

Technical Appendix Table of Contents

- A. Project Methodology
- B. Housing Displacement Academic Field Scan Memo
- C. Existing Comp Plan Policy Eval Framework
- D. Data & Indicators Summary
- E. Engagement Themes Summary
- F. Risk Profiles & Policy Recommendations
 - 1. Lacey
 - 2. Olympia
 - 3. Tumwater
 - 4. Yelm

File Attachments

- 1. Policy Evaluation Summary Memo
- 2. Policy Recommendation Matrix
- 3. Planning Staff Meeting Summaries
- 4. Affinity Group Summaries
- 5. Engagement Survey Analysis
- 6. Engagement Survey Raw Data
- 7. Engagement Outreach Database

Project Methodology

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction

This report analyzes housing displacement risks in the cities of Lacey, Olympia, Tumwater, and Yelm. As urban areas evolve, the need for effective policies that safeguard against displacement becomes increasingly critical. This analysis aims to identify factors contributing to housing instability and displacement, especially among vulnerable populations. By examining historical policies, current trends, and community dynamics, we seek to outline actionable recommendations for local governments to enhance housing security and promote equitable living conditions for all residents. Through collaborative engagement with community stakeholders, this report underscores the importance of inclusive housing strategies that prioritize the needs of marginalized groups while fostering sustainable development.

Research

The project team submitted a Housing Displacement Academic Field Scan memo synthesizing the latest peer-reviewed journals from the last decade that responds to the lines of questioning set out within the Housing Displacement Analysis project for the cities of Lacey, Olympia, Tumwater, and Yelm, including:

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

Data Indicators

For a localized understanding of displacement risk, the project team completed a demographic analysis based on the Racially Disparate Impacts (RDI) tool published by the Washington State Department of Commerce outlining a variety of indicators to measure displacement risk. The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD). Additionally, demographic data was pulled from the American Community Survey.

Public Engagement

Affinity Groups

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

- 1) Manufactured housing communities,
- 2) Communities of low-wage workers,
- 3) Military families and households, and;
- 4) Accessory dwelling units.

Public Survey

A key aspect of this project involves assessing community insight, perceptions, and lived experiences around the impacts of livability, affordability, and displacement in Olympia, Lacey, Tumwater, and Yelm. A robust data collection effort, including multi-lingual outreach via community anchors, focus groups, and an open-access multi-modal survey, sought to engage both those who have been frequently engaged as well as new perspectives and experiences not included in past policy and housing assessments conducted in the region.

Policy Recommendation Analysis

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

Criteria Evaluation Method and Scoring

Policies were evaluated with a set of criteria and scored based on the following scale. These were then totaled to calculate an overall impact score for each policy option.

- **Yes, positive impact** (+2): The policy option has a positive impact and directly addresses the criterion.
- **Somewhat positive impact** (+1): The policy option has a somewhat positive impact, or indirectly addresses the criterion.
- **Neutral/ No impact** (+0): The policy option does not directly address the criterion, but may benefit other housing priorities for the jurisdiction.

- **Negative impact** (-1): The policy option may exacerbate, or detract from, addressing the criterion or issue. However, while some options may have a negative impact on one element of the scoring criteria, it does not mean that they are bad options overall. For example, encouraging redevelopment may increase housing supply overall and reduce long-term displacement pressures, but also increase physical displacement pressures in the short-term.

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

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

In addition to these, each of the jurisdictions had their own, unique (yet sometimes related and similar) policy evaluation criteria.

Lacey

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

Olympia

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

Tumwater

- Does this policy encourage the preservation of naturally occurring affordable housing such as manufactured home parks and other existing affordable units?

- Does this policy incentivize and support the development of affordable and deeply affordable housing?
- Does this policy encourage adaptive reuse of existing residential units or other buildings where feasible?
- Does this policy incentivize or reduce barriers to developing diverse housing types including smaller homes?

Yelm

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

Identifying Policy Recommendations

After analyzing the critical issues in each jurisdiction and the challenges of housing displacement, we compiled a comprehensive inventory of potential policies and programs to address these concerns. The list also included each city's respective Housing Action Plan policies to better reflect existing programs and policies to show how these contribute to or detract from anti-displacement goals, and to help the cities prioritize future implementation actions of their HAP.

MEMORANDUM

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

Purpose

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

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

What past housing policies resulted in resident displacement?

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

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

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

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

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

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

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

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

Bibliography

1. Besbris, Max, Sadie Dempsey, Brian McCabe, and Eva Rosen. "**Pandemic Housing: The Role of Landlords, Social Networks, and Social Policy in Mitigating Housing Insecurity During the COVID-19 Pandemic.**" RSF: The Russell Sage Foundation Journal of the Social Sciences 10, no. 4 (2024): 207-224.
2. Rutan, Devin Q., 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): 104-125.
3. DeLuca, Stefanie, and Eva Rosen. "**Housing insecurity among the poor today.**" Annual Review of Sociology 48, no. 1 (2022): 343-371.
4. Elliott-Cooper, Adam, Phil Hubbard, and Loretta Lees. "**Moving beyond Marcuse: Gentrification, displacement and the violence of un-homing.**" Progress in Human Geography 44, no. 3 (2020): 492-509.
5. Rodríguez-Pose, Andrés, and Michael Storper. "**Housing, urban growth and inequalities: The limits to deregulation and upzoning in reducing economic and spatial inequality.**" Urban Studies 57, no. 2 (2020): 223-248.
6. Lee, Barrett A., and Megan Evans. "**Forced to move: Patterns and predictors of residential displacement during an era of housing insecurity.**" Social Science Research 87 (2020): 102415.
7. Been, Vicki, Ingrid Gould Ellen, and Katherine O'Regan. "**Supply skepticism: Housing supply and affordability.**" Housing Policy Debate 29, no. 1 (2019): 25-40.
8. Desmond, Matthew, and Carl Gershenson. "**Who gets evicted? Assessing individual, neighborhood, and network factors.**" Social science research 62 (2017): 362-377.
9. Chapple, Karen, Paul Waddell, Daniel Chatman, Miriam Zuk, Anastasia Loukaitou-Sideris, Paul Ong, Karolina Gorska, Chhandara Pech, and Silvia R. Gonzalez. "**Developing a new methodology for analyzing potential displacement.**" (2017).
10. Chapple, Karen, and Miriam Zuk. "**Forewarned: The use of neighborhood early warning systems for gentrification and displacement.**" Cityscape 18, no. 3 (2016): 109-130.
11. Zuk, Miriam, Ariel H. Bierbaum, Karen Chapple, Karolina Gorska, Anastasia Loukaitou-Sideris, Paul Ong, and Trevor Thomas. "**Gentrification, displacement and the role of public investment: a literature review.**" In Federal Reserve Bank of San Francisco, vol. 79. (2015).

Policy Framework Review

Evaluation Method

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

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

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

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

City of Olympia

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Land Use and Urban Design Element, Comprehensive Plan				
PL6.1	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.	Establish and periodically review and update a design review process and design criteria that ensures streamlined review, encourages sufficient housing production to meet the City's housing capacity goals, and is consistent with the goals and policies in the Comprehensive Plan for: • Commercial and mixed use development adjacent to freeways and public streets • Other highly-visible, non-residential development, such as the Port of Olympia, campus developments, and master planned developments • Multifamily residential development and manufactured housing parks • Detached homes on smaller lots (less than 5,000 square feet) and in older neighborhoods (pre-1940)

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
				• Properties listed on a Historic Register or located within a designated historic district

