

Addendum - Rental Registry One Year Evaluation

This addendum is intended to accompany the August 19 City Council Study Session staff report titled Rental Registry One Year Evaluation and expand upon information shared in the report. Insight into considerations that helped form the program are detailed in an attempt to provide clarification and understanding on why the program operates as it does. This addendum will also preliminarily explore planned changes introduced in the staff report and evaluate the potential impacts those changes might have on the program, should Council be interested in process improvements beyond those introduced in the staff report.

Council Process & Direction

At LUEC's May 2022 meeting, the committee directed staff to continue work to explore a rental registry and identified the following goals for a registration program:

- Ensure basic life health and safety in rental housing
- Preserve existing rental housing
- Share information and resources with landlords
- Gather data about rental housing in Olympia

Taking into consideration the identified program goals, staff continued to research peer city policies and interviewed other cities with rental registry programs. Peer cities provided information about their program structure, staffing, costs and revenue, as well as valuable insights into challenges and lessons learned. Staff worked with internal stakeholders from the City's code enforcement, building inspector, and business licensing teams to understand their processes and how to align a program with current operations. Staff from Housing, Code Enforcement, Building Inspections, and Community Planning & Development met three times between June and September of 2022 to review peer city programs and options.

In November 2022, staff presented findings to LUEC with program elements to consider based on staff research and recommendations. LUEC provided feedback and direction to staff on their desired scope and program elements, based on the information and considerations presented by staff.

In June 2023, staff presented information for LUEC to consider regarding program structure, including exemptions and scope; fee schedule; and program staffing. LUEC provided direction to staff in order for staff to present a program proposal and budget at a Council study session in August 2023. Council directed staff to develop an ordinance to establish rental registration, business license and inspection requirements for rental properties in Olympia.

Council passed the ordinance to establish these requirements in November 2023, with a March 1, 2024, implementation date for the rental registry and business license requirements and a January 1, 2025, effective date for the inspection requirement.

Council passed a set of complementary tenant protection policies in April 2024, such as tenant relocation assistance requirements if a tenant is displaced due to a unit being condemned, demolished, or substantially rehabilitated.

Program Development

In November 2023, Council adopted an ordinance establishing a Rental Registry and Inspection program to be enacted March 2024.

As the program launch date neared, staff:

- Developed the registry application in the SmartGov software portal
- Created job descriptions for program staff
- Created a draft inspection checklist and gathered public feedback
- Began planning for how to train qualified third-party inspectors
- Produced outreach materials and communications to share with landlords

Staff incorporated lessons learned from interviews with other cities in Washington, peer-reviewed research, and best practices guidance into program design. Over a dozen cities in Washington have implemented rental registry programs, and many similar programs have been implemented across the U.S. Staff interviewed eleven other jurisdictions in Washington who had implemented rental registry programs. Peer cities provided information about their program structure, staffing, costs and revenue, as well as valuable insights into challenges and lessons learned. Staff participated in a small to midsize Peer Cities Network in 2023 through the NYU Furman Center. Staff learned about rental registry programs in other cities in the cohort and nationwide through program overviews and literature review. Staff reviewed best practices guidance and model policies written by ChangeLab Solutions and National Center for Healthy Housing.

A common message received from other cities was to adapt and make changes, based on lessons learned from implementation. Staff heard from many cities that had low compliance in their first five years or had to make major updates to their programs (such as shutting down their inspection programs during the COVID-19 pandemic). A common word of advice from peer cities with registry programs in Washington was that enforcement and staffing capacity are critical to the success of a program. These staff reinforced that having mechanisms for enforcement in the code and adequate staffing for enforcement was key to program success and meeting overall goals for housing preservation and safety.

