that impact access

- Appropriate voice and representation of impacted people, especially of color
- Fewer manufactured homes available
- Role of social media
- Role of AI to set rents

Show up to testify at City Council

Land Ownership:

- Many elders/seniors specifically impacted
- Private equity
- If there's a rent cap, owners will sell the park
- Yearly rent increases immediately after buyout
- Owners not selling because the ROI from rent is too good
- Those working on solutions – ex Nonprofits (HWL) – push for solutions that don't match the real needs
- Group purchasing – but difficult to organize
- Transparency (starred)
- Local ownership
- Management company vs On-site management - tensions
- Fewer of these available
- Some bad actors are local
- Owners not selling to coop because of larger offers from private companies (starred)
- Sell to a hedge fund, who sells to Coop at profit
- Some bad actors are local
- Mom and Pop consistently more affordable vs Private equity (local and out of town)
- Rapport with owners

Legal Paths:

- Lease stability
- Rent caps/control (starred)
- Swap rental limit caps for tax breaks elsewhere
- Price fixing suits
- Opportunity to compete to purchase
- Forming a cooperative
- Eminent domain
- We need a moratorium on our property until the park preservation goes through, zoning us as a mobile home park.

- 10-year manufactured zoning overlay
- Social housing categorization
- Remove parking minimums
- Smaller fire trucks
- More infill without restrictions on unit count
- Mixed income communities (starred)
- Background requirement barriers

Physical and Financial Barriers:

- Cost of moving (starred)
- Physical barriers to moving the purchased home
- When rent goes up, people can't sell the house (locked in)
- Movers unwilling to move due to liability
- High up-front investment costs (ex: purchasing a home) already paid
- Recouping the investment (starred)
- Identifying comparably affordable housing
- Impossible to sell
- More availability than demand
- Rent increases = lost value
- Impossible to move
- Local restrictions make it harder for mom and pops
- Electrical capacity

December 10, 2024

Olympia, Lacey, Tumwater and Yelm Housing Displacement Analysis Military Affinity Groups

Summary

On December 10th, Uncommon Bridges facilitated a Housing Displacement Analysis Affinity Group, made up of a cohort of military-connected households including veterans, dependents, and service providers. The participants provided insights, feedback, and recommendations to the cities of Olympia, Tumwater, Lacey and Yelm regarding specific pressures and opportunities regarding housing for the updated Comprehensive Plan. Key themes that emerged from the discussion focused around coordination of resources and tenant protections.

COHORT ATTENDEES:

- Michael Klos, Special Operations Veteran and Liaison With Disabled American Veterans Chapter 41
- Mohammad Mahis, Veteran US Army Combat Interpreter
- Thomas Mason, Disabled Desert Storm Veteran
- Katherine Jane Mitchell, Military Dependent
- Victoria Lin Vazquez, Military Dependent

Uncommon Bridges followed the agenda below:

- Welcome
- Meeting Purpose & Review
- Understanding Housing Displacement (physical, economic, cultural) and Comprehensive Plans
- How Input Will Be Used
- Questions
- Final Reflections & Adjourn

Uncommon Bridges led a discussion using a Mural Board to capture the comments from the cohort members. The group shared feedback and recommendations on housing policy and what measures they would like to see incorporated into the comprehensive plan.

KEY THEMES

Participants shared their reflections, recommendations, and insights on the specific housing pressures they face, issues specific to military households, and what they would like cities to do to address these challenges. Key theme 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.

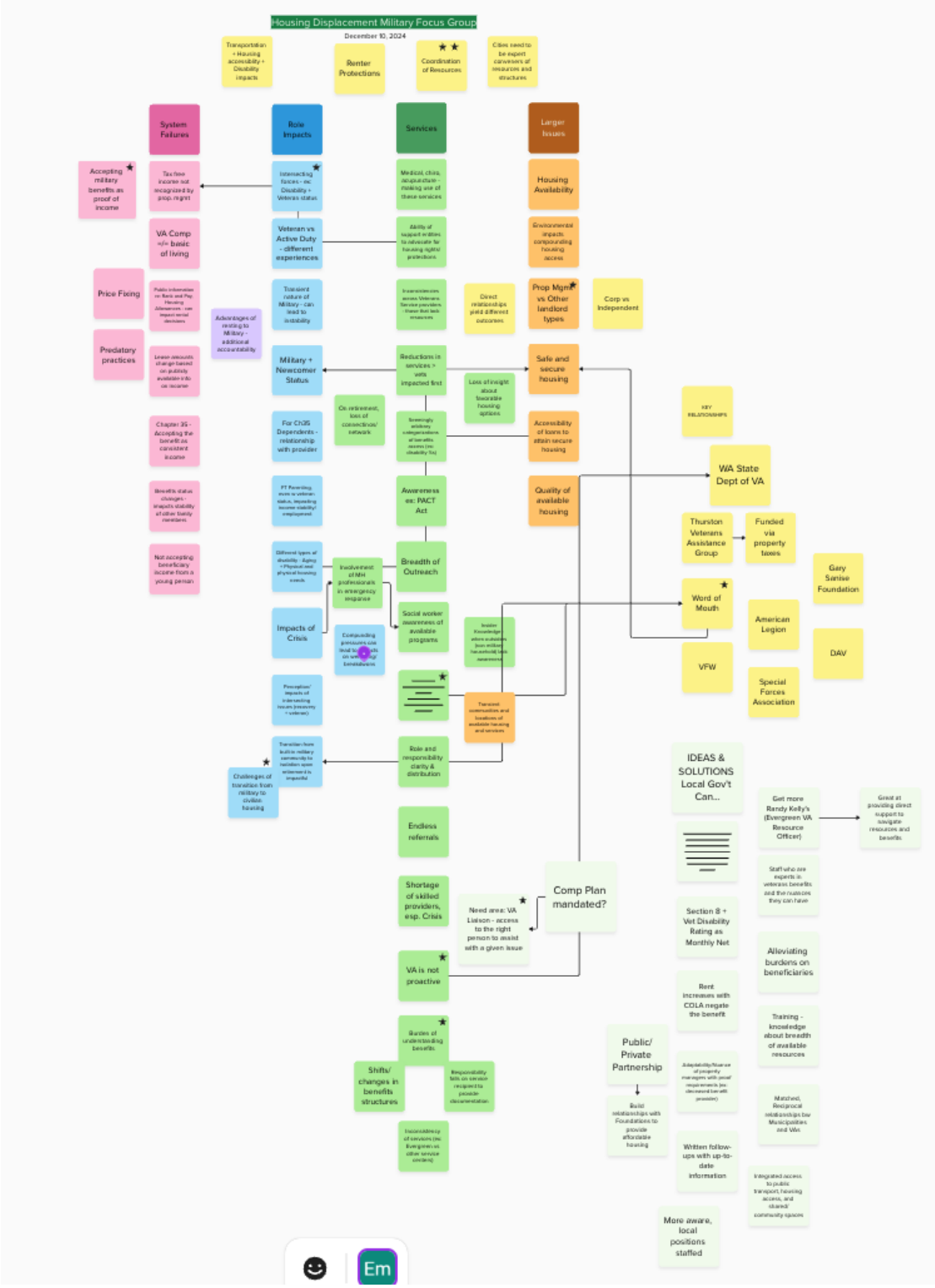
Provider Competence

- 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