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL6.4	Require multi-family housing to incorporate architectural forms and features common to nearby housing; to include porches, balconies, bay windows and similar details; to have entries oriented to streets or a courtyard, and include accessible open space; and to be reduced in size near lower density residential districts.	Challenging	Additional restrictions on multi-family housing types can result in less affordable rents. While design standards are not necessarily negative—they can ensure liveable spaces—this policy should be updated to balance both design and affordability goals, allowing flexibility to ensure housing production and choices.	Balance design standards for multi-family housing that require developers incorporate architectural forms and features similar to existing development, include entries oriented towards streets or a courtyard, and include accessible open space, with flexibility to ensure design standards do not increase the cost of development and prevent housing production.
PL8.4	Avoid height bonuses and incentives that interfere with landmark views.	Challenging	Limiting density for aesthetic reasons can result in lower housing capacity. However, this may be an acceptable compromise as long as the housing and affordability considerations are planned for elsewhere. To avoid subjective views being used as a tool for limiting housing development, this policy should be updated to specify or map viewsheds are most	Avoid height bonuses and incentives that interfere with the City's special landmark views and specify which areas of the city this applies to in the city's code.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			important to preserve through code provisions.	
PL11.2	Provide incentives for housing in commercial districts near transit stops.	Approaching	Providing housing near jobs can be helpful in preventing displacement while reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability as well.	Provide incentives for housing and affordable housing in commercial districts near transit stops.
GL14	Olympia's neighborhoods provide housing choices that fit the diversity of local income levels and lifestyles. They are shaped by thorough public planning processes that involve community members, neighborhoods, and city officials.	Approaching	While this policy does address housing for the different income levels, it should be expanded to clearly call-out low income groups and prioritize housing for historically marginalized groups.	Olympia's neighborhoods provide housing choices that fit the diversity of local income levels and lifestyles. They are shaped by thorough public planning processes that involve community members, neighborhoods, and city officials, and actively seek input from historically marginalized or overburdened populations.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL14.2	Concentrate housing into three high-density Neighborhoods: Downtown Olympia, Pacific/Martin/Lilly Triangle; and the area surrounding Capital Mall. Commercial uses directly serve high-density neighborhoods and allow people to meet their daily needs without traveling outside their neighborhood. High-density neighborhoods are highly walkable. At least one-quarter of the forecasted growth is planned for downtown Olympia.	Approaching	While this policy does address the city's housing needs and demands, it does not address reducing displacement and affordability pressures.	NA
PL14.3	Preserve and enhance the character of existing Low-density Neighborhoods. Disallow medium or high-density development in existing Low-density Neighborhood areas except for Neighborhood Centers.	Challenging	Language that aims to preserve low-density, single-family neighborhood "character" can often be used as a proxy for prohibiting more diverse housing choices. Instead of "character," this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing	Focus medium or high-density development in Neighborhood Centers of low-density neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			types such as middle housing.	
PL14.4	In low-density Neighborhoods, allow medium-density Neighborhood Centers that include civic and commercial uses that serve the neighborhood. Neighborhood centers emerge from a neighborhood public process.	Approaching / Supporting	Depending on how inclusive the Neighborhood Center identification and engagement process is, this policy would support anti-displacement through placemaking and housing, or it may cause further displacement.	Ensure neighborhood centers are developed around a public process that actively seeks input from all residents, prioritizing those from historically marginalized or overburdened communities.
Land Use and Urban Design Element, Comprehensive Plan - Housing Section				
GL16	The range of housing types and densities are consistent with the community's changing population needs and preferences.	Approaching	While the policy acknowledges different community and population needs, it could be improved by incorporating affordability and anti-displacement language.	Ensure a range of housing types and densities consistent with the community's changing population needs, preferences, and to provide housing affordable for all income brackets.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL16.2	Adopt zoning that allows a wide variety of compatible housing types and densities.	Approaching	The policy intends to allow a variety of housing types. However, “compatible” is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Adopt zoning that allows a wide variety of housing types and densities to provide housing for all needs.
PL16.3	Allow 'clustering' of housing compatible with the adjacent neighborhood to preserve and protect environmentally sensitive areas.	Approaching	This goal would allow parcels that would be undevelopable under strict application of the zoning code to be developable. However, “compatibility” could be further defined to ensure the building types used are not exclusionary.	Allow clustering of housing to preserve and protect environmentally sensitive areas and increase the developable area of parcels with critical areas present.
PL16.4	Disperse low and moderate-income and special needs housing throughout the urban area.	Approaching	While this policy seeks to ensure lower income households are not isolated to certain parts of the city, it could be enhanced to go further by allowing and fostering capacity rather	Allow and increase the amount of low and moderate-income and special needs housing in the city.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			than focusing on dispersion.	
PL16.5	Support affordable housing throughout the community by minimizing regulatory review risks, time and costs and removing unnecessary barriers to housing, by permitting small dwelling units accessory to single-family housing, and by allowing a mix of housing types.	Supportive	This policy supports housing growth and affordability.	NA
PL16.6	Promote home ownership, including by allowing manufactured homes on individual lots, promoting preservation of manufactured home parks and allowing these parks in multi-family and commercial areas, all subject to design standards ensuring compatibility with surrounding housing and land uses.	Approaching	This policy could be improved by better defining compatibility. Consider identifying whether compatibility is driven by architectural massing or design styles.	Promote home ownership, including by allowing manufactured homes on individual lots, promoting the preservation of manufactured home parks, and allowing these parks in multi-family and commercial areas, with appropriate development standards.
PL16.7	Allow single-family housing on small lots, but prohibit reduced setbacks abutting conventional lots.	Approaching	Allowing smaller homes on smaller lots reduces land costs.	NA. The intent of this policy needs to be clarified by City staff.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			"Conventional lots" is unclear however.	
PL16.8	Encourage and provide incentives for residences above businesses.	Supportive	Incentivizing residences over businesses creates flexibility and a variety of units.	NA
PL16.9	In all residential areas, allow small cottages and townhouses, and one accessory housing unit per home -- all subject to siting, design and parking requirements that contribute to neighborhood character.	Approaching	While allowing cottages and townhouses supports housing and affordability goals, "neighborhood character" is vague and could be tied to exclusionary housing practices.	Allow small cottages, townhomes, and one accessory dwelling unit per home, all subject to design standards and parking requirements consistent with the underlying zone.
PL16.10	Require effective, but not unreasonably expensive, building designs and landscaping to blend multi-family housing into neighborhoods.	Approaching	Requiring additional standards for multi-family housing types ultimately hinders affordability.	Require effective, but not unreasonably expensive, building standards and landscaping to blend multi-family housing into neighborhoods, and periodically review these standards to ensure they do not prevent the development of affordable housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL16.11	Require that multi-family structures be located near a collector street with transit, or near an arterial street, or near a neighborhood center, and that they be designed for compatibility with adjacent lower density housing; and be 'stepped' to conform with topography.	Approaching	Requiring multi-family housing to be located near transit or neighborhood centers increases their accessibility, but this policy could be expanded to include multi-family housing throughout the city to increase the number of housing units. This policy could also be improved by better defining compatibility.	Require that multi-family structures be prioritized near a collector street with transit, near an arterial street, or near a neighborhood center, encouraged throughout the city, and be designed to conform with topography in a stepped formation.
PL16.12	Require a mix of single-family and multi-family structures in villages, mixed residential density districts, and apartment projects when these exceed five acres; and use a variety of housing types and setbacks to transition to adjacent low-density areas.	Approaching	Requiring a mix of single- and multi-family housing types could support housing growth and affordability, but it does not address reducing displacement and affordability pressures. This policy could be better improved by specifying the "mix" of housing.	NA
PL16.13	Encourage adapting non-residential buildings for housing.	Supportive	Adapting non-residential buildings for housing supports housing growth and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL16.14	Provide annual information on affordable homeownership and rentals in the City, including the operative definitions of affordable housing, criteria to qualify for local, state, and federal housing assistance, data on current levels of market-rate and affordable housing, demand for market-rate and affordable housing, and progress toward meeting market-rate and affordable housing goals.	Supportive	Reviewing affordability and funding opportunities to increase housing annually is supportive of housing growth and affordability.	NA
Land Use and Urban Design Element, Comprehensive Plan - Downtown and Other Neighborhoods - Neighborhoods Section				
GL20	Development maintains and improves neighborhood character and livability.	Approaching	This policy could be improved by specifying what “neighborhood character” means, as the term is vague and could be tied to exclusionary housing practices.	Ensure new developments maintain the scale and form of existing neighborhoods while increasing their livability and affordability.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PL20.1	Require development in neighborhoods to be of a type, scale, orientation, and design that maintains or improves the character, aesthetic quality, and livability of the neighborhood.	Challenging	This policy could be improved by specifying “character”, which is vague and could be tied to exclusionary housing practices. This policy does not directly address housing affordability or supply. Requiring additional standards could ultimately hinder affordability.	Maintain development standards for new residential developments that balance maintaining the scale and form of existing neighborhoods with flexible standards that encourage diverse housing types.
PL20.2	Unless necessary for historic preservation, prohibit conversion of housing in residential areas to commercial use; instead, support redevelopment and rehabilitation of older neighborhoods to bolster stability and allow home occupations (except convalescent care) that do not degrade neighborhood appearance or livability, nor create traffic, noise or pollution problems.	Approaching	This policy preserves housing in residential areas, but it could increase displacement risk as it does not address protecting residents from potential displacement or racially disparate impacts that may result from the redevelopment and rehabilitation of older neighborhoods.	Prohibit the conversion of housing in residential areas to commercial use unless necessary for historic preservation and support the redevelopment and rehabilitation of older neighborhoods to maintain existing affordable housing stock and allow home occupations, considering and preventing the potential displacement impacts that may result from the redevelopment and rehabilitation of older neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
20.3	Allow elder care homes and seniors-only housing and encourage child care services everywhere except industrial areas; but limit hospice care to multi-family and commercial districts.	Approaching	This policy addresses housing supply and affordability by allowing housing for the elderly. It could be more equitably applied to residential zones, rather than only being allowed in multi-family and commercial districts.	NA, could consider allowing hospice care in all areas but industrial, as well.
PL20.4	Support development and public improvements consistent with healthy and active lifestyles.	Supportive	This policy could be improved by prioritizing investment in neighborhoods that have historically experienced a lack of investment.	NA
PL20.5	Prevent physical barriers from isolating and separating new developments from existing neighborhoods.	Supportive	This policy supports housing growth, affordability, and the integration of new developments.	NA
Public Services Element, Comprehensive Plan				
GS3	Affordable housing is available for all income levels throughout the community.	Supportive	Providing affordable housing advances housing growth. This goal should be updated to consider housing by income bracket to meet	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			the requirements of HB 1220.	
PS3.1	Promote a variety of residential densities and housing types so that housing can be available in a broad range of costs.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing. This policy should be updated to consider housing by income bracket to meet the requirements of HB 1220.	NA
PS3.2	Encourage preservation of existing houses.	Approaching	This policy is supportive of housing goals but could prevent affordable housing from being built.	Encourage the preservation of existing or naturally affordable housing units.
PS3.3	Take steps to ensure housing will be available to all income levels based on projected community needs.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing. This policy should be updated to consider housing by income bracket to meet the requirements of HB 1220.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GS4	Deteriorating residential areas within the City are revitalized.	Approaching	This policy is supportive of housing goals but could lead to displacement or disproportionate impacts to vulnerable or historically marginalized communities.	Encourage renovation or retrofit of deteriorating residential units to maintain the quality of the existing housing stock, and partner with other organizations or create a city program to provide temporary relocation assistance where needed.
PS4.1	Support efforts to preserve the historic features or character of historic properties in City housing rehabilitation programs.	Challenging	This policy could place additional burdens or barriers to housing rehabilitation.	Ensure rehabilitation programs support efforts to preserve historic features of historic properties in the City where feasible and do not prevent housing rehabilitation or the provision of safe housing.
PS4.2	Provide assistance and incentives to help low-income residents rehabilitate properties they cannot afford to maintain.	Supportive	Providing assistance to low income residents to rehabilitate their properties is supportive of housing growth and maintaining existing affordable housing stock, while prioritizing assistance for low income groups.	NA
GS5	Special needs populations, such as people with developmental disabilities, the homeless, the frail elderly, and others who have difficulty securing housing,	Supportive	This goal is supportive of housing goals, especially to provide housing for vulnerable populations.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	have adequate, safe, and affordable housing.			
PS5.1	Disperse housing for low-income, moderate-income, and special-needs residents throughout Olympia and its Urban Growth Area, and discourage concentration of such housing in any one geographic area.	Approaching / Supportive	This policy is supportive of housing growth and ensuring low income or other types of housing are integrated throughout the city.	NA
PS5.2	Support the Fair Share Housing allocation process and work with other jurisdictions to monitor progress toward achieving agreed upon goals.	Approaching	This policy helps support housing growth, but doesn't directly address affordability or displacement.	NA
PS5.3	Evaluate the possibility of providing density bonuses to builders who provide low-income housing in market-rate developments, and of tying the bonus to affordability.	Approaching	This policy could be strengthened by requiring low income units.	Evaluate the possibility of providing density bonuses to builders who provide low-income housing in market rate developments or requiring the provision of low-income units.
PS5.4	Encourage new housing on transportation arterials and in areas near public transportation hubs.	Approaching	While greater housing density and new units near transportation facilities—especially transit—can connect households to	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			employment, this policy may also result in greater densities of housing adjacent to toxic and harmful emissions near busier streets, resulting in environmental justice concerns.	
PS5.5	Encourage self-help housing efforts in which people earn home equity in exchange for renovation or construction work, such as "sweat equity" volunteer programs.	Approaching	This policy provides incentive and a way to build home equity but could include other ways for people who are not able bodied.	Encourage self-help housing efforts in which people earn home equity in exchange for renovation or construction work, such as "sweat equity" volunteer programs, and explore other methods of building home equity for those who are not able bodied.
PS5.6	Retain existing subsidized housing.	Supportive	This policy is supportive of housing goals and displacement prevention.	NA
GS6	Our community is safe and welcoming and social services are accessible to all who need them.	Supportive	This goal aims to provide social services to those who need them, but could be strengthened by prioritizing the most vulnerable populations in Olympia to ensure their needs are met.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS6.1	Support non-profit and faith-based charitable organizations that provide funding and/or oversight for social service funding.	Supportive	This policy aims to provide social services by assisting other organizations.	NA
PS6.2	Work with other local governments to provide financial support and oversight of social service funding.	Supportive	This policy aims to provide social services by working with other local governments.	NA
PS6.3	Support programs and projects that assist low-income people and those at risk of homelessness with public funding.	Supportive	This policy aims to provide social services by contributing public funding, which could help mitigate or prevent potential displacement.	NA
PS6.4	Identify barriers to social service, shelter and housing resources for low-income people and those at risk of becoming homeless.	Supportive	This policy helps to mitigate or prevent displacement by reducing barriers to providing services.	NA
GS7	There is enough emergency housing, transitional housing, permanent housing with supportive services, and independent affordable housing.	Supportive	This goal is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS7.1	Encourage a strong network of emergency shelter resources for homeless and at-risk families with children, childless adults, unaccompanied youth, and victims of sexual and domestic violence.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA
PS7.2	Take a regional approach with other jurisdictions so that support for a broad range of social services and resources, including shelter and housing, can be maximized.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA
PS7.3	Encourage businesses, charitable non-profit organizations, and faith-based community organizations to provide shelter and housing services.	Approaching	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness, but could be strengthened by recognizing the city's role in providing shelter and housing services.	Encourage and support businesses, charitable non-profit organizations, and faith-based community organizations to provide shelter and housing services.
PS7.4	Support coordinated service delivery models to maximize the best use of public, charitable,	Supportive	This policy addresses housing exclusion for individuals experiencing or at risk of homelessness and	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	and privately-funded shelter and housing resources.		helps mitigate or prevent displacement by reducing barriers to providing services.	
PS7.5	Support best practices that reflect current standards of care, and incorporate emerging models that optimize the use of public and charitable resources.	Supportive	This policy addresses housing exclusion for individuals experiencing or at risk of homelessness and helps mitigate or prevent displacement by reducing barriers to providing services.	NA
PS7.6	Encourage shelter and housing providers and programs to locate in the greater Olympia area, or near transportation arterial hubs, so residents can easily access them.	Supportive	This policy addresses housing exclusion for individuals experiencing or at risk of homelessness and helps mitigate or prevent displacement by reducing barriers to accessing services.	NA
PS7.7	Work toward making the community more aware of homelessness in Olympia and how it can be prevented as a way to encourage charitable	Approaching	This policy may have good intent to get community members involved, but making the community more aware of homelessness could lead to the	Raise awareness of the city's homelessness and displacement prevention efforts and resources, especially with residents at risk of displacement.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	support and involve community members.		community not being supportive of supportive housing services or emergency housing.	
PS7.8	Use data to continually assess the community's need for shelter and housing and who it is serving. Use this data to continually improve these services.	Supportive	This policy is supportive of housing goals, to continually evaluate where gaps in housing are needed. It could be improved by saying "who it is serving and who is being left out" in order to evaluate any disproportionate impacts.	NA
PS7.9	Revise policies that limit or prevent the community from providing shelter and housing resources.	Approaching	This policy is supportive of housing goals and could be improved by addressing displacement.	Periodically review (<i>the City would need to specify how often</i>) and revise policies that limit or prevent the provision of shelter, housing resources, or that may increase displacement.
PS7.10	Coordinate land use, housing, transportation, and capital facility planning to support all aspects of shelter and housing resources, including emergency shelter,	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	transitional housing, permanent housing with supportive services, and low-income housing.		experiencing or at risk of homelessness.	
PS7.11	Integrate group homes into all residential areas of the community. Set zoning standards to ensure group home sizes (number of residents and staff) are compatible with allowed densities and that transportation and other services are available.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals living in group homes.	NA
PS7.12	Evaluate regulations so the City can be more flexible in locating shelters and increasing capacity.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA
GS8	The existing low-income housing stock is preserved.	Supportive	This policy is supportive of housing goals and displacement prevention.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS8.1	Continue to fund the repair and rehabilitation of single-family and multi-family housing using federal, state, and local funding sources.	Supportive	This policy is supportive of maintaining existing housing. It could be strengthened by considering potential displacement impacts and affordability.	NA
PS8.2	Support applications by the Housing Authority of Thurston County and other non-profit housing developers to construct or purchase existing units for low-rent public housing.	Supportive	This policy is supportive of maintaining existing affordable housing, while prioritizing opportunities for low income groups.	NA
PS8.3	Support applications from eligible non-profits to federal and state funding sources to build new, or rehabilitate existing housing to meet low-income housing needs.	Supportive	This policy is supportive of maintaining existing affordable housing, while prioritizing opportunities for low income groups. It could be strengthened by considering potential displacement impacts.	NA
PS8.4	Encourage and provide technical assistance to private developers and non-profits applying for below-market-rate state or federal loans to construct or	Supportive	This policy is supportive of housing and growth, while prioritizing opportunities for low income groups. It could be strengthened by considering potential	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	rehabilitate low-income, multifamily rental housing.		displacement impacts from rehabilitation.	
PS8.5	When Community Development Block Grant or Housing and Urban Development-funded buildings are at risk of being converted to market-rate status, inform the tenants of any purchase and relocation options available. When possible, help the Housing Authority of Thurston County and non-profit organizations buy such housing.	Approaching	This policy aims to mitigate the impacts of displacement, but could be improved by prioritizing avoiding displacement.	NA
PS8.6	Enforce policies* that provide financial and relocation help to people who are displaced from their homes as a result of construction and development projects using federal funds. <i>*(Per section 104(d) of the Housing and Community Development Act of 1974 as amended, requiring the replacement of low- and moderate-income housing units that are demolished or converted to another use, in connection with a</i>	Approaching	This policy aims to mitigate the impacts of displacement, but could be improved by prioritizing avoiding displacement.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	<i>Community Development Block Grant project.)</i>			
GS9	New low-income housing is created to meet demand.	Supportive	This policy is supportive of housing and growth, while prioritizing opportunities for low income groups.	NA
PS9.1	Continue to support projects funded by low-income tax credits and revenue bonds.	Supportive	This policy is supportive of housing and growth, while prioritizing opportunities for affordable housing.	NA
PS9.2	Investigate and support appropriate multi-jurisdictional support for the Housing Authority of Thurston County bond sales.	Approaching	This policy helps support housing growth, but doesn't directly address affordability or displacement.	NA
PS9.3	Promote partnerships between public and private non-profit organizations to increase housing and home ownership opportunities for people with special needs, and for low- and moderate-income households.	Supportive	This policy encourages homeownership and is supportive of housing affordability and mitigating displacement, while prioritizing opportunities for low and middle incomes.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS9.4	Continue to encourage development of single-room occupancy units downtown, along urban corridors, and in other areas where high-density housing is permitted. This could include encouraging alliances between public, private, and nonprofit organizations.	Approaching	This policy is supportive of housing goals and displacement but could be more equitably applied throughout the city.	NA, but consider expanding this to more areas of the city.
PS9.5	Evaluate the possibility of supporting a program that would allow low-income tenants of manufactured home parks to jointly purchase and renovate permanent sites for their manufactured homes. Consider funding programs to subsidize the interest rates, loan origination fees, and/or other costs of acquiring the land.	Supportive	This policy is supportive of housing affordability, and could be improved to address displacement.	NA
PS9.6	Help low-income and special needs residents find ways to purchase housing, such as shared or limited-equity housing, lease-purchase options, co-housing, land trusts, and cooperatives.	Supportive	This policy is supportive of housing growth and affordability for potentially vulnerable or at risk populations.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
PS9.7	Work with jurisdictional partners through the county-wide Home Consortium, to fund affordable housing projects that serve low- and very low-income residents.	Supportive	This policy is supportive of housing growth and affordability.	NA
PS9.8	Continue to administer the Housing Tax Credit program to develop both market-rate and low-income housing.	Approaching	This policy is supportive of housing goals but could better address affordability and provide housing for all income bands.	NA
PS9.9	Support non-profit and faith-based organizations in their efforts to provide emergency homeless shelters.	Supportive	This policy is supportive of housing goals and addresses housing exclusion for individuals experiencing or at risk of homelessness.	NA

City of Lacey

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Planning Areas - Central				
Goal 2	Maintain quality and function of existing residential areas in the Central Planning Area.	Approaching	This policy could be improved by specifying what “quality and function” means, as the terms are vague and could be tied to exclusionary housing practices, and by addressing how this policy would prevent exclusion, disproportionate impacts, or displacement.	Maintain existing affordable housing where feasible and ensure future residential development maintains the existing scale and form of residential areas in the Central Planning Area.
Policy A	Acknowledge historical character and value of the Lacey Historic Neighborhood as a unique housing resource. Continue to require special development standards for Lacey Historic Neighborhood that recognize and preserve historical values and neighborhood character while allowing reasonable infill and development.	Approaching	This policy allows for infill and housing development in the Historic Neighborhood, but could be improved by defining what “reasonable” infill and development means, as well as “neighborhood character”, as the term is vague and could be tied to exclusionary housing practices.	Acknowledge the value of the Lacey Historic Neighborhood as a unique housing resource by continuing to require development standards that recognize, preserve, or honor historical values and design while accommodating infill development.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy B	Acknowledge character and value of older residential neighborhoods adjacent to the Central Business District as an affordable housing resource.	Supportive	This policy addresses housing supply and affordability, but should better define “character”.	Acknowledge the value of older residential neighborhoods adjacent to the Central Business District as a potential affordable housing resource.
Policy C	Develop and implement a subarea plan for the Golf Club Road neighborhood.	NA	This policy could be improved by discussing goals to improve housing affordability and avoid disproportionate impacts to vulnerable communities in this neighborhood.	NA
Goal 3	Provide opportunities for infill in the Central Planning Area.	Supportive	This policy is supportive of housing growth and affordability, but could be strengthened to consider potential racially disparate impacts.	Provide opportunities for infill development in the Central Planning Area.
Policy A	Maintain the liberal policy on accessory residential units while maintaining quality and character of neighborhood through performance standards and design review.	Approaching	While allowing ADUs supports housing growth and affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices.	Continue to maintain the city's ADU policies while maintaining the scale and form of existing neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy B	Provide opportunities for duplexes, triplexes and quadraplexes to locate in lower density neighborhoods as infill mechanisms which enhance neighborhood character by requiring exceptional and rigorous design requirements.	Approaching	While allowing duplexes, triplexes, and quadraplexes supports housing growth and affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices. “Exceptional and rigorous design requirements” can be leveraged to maintain high-cost housing types, unattainable to those from lower incomes or historically marginalized communities.	Increase opportunities for locating duplexes, triplexes, and quadraplexes in low-density neighborhoods and ensure development standards and any design requirements are not overly stringent or increase the cost of development.
Policy C	Provide opportunities for single-family cluster housing on smaller lot sizes than the under- lying zone with exceptional and rigorous design requirements to maintain quality and character of neighborhood areas.	Approaching	While allowing cluster housing on smaller lots may reduce land costs and support housing affordability, “character” should be better defined as the term is vague and could be tied to exclusionary housing practices. Requiring “rigorous design requirements” could ultimately hinder affordability.	Develop standards for single-family cluster housing on smaller lot sizes than the underlying zoning to reduce land costs and support housing affordability.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Planning Areas – Horizons Planning Area				
Goal 1	Continue to encourage the development of a range of residential types, providing opportunity for high density residential development along arterials with transitions to existing low density residential development.	Approaching	This policy is supportive of housing growth and affordability, but could be strengthened to expand high density housing throughout the city and to consider affordability as well.	Continue to encourage the development of a range of residential types, providing opportunity for high density residential development throughout the Horizons Planning Area, especially in areas near existing services.
Policy A	Undeveloped property along College, Yelm, Ruddell, and Rainier Road should be zoned for moderate or high density residential development.	Approaching	This policy is supportive of housing growth, but could be strengthened to consider potential racially disparate impacts.	Zone undeveloped property along College, Yelm, Ruddell, and Rainier Road for moderate or high density residential development.
Policy B	Support infill development in higher density areas primarily around existing neighborhood centers, recognized nodes, and urban corridor areas.	Supportive	Providing housing near jobs and neighborhood centers can be helpful in preventing displacement while reducing overall community impacts such as traffic. The policy could be expanded to consider affordability as well.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Encourage a full range of higher density residential uses, including single-family zero lot line developments, townhouse units, mixed residential use, planned residential developments and multifamily apartments.	Supportive	This policy is supportive of housing growth.	NA
Policy D	Pay careful attention to blend different land use types to minimize potential land use conflicts while maintaining walkability as a priority.	NA	NA	NA
Planning Areas – Lakes Planning Area				
Goal 3	Maintain existing moderate and high density housing opportunities along major arterials with convenient access to transit where no impact to environmentally sensitive areas will occur.	Supportive	Providing housing near transit can be helpful in reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability and anti-displacement as well.	Maintain existing affordable and moderate and high density housing units along major arterials with convenient access to transit where no impact to environmentally sensitive areas will occur.
Policy A	Maintain areas for medium density development opportunities along Ruddell Road.	Approaching	This policy is supportive of housing growth, but could be expanded to allow high density housing or address anti-displacement in this area.	Maintain areas for medium or high density development opportunities along Ruddell Road. <i>(Edited to add "high density" as medium and high density options are both included in the Horizons</i>