Staff learned that some other cities have their own business licensing system that they can adapt for their needs, some cities use the business license application through Washington State Department of Revenue (DOR) in lieu of a separate registry application, and some cities do not explicitly require a business license as an element of their rental registry and inspection program (creating their own rental housing license). Staff learned from other cities about their capabilities and limitations to collect information depending on the licensing approach. The City of Olympia contracts with the DOR to manage the city's business license applications and taxes. Staff learned from the City's business licensing staff that the DOR application is not customizable, so the

City could not collect additional data regarding rental housing properties, which was one of LUEC's goals for the program. Prior to these discussions, the City's business licensing staff had been providing guidance to community members that business licenses were required to rent property in Olympia. Staff learned that there was some confusion both internally and externally about this requirement, and that there was no active enforcement for rental property owners to obtain a business license. While the business licensing staff's interpretation was that each location of a business required a license, housing staff recommended that a landlord be allowed to obtain just one business license to cover all of their rental activities within the City. Staff made this recommendation recognizing that a landlord may own several rental properties but is conducting one business activity. Additionally, business locations are typically used for tax collection purposes. Since rental housing is not subject to B&O taxes, each physical location is not relevant for tax assessment purposes. LUEC also expressed a desire for public recognition and a cultural shift to acknowledge that renting property is a business activity, which comes with revenue as well as responsibilities. Staff updated both the Rental Housing code and Business Licensing code to ensure clarity regarding the business license requirements for rental property owners.

Considering LUEC's desire to capture information about rental properties and share information with landlords, staff determined that the business license application alone would not meet LUEC's goals. The staff workgroup determined that the City's current SmartGov portal could be used for this purpose, considering the cost savings of using an existing platform and current use of the platform for similar programs (vacant property registration and short-term rental permit). Creating a separate registration process would allow the City to both collect additional information from landlords and help facilitate two-way communication between the City and rental property owners.

Rental registries can support communication and educational efforts of jurisdictions by reaching landlords directly. Other Washington cities interviewed have provided free fair housing trainings to registered landlords. The City has set up a listserv related to the rental registry where it sends code changes, state landlord tenant law updates, information about the program, renewal reminders, information about funding opportunities, and webinars or other educational resources. City staff have shared information about grant opportunities and assistance with rehabilitation for properties rented by low-income households, held webinars on topics such as dealing with mold, resources available for landlords through the State's landlord mitigation programs, and other topics.

Staff learned about the various inspection models used in other jurisdictions. Several other Washington cities (such as Aberdeen, Bellingham, Seattle, Lakewood, and Tukwila) offer landlords a choice between using a City inspector or contracting with a private inspector. Most cities charge a fee to conduct the inspection, however, the cities' inspection rates are typically lower than the rates for private inspectors. Other cities (Burien and Kent) require landlords to contract with a private inspector. Some cities (Renton and Tacoma) require rental property owners to self-certify that their property meets required standards. In Tacoma, if a property is found to have concerns through

complaints submitted to code enforcement, periodic inspections may be required. Staff discussed these options with the internal cross-departmental workgroup. The workgroup determined that requiring the contracting of independent third-party inspectors would be the least staff intensive option with lowest risk to the City. This would also keep registration fees lower to offset program expenses. Staff reviewed several other cities' inspection checklists. The internal staff workgroup reviewed the common elements and differing approaches of other jurisdictions. Staff created a preliminary inspection checklist to share with Council and the public to gather feedback before implementation.

Other cities' staff reported that their inspection programs have helped landlords to identify issues before becoming much more costly repairs. The City's goal is not to remove housing units from local inventory but rather to work with property owners to address concerns in housing stock. This model of cooperative compliance is recommended in ChangeLab Solutions' Guide to Proactive Rental Inspections. The City's enforcement approach is to provide education, outreach, and resources to property owners to encourage voluntary compliance, rather than issuing fines. However, the City code also includes numerous enforcement mechanisms since staff heard from peer cities that having enforcement measures was crucial for program compliance.

Proactive inspections support life safety. From 2008 - 2013, Sacramento's Rental Housing Inspection Program (RHIP) "reduced housing and dangerous building cases by 22 percent." ("Ordinance Revisions to City Code Chapter 8.120 Relating to the Rental Housing Inspection Program", 2013) In four years, with their proactive inspection program Greensboro had a 65% decrease in the number of rental units in active violation of the housing code (Hickey, 2008). Interdepartmental staff worked together to review inspection checklists created by other cities and to ensure that Olympia's checklist addressed critical health and safety issues. Some tenants do not report repairs or maintenance needed due to fear of retaliation or fear of rent increases. Inspections are required on a periodic rather than complaint-based basis are more equitable, since the units must meet standards rather than the onus being on the tenant to report deficiencies. A study of Seattle's complaint driven code enforcement system found that inspections in more than half of the properties identified code violations that tenants/neighbors had never reported (Prothman, 2010). In San Francisco, 62% of tenants said they had code issues in their apartments but only 28% had complained to their landlord, and only 11% reported to a government agency or community organization (Chinese Progressive Association, 2005). Betts (2001) states that "middle-class residents are more likely to complain than residents in poorer and more deteriorated neighborhoods and most likely to get results because they are well enough organized to document violations, demanding enough to monitor the progress of complaints, and astute enough to enlist the support of political stakeholders." Barton (2015) also describes how "petition-based systems favor tenants who are more knowledgeable about the law, better educated, or have assistance from advocacy groups," since they are more likely to file petitions. Schilling et al (2022) share that "many residents, particularly those in Latine and Asian households and those who fear retaliation from landlords and possible displacement, may underreport subpar housing conditions."

About 20% of respondents to the Assessment of Fair Housing survey in 2022 indicated they experience health impacts from their housing unit conditions, with nearly half of those respondents citing mold as an environmental health issue in their housing that has led to detrimental health impacts. According to the National Healthy Housing Standard, “20 to 30 percent of asthma cases are linked to home environmental conditions.”

Staff reviewed the exempted housing types in other cities’ registries to provide a range of options to LUEC. Many cities exempt ADU/DADUs and other properties where the land or housing unit is shared with the property owner. The presumption for these cities is that property owners are living in the same housing conditions as the tenant where there is a shared living space or property. Some cities exempt single family homes. Data estimates reviewed by staff indicated that up to 20% of potential rental units were single family homes, ADU/DADUs, or townhomes. Staff recommended that properties where the owner lives onsite (such as a duplex or ADU/DADU) are not required to obtain a business license or inspection, but that an inspection could be required if code violations are identified in the unit. Staff recommended that these shared properties register so the City would still be able to obtain information about where these units are located and communicate with property owners. Staff found that many other programs in other cities waive inspection requirements for subsidized affordable housing properties. Staff recommended waiving registration fees and allowing subsidized affordable housing providers the option to provide an alternative inspection report, since these properties are already required to undergo periodic health and safety inspections. Under the authorizing statute (RCW 59.18.125), properties that have obtained a certificate of occupancy within the past 4 years are exempted from inspection requirements (unless a code violation has been identified). Staff consulted the internal workgroup, including the building inspections team, and determined that this timeframe could be extended beyond the 4 years to exempt properties that have received a certificate of occupancy within the past 10 years from the inspection requirement.

Staff conducted extensive research to best estimate staffing needs and anticipate issues, all the while recognizing that every city has their own unique program structure, requirements, processes, and platforms. Since both Burien and Kent require third-party inspectors, staff used these cities as an example of staffing needs. Kent, in particular, has a similar number of rental units as projected in Olympia. Both Burien and Kent have 1.0 FTE rental registry program manager, however, Burien uses information obtained from the business license application from the DOR.

Staff also discussed program staffing needs with the internal workgroup. Housing staff estimated 1.5 full-time equivalent (FTE) staff— 1.0 FTE staff to manage the program operations, plus an additional 0.5 FTE permit technician to review applications—would be necessary in the first year of implementation. Housing staff recommended an additional 1.0 FTE code enforcement officer to begin halfway through 2025 (50% of the year) since the inspection requirement began January 1, 2025. Staff anticipated inspection reports would generate possible investigations into code violations. From January 1, 2025, onward, staff estimated 2.5 FTE staff would be needed to meet the

program's operational needs. In preparing the revenue projection model, staff factored in estimated cost of living adjustments for staff the first five years of program operations.