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
				<i>Planning Area policies, along the same road).</i>
Planning Areas – Pleasant Glade Planning Area				
Goal 2	Provide opportunities for moderate and high density housing along major arterials with convenient access to potential transit, designating “urban reserve areas”, and annexing areas for public use where appropriate.	Approaching	Providing housing near transit can be helpful in reducing overall community impacts such as traffic. The incentives could be expanded to consider affordability and anti-displacement as well.	Provide opportunities for affordable and moderate and high density housing along major arterials with convenient access to potential transit, designating “urban reserve areas”, and annexing areas for public use where appropriate.
Policy A	Maintain existing areas for moderate and high density development opportunities along arterials of Sleater Kinney and 15th Avenue, contingent on provisions for public sewer.	Supportive	This policy is supportive of housing growth, but could be expanded to address anti-displacement in this area.	Maintain existing affordable housing and areas for moderate and high density development opportunities along arterials of Sleater Kinney and 15th Avenue, contingent on provisions for public sewer.
Policy B	Study and analyze designating the northwest portion of the planning area as an “urban reserve area” or “urban holding area” until sewer service can be extended.	Supportive	This policy is supportive of housing growth that is supported by adequate public facilities and infrastructure.	NA
Policy C	Consider the annexation of the Greg J. Cuoio Community Park property for the future completion for public access.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Planning Areas – Seasons Planning Area				
Goal 3	Over the long term, encourage development of a range of residential types, with emphasis on providing additional moderate and high density opportunities.	Approaching	This policy addresses the city's housing needs and growth, but does not address affordability.	Encourage the development of a range of housing types, with an emphasis on medium and high density development as well as units affordable to low-income households.
Policy A	Maintain areas along Marvin Road for moderate density development as sewer becomes available. Review areas along Mullen, Yelm Highway, and 58th for moderate density development as sewer becomes available. Moderate and High Density zones should be planned to provide transitions to existing low density residential development.	Approaching	This policy supports housing growth but could be strengthened by considering impacts on vulnerable populations and racially disparate impacts.	Maintain areas along Marvin Road and review areas along Mullen, Yelm Highway, and 58th for moderate density development as sewer becomes available.
Policy B	Encourage a full range of residential uses when adequate facilities and services are available to serve them.	Approaching	This policy supports housing growth but could be strengthened by considering impacts on vulnerable populations and racially disparate impacts.	Encourage a full range of residential uses and housing types for all incomes when adequate facilities and services are available to serve them.
Policy C	Pay careful attention to creating effective transitions between new developments of moderate	Approaching	This neighborhood area allows a variety of housing types	Ensure new development fits the scale and form of existing development through development regulations.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	density and existing low density development.		supportive of housing supply objectives.	
Housing Element, Comprehensive Plan				
Goal 1	Have a sufficient number of single-family dwelling units, multifamily units, and group and special need housing to provide a selection of rental and home ownership affordable housing opportunities for all persons.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability.	NA
Policy A	Provide opportunities for development of all housing types to accommodate future needs for each type of housing.	Supportive / Approaching	While supportive, this policy will need to be updated to meet HB 1220 guidance on specific household income brackets. However, providing housing across all income segments reduces displacement risk and enables housing opportunities to all, regardless of income.	Increase opportunities to develop a wide range of housing types to accommodate diverse housing needs and provide housing for all income brackets.
Policy B	Monitor the market and available land in the urban growth boundary to provide sufficient area zoned to meet the demand for various types of housing.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Encourage a wide variety of housing from low to high income in range to allow placement and mobility within the housing market.	Supportive	This policy is supportive of providing housing for all needs. It could be improved by prioritizing the provision of housing for low-moderate incomes and considering potential displacement impacts. This policy will need to be updated to meet HB 1220 guidance on specific household income brackets.	Encourage a wide variety of housing available to all income brackets to allow placement and mobility within the housing market.
Policy D	Promote preservation and improvement of existing single-family and multifamily units.	Approaching	This policy supports housing growth by preserving existing housing stock. It could be improved by considering anti-displacement.	Promote the preservation and maintenance of existing housing units, prioritizing those that serve low income households or provide special housing needs.
Policy E	Support neighborhood revitalization through available grants from the State, Federal and local levels to maintain and improve infrastructure.	Approaching	This policy supports housing growth by pursuing grant funding, but could be strengthened by prioritizing affordable housing or improving infrastructure in vulnerable neighborhoods. "Neighborhood revitalization" could be	Pursue grants to provide funding for renovating and maintaining existing affordable housing units and ensure there are anti-displacement mechanisms in place, such as the provision of relocation assistance or a right to return policy.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			better defined, as it could lead to the displacement of historically marginalized populations.	
Policy F	Support policies and programs to address the unique housing needs of the military population, including active duty, reserves, dependents and contractors.	Supportive	This policy is supportive of providing housing for all needs. It could be improved by addressing potential displacement impacts.	NA
Goal 2	Achieve a balanced community with each planning area accommodating a fair share of housing needs for all persons.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability. It could be improved by addressing potential disproportionate impacts.	NA
Policy A	Consider requirements and incentives designed to result in a balanced, increased supply of affordable housing in all parts of the City for very low, low and moderate income households.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.	Consider requirements and incentives that result in a balanced, increased supply of affordable housing throughout the City for very low, low, and moderate income households.
Policy B	Consider programs that include mandatory requirements for new developments targeting individual planning areas until	Approaching	This policy supports housing growth by pursuing grant funding, but could be	Consider programs that include mandatory requirements for new developments targeting individual planning areas until housing goals

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	housing goals for target groups are achieved.		strengthened by specifying anti-displacement goals and prioritizing vulnerable populations or those with special housing needs.	for affordability, anti-displacement, and special needs housing are met.
Goal 3	Work with regional agencies and bodies to implement affordable housing techniques consistently and on a regional scale.	Supportive	This policy is supportive of housing growth and affordability.	NA
Policy A	A myriad of affordable housing strategies should be implemented by all surrounding jurisdictions in Thurston County to meet housing needs on a regional scale for very low, low and moderate income households.	Supportive	This policy is supportive of housing growth and affordability.	Work with surrounding jurisdictions in Thurston County to implement a myriad of affordable housing strategies to meet regional housing goals to support very low, low, and moderate income households.
Policy B	Public and nonprofit agencies, such as the Housing Authority with expertise in housing practices and special needs, should be a major partner in inclusionary programs.	Supportive	This policy is supportive of housing growth and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	The Housing Authority, or other agencies, should take a lead role where its expertise and function lend itself to best accomplish program objectives. Lead responsibility might include such tasks as qualifying households by income bracket, monitoring target objectives, administration of an affordable housing trust, taking ownership of dedicated lots and units, contracting for the development of units, monitoring the sale and resale controls of designated public units, and other related tasks.	Supportive	This policy is supportive of housing growth and affordability.	NA
Goal 4	Achieve housing that is compatible and harmonious with existing neighborhood character while allowing infill and providing for environmental sensitivity.	Approaching	Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices. Instead of “character,” this policy could consider height and building form while allowing more flexibility for similar, yet more affordable, housing	Ensure infill development that incorporates various housing types and sizes maintains the existing scale and form of neighborhoods and prioritizes the provision of affordable housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			types such as middle housing.	
Policy A	When designating areas for infill and zoning classifications, consider and place emphasis on the composition of the neighborhood, housing need, available infrastructure, principals of walk- ability and healthy communities.	Approaching	This policy is supportive of housing growth, but could be strengthened to address reducing displacement and affordability pressures.	NA
Policy B	When implementing infill projects in designated areas, require design of infill projects that: • Meet the housing needs of the planning area considering variety and choice. • Integrate successfully into the existing residential environment considering form based concepts and healthy community objectives. • Provide a form, look and feel and social functionality that will add to the character, desirability and value of the surrounding neighborhood.	Approaching	This policy is supportive of housing growth, but could be strengthened to address reducing displacement and affordability pressures. Language that aims to preserve low-density, single-family neighborhood “character” can often be used as a proxy for prohibiting more diverse housing choices.	When implementing infill projects in designated areas, prioritize infill projects that meet diverse housing needs, provide affordable housing, and incorporate different housing types.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Continue to utilize design review guidelines for all residential developments.	Approaching	The policy intends to ensure new development is integrated with the rest of the city, but additional design requirements could ultimately hinder the development of affordable housing.	Review design guidelines to ensure they are not overly stringent or disincentivize the provision of housing.
Goal 5	Provide a variety of housing opportunities for those with special needs.	Supportive	This policy supports housing growth and could be strengthened to address affordability.	NA
Policy A	Provide opportunities for development of various types of group housing.	Supportive	This policy supports housing growth and could be strengthened to address affordability.	NA
Policy B	Ensure a full range of housing and facilities for the accommodation of persons with special needs exist within each planning area, with consideration for promotion of housing in those planning areas providing the most services for such individuals.	Supportive	This policy supports housing growth and could be strengthened to address affordability.	NA
Policy C	Design group homes and facilities for special populations so that they are integrated, compatible, and harmonious with surrounding land uses.	Approaching	The policy intends to allow housing for a variety of needs. However, “compatible” is vague and can be	Ensure housing for populations with specific housing needs, such as group homes or transitional housing, are integrated with surrounding neighborhoods.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	<i>(Recommended to delete Goal 6, Policy C for redundancy).</i>
Policy D	Enforce all requirements of the International Building Code that addresses the Americans with Disabilities Act and the Fair Housing amendments.	Supportive	This policy supports housing for all needs. It could be strengthened by addressing housing affordability.	NA
Goal 6	Work cooperatively with local jurisdictions, nonprofits and religious organizations to reduce homelessness and find ways for providing emergency and transitional shelter to serve the identified needs of this population.	Supportive	This policy addresses housing exclusion for individuals experiencing homelessness.	NA
Policy A	Based upon identified need, provision of facilities and services should be addressed by all local jurisdictions with fair share commitment reflected in local budgets.	Approaching	This policy supports services for all needs, but does not directly address ways to increase housing supply or affordability, or to mitigate racially disparate impacts.	NA
Policy B	Provide the opportunity to accommodate innovative strategies that will include	Supportive	This policy addresses housing exclusion for individuals	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	emergency and transitional housing for the homeless population.		experiencing homelessness.	
Policy C	Ensure location and use of emergency and transitional housing considers, and is successfully integrated into, the surrounding neighborhood without impact to other land use activities.	Approaching	This policy addresses the provision of housing for individuals experiencing homelessness, but could better specify what it means to be integrated into the surrounding neighborhood without impact to other land use activities. Requiring additional standards for transitional and emergency housing types may ultimately hinder their development and affordability.	Recommended to delete for potential redundancy with Goal 5 Policy C.
Policy D	Maintain and expand linkages with the business, religious and nonprofit communities as partners in ending homelessness.	Approaching	This policy addresses provisions for individuals experiencing homelessness, but could be more specific in outlining what the city's role may be.	Actively maintain and expand collaborative efforts with the business, religious, and nonprofit communities as partners in ending homelessness and seek their input on housing-related decisions.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy E	An emphasis in City policy will be to reflect the Continuum of Care approach, which emphasizes supporting self-sufficiency and transitional housing programs rather than stop gap measures which fail to break the cycle of homelessness.	Supportive	This policy addresses housing exclusion for individuals experiencing homelessness. It could be improved by addressing housing affordability for those who are transitioning out of homelessness.	NA
Policy F	The City supports an increased role in meeting the problems of homelessness from the private sector through funds, in-kind, and volunteer support and will evaluate its funding decisions partially on the basis of other funding sources. The City will use its resources to leverage support for homeless services from the state and federal government and other funding sources.	Approaching	This policy addresses housing exclusion for individuals experiencing homelessness. It could be improved by better, more inclusive language, and the city could consider playing a larger role to supplement the efforts of the private sector.	The City supports an increased role in preventing homelessness by seeking private sector support through funds, in-kind donations, and volunteer support and will evaluate its funding decisions partially on the basis of other funding sources. The City will use its resources to leverage support for homelessness services from the state and federal government and other funding sources.
Policy G	As much as practical, consider the needs of the intended uses and site facilities to provide convenient access to the services the population will require.	Approaching	This policy aims to provide services necessary for various housing needs. It could be improved by prioritizing historically disadvantaged communities or vulnerable populations.	Ensure facilities and services are accessible to the populations they are serving, prioritizing the needs of historically marginalized or overburdened communities.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy H	Continue to review and monitor participation and experience in programs that support the homeless population, assess effectiveness in meeting the needs of Lacey's homeless individuals, and provide opportunities for programs that can better serve this demographic.	Supportive	This policy addresses strategies to meet the needs of individuals experiencing homelessness. It could be expanded to include housing considerations in addition to the programs mentioned.	NA
Policy I	Particular priority will be provision of services to minors without family resources and families with children. The City will place its highest priority on assisting homeless children and families with children and victims of domestic violence and other special needs groups.	Supportive	This policy addresses a particularly vulnerable subset of individuals experiencing homelessness. It could be expanded to include housing considerations in addition to the services mentioned.	NA
Policy J	As long as there is a demonstrated need for temporary transitional housing and the tent city program continues to operate in a fashion that is compatible with adjacent land uses, Lacey should consider continued support of the opportunity for local churches to administer to the home- less by hosting a tent city.	Approaching	This policy aims to provide transitional or temporary housing for houseless individuals. It could be improved by removing vague language around "compatibility", which could hinder the provision of housing for houseless individuals.	Consider ways to develop transitional housing, support the tent city program, and assist local churches that host or assist individuals experiencing homelessness.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Goal 7	Identify and support a central contact to provide a help response for the homeless and citizens at risk of becoming homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA
Policy A	Support Lacey's community partners in improving the community's response to the needs of the homeless with identification of a referral point of contact for people to find services. This can include a service like the 211 referral line.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potential displacement, or to assist those who are experiencing homelessness.	NA
Policy B	Support homeless persons or those at risk of becoming homeless by identifying referrals that can put people in contact with the organizations that provide the services that they need.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy C	Make technical assistance documents available to citizens and jurisdictional staff on the 211 referral line and related social services so more people will be aware of community resources and where individuals can find help. Distribution of information to publicize the 211 services should include internet information, distribution at relevant community meetings, contact phone numbers, and informational flyers to community service and religious faith-based organizations.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potential displacement, or to assist those who are experiencing homelessness.	NA
Policy D	Continue to take a regional perspective in addressing homelessness in the Thurston County community through support and participation in the Thurston County Home Consortium that provides coordinated planning, activities and evaluations that address homelessness.	Supportive	This policy addresses providing housing and services for individuals experiencing homelessness through increased coordination with other regional jurisdictions.	NA
Policy E	As supported programs formulate future budgets or experience budget growth, promote a sharpened focus on addressing priority issues	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	identified for Lacey's homeless demographic.		potentially displacement.	
Policy F	As Lacey reviews programs asking for support through the Housing Consortium, support should be prioritized based upon a program reflecting the goals and priorities identified in this Housing Element.	Approaching	This policy could be improved by including equity, racially disparate impacts, and anti-displacement as priorities of the housing element or this policy.	Prioritize programs asking for support through the Housing Consortium to support based on programs that work to undo racially disparate impacts, address displacement, and increase the affordability and availability of housing.
Goal 8	Strive for no net increase in the number of homeless people identified in future homeless census counts by focusing on proactive intervention.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA
Policy A	Look for opportunities to strengthen outreach and engagement activities that will facilitate enrollment in treatment and service programs of individuals who are homeless or at risk of becoming homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially displacement.	NA
Policy B	Promote programs designed to ensure that persons returning to the community from institutional or other sheltered settings (including foster care) do not become homeless.	Supportive	This policy addresses support for houseless individuals, specifically to prevent homelessness and potentially	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			displacement. It could be improved by including efforts to increase housing affordability for these individuals.	
Policy C	Encourage the use of effective prevention interventions, ranging from family strengthening and high-risk youth programs to specific discharge planning.	Supportive	This policy addresses disparate impacts and potential displacement through preventative strategies.	NA
Goal 9	Achieve maximum utilization of public buildings for use in the public interest by scheduling secondary uses and activities at times facilities are not being utilized for primary functions.	Approaching	This policy could be improved by specifying what activities are in the public interest, especially in terms of supportive housing services or emergency shelter.	NA
Policy A	Review opportunities for shared use of public facilities where it will not conflict with primary use of the structure and associated activities.	Approaching	This policy could be improved by specifying what activities are in the public interest, especially in terms of supportive housing services or emergency shelter.	Review opportunities for the shared use of public facilities when they do not conflict with the primary use of the facility and its associated activities, such as utilizing the facilities to support housing assistance programs or act as emergency shelters during extreme weather.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy B	When designing new public buildings and planning expansions of existing buildings, consider design to serve dual roles in providing a full range of public services, including emergency shelter, meal services, and other services that might be needed.	Supportive	This policy supports housing services and emergency shelter.	NA