Unlike programs in other jurisdictions, LUEC's goal for the program was not to identify and condemn substandard properties, but rather to prevent displacement of tenants by identifying and working with property owners to remedy concerns. This line of thinking was identified in the 2019-2024 Thurston County 5-Year Homeless Crisis Response Plan, a county-wide plan for how Thurston County will respond to the homelessness crisis. One strategy listed in that plan is to keep currently housed individuals and families in their housing by addressing housing quality issues as they arise. This strategy recognizes that low-income renting households who are at higher risk of homelessness may be renting housing units that need repairs and, that by preserving these units, the homeless crisis response system will help prevent homelessness. The strategy recommends pairing code enforcement with tenant protections and funding for rehabilitation.

Staff researched policies passed in peer cities and authorizing statutes. Under RCW 59.18.440, cities may enact a relocation assistance program for tenants who are displaced when a property is demolished, substantially renovated, or the use changes. Under RCW 59.18.085, landlords are required to pay relocation assistance to tenants when a property is condemned. If landlords fail to pay within the required timeframe, a city may advance the relocation assistance funds to the tenant. Staff recommended amending the Rental Housing Code to establish relocation assistance requirements if a property is condemned, demolished, or needs substantial renovation to mitigate the harm of tenant displacement. As an additional enforcement mechanism for the inspection requirements, staff recommended passing a policy similar to those passed in peer cities that prohibits rent increases if a unit is uninhabitable, a tenant's request to make the unit habitable is not fulfilled, a unit does not complete the required inspection, or the unit does not pass the required inspection. To curb cost increases as a result of implementing the registry fee and inspection costs, staff recommended that landlords not be permitted to pass registry, business license, and inspection fees on to tenants. Council passed these complementary tenant protections in April 2024.

Rental registries can be paired with enforcement of tenant protections policies. Research from Newark, NJ highlighted that, by implementing rental unit registration, there has been an increase in landlords complying with the city's rent control ordinance: from 520 in 2018 to an all-time high of 2,885 in 2020, an increase of 454 percent (Inside NJ, 2020). Property owners in Olympia must include a tenant information document that outlines the city's tenant protection policies and includes information about submitting a complaint. Tenants have a defense to eviction if their landlord is not registered or is not in compliance with the City's Rental Housing Code.

Program Design

The program requires registration and inspection of long-term rental units. It also requires landlords to obtain and maintain a business license.

Registration Requirement

Landlords in Olympia are required to register their rental properties with the City with a few exceptions, such as if they rent to an immediate family member, or if they rent rooms in their own home. The cost to initially register or renew registration is \$35 per unit annually. Property owners who provide affordable housing, such as nonprofit organizations and properties receiving a 12-year Multi-Family Tax Exemption or low-income housing tax credits, may request a fee waiver. Registration occurs through the City's SmartGov online portal, which is also used for permitting. The annual registration cycle is aligned with the calendar year (January-December).