City of Tumwater

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Land Use Element, Comprehensive Plan				
LU-2.3	Encourage innovative land use management techniques such as density bonuses, cluster housing, zero-lot-line development, planned unit developments, and transfer of development rights to create vibrant centers, corridors, and neighborhoods while accommodating growth.	Supportive	This policy is supportive of housing growth and affordability. It could be expanded to consider anti-displacement.	NA
LU-4.3	Continue to allow manufactured housing on individual lots within the City, as well as within mobile and manufactured home parks, to encourage affordable housing.	Supportive	This policy is supportive of housing growth and affordability.	NA
LU-4.4	Permit implementing regulations to experiment in new forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems such as density, diversity, equitability, and affordability can be achieved.	Approaching	This policy intends to create development regulations that encourage diverse, affordable, and equitable housing types with high quality amenities. It could be rewritten to improve clarity.	Develop implementing regulations that provide flexibility for innovative forms of residential development that improve open space amenities, provide privacy, and allow for diverse housing options that are affordable and equitable.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
LU-4.5	Encourage higher density residential uses in order to provide affordable housing. These uses should blend with the existing character of the community.	Approaching	The policy intends to allow housing for a variety of needs. However, “character” is vague and can be leveraged to maintain high-cost housing types that are unattainable to those with lower incomes or from historically marginalized communities.	Encourage higher density residential uses that increase affordable housing stock and fit the overall scale and form of existing development.
LU-4.6	Increase housing types and densities in corridors and centers to meet the needs of a changing population.	Supportive	Increasing housing types and densities is supportive of housing growth, especially in areas with jobs and services.	NA
LU-4.7	Increase the variety of housing types outside of corridors and centers of appropriate intensities with supporting design guidelines to meet the needs of a changing population.	Approaching	The policy intends to allow housing for a variety of needs. However, extensive design guidelines can be leveraged to maintain high-cost housing types that are unattainable to those with lower incomes or from historically marginalized communities.	Increase the variety of housing types allowed in areas outside of corridors and centers to support the needs of a changing population.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL LU-9	Identify what conditions should be applied to development in residential areas.	Approaching	The policy intends to ensure new development is integrated with the rest of the city, but additional requirements, especially in terms of design, could ultimately hinder the development of affordable housing.	Identify appropriate conditions and requirements for development in residential areas to ensure diverse housing types can be built without rigorous standards that may increase building costs.
LU-9.1	Protect residential developments from excessive noise, odors, dirt, glare, and other nuisances emanating from commercial and industrial uses.	NA	NA	NA
LU-9.2	Allow for multi-family residential development in the zoning code. Consideration should be given to encouraging this type of development near centers of community services.	Approaching	Allowing multi-family developments in the zoning code is supportive of housing growth, especially in areas with jobs and services. It could be improved by prioritizing housing for historically disadvantaged communities or vulnerable populations.	Allow multi-family residential development in the zoning code and encourage multifamily development near centers, community services, and public transportation.
LU-9.3	Integrate design features of existing natural systems into the layout and siting of new residential dwelling units. Preserve trees and significant ecological systems, whenever possible and practical.	Approaching	This policy would bring health benefits from additional greenery and shade, but could ultimately hinder the	Where feasible, encourage the integration of design features that highlight the natural environment and preserve existing trees, provided that they don't hinder the development of housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			development of affordable housing.	
LU-9.4	Permit experimentation in development regulations with newer forms of residential development where amenities of open space, privacy, and visual quality can be maintained or improved, and flexible solutions to land use problems can be achieved.	Approaching	Flexible standards for diverse housing types would support housing growth, but this policy should include emphasis on providing housing for low income or historically marginalized populations.	Develop implementing regulations that provide flexibility for innovative forms of residential development that improve open space amenities, provide privacy, and allow for diverse housing options that are affordable and equitable. (Note: may be redundant with LU-4.4)
LU-9.5	Do not permit private residential gated communities.	Supportive	This policy helps prevent exclusive residential communities.	NA
LU-9.6	Promote nearby access to healthy food for residential developments.	Approaching	This policy does not directly help the city increase housing supply, but helps increase food security for residential developments, but could be expanded to prioritize promoting access to healthy foods in historically marginalized and low-income communities.	Promote access to healthy food for residential developments, prioritizing historically marginalized or overburdened communities or low-income households.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Housing Element, Comprehensive Plan				
GOAL H-1	To conserve and improve the existing city housing stock and quality of life of neighborhoods.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures.	NA
H-1.1	Assist city neighborhoods in maintaining and rehabilitating the existing housing stock as decent, safe, sanitary, and affordable housing.	Supportive	Preserving and improving existing affordable housing stock can help reduce displacement pressures and increase housing supply.	NA
H-1.1.1	Create a formal maintenance and rehabilitation program beyond the current City code enforcement procedures to support Policy H-1.1 in coordination with the City's work with the Regional Housing Council.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures and increase housing supply. Special care should be taken to ensure vulnerable populations are displaced through rehabilitation of housing.	NA
H-1.2	Encourage a range of housing, economic development, and community revitalization in the city.	Approaching	"Revitalization" of neighborhoods could lead to displacement. This policy should be expanded to include anti-displacement language.	Encourage a range of housing, promote economic development, and ensure the existing housing stock remains in good condition to retain existing affordable housing units.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-1.3	Promote the quality of life of existing communities and implementation of community housing goals through the preparation of comprehensive plans and the development review process.	Supportive	Including affordable housing policies that prioritize anti-displacement, affordability, and equity in the comprehensive plan and development regulations supports housing growth.	NA
H-1.4	Provide assistance to improve community surroundings and infrastructure in residential areas.	Approaching	Improving infrastructure to better serve communities is supportive of housing growth, but “improve community surroundings” is vague and could lead to displacement or disproportionate impacts to historically marginalized communities. This policy should consider displacement impacts.	Maintain and improve infrastructure where needed to support existing residential areas and preserve existing affordable housing units.
H-1.5	Encourage and facilitate economic development as an important part of provision of housing by providing jobs.	Approaching	Providing jobs does not provide housing in itself, but increasing employment opportunities near housing	Encourage and facilitate economic development to increase employment opportunities near existing housing. OR Encourage the provision of affordable housing near

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
				employment opportunities and encourage economic development to increase employment opportunities near existing housing.
GOAL H-2	To provide a sufficient number of single family dwelling units, multi-family dwelling units, manufactured homes, and group housing to provide an affordable selection of housing to each economic segment of the Tumwater population.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Provide a sufficient number of diverse housing types and affordable units for each income bracket to meet the City's housing targets and needs for households from all economic backgrounds.
H-2.1	Provide sufficient, suitably zoned land for development of all housing types to accommodate the future needs for each type of housing, including single-family detached dwellings, accessory dwelling units, townhouses, duplexes, triplexes, fourplexes, multi-family dwellings, cottage housing, senior housing, roominghouses, group housing, and manufactured homes in manufactured home parks and on single lots.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Ensure sufficient and suitably zoned residential land to accommodate a range of housing types to meet all income levels, including those earning 0 to 40% of the Area Median Income (AMI), and update development regulations to allow these diverse housing types, such as single family detached dwellings, accessory dwelling units, townhouses, multi-family dwellings, cottage housing, senior housing, roominghouses, group housing, and manufactured home parks in manufactured home parks and on single lots, among others.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-2.2	Provide opportunities for a range of housing types to provide for all economic segments of Tumwater's population.	Approaching	Providing opportunities for diverse housing types and incomes is important.	Provide opportunities for a range of housing types to provide affordable housing for all economic segments of Tumwater's population.
H-2.2.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned land.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	(Probably captured in edits to Policy H-2.1.)
GOAL H-3	To provide adequate, affordable housing for residents of all income groups, including sufficient housing affordable to low and moderate-income groups.	Supportive	Providing affordable housing advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
H-3.1	Encourage the development of innovative plans, codes, standards, and procedures in order to take advantage of new private and public sector approaches to housing provision.	Approaching	This policy would help the city provide additional housing using innovative methods but could be improved by considering how these innovative plans could increase affordability of housing and prevent displacement.	Encourage the development of innovative plans, codes, standards, and procedures to take advantage of new private and public sector approaches to providing housing for all needs and affordable for all household incomes.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-3.1.1	The Zoning Code allows manufactured homes on single-family lots in all residential zones. It is the intent of the Housing Element to promote the designation of a sufficient supply of land for traditional mobile/manufactured home parks and to recognize that modular/manufactured housing on single family lots and in manufactured home parks is a viable form of housing construction.	Supportive	Preserving existing affordable housing stock like manufactured homes reduces displacement risk and maintains affordable housing supply.	NA
H-3.1.2	Increase code enforcement efforts and build public private partnerships to encourage renovations of unfit structures for use as transitional or affordable housing.	Approaching	Retrofitting existing affordable housing stock reduces displacement risk and maintains affordable housing supply. However, this is phrased as retrofitting unfit structures for use as transitional or affordable housing, rather than retrofitting <i>existing</i> transitional or affordable housing, which could create disproportionate impacts if only buildings in need of repair are designated for transitional or affordable housing.	Increase code enforcement to ensure the existing affordable housing stock is well maintained and retrofitted where needed to provide safe housing, and build public private partnerships to identify opportunities for adapting existing buildings for transitional or deeply affordable housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-3.2	Encourage provision of adequate building sites through appropriate land use planning and zoning codes, infrastructure supply, and overall regulatory climate.	Supportive	Allowing for additional housing with sufficient infrastructure through land use planning and code changes contributes to housing growth.	NA
H-3.3	Tumwater should assume its "fair share" of housing for low and moderate income groups, in cooperation with other jurisdictions in Thurston County.	Supportive	Providing affordable housing advances housing growth and affordability. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
H-3.3.1	Monitor land supply, census data, and housing policies to ensure Tumwater accommodates its fair share of housing for low and moderate income groups.	Supportive	Providing sufficient land for housing advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
H-3.3.2	Work with Tumwater School District, Housing Authority, and other agencies and organizations to pursue grant funding and implement transitional housing strategies for families with children.	Supportive	Pursuing opportunities to increase transitional housing for families supports housing for vulnerable communities and could help mitigate displacement. This policy	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			could be expanded to prioritize low income families or those from historically marginalized communities.	
H-3.3.3	Establish a multi-family tax exemption program that gives financial incentive for developers to create multi-family structures in target areas and to set aside a percentage of units as low-income housing.	Supportive	This policy is supportive of housing growth and affordability. It could be expanded to include anti-displacement measures in the “target areas”.	NA
H-3.4	Tumwater should work with the other jurisdictions in Thurston County as part of the Regional Housing Council to share decision making responsibilities related to homelessness and affordable housing in Thurston County to allow for collaboration in expanding affordable housing options and sharing the planning for, identification of, and resource allocation to activities and programs intended to support individuals experiencing homelessness in Thurston County.	Supportive	This policy is supportive of housing affordability and preventing displacement, by expanding collaboration with neighboring jurisdictions to provide affordable housing and resources to support individuals experiencing homelessness.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL H-4	To provide adequate opportunities for housing for all persons regardless of age, race, color, national origin, ancestry, sex, sexual orientation, familial status, marital status, ethnic background, source of income use of federal housing assistance, or other arbitrary factors.	Supportive	Providing opportunities for housing for all needs advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
H-4.1	Support the inclusion of living opportunities for families with children throughout the city.	Supportive	Providing opportunities for housing for families with children advances housing growth. This goal should be updated to prevent displacement of these households.	NA
H-4.2	Support and encourage a variety of housing types and price ranges through appropriate policies and regulations.	Supportive	Providing opportunities for housing for all needs advances housing growth. This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA
H-4.2.1	Continue the requirement for reasonable maximum lot sizes in order to create smaller lots that are more affordable and that allow a more efficient use of City services.	Supportive	Setting maximum lot sizes increases the land available for new residential development. This policy could be expanded to reference diverse housing types	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			affordable for all income levels.	
H-4.2.2	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) consistent with this policy.	Approaching	This policy could be strengthened to require homeowner associations to not prevent affordable or diverse housing types or require strict design requirements that may hinder affordability.	Encourage homeowner associations to adopt Covenants, Conditions, and Restrictions (CCRs) that do not hinder the provision of diverse housing types or affordable housing and do not include strict design requirements that may hinder housing affordability.
GOAL H-5	To supply sufficient, safe, suitable housing sites and housing supply to meet projected future housing needs for Tumwater over the next 20 years.	Supportive	This goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220, and to prevent potential displacement of existing residents.	NA
H-5.1	Ensure appropriate land use designations and Zoning Code designations to provide sufficient land for housing construction.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Ensure appropriate land use designations and zoning code designations to provide sufficient land for housing affordable for all household incomes.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-5.1.1	Monitor the Land Use Element and Zoning Code to ensure an adequate supply of suitably zoned vacant land. (2.1.1)	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	(Probably captured in edits to Policy H-2.1.)
H-5.1.2	Continue joint planning with Thurston County to plan for future growth in Tumwater.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.	NA
H-5.2	Lands not suitable for development due to site constraints such as wetlands, steep slopes, geologically hazardous areas, etc., should be identified and considered when determining sufficient land for new housing in accordance with Tumwater's Conservation Plan.	Supportive	This policy would allow the city to have an accurate determination of land available for new housing.	NA
H-5.3	Encourage construction practices, which exceed minimum standards. Tumwater will support the use of alternative building designs and methods that exceed the minimum standards set by Tumwater.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL H-6	To promote a selection of housing that is decent, safe, and sound, in close proximity to jobs and daily activities, and varies by location, type, design, and price.	Supportive	Increasing diverse housing types is supportive of housing growth, especially in areas with jobs and services.	NA
H-6.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Challenging	This policy is at a high risk of having a disproportionate impact on lower income and historically marginalized communities, resulting in greater displacement.	(Recommended to delete this policy)
H-6.2	Provide for a dynamic mix of residential land uses and zones in order to create a diverse mix of sites available for different housing types.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Provide for a dynamic mix of residential land uses and zones in order to allow a diverse mix of sites available for different housing types affordable for all household income levels and to meet residents' diverse housing needs.
H-6.2.1	Continue to monitor the available land supply, census data, and City policies to ensure a diverse mix of land for residential housing stock.	Supportive	Providing land for a mix of housing advances housing growth. This goal should be updated to consider displacement and affordability concerns and housing by income bracket to meet the requirements of HB 1220.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-6.2.2	Continue to implement innovative design techniques, such as zero lot line developments, architectural design standards, alley houses, and attached single-family housing. Zero lot line developments are residential real estate in which the structure comes up to or very near to the edge of the property. Zero-lot-line houses are built very close to the property line in order to create more usable space.	Supportive	This policy is supportive of housing growth. Ensuring clear and predictable standards for housing and building codes supports housing production goals. Strict design requirements can be leveraged to maintain high-cost housing types, unattainable to those from lower incomes or historically marginalized communities.	NA
H-6.3	Support increasing housing opportunities along urban corridors and centers.	Supportive	Increasing housing supply is supportive of housing growth, especially in areas with jobs and services.	NA
H-6.4	Encourage provision of affordable housing near public transit routes to promote efficient transportation networks.	Approaching	Ensuring that neighborhoods encourage active transportation is important for inclusive communities. However, this goal could be edited to pay special attention to underserved neighborhoods.	Encourage the provision of affordable housing near public transit routes, prioritizing neighborhoods that are underserved by affordable housing.
H-6.4.1	Continue to involve Intercity Transit in Tumwater's development review process.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-6.5	Tumwater will maintain current Building Code standards and will use the most up to date future Code editions.	Supportive	Ensuring clear and predictable standards for housing and building codes supports housing production goals.	NA
H-6.6	Increase the variety of housing types outside of corridors and centers of appropriate intensities with supporting design guidelines to meet the needs of a changing population.	Supportive	Ensuring clear and predictable standards for housing and building codes supports housing production goals.	NA
GOAL H-7	To ensure that housing is compatible in quality, design, and density with surrounding land uses, traffic patterns, public facilities, and environmentally sensitive areas.	Approaching	“Compatible” as it relates to design is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Ensure new housing development maintains the existing scale and form of surrounding land uses, traffic patterns, public facilities, and prevents impacts to environmentally sensitive areas.
H-7.1	Support the stability of established residential neighborhoods through appropriate plans and codes.	Approaching	This policy may help prevent residential displacement, but may also provide a barrier to increasing housing diversity and affordability in existing neighborhoods.	Support the stability of existing affordable housing through appropriate plans and codes.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-7.1.1	Continue to implement design standards for multi-family and attached single-family dwellings in order to ensure compatibility with existing neighborhoods.	Approaching	The policy intends to allow a variety of housing types. However, “compatible” is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Continue to implement design standards for multi-family and attached single-family dwellings, ensuring they are not overly stringent or increasing the cost of housing development.
H-7.2	Assure housing will be well maintained and safe.	Supportive	Ensuring housing is well-maintained and safe is supportive of housing goals, but should prioritize low income or other historically marginalized communities.	NA
H-7.3	Enhance the appearance of and maintain public spaces in residential areas.	NA	NA	NA
H-7.4	Promote community involvement to achieve neighborhood improvement.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.	Promote community involvement and opportunities to increase a sense of community by prioritizing historically marginalized neighborhoods and actively seeking their input on city decisions.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL H-8	To support healthy residential neighborhoods which continue to reflect a high degree of pride in ownership or residency.	Approaching	This policy could be strengthened by addressing affordability and to prevent displacement of existing residents.	NA
H-8.1	Support the stability of established residential neighborhoods.	Approaching	This policy may help prevent residential displacement, but may also provide a barrier to increasing housing diversity and affordability in existing neighborhoods.	(Redundant with H-7.1.)
H-8.2	Assure housing will be well maintained and safe.	Supportive	Ensuring housing is well-maintained and safe is supportive of housing goals, but should prioritize low income or other historically marginalized communities.	NA
H-8.2.1	Protect residential areas from undesirable activities and uses through aggressive enforcement of adopted City codes.	Challenging	This policy is at a high risk of having a disproportionate impact on lower income and historically marginalized communities, resulting in greater displacement.	(Recommended to delete this policy, redundant with H-6.1 as well.)
H-8.3	Enhance the appearance of and maintain public spaces in residential areas.	NA	NA	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-8.4	Promote community involvement to achieve neighborhood improvement.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.	(Redundant with H-7.4.)
H-8.4.1	Encourage neighborhood meetings to discuss community issues as situations and concerns arise.	Approaching	This policy could be strengthened to ensure the concerns of historically marginalized communities are prioritized.	(May be redundant with proposed edits for H-7.4.)
H-8.5	Encourage home ownership for Tumwater residents.	Approaching	Encouraging homeownership helps mitigate displacement, but should prioritize opportunities for low and middle incomes.	Encourage home ownership for Tumwater residents of all household incomes and provide assistance for low-income households, where feasible.
GOAL H-9	To encourage a variety of housing opportunities for those with special needs, particularly those with problems relating to age or disability.	Supportive	This policy is supportive of providing housing for all needs, housing growth, and affordability. It could be improved by preventing the potential displacement of those with special housing needs.	NA
H-9.1	Require housing to meet the needs of those with special housing requirements without creating a concentration of such housing in any one area.	Supportive	This policy is supportive of providing housing for all needs throughout the city. It could be improved by preventing the	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			potential displacement of those with special housing needs.	
H-9.2	Assist social service organizations in their efforts to seek funds for construction and operation of emergency, transitional, and permanent housing.	Supportive	This policy addresses support for housing for individuals experiencing homelessness, and could help mitigate displacement.	NA
H-9.3	Support and plan for assisted housing opportunities using federal, state, or local aid.	Supportive	This policy addresses pursuing funding to support assisted housing opportunities which could mitigate displacement and increase the amount of affordable housing in the city.	NA
H-9.4	Encourage and support social and health service organizations, which offer support programs for those with special needs, particularly those programs that help people remain in the community.	Supportive	This policy addresses services to support populations with special needs to help mitigate displacement.	NA
H-9.5	Encourage alternative housing strategies for homeless youth, which may include Host Homes.	Supportive	This policy addresses the provision of housing for homeless youth.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
GOAL H-10	To provide housing that is compatible and harmonious with existing neighborhood character through use of innovative designs that enhance the appearance and quality of Tumwater's neighborhoods.	Approaching	The policy intends to allow a variety of housing types. However, "neighborhood character" is vague and can be leveraged to maintain high-cost, low-density housing types, unattainable to those from lower incomes or historically marginalized communities.	Provide innovative housing that reflects the existing scale and form of Tumwater's neighborhoods and provides housing affordable for all household incomes.
H-10.1	Encourage innovation and variety in housing design and development. Tumwater will support efforts to build housing with unique individual character, which avoids monotonous neighborhood appearance.	Approaching	Encouraging diverse and innovative design could ultimately hinder housing affordability or supply by requiring additional, subjective design standards.	Encourage diverse and innovative housing design that incorporates diverse housing types that are affordable for all household income brackets.
H-10.2	Multi-family residential housing should be subject to design criteria that relate to density, structure bulk, size and design, landscaping, and neighborhood compatibility.	Approaching	Design standards intend to integrate new housing developments with existing ones, but can be leveraged to maintain high-cost housing types, which are unattainable to those from lower incomes or historically marginalized communities.	Ensure design standards for multi-family housing maintain the existing scale and form of development and landscaping in Tumwater without increasing the cost to develop housing.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-10.2.1	Continue to implement multi-family housing design standards.	Approaching	Design standards intend to integrate new housing developments with existing ones, but can be leveraged to maintain high-cost housing types, which are unattainable to those from lower incomes or historically marginalized communities.	(Redundant with H-10.2 above.)
GOAL H-11	To provide housing to accommodate Tumwater's housing needs in the urban growth area and make the most efficient use of infrastructure and services.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure.	NA
H-11.1	Reference the Transportation Element and anticipated transportation impacts when making housing decisions affecting the location and density of housing.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure. It should also prioritize affordability.	NA
H-11.2	Reference utility plans and the impact of housing decisions on capital improvements planning.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure. It should also prioritize equity in the provision of services.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-11.3	Encourage the construction of affordable housing, including cottage housing and accessory dwelling units, within a half mile or twenty minute walk of an urban center, corridor or neighborhood center with access to goods and services to provide access to daily household needs.	Supportive	Providing housing near transit supports housing supply goals and reduces impacts to transportation and provides access to jobs.	NA
GOAL H-12	To encourage urban growth within the city limits with gradual phasing outward from the urban core.	Approaching	This policy could be improved by addressing affordability and encouraging increased density throughout the city.	NA
H-12.1	Encourage the construction of housing on vacant property within the city and the redevelopment of underdeveloped property within residential areas to minimize urban sprawl and associated public service costs.	Approaching	This policy supports housing growth, but could better address affordability and anti displacement, especially related to the redevelopment of underdeveloped property to ensure people are not displaced.	Encourage the construction of affordable, transitional, or supportive housing on vacant properties within the city to minimize urban sprawl and associated public service costs.
H-12.1.1	Continue to review and revise, as necessary, City Development Standards deemed unnecessary and make development more expensive and/or difficult.	Supportive	This policy supports housing growth and affordability.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
H-12.1.2	Continue to support high-density zoning within specific areas of the city that have the infrastructure and services to support high-density housing.	Supportive	This policy supports housing growth by ensuring there are adequate services and infrastructure.	NA
H-12.1.3	Continue to implement minimum density levels for all residential zoning districts to ensure efficient use of the urban growth area.	Supportive	This policy supports housing growth. It could be improved by addressing affordability.	NA
H-12.1.4	Work cooperatively with Thurston County to provide for more efficient and orderly annexations to facilitate urban service delivery.	NA	Consider moving to Land Use Element	NA
GOAL H-13:	Ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing.	Approaching	Providing land for all types of housing is important. However, this goal should be updated to consider affordability concerns and housing by income bracket to meet the requirements of HB 1220.	Ensure consistency with RCW 36.70A.070(2)(c) which requires sufficient land be available for all types of housing including manufactured housing, in order to provide housing affordable for all income brackets.
H-13.1	Maintain the manufactured home park district zoning in appropriate areas in order to prevent conversion of affordable housing to other uses without replacement.	Supportive	Preserving existing affordable housing stock reduces displacement risk.	NA
H-13.1.1	Encourage manufactured housing park district zoning to locate near transit services.	Supportive	Providing access to services such as transit reduces community vulnerabilities and dependence on car travel,	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			especially for vulnerable community members such as elderly and youth.	
H-13.2	When locating zones and designations for manufactured home parks, carefully consider the risks from natural hazards, such as flooding and liquefaction, and the impacts of those hazards on the future residents of those manufactured home parks, Tumwater's emergency responders, and the city as a whole.	Supportive	Renters and lower income communities often have higher risk and vulnerabilities to natural hazards and events. Ensuring that zoning does not push manufactured home parks into high-risk areas reduces displacement and threats to community member safety.	NA

City of Yelm

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Land Use Element, Comprehensive Plan				
Policy 3.3	Adopt two categories of residential single family land use to meet community needs: Single Family - 4 units per acre; and	NA - Dependent on Land Capacity Analysis	See Land Capacity Analysis Report	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
	Single Family - 6 units per acre.			
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.	NA - Dependent on Land Capacity Analysis	See Land Capacity Report	NA
Policy 3.5	Adopt a mixed use development category which allows both residential and commercial uses suitable for planned developments on larger parcels and which provides for a variety of land uses, more efficient use of open space, and more cost effective public infrastructure.	Approaching	This policy supports housing near commercial services. It could better address affordability.	NA
Policy 4.4	Adopt development regulations that accommodate “live-work” structures (where citizens can live and work within the same structure).	Supportive	Allowing live-work structures creates both housing and economic opportunities for community members who wish to start a business, but cannot afford a home and a commercial space.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 4.6	Adopt development regulations that allow permits to be processed in a timely and efficient manner.	Supportive	Streamlining permit processes reduces barriers to housing production to meet housing supply deficits and reduce building costs.	NA
Goal 5	Encourage diverse residential growth.	Supportive	Allowing diverse housing types and growth allows housing supply to meet the shifting housing needs of households.	NA
Policy 5.2	Adopt development standards that allow duplexes, townhouses, and accessory dwelling units within residential areas. These are intended to increase the variety of housing in the community and aid in achieving an overall urban density.	Supportive	Allowing housing diversity supports overall goals of providing different housing types to address different household needs.	NA
Policy 5.3	Adopt development regulations that encourage mixed use subdivisions.	Supportive	Allowing housing diversity supports overall goals of providing different housing types to address different household needs.	NA
Goal 10	Create vibrant centers, corridors, and neighborhoods while accommodating growth.	NA	NA	NA
Policy 10.1	Promote a greater mix of uses and densities to support efficient provision of services.	Supportive	Allowing housing and land use diversity supports overall goals of providing different housing types to	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			address different household needs.	
Goal 11	Create safe and vibrant neighborhoods with places that build community and encourage active transportation.	Approaching	Ensuring that neighborhoods are safe and encourage active transportation is important for inclusive communities. However, this goal could be edited to take special attention to underserved neighborhoods.	Create safe and vibrant neighborhoods that build community, support historically marginalized or overburdened communities, and encourage active transportation.
Policy 11.1	Plan at the neighborhood level to increase housing density and diversity while preserving neighborhood character and quality of life.	Approaching	While local-level planning can result in inclusive and grassroots actions, the element of “preserving neighborhood character” can sometimes be used as an argument for continuing exclusionary housing types and disputing zoning changes that seek to allow more housing diversity.	Plan at the neighborhood level to increase housing diversity and the quality of life for residents.
Policy 11.2	Plan for land use patterns that provide most neighborhood residents an array of basic services within a half mile or 20 minute walk from home.	Supportive	Providing retail and services within a half-mile walkshed encourages community resilience and reduces dependency on vehicular transportation, which can be a large cost factor for households.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 11.3	Encourage appropriately scaled home-based business and live/work opportunities in neighborhoods.	Supportive	Allowing live-work structures creates both housing and economic opportunities for community members who wish to start a business, but cannot afford a home and a commercial space.	NA
Goal 12	Maximize opportunity to redevelop land in priority areas by investing in infrastructure and environmental remediation.	Supportive	Reducing the overall land and infrastructure investment while also expanding residential buildable lands supports housing supply goals.	NA
Policy 12.1	Mitigate the additional cost of development in centers and corridors by making public infrastructure investment that adds value, safety and public enjoyment for the entire community and that result in appropriate public return on investment when adjacent properties are developed. Allow for latecomers and other methods of repayment for government outlay for infrastructure.	Approaching	While this policy does facilitate housing growth, it could be enhanced by including affordability considerations.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Housing Element, Comprehensive Plan				
Goal 1	Encourage a variety of housing types, densities and a range of affordable housing within Yelm and its Urban Growth Area.	Supportive	Allowing different types of housing and affordability levels fosters a cohesive and inclusive community when it comes to housing.	NA
Policy 1.1	Allow a variety of housing types within the residential and mixed use designations to promote a range of housing alternatives within the community. This may include but not be limited to: government assisted housing, housing for low-income families, manufactured housing, multi-family housing, and group or foster homes.	Supportive	Ensuring access to affordable housing types—including manufactured home types and group homes—is essential to reducing displacement risks among vulnerable community members.	NA
Policy 1.2	Allow accessory dwelling units in all residential land use categories subject to development standards and design criteria.	Supportive	Accessory Dwelling Units provide opportunities for aging in place and adapting existing housing stock and residential land uses to meet the changing housing needs of households.	NA
Policy 1.3	Encourage opportunities for a range of housing costs to enable housing for all segments of the population.	Supportive / Approaching	While supportive, this policy will need to be updated to meet HB 1220 guidance on specific household income	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			brackets. However, providing housing across all income segments reduces displacement risk and enables housing opportunities to all, regardless of income.	
Policy 1.4	Encourage the provision of adequate affordable building sites through appropriate zoning, infrastructure, and other development regulations.	Supportive	Regularly reviewing and ensuring zoning, development regulations, and infrastructure support housing at different affordability levels supports anti-displacement efforts.	NA
Policy 1.5	Review development regulations to ensure that a range of housing types is available throughout Yelm.	Supportive	Allowing and reducing barriers to housing types through development regulations is essential to enabling affordable housing options.	NA
Policy 1.6	Review development regulations to ensure residents can safely walk throughout Yelm.	Supportive	Not all community members have consistent access to vehicles, including vulnerable populations such as youth and elderly. Providing walkable residential neighborhoods promotes inclusion and positive health outcomes.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 1.7	Monitor the need for special needs housing and increase opportunities for such housing.	Supportive	Providing housing for special needs reduces displacement and homelessness risk among community members with special needs.	NA
Policy 1.8	Consider density increase incentives to promote a variety of housing types, mixed uses, range of housing costs, affordability, and increased special needs housing.	Supportive	Providing a wide range of housing types and densities—at different affordability levels—provides options	NA
Goal 2	Meet the county wide planning policy to ensure a fair share of affordable housing.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.	NA
Policy 2.1	Encourage a variety of housing types in the residential designations to assure choice, opportunity, and availability of a fair share of affordable housing throughout Yelm, its UGA, and adjacent areas of Thurston County.	Supportive	Providing housing diversity and sufficient housing options reduces displacement risk and encourages affordability.	NA
Policy 2.2	Participate with other jurisdictions and Thurston County in a regional process to monitor Fair Share Affordable Housing targets within the County.	Supportive	Taking a regional approach to affordable housing goals is important given cross-jurisdiction impacts of displacement pressures.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Goal 3	Conserve and improve the existing housing stock and neighborhoods.	Supportive	Preserving existing affordable housing stock can help reduce displacement pressures.	NA
Policy 3.1	Maintain up-to-date development regulations for building, housing, mechanical, and other design standards.	Supportive	Ensuring clear and predictable standards to housing and building codes supports housing production goals.	NA
Policy 3.2	Require owners of unsafe dwelling units to correct significant problems and encourage the maintenance of existing structures consistent with the standards of the neighborhood.	Approaching	Ensuring housing is safe and habitable is important. Rehabilitation, however, can also result in physical displacement pressures as existing households may be forced to move or incur high costs of repair. Such support should involve connecting households with alternatives or incentive programs to reduce these risks.	Require owners of unsafe dwelling units to correct significant problems and encourage the maintenance of existing structures consistent with the city's code, and consider funding assistance for low-income owners or incentive programs to reduce displacement risks.
Policy 3.3	Support rehabilitation efforts for substandard housing.	Approaching	Ensuring housing is safe and habitable is important. Rehabilitation, however, can also result in physical displacement pressures as existing households may be forced to move or incur high costs of repair. Such support should	Support rehabilitation efforts for substandard housing and develop assistance programs to reduce displacement risks.