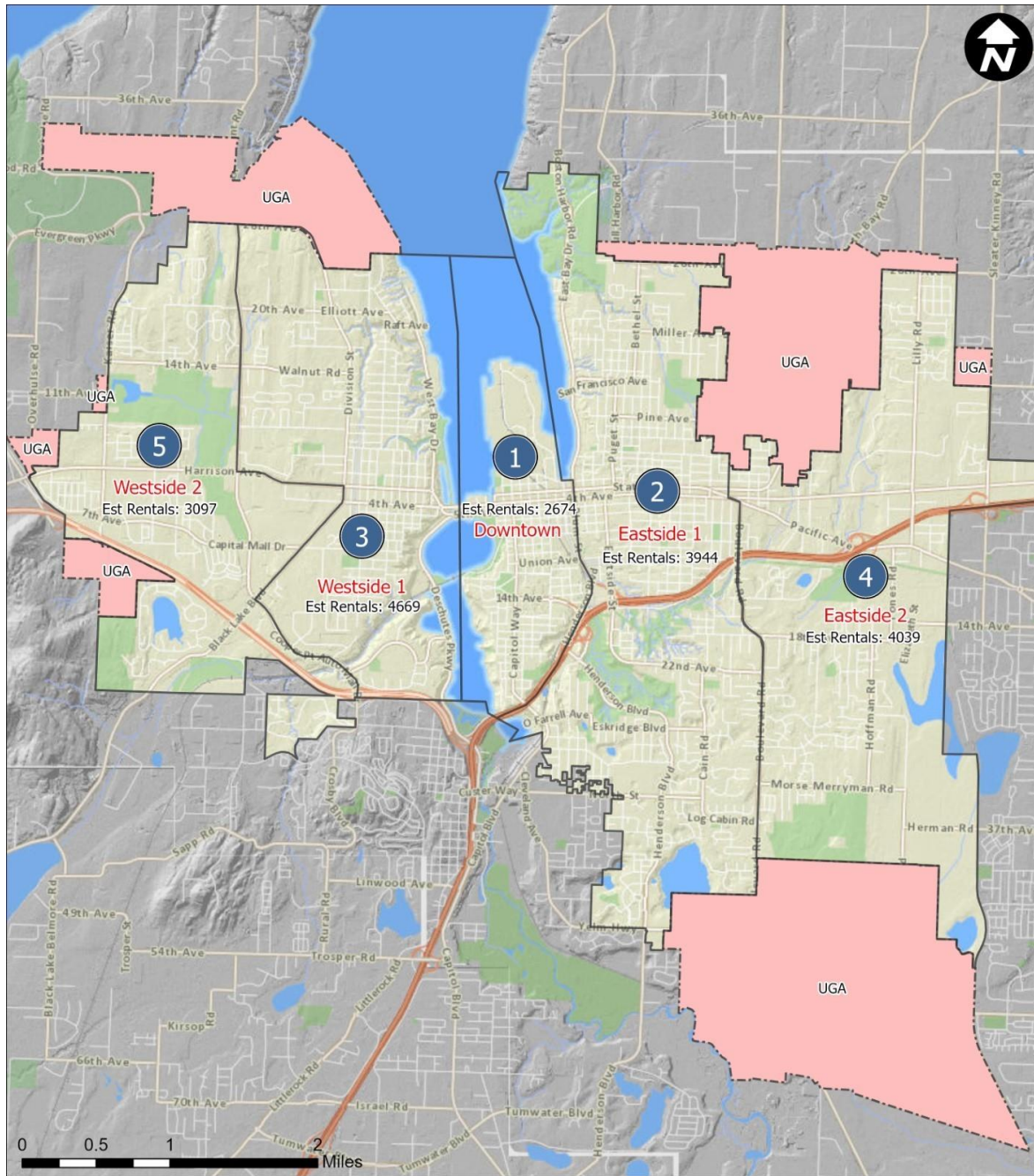
Inspection Requirement

Landlords are required to undergo an inspection of a portion of their rental units once every five years. A percentage of units at the rental property are selected by City staff for inspection (according to the formula outlined in the authorizing statute RCW 59.18.125). Affordable housing properties which have contracts that require a periodic inspection (such as those supported by Housing Choice vouchers) may submit an alternative housing inspection report. Unlike programs in other jurisdictions, the intent of Olympia's program is not to identify and condemn substandard properties, but rather to prevent displacement of tenants by identifying and working with property owners to remedy concerns. The inspection component of the program ensures housing is maintained for tenant life safety; it also creates reasonable baseline standards for rental housing.

The City is divided into five geographic zones with inspections occurring in one zone each year on a rotating basis. Property owners are notified that their rental property will be due for inspection by December of the year prior to any due inspection(s). Landlords are responsible for scheduling and paying third party inspectors to complete the inspections. The City keeps an updated list of licensed third-party inspectors who have been trained and approved by City staff to perform these rental housing inspections. The qualified third-party inspectors utilize a checklist developed by City staff to complete these inspections and assess safety of rental units.