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			involve connecting households with alternatives or incentive programs to reduce these risks.	
Policy 3.4	Encourage and facilitate local economic development as an important element of improving housing conditions by providing economic opportunity.	Approaching	While economic development is an important step for ensuring housing growth and conditions—particularly when it comes to local financing—such growth should not result in the rapid displacement of community members through rising costs.	Encourage and facilitate economic development to provide increased economic opportunity for existing residents, so more people can work near their home.
Policy 3.5	Encourage local community groups, churches, and businesses to provide voluntary assistance with maintain existing structures for the elderly, low income, and those with special needs.	Approaching	While encouraging local groups is beneficial, this policy would be strengthened through active support and connecting these groups with funding to do so.	Encourage and provide funding for local community groups, churches, and businesses to provide voluntary assistance with maintaining existing housing for the elderly, low income households, and those with special housing needs.
Goal 4	Promote energy efficient housing to reduce the overall costs of home ownership.	Supportive	Reducing barriers to home ownership, especially when aimed at historically marginalized or vulnerable community members, could reduce displacement pressures.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 4.1	Support programs that make existing structures more energy efficient.	NA	NA	NA
Policy 4.2	Periodically review the energy efficiency development regulations to ensure that they are up-to-date.	NA	NA	NA
Policy 4.3	Promote residential subdivision designs that maximize solar heating opportunities.	NA	NA	NA
Goal 5	Provide sufficient housing for low- and moderate-income households within each jurisdiction.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.	NA
Policy 5.1	Provide sufficient housing for low- and moderate-income households.	Supportive	While supportive, this policy should be updated to take special attention to HB 1220. The policy could be improved by paying special attention to the lowest incomes, 0-30% Area Median Income, when it comes to housing capacity.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 5.2	Provide tenants and landlords information about housing rights and responsibilities.	Supportive	Ensuring awareness on housing rights can empower tenants and ensure safe housing.	NA
Policy 5.3	Incentivize developers to set aside a percentage of multifamily housing units for low- and moderate-income buyers and renters.	Supportive	Providing incentives for less than market rate housing provides opportunities for community members to remain in the community as prices increase, and provides opportunities for new community members to live in the City.	NA
Policy 5.4	Support efforts to provide funding for shared-equity policies — via community land trust or down-payment assistance models — to make buying housing of all types affordable.	Supportive	Providing programs to control the variable costs of land could create long lasting affordable housing opportunities for community members, particularly those from vulnerable groups or lower incomes.	NA
Goal 6	Provide sufficient service-enriched housing for homeless and high-risk populations.	Supportive	Allowing shelters and other types of emergency housing reduces displacement pressures, and provides services to respond to and prevent households from experiencing homelessness.	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
Policy 6.1	Allow shelters, group homes, transitional housing, and permanent housing with social services in development regulations in locations where these facilities have access to transit, parks, and other amenities.	Supportive	Allowing shelters and other types of emergency housing reduces displacement pressures, and provides services to respond to and prevent households from experiencing homelessness.	NA
Goal 7	Encourage housing density and diversity in neighborhoods to add vibrancy and increase equitable access to opportunity.	Supportive	Allowing housing density and diversity across neighborhoods gives the community means and options to avoid displacement pressures.	NA
Policy 7.1	Review and amend residential development regulations to provide opportunity for the mix and density of housing needed to meet the needs of changing demographics, use land wisely, and support nearby transit and businesses.	Approaching	Providing housing near transit supports housing supply goals and reduces impacts to transportation and provides access to jobs. However, this policy could be further expanded to call out affordability goals as well.	Review and amend residential development regulations to provide opportunities for the mix and density of housing needed to meet the needs of changing demographics, provide affordable housing, use land wisely, and support nearby transit and businesses.
Policy 7.2	Allow densification by providing for accessory dwelling units, small houses on small lots, attached housing types or appropriately scaled multifamily buildings, cottage housing, and village cohousing developments in development regulations.	Supportive	Allowing more diverse housing types that support affordability goals, such as smaller houses on smaller lots, also mitigates displacement pressures from increasing land costs	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			and greater demand than supply.	
Goal 8	Encourage the construction, weatherization and operation of homes to boost energy efficiency.	Supportive	Preserving existing housing stock through energy upgrades reduces costs by extending the useful life of the unit.	NA
Policy 8.1	Prioritize home weatherization funds to preserve affordable housing.	Supportive	Preserving existing affordable housing stock, without increasing renter costs, reduces displacement pressures from aging buildings and increasing maintenance needs.	NA
Policy 8.2	Support regional efforts to engage landlords and property managers in energy efficiency efforts.	Supportive	Supporting easier upgrades can maintain naturally affordable housing units from going into disrepair and being redeveloped into newer, less affordable housing options.	NA
Policy 8.3	Support the efforts of local financial institutions to facilitate affordable financing of energy upgrades.	Supportive	Supporting easier upgrades can maintain naturally affordable housing units from going into disrepair and being	NA

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			redeveloped into newer, less affordable housing options.	
Policy 8.4	Support regional efforts to conduct energy audits of large power consumers to identify efficiency improvements, such as RESNET's Home Energy Rating System.	NA		
Goal 9	Increase housing amid urban corridors and centers to meet the needs of a changing population.	Approaching	Providing housing opportunities in key centers and corridors fosters housing near jobs and opportunities. This goal could be expanded to consider affordability needs as well.	Increase housing affordable to all income brackets in urban corridors and centers to meet the needs of a changing population.
Policy 9.1	Review regulations that stymie or prevent housing development near or within urban corridors and centers.	Supportive	Addressing barriers to housing supply development ensures supply can meet demands, especially in areas with jobs and services.	NA
Policy 9.2	Remove barriers or "right-size" regulations to achieve goals.	Supportive	Reviewing and removing regulatory barriers to housing supports housing supply and streamlines review processes.	NA
Policy 9.3	Identify priority areas ripe for housing development that will meet multiple goals.	Approaching	This goal aims to increase housing supply. However, it should not come at the	Identify vacant or underdeveloped lots for housing development, prioritizing affordable housing and

Goal, Policy, or Regulation	Policy Text	Evaluation	Reason / Recommendation	Proposed Edits
			cost of displacing historically marginalized households.	ensuring existing households are not displaced.
Policy 9.4	Examine ways to encourage smaller, affordable housing units through the fee structure, especially in centers, corridors or adjacent to neighborhood service hubs.	Supportive	Allowing and encouraging more diverse housing types that are more affordable support affordability and anti-displacement objectives.	NA
Policy 9.5	Reduce impact fees for those projects located where there is less impact.	Supportive	Targeting reduce the burden to build housing would support housing unit construction	NA
Policy 9.6	Use tax exemptions, such as Special Valuation, or other financing tools to make projects financially feasible.	Supportive	Providing flexibility to support housing construction supports housing supply goals.	NA
Policy 9.7	Identify opportunities to aggregate properties where housing density is needed to achieve community goals and make multifamily projects feasible to build and finance.	Supportive	Allowing flexibility to support multifamily housing construction supports anti-displacement by providing diverse housing types.	NA

Data & Indicators Summary

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

How do we measure the effectiveness of our strategies against displacement, gentrification, and racially disparate impacts? Through its Racially Disparate Impacts (RDI) tool, the WA Department of Commerce suggests the following 5 measures as “bullseye” or supportive metrics.¹ The RDI tool relies on estimates published by the U.S. Census Bureau and the Department of Housing and Urban Development (HUD) and is presented in four-year ranges. This analysis compares RDI data points from two timeframes, 2015-2019 and 2017-2021. Additionally, demographic data was pulled from the American Community Survey.

Generally, housing displacement risk increases when:

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

Racial Diversity

All cities are increasing in population, but Lacey, Tumwater, and Yelm have seen decreases in certain demographics of non-white residents.

Racial diversity estimates are based on data collected by the U.S. Census Bureau, which classifies people into distinct race and ethnicity categories. Race is a social identity, with a history rooted in oppression and exploitation of people not classified as “white”.² Ethnicity refers to groups of people who share common ancestry, language, or dialect. There is a wide range of ethnic identities, which may or may not be tied to nationality. The Census asks respondents to identify as either Hispanic or Latino or Not Hispanic or Latino. The

¹ The RDI toolkit is designed for use by the Department of Commerce (Commerce) in its support of local jurisdiction efforts to meet the requirements of the Growth Management Act (GMA). The toolkit compiles statistics relevant to a jurisdiction's analysis of racially disparate impacts in its community.

² The Census offers six racial identities for people to choose from. Respondents self-identify. Since the 2000 census, respondents can self-identify as one or more options. The options provided are: White, Black or African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, and Other.

Office of Management and Budget defines "Hispanic or Latino" as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

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

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

Cost Burden

All cities are increasing in the number of non-cost burdened homeowners. Comparatively, the growth of non-cost burdened renter households is significantly fewer. In some cases, the number of non-cost burdened renter households is decreasing.

A household experiencing a housing cost burden is paying more for housing than it can afford based on income. This means one or multiple of a house's critical needs (i.e., food, physical health, mental health, education, and/or general well-being) are not being met. A household is considered cost-burdened if its monthly housing costs are greater than 30% of its monthly income. Estimates of households experiencing cost burden include:

- Not cost-burdened includes households paying less than 30% of their household income on housing costs.
- Cost-burdened (30-50%) includes households paying between 30% and 50% of their household income on housing.

- Severely cost-burdened (>50%) includes households paying more than 50% of their income on housing costs.

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

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

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

Rental Affordability

All cities have less rental housing for very low-income households (30-50% AMI).

In addition to estimates of households within an income range, CHAS data also provides estimates of the number of rental housing units affordable to households with incomes within the income range. A housing unit is considered affordable if gross housing costs are less than 30% of a household's income. The estimates are based on self-reported housing costs. Since self-reported housing costs reflect the costs to the household, the housing unit estimates reflect all the housing subsidies or other benefits in use in the area. A rental unit affordable to a household with an extremely low income (<30% of AMI) may or may not be occupied by a household in that income range. RDI tool rental affordability estimates use the corresponding household income thresholds:

- <30% AMI includes housing units that are affordable to a household with an income up to 30% of AMI.
- 30 - 50% AMI includes housing units that are affordable to a household with an income between 30% and 50% of AMI.
- 50% - 80% includes housing units that are affordable to a household with an income between 50% and 80% of AMI.
- >80% AMI includes housing units that are affordable to a household with an income greater than 80% of AMI.

Rental unit affordability estimates exclude housing units without complete kitchen or plumbing facilities, as well as vacant units that are not listed as either for rent or for sale and group quarter units.

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

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

Income

All cities are experiencing growth in renter and homeowner households above the median income (>100% AMI). High incomes coupled with continued high housing cost burdens points to high cost of housing outpacing wage gains.

To account for regional variation in labor and housing markets, the WA Department of Commerce RDI tool uses area median income (AMI). AMI represents the midpoint of an area's income distribution. Fifty percent (50%) of households have an income higher than the area median income and 50% have an income lower than the AMI. The Growth Management Act requires jurisdictions to account for the housing needs of households across the income spectrum. Income data and housing affordability estimates are provided by US Housing and Urban Development's Comprehensive Housing Affordability Strategy (CHAS) data. Household income estimates are for the number of households with a

household income up to a threshold based on a percentage of the area median income, with adjustments based on household size. The income bins are:

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

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

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

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

Tenure/Homeownership

All cities but Yelm are increasing in overall homeowner households of all income levels. Yelm and Tumwater are decreasing in overall renter households of all income levels.

Tenure refers to the distribution of homeowners and renter households across the region.

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

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

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

Age

Yelm and Olympia saw the biggest changes in any individual age range. Overall, there is great variation in population change by age across the cities, but a trend of aging populations is detectable.

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

% Change in Population by Age	Lacey	Olympia	Tumwater	Yelm
Under 5 years	-0.90%	0.00%	-1.10%	-4.00%
5 to 9 years	0.00%	-1.80%	0.70%	2.00%
10 to 14 years	-0.80%	-1.00%	-1.60%	-2.20%
15 to 19 years	0.00%	0.90%	-3.90%	-1.20%
20 to 24 years	-0.10%	-5.10%	0.90%	4.20%
25 to 29 years	0.30%	0.70%	0.60%	-1.80%
30 to 34 years	0.00%	2.70%	1.00%	1.30%
35 to 39 years	0.00%	0.70%	0.60%	-0.10%
40 to 44 years	1.30%	0.30%	1.60%	-0.80%
45 to 49 years	-0.10%	-0.60%	-0.90%	0.20%
50 to 54 years	-1.90%	-2.00%	-1.90%	1.20%
55 to 59 years	-2.10%	-0.90%	-1.00%	0.80%

60 to 64 years	1.50%	-0.10%	2.50%	2.00%
65 to 69 years	2.30%	1.30%	2.00%	-0.30%
70 to 74 years	1.10%	3.50%	1.10%	2.20%
75 to 79 years	-0.10%	1.80%	0.30%	-0.20%
80 to 84 years	-0.30%	0.00%	0.40%	-1.10%
85 years and over	-0.30%	-0.60%	-0.80%	-1.60%

Engagement Themes Summary

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

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

The project team was able to aggregate and synthesize the stakeholder feedback across all engagement touchpoints to distill the main takeaways into the following themes for consideration. These takeaways should be read with the context that they are direct feedback from community stakeholders from their own viewpoints, level of understanding, and lived experience with housing. Final policy recommendations are not solely based on this feedback, rather, they aim to integrate the perspectives into what is actually possible within the confines of law and institutional standards.

1. Cities should identify ways to monitor renter income verification, establish local ordinances to enforce attainable income verification and identify and address price fixing.
2. Cities should use creative zoning overlays and innovative land use policies to classify and protect mobile home communities, as well as other types of affordable housing.
3. Zoning should balance commercial development with opportunities for affordable housing.
4. Cities should create a program to support upgraded utilities and infrastructure and promote incentives for property owners, including multifamily, single family, accessory, and mobile homes, to improve their properties. Tenants who are forced to relocate due to substandard maintenance (condemned properties) should receive support so they can effectively relocate to a nearby affordable housing option.
5. Affordable housing and homelessness prevention programs should work closer together as they share the same clientele.
6. Military service providers, including VAs, volunteer groups, bases, centers, and cities, should ensure that their programs are adequately staffed with the most current information regarding housing and support benefits for military families and households.

7. Cities should promote educational programs that explain to homeowners and potential buyers the long-term investment opportunity of ADUs, and the financial plan required to pursue a build.
8. Permitting processes to develop new affordable housing should continue to be simplified and streamlined.
9. Cities could support residents, including current residents of manufactured home communities, in forming cooperatives or community land trusts (CLTs) to be prepared to exercise the right of first refusal and manage properties independently.
10. Cities should create a program to support private ownership of mobile home communities and private rental units by local, family-owned operations with on-site management and disincentivize corporate owners from buying land on which manufactured home communities are located.
11. Cities should take steps to minimize the amount of potential long-term housing being used for short-term transient rentals (Air BnBs).
12. Cities should work with community groups to coordinate a one-stop shop for housing benefit explanations and application support.
13. Cities should promote an educational campaign to private landlords about legal requirements and renter income qualifications for those on supplemental income.
14. Cities should offset the impacts of increased taxes and tax increment financing, as they are seen to contribute to unaffordability for renters and low-income households by way of increased cost of living as new upscale developments are built.
15. Cities should consider rent control options and develop and enforce adequate tenant protections (eviction proceedings, rent increase management, etc.).
16. Cities should balance suburban development with investment in affordable housing in urban centers.
17. Cities should ensure robust transportation is available to residents and minimize land used for parking over housing.
18. Urban renewal efforts should include the protection of existing affordable housing units.

Lacey, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

The City of Lacey has been engaged in collaborative planning to address various regional housing issues with the cities of Yelm, Tumwater, and Olympia. As part of this, Lacey has been working to address housing issues specific to their city, and while the city has made significant efforts to increase affordability and undo racially disparate impacts in Lacey by implementing or initiating many actions in their Housing Action Plan (HAP), the city is facing significant barriers in seeing additional progress. In particular, the city has identified its intent to develop more policies, programs, and partnerships to address economic, physical, and cultural forms of displacement. However, policy alone is not effective enough to meet the city's housing goals. Therefore, the bulk of the recommendations included in this report focus on various partnerships and programs the city could collaborate on to take the existing, revised, and recommended policies further.

Assets

The City of Lacey has worked on many housing-related issues through various planning efforts in recent years, recognizing that housing displacement is a multi-faceted issue requiring multiple strategies and collaboration with regional partners.

In 2019, Lacey adopted an Affordable Housing Strategy as an appendix to their Housing Element, which details specific actions the city can take to increase affordable housing and provide for specific residential needs and services for those experiencing homelessness. In 2021, Lacey participated in a collaborative effort with Olympia and Tumwater to develop a Housing Action Plan (HAP). The City has completed or is actively implementing many items in its HAP, including efforts to offer density bonuses or fee waivers for low-income housing, offer density or other incentives for desired unit types, reduce parking requirements for residential uses, reduce minimum lot sizes, increase minimum residential densities, allow single-room occupancy (SRO) housing in all multifamily zones, and strategically allow live/work units in nonresidential zones.

There has been a lot of progress in recent years, and the City is determined to utilize its Comprehensive Plan update to build upon the work they have done to address racially disparate impacts, housing affordability, and displacement issues, acknowledge past harm, and foster a vibrant and more livable community for its residents.

Issues

While the City of Lacey has made significant progress in advancing actions in their HAP, city staff have identified some housing issues that need greater attention. While many residents choose to call Lacey home, some do not feel like they have a strong connection to the city or feel like they belong, which could indicate potential cultural displacement pressures. Strategies to increase placemaking and retain access to cultural events, religious institutions, or businesses unique to Lacey are important to explore further. There are also concerns that those who work in Lacey cannot always afford to live in Lacey if they want to, or are forced to move out of the city due to rising housing costs. Efforts to preserve existing and naturally occurring affordable housing are also needed to maintain affordable housing and prevent displacement. Together, these issues highlight the need for future policy or efforts to address displacement in Lacey, especially as many existing efforts in Lacey are intended to increase housing affordability or supply, but don't directly address preventing housing displacement, which is a multifaceted issue in itself.

Housing Displacement Risk Policy Analysis

The City of Lacey's existing Housing Element and additional housing-related policies throughout the Comprehensive Plan were reviewed using criteria consistent with the Department of Commerce's Racially Disparate Impacts guidance, as outlined in the Project Methodology section of the technical appendix. The resulting policy analysis found that Lacey's housing-related policies are generally split between policies identified as "supportive" and "approaching." Lacey's housing policies that are "supportive" of housing growth and affordability include efforts to increase higher residential densities, support infill development, provide and incentivize a sufficient amount of housing affordable to all incomes and unique housing needs, and partner with other agencies to improve housing affordability and prevent displacement and homelessness.

Generally, Lacey's housing policies that are identified as "approaching" support housing growth but could better address affordability and anti-displacement to ensure housing is equitably provided to all incomes and those who have historically been excluded or displaced. One policy in particular (Policy C under Goal 3 in the Central Planning Area section) may be strengthened by removing vague wording. Proposed edits clarify the intent of the policy, which is to regulate development standards for middle housing options that encourage them to be sensitive and complimentary of the surrounding neighborhood while balancing other city priorities like climate resilience.

In all, Lacey's housing-related goals and policies address housing displacement and include efforts to prevent disproportionate impacts. To strengthen Lacey's existing efforts, the City should consider additional policies to strengthen community partnerships that can help prevent displacement while continuing to foster a community supportive of existing residents and those who choose to live in Lacey.

Recommendations

There are a few key ways the city can supplement existing efforts to achieve greater success related to preventing racially disparate impacts, providing deeply affordable housing, and preventing displacement (economic displacement in particular). Efforts to increase community connections and partnerships with organizations would help the city take their existing work and policies further, by effectively increasing the capacity of city staff through these partnerships. Additional efforts and social services outside of housing policy are needed for Lacey's housing policies to be more effective.

Despite this, there are several additional policy areas Lacey should consider in its Comprehensive Plan update. For one, there are several existing policies in the Housing Element of Lacey's existing Comprehensive Plan that could be updated with minor edits to clarify the intent of the policies, remove vague language, connect policies to other elements of the Comprehensive Plan, or remove language that may be exclusive. Edits are proposed for many policies in the Final Existing Comp Plan Policy Evaluation Framework Appendix.

New policies or programs are needed to address a few significant policy gaps. For one, policies are needed to preserve existing units and naturally affordable housing, which is crucial to prevent economic displacement and help residents remain in their chosen community. Similarly, efforts are also needed to protect manufactured housing and prevent displacement in these communities. Housing affordable to lower wage earners in the city is also needed to provide housing for those who work in Lacey but cannot afford to live in the city. Cultural displacement could be mitigated by increasing placemaking efforts and retaining existing events and access to businesses, religious institutions, and other facilities and places important to various communities in Lacey.

Finally, Lacey's HAP has many additional actions the city could continue to implement by advancing them to their Planning Commission. Policies from the HAP that score high in the Policy Evaluation Matrix should be considered priorities for this effort.

Data & Indicators

Generally, housing displacement risk increases when:

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

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

Lacey has seen a decline amongst American Indian and Alaska Native residents. White and Hispanic or Latino populations are growing the fastest.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	357	303	-54
Asian	4,125	5562	1,437
Black or African American	2,034	3379	1,345
Hispanic or Latino (of any race)	3,126	7252	4,126
Native Hawaiian and Other Pacific Islander	336	994	658
Other Race	192	148	-44
Two or more races	1,415	4323	2,908
White	28,749	35027	6,278

Cost Burdened Population

Lacey has seen a 12% increase in severely cost-burdened households between the two timeframes.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	4150	4,040	110
Cost-Burdened (30-50%)	2880	2,815	65
Severely Cost-Burdened (>50%)	1915	1,715	200
Not Calculated	10	40	-30

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	9110	8,345	765
Cost-Burdened (30-50%)	1785	1,415	370
Severely Cost-Burdened (>50%)	1015	830	185
Not Calculated	125	80	45

Rental Affordability

Lacey has limited and decreasing rental units affordable to extremely low-income and very-low-income households.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	0	0	0
Very-Low Income (30-50% AMI)	160	250	-90
Low-Income (50-80% AMI)	40	0	40
Moderate-Income (80%-100% AMI)	150	0	150

Income

Lacey is losing low income renters and gaining moderate and above medium income renters while extremely-low income homeowner households are increasing.

Change in # Households by Income Status: Renters	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq$ 30% AMI)	1180	1,340	-160
Very Low-Income (30-50%)	1340	1,575	-235
Low-Income (50-80%)	2125	2,600	-475
Moderate Income (80-100%)	1550	1,015	535
Above Median Income (>100%)	2755	2,075	680

Change in # Households by Income Status: Owners	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq$ 30% AMI)	1075	825	250

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Very Low-Income (30-50%)	635	620	15
Low-Income (50-80%)	1580	1835	-255
Moderate Income (80-100%)	1420	1570	-150
Above Median Income (>100%)	7320	5825	1495

Tenure/Homeownership

Across all income levels, Lacey has seen a 13% increase in homeowner households and a 4% increase in renter households between the two time periods.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	8950	8605	345
Owner	12035	10670	1365

Age

The fastest-growing age groups in Lacey are #1) 65 to 69 years, #2)40 to 44 years, and #3)75 to 79 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	40,334	57,088	41.54%
Under 5 years	6.70%	5.80%	-0.90%
5 to 9 years	6.40%	6.40%	0.00%
10 to 14 years	7.00%	6.20%	-0.80%
15 to 19 years	4.70%	4.70%	0.00%
20 to 24 years	6.60%	6.50%	-0.10%
25 to 29 years	8.50%	8.80%	0.30%
30 to 34 years	8.00%	8.00%	0.00%
35 to 39 years	7.60%	7.60%	0.00%
40 to 44 years	5.00%	6.30%	1.30%
45 to 49 years	5.60%	5.50%	-0.10%
50 to 54 years	6.30%	4.40%	-1.90%

% Change in Population by Age	2010 ACS	2023 ACS	Change
55 to 59 years	6.70%	4.60%	-2.10%
60 to 64 years	4.80%	6.30%	1.50%
65 to 69 years	3.40%	5.70%	2.30%
70 to 74 years	3.80%	4.90%	1.10%
75 to 79 years	3.10%	3.00%	-0.10%
80 to 84 years	2.50%	2.20%	-0.30%
85 years and over	3.50%	3.20%	-0.30%

Implementation Capacity & Limitations

Implementing the recommended policies and remaining actions of the HAP will require significant financial resources and staff time to be effective, sustainable, and serve the greatest number of residents. The primary limitation will likely be financing limitations due to the need to navigate city politics, financing, and to identify and secure available financial resources for the recommended programs. City staff would also need additional capacity to pursue funding, whether through grants, regional or state programs, or other sources, for many of these programs.

Many of the revised Housing Element policies, remaining actions in the HAP, and policy recommendations developed for Lacey would also require significant staff time to work with community partners to develop ordinances to update the city's development regulations, in addition to time spent working with the Planning Commission and City Council to review and approve ordinances. The recommended policies would also require significant staff time to identify, develop, and maintain community partnerships and collaborative efforts with local organizations.

Olympia, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

Issues around housing and displacement in the City of Olympia are complicated and nuanced. The City has increasingly taken on a leadership role in efforts to address mounting housing and affordability crises, and they have taken on a multi-faceted approach. Many policies and implementation strategies have been enacted and tested over several years, enough time to see where substantive gains have been made and to concretely identify specific barriers to progress. Recommendations for the City of Olympia are primarily suggestions to fine-tune existing policies to specifically address displacement risk. In Olympia, data and displacement indicators point to a rental population that is at increased risk for displacement, more so than the home-owning population.

Assets

The City of Olympia has worked on many issues related to housing affordability and displacement in the last six years. They have built a web of protective policies, long-range plans, funding strategies, and community partnerships. This approach recognizes that there is no one-step solution to housing displacement; multiple issues have to be addressed simultaneously to have an impact.

The City Council adopted the One Community Plan in 2020 which explicitly seeks community agreement around responding to the homelessness crisis. In 2021, in collaboration with Lacey and Tumwater, the Olympia finalized a Housing Action Plan (HAP) based on data from a Thurston County Regional Housing Needs Assessment and Housing Gap Analysis, and in 2023, The City collaborated with Thurston County and the Housing Authority of Thurston County to conduct an Assessment of Fair Housing. The City is currently implementing many of the actions identified in their HAP, and updates to the Comprehensive Plan seek to fold and build upon all related work since 2018. Updates to the Comprehensive Plan will also support the expansion of middle housing options and opportunities.

The City has also enacted several policies and programs, such as a tenant protection policy, affordable housing incentives, and a multi-family tax exemption (MFTE) program. They are actively collaborating with the development community and manufactured homeowners, and they have dedicated staff to attend and advise during permitting meetings. The MFTE program has been particularly successful in the Downtown area.

Issues

Displacement issues identified within the City of Olympia include some specific boundaries encountered during the enactment of the City's affordable housing protection policies and implementation. These include:

- The difficulty of enforcing tenant protections
- Increases in rent beyond the control of the City (the City has increased efforts to control the costs they can, such as limiting extra fees and move-in costs)
- Restraints on middle housing development due to sewer connections or critical areas
- Middle housing is quite expensive when it does get built and does not serve affordable housing needs.
- Barriers around awareness of the MFTE program, particularly because only a handful of developers are utilizing this program
- A need for more, permanent, supportive, and deeply affordable housing.

Housing Displacement Risk Policy Analysis

To identify policies to enhance all of Olympia's existing work to improve housing affordability, nurture community partnerships, and pursue funding opportunities to prevent displacement and racially disparate impacts, the consultant team reviewed Olympia's current Comprehensive Plan. Policies in the Housing Element, along with other housing-related policies in other elements, namely Public Services, were reviewed for policies that may result in racially disproportionate impacts or are supportive of housing goals. A few of Olympia's policies are identified as "supportive", including policies that encourage adapting non-residential buildings for housing, support the provision of affordable housing by minimizing barriers and regulatory review, and prevent physical barriers from isolating new development from existing neighborhoods. Most of Olympia's housing-related policies are indicated as "approaching" because they aim to increase Olympia's housing supply but could be strengthened to better address racially disparate impacts, identify anti-displacement strategies, and prevent housing exclusion while prioritizing historically marginalized populations. Several conflicting policies are identified as "challenging" housing goals. These include policies requiring additional design or architectural features to be included in new housing or to preserve existing neighborhood "character," which could be updated or changed to remove vague language and allow greater flexibility to ensure increased housing production and choices. Proposed edits to these policies can be found in the Final Existing Comp Plan Policy Evaluation Framework Appendix.

Recommendations

A few policies float to the top of the recommendations for the City of Olympia to assist most directly in overcoming the barriers encountered by the City. A full list of new policy

recommendations is available in the specific Policy Evaluation Matrix for the City. The top-scoring ones are summarized:

- Policies for the protection and preservation of the manufactured home community.
- Additional measures to encourage the retention and maintenance of existing affordable housing, especially in high-opportunity neighborhoods or areas that have historic patterns of segregation.

An analysis has also been completed of the City's Housing Action Plan (HAP) policies, and a number of these score very high, such as:

- Evaluate the relationship between the Olympia and the county's home fund to ensure housing goals are met.
- Expanding allowance of residential tenant improvements without triggering land use requirements.
- Allowing Single Room Occupancy (SRO) housing in all multifamily zones.

The city could consider prioritizing these HAP policies and others that score high in the Policy Evaluation Matrix for implementation by advancing them to their Planning Commission, as they meet city priorities and address existing deficiencies in the city's housing policy.

Data & Indicators

Generally, housing displacement risk increases when:

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

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

All racial and ethnic groups are growing in Olympia, with the Hispanic and Latino population by 118% between 2010 and 2023.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	377	379	2
Asian	2,698	3622	924
Black or African American	1,020	1365	345
Hispanic or Latino (of any race)	2,628	5727	3,099
Native Hawaiian and Other Pacific Islander	55	476	421
Other Race	52	184	132
Two or more races	1,487	4104	2,617
White	37,391	39726	2,335

Cost Burdened Population

The severely cost-burdened renter population in Olympia grew by 8% between the two timeframes. Cost-burdened homeowner households increased by 21% over the same period.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	5730	5545	185
Cost-Burdened (30-50%)	2995	2970	25
Severely Cost-Burdened (>50%)	3420	3160	260
Not Calculated	315	199	116

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	9285	8445	840
Cost-Burdened (30-50%)	1425	1280	145
Severely Cost-Burdened (>50%)	925	735	190
Not Calculated	90	85	5

Rental Affordability

Olympia lost approximately 58% of rental units affordable to very low-income households between the two time periods.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	45	20	25
Very-Low Income (30-50% AMI)	80	190	-110
Low-Income (50-80% AMI)	195	185	10
Moderate-Income (80%-100% AMI)	100	25	75

Income

Olympia renter households making above the median income increased by 29% within the two time periods. Homeowner households making above the median income grew by 21% in the same time.

Change in # Households by Income Status:			
Renters	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq$ 30% AMI)	2875	2985	-110
Very Low-Income (30-50%)	2220	2400	-180
Low-Income (50-80%)	2745	2520	225
Moderate Income (80-100%)	1390	1475	-85
Above Median Income (>100%)	3225	2495	730

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq$ 30% AMI)	660	750	-90
Very Low-Income (30-50%)	755	715	40
Low-Income (50-80%)	1355	1485	-130
Moderate Income (80-100%)	1100	1075	25
Above Median Income (>100%)	7855	6510	1345

Tenure/Homeownership

Olympia homeowner households of all income levels increased by 11% while renter households of all income levels increased by 5% in the same period.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	12460	11870	590
Owner	11725	10535	1190

Age

The fastest-growing age groups in Olympia are #1) 70 to 74 years, #2)75 to 79 years, and #3)65 to 69 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	45,708	55,583	21.60%
Under 5 years	5.10%	5.10%	0.00%
5 to 9 years	5.50%	3.70%	-1.80%
10 to 14 years	6.10%	5.10%	-1.00%
15 to 19 years	6.10%	7.00%	0.90%
20 to 24 years	10.60%	5.50%	-5.10%
25 to 29 years	8.00%	8.70%	0.70%
30 to 34 years	6.00%	8.70%	2.70%
35 to 39 years	6.80%	7.50%	0.70%
40 to 44 years	6.60%	6.90%	0.30%
45 to 49 years	6.80%	6.20%	-0.60%
50 to 54 years	7.50%	5.50%	-2.00%
55 to 59 years	6.90%	6.00%	-0.90%
60 to 64 years	5.20%	5.10%	-0.10%
65 to 69 years	3.80%	5.10%	1.30%
70 to 74 years	2.30%	5.80%	3.50%
75 to 79 years	2.10%	3.90%	1.80%
80 to 84 years	1.70%	1.70%	0.00%
85 years and over	2.90%	2.30%	-0.60%

Implementation Capacity & Limitations

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

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

Tumwater, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

The City of Tumwater wants to keep housing affordable for existing residents and maintain existing housing stock as affordable housing. A lot of new housing supply in the City will not be affordable when it is built.

Assets

The City has zoning protections for manufactured home parks and they anticipate higher-density homes with the enactment of development standards to meet House Bill 1110 requirements. However, the City is interested in understanding how to mitigate the impacts of this density.

The City's Housing Action Plan (HAP), written in collaboration with Lacey and Olympia, shows that the City has begun work necessary to implement anti-displacement policies. Some of these policies include policies to protect existing affordable housing stock, funding projects that increase low-income housing supply, maintaining a rental database to have better information to track whether or not rental costs are rising, helping reduce costs and fees that are under the City's control, and increasing collaboration with various community partners.

Issues

There are several housing issues the City of Tumwater hopes to address in its Comprehensive Plan update. These include wanting to maintain housing affordability for existing Tumwater residents. Also of interest are strategies to revive the market for small local builders who might take on smaller projects that also pass affordability on to residents (a lot of this community was lost in Tumwater during the pandemic). Yet another interest will be policies considering adaptive reuse to preserve existing affordable housing stock.

Housing Displacement Risk Policy Analysis

Many of Tumwater's housing-related policies are "supportive" or "approaching" housing goals. The City's policies generally support housing growth and the provision of adequate services to support housing, mitigate displacement, and support those who need transitional or supportive housing or have additional housing needs. Policies that are identified as "approaching" generally encourage diverse housing types to meet various

housing needs, but could be strengthened to better mitigate displacement, consider housing affordability and availability by income bracket, and protect historically marginalized populations from disproportionate impacts. There is only one policy (that shows up twice in the plan) identified as “challenging;” it aims to protect residential areas from undesirable activities and uses through aggressive code enforcement, which could lead to greater displacement or disproportionate impacts among lower income and historically marginalized groups.

Compared to other jurisdictions, words used in policy language in HAP are not as strong. The City will be updating and incorporating the HAP goals and actions into the 2025 CUP Housing Element. This is a potential opportunity to strengthen policy language in the Comprehensive Plan to incorporate stronger words like “require”, rather than “encourage”.

Recommendations

A few policies float to the top of the recommendations for the City of Tumwater to assist most directly as protective measures against economic and physical displacement. A full list of new policy recommendations is available in the specific Policy Evaluation Matrix for the City. The top-scoring ones are summarized:

- A Community Land Trust-style program for mobile home communities.
- A City program to support private, local, small-scale ownership of mobile home communities. This builds on the City’s mobile home housing stock and also wishes to help preserve existing affordable stock.
- Increased staffing capacity to process ADUs quickly and reduce costs under City control

An analysis has also been completed of the City’s Housing Action Plan (HAP) policies, and a number of these score very high, such as:

- Providing “notice of intent to sell” ordinance for multifamily developments
- Establishing a program to preserve and maintain healthy and viable manufactured home parks (some details of which are captured in the new recommendations)
- Mixing market rate and low-income housing to avoid creating areas of concentrated low-income housing.

The city could consider prioritizing these HAP policies and others that score high in the Policy Evaluation Matrix for implementation by advancing them to their Planning Commission, as they meet city priorities and address existing deficiencies in the city’s housing policy.

Data & Indicators

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse
- Households are spending more than 30% of income on housing

- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

The fastest-growing racial and ethnic groups in Tumwater are Hispanic or Latino residents and White residents. Alternatively, Tumwater saw a 64% decrease in the American Indian and Alaska Native population between 2010 and 2023.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	395	241	-154
Asian	512	1120	608
Black or African American	192	947	755
Hispanic or Latino (of any race)	925	2409	1,484
Native Hawaiian and Other Pacific Islander	3	109	106
Other Race	84	554	470
Two or more races	474	2260	1,786
White	14,249	18879	4,630

Cost Burdened Population

Tumwater has seen a slight decrease in cost-burdened and severely cost-burdened renter households while homeowner, not cost-burdened households are growing.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	2290	2190	100

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Cost-Burdened (30-50%)	950	1015	-65
Severely Cost-Burdened (>50%)	975	1080	-105
Not Calculated	25	14	11

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	4510	4155	355
Cost-Burdened (30-50%)	495	670	-175
Severely Cost-Burdened (>50%)	450	405	45
Not Calculated	30	40	-10

Rental Affordability

Tumwater has limited rental availability across all income types, but especially for extremely low-income and very low-income households.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	0	0	0
Very-Low Income (30-50% AMI)	0	45	-45
Low-Income (50-80% AMI)	80	70	10
Moderate-Income (80%-100% AMI)	80	75	5

Income

Tumwater is seeing significant growth in households making above the median income. Renter households above the median income increased by 27% while homeowner households above the median income increased by 12%.

Change in # Households by Income Status: Renters	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq$ 30% AMI)	680	920	-240
Very Low-Income (30-50%)	690	775	-85
Low-Income (50-80%)	990	1010	-20

Change in # Households by Income Status:			
Renters	2017-2021	2015-2019	Difference
Moderate Income (80-100%)	455	470	-15
Above Median Income (>100%)	1430	1125	305

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Extremely Low-Income (≤30% AMI)	325	470	-145
Very Low-Income (30-50%)	395	335	60
Low-Income (50-80%)	715	805	-90
Moderate Income (80-100%)	415	425	-10
Above Median Income (>100%)	3635	3235	400

Tenure/Homeownership

Tumwater saw a 1% reduction in renter households across income levels while homeowner households across income levels increased by 4%.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	4240	4300	-60
Owner	5490	5265	225

Age

The fastest-growing age groups in Tumwater are #1) 60 to 64 years, #2)65 to 69 years, and #3)70 to 74 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	16,834	26,519	57.53%
Under 5 years	5.50%	4.40%	-1.10%
5 to 9 years	6.60%	7.30%	0.70%
10 to 14 years	6.50%	4.90%	-1.60%
15 to 19 years	7.90%	4.00%	-3.90%
20 to 24 years	6.10%	7.00%	0.90%
25 to 29 years	8.30%	8.90%	0.60%

% Change in Population by Age	2010 ACS	2023 ACS	Change
30 to 34 years	7.40%	8.40%	1.00%
35 to 39 years	7.90%	8.50%	0.60%
40 to 44 years	5.50%	7.10%	1.60%
45 to 49 years	7.10%	6.20%	-0.90%
50 to 54 years	7.60%	5.70%	-1.90%
55 to 59 years	6.70%	5.70%	-1.00%
60 to 64 years	4.70%	7.20%	2.50%
65 to 69 years	2.90%	4.90%	2.00%
70 to 74 years	2.50%	3.60%	1.10%
75 to 79 years	2.30%	2.60%	0.30%
80 to 84 years	1.60%	2.00%	0.40%
85 years and over	2.70%	1.90%	-0.80%

Implementation Capacity & Limitations

The housing action plan policies are all a good start for the City. The biggest impact on displacement means focusing on preserving mobile home parks as existing affordable stock. This will require continued education and communication to explain why the focus is here to build upon the political support MHPs already have in the City.

Many of the revised Housing Element policies, remaining actions in the HAP, and policy recommendations developed for Tumwater would also require significant staff time to work with community partners to develop ordinances to update the city's development regulations, in addition to time spent working with the Planning Commission and City Council to review and approve ordinances. The recommended policies would require significant staff time to identify, develop, and maintain community partnerships and collaborative efforts with local organizations. City staff would also need additional capacity to pursue funding, whether through grants, regional or state programs, or other sources, for many of these programs to be effective, sustainable, and serve the greatest number of residents.

Yelm, WA

Housing Displacement Risk Analysis for the cities of Lacey, Olympia, Tumwater, and Yelm

Introduction & Overview

Market-rate housing in the City of Yelm sells quickly these days, and much of the housing is of interest to military families who are looking for a small-town feel. Yelm hasn't seen a lot of displacement yet, but economic displacement could be on the horizon and the City eyes displacement and housing affordability crises in nearby Cities with some apprehension. As of right now, the City doesn't have a specific housing program, but it looks to Cities like Tumwater, Lacey, and Vancouver for ideas and program examples that could work in Yelm.

Assets

Proximity to the military base also means a unique set of issues, such as effective price setting as rent is calibrated to be the military basic allowance for housing (bah), which makes rent a bit more affordable overall in the City.

Much of the City's affordable housing stock was built in the 1970s, and there the City runs effective rehab programs, such as for mold abatement, that help homeowners keep affordable housing stock in good condition. Housing that is older than the 1970s has mostly been converted to commercial uses.

There is an openness in Yelm to collaborating with nearby Cities on a multifamily tax exemption (MFTE) credit program. Similarly, the City has considered stock accessory dwelling unit (ADU) plans, particularly if that would help decrease the cost (and affordability) of ADU construction.

Issues

Issues and concerns raised by staff include a broad range of possible interests for the City. These include a willingness to consider additional policies to safeguard against displacement as market-rate housing continues to sell very quickly.

Yelm would like to see more policies as preventative measures against economic displacement, including an MFTE program. The primary barrier to this currently is the City Council's perception of taxation. The biggest issue for a MFTE program Yelm may be getting buy in from the community and the City Council.

Analysis of the Comprehensive Plan and House Bill 1220 showed housing deficits for all bands, including market rate.

Housing Action Plan

Yelm's Housing Action Plan (HAP) identifies a gap in housing units that are available to meet low-income and very-low income renter households. This may need to take the form of subsidized housing or rental assistance programs. The HAP also provides an evaluation of the City's density and current zoning designations to look for ways to increase density and allow for development or redevelopment of parcels.

Housing Displacement Risk Policy Analysis

Yelm's housing policies are generally supportive of housing goals, including policies that encourage diverse residential growth, efficient permit processing, allow various residential uses and types that provide for diverse housing needs, and increase funding for affordable housing or reduce barriers to home ownership. Policies indicated as "approaching" could be improved primarily by considering affordability for all income groups and prioritizing those that have been historically marginalized, but they generally encourage housing growth, the maintenance of existing housing stock, and the provision of housing near transit and other services. There aren't any policies identified as "challenging."

Recommendations

A few policies float to the top of the recommendations for the City of Yelm to assist most directly as protective measures against economic displacement. A full list of new policy recommendations is available in the specific Policy Evaluation Matrix for the City. The top-scoring ones are summarized:

- Policies for the protection and preservation of the manufactured home community.
- Short-term rental programs to minimize long-term housing being used for transient rentals

An analysis has also been completed of the City's Housing Action Plan (HAP) policies, and a number of these score very high, such as:

- Partnerships with low-income housing developers, the Housing Authority of Thurston County, and other organizations that provide support for low-income, workforce, senior housing, and other populations with unique housing needs.
- Community Development Block Grants, Section 108 loans, and other federal resources for affordable housing.
- Offering density bonuses for low-income housing.

Data & Indicators

Generally, housing displacement risk increases when:

- The population becomes more racially and ethnically diverse

- Households are spending more than 30% of income on housing
- Rental units become unaffordable for extremely low-income residents
- Poverty rates increase in a community
- Homeownership rates decline

These metrics are derived from the Racially Disparate Impacts tool created by the WA Department of Commerce. The tool has five metrics for housing displacement risk: racial diversity, cost burden, rental affordability, income levels, and homeownership.

The following pages detail the dynamics of housing displacement risk as observed in each of the four cities. Profiles include housing displacement indicator data, policy recommendation summaries, and city-specific policy evaluation criteria. Our profiles have added age and manufactured home unit metrics to reflect research findings and community engagement feedback.

Racial Diversity

Yelm lost 57% of its Asian population between 2010 and 2023. Comparatively, the Black population has grown by 115%, the Hispanic population by 158%, and the Native Hawaiian and Pacific Islander population by 720%.

Change in # of Residents by Race & Ethnicity	2010	2023	Difference
American Indian and Alaska Native	40	129	89
Asian	230	98	-132
Black or African American	242	521	279
Hispanic or Latino (of any race)	573	1481	908
Native Hawaiian and Other Pacific Islander	65	533	468
Other Race	0	0	0
Two or more races	201	805	604
White	4,835	7051	2,216

Cost Burdened Population

Yelm has seen a slight growth amongst severely cost-burdened rental households but a significant growth amongst non cost burdened homeowner households.

Change in # Households by Cost-Burdened Status: Renters	2017-2021	2015-2019	Difference
Not Cost Burdened	515	550	-35
Cost-Burdened (30-50%)	245	275	-30
Severely Cost-Burdened (>50%)	215	170	45
Not Calculated	45	40	5

Change in # Households by Cost-Burdened Status: Homeowners	2017-2021	2015-2019	Difference
Not Cost Burdened	1545	1110	435
Cost-Burdened (30-50%)	415	474	-59
Severely Cost-Burdened (>50%)	180	130	50
Not Calculated	0	0	0

Rental Affordability

Yelm seems to only have rental units affordable to those making above 100% AMI.

Change in # of Rental Units by Affordability Rating	2017-2021	2015-2019	Difference
Extremely-Low Income (<30% AMI)	0	0	0
Very-Low Income (30-50% AMI)	0	0	0
Low-Income (50-80% AMI)	0	0	0
Moderate-Income (80%-100% AMI)	0	0	0

Income

Homeowner households making above 100% AMI have increased by 77% in Yelm while both low income renter and homeowner households have decreased.

Change in # Households by Income Status: Renters	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq$ 30% AMI)	245	230	15
Very Low-Income (30-50%)	130	190	-60
Low-Income (50-80%)	195	210	-15
Moderate Income (80-100%)	220	185	35

Change in # Households by Income Status:			
Renters	2017-2021	2015-2019	Difference
Above Median Income (>100%)	230	210	20

Change in # Households by Income Status:			
Owners	2017-2021	2015-2019	Difference
Extremely Low-Income ($\leq 30\%$ AMI)	70	80	-10
Very Low-Income (30-50%)	85	150	-65
Low-Income (50-80%)	325	320	5
Moderate Income (80-100%)	320	410	-90
Above Median Income (>100%)	1345	760	585

Tenure/Homeownership

Yelm has seen an overall decrease in renter and owner households across all income levels.

Change in # of Households	2017-2021	2015-2019	Difference
Renter	310	1025	-715
Owner	1080	1720	-640

Age

The fastest-growing age groups in Yelm are #1) 20 to 24 years, #2) 60 to 64 years, and #3) 5 to 9 years.

% Change in Population by Age	2010 ACS	2023 ACS	Change
Total Population	6,186	10,618	71.65%
Under 5 years	10.80%	6.80%	-4.00%
5 to 9 years	9.20%	11.20%	2.00%
10 to 14 years	10.40%	8.20%	-2.20%
15 to 19 years	8.20%	7.00%	-1.20%
20 to 24 years	4.40%	8.60%	4.20%
25 to 29 years	9.40%	7.60%	-1.80%
30 to 34 years	9.80%	11.10%	1.30%

% Change in Population by Age	2010 ACS	2023 ACS	Change
35 to 39 years	8.20%	8.10%	-0.10%
40 to 44 years	7.10%	6.30%	-0.80%
45 to 49 years	6.10%	6.30%	0.20%
50 to 54 years	3.30%	4.50%	1.20%
55 to 59 years	4.10%	4.90%	0.80%
60 to 64 years	1.70%	3.70%	2.00%
65 to 69 years	1.00%	0.70%	-0.30%
70 to 74 years	0.40%	2.60%	2.20%
75 to 79 years	1.70%	1.50%	-0.20%
80 to 84 years	2.00%	0.90%	-1.10%
85 years and over	2.00%	0.40%	-1.60%

Implementation Capacity & Limitations

As is true in many small towns, housing programs are hard to fund, assemble, and administer. But this may be a critical piece of infrastructure needed to truly provide housing or even rental assistance programs to low- and very-low-income renters.