Pictured on the next page is the current map staff generated to split the City into five inspection zones. This map has been updated with the latest rental unit estimates in each zone. Staff took into consideration the estimated number of rentals, both at the time of generating the original map towards the end of 2024 as well as future residential development projects in the pipeline, to try to more evenly split the number of inspections that were due. Staff also took into consideration the frequency of Code Enforcement cases in each zone to determine the order each zone is assigned inspections. Since the City's code requires each property to be inspected once every 5 years, staff wanted to avoid the possibility of a majority of rental property owners waiting until the final year of each cycle to schedule their inspections, both for City staff and third-party inspector capacities. Staff also wanted to make sure that the boundaries of each zone were along major roadways, wherever possible, so that the zones are more easily digestible by the public.

Inspection Zone Map (updated 08/05/2025)



A searchable version of this map is available on the City's Rental Registry and Inspection Program webpage, so that landlords and tenants can search their address to see if it lies within the currently "Active" inspection zone and may be due for inspection.

The following table demonstrates fees associated with the program and can be found on the Rental Registry and Inspection Program webpage:

Requirement	Fee	Paid to
Annual registration fee	\$35/unit	City of Olympia
Business license	\$50 application fee (one-time) \$30 Olympia endorsement (annually) \$5 license renewal (annually)	Washington State Department of Revenue
Inspections	Fees will be set by third party inspectors and vary depending on size and type of rental property. Once the inspection program is more established, the City will share average costs.	Third-party qualified rental housing inspector

The following table overviews current program exemptions and can be found on the Rental Registry and Inspection Program webpage:

Are any properties exempted from these requirements?

Most properties that are covered under the Washington Residential Landlord-Tenant Act will be required to comply. There are some exceptions:

Rental type	Registration	Business license	Inspection
Room rentals in the owner's home	Not required	Not required	Not required
Landlords who rent to an immediate family member	Not required; but must submit Declaration to Rent to Immediate Family Member	Not required	Not required
Owner-occupied properties with only 1 rental unit onsite (ADU, duplex)	Required	Not required	Not required
New construction	Required	Required	Exempted for 10 years after issuance of a certificate of occupancy.
Affordable housing units that are already subject to regularly scheduled inspections to comply with HUD requirements	Required, exempted from fees	Required	Can submit an alternative inspection report.

Business Licensing Requirement

Landlords are required to obtain a state business license with a City of Olympia endorsement through the Washington State Department of Revenue (DOR). This requirement was outlined in Olympia's municipal code prior to adoption of the Rental Registry Program. Landlords who are exempted from registration requirements and those who only rent one unit on the same property where they reside (such as an ADU/DADU or duplex) are not required to obtain a business license. The initial business license cost to DOR is \$50 with a \$5 annual renewal fee thereafter. The Olympia business license endorsement adds \$30 annually. This endorsement fee is waived for nonprofit organizations. The business license is valid for one year and expires 365 days after issuance. One business license can apply to all of a rental property owner's sites.

Program Accomplishments

The Rental Registry and Inspection Program has experienced early successes, which can generally be categorized under the following themes:

1. *Program is Operational*
2. *Enforcement of Business License Code*
3. *Rental Housing Code Education*
4. *Rental Housing Data Collection*

1. Program is Operational

The program launched on time by March 1, 2024. Two program staff were hired in early 2024 to operate the program. Rental Registry Program Manager, Sarah Williams, was hired in February 2024 and immediately set out to begin public education and development of program materials. Permit Specialist, Jody Sheldon, was hired to process rental registrations in April 2024.

The program has been in operation for 17 months and several staff across Community Planning & Economic Development play crucial roles in the program's operations, including:

- Permit staff help check applications for completeness.
- Administrative Services staff cross-check addresses to verify units being registered are permitted.
- Customer Service staff assist landlords who stop by or call City Hall with questions, requests for help, and processing payment of registration fees.
- Code Enforcement staff are responsible for responding to rental units that are in violation of city code (whether Rental Housing Code or building codes).
- Business Operations Specialist provides SmartGov technical assistance as well as data analysis support.
- Program Manager processes applications, provides customer service, produces educational materials, distributes notices of inspections due or registration required, works with certified inspectors, and much more.

The following table shows staff who support the program but are not currently billing time to the program. Time dedicated to the program ebbs and flows. For example, after the 60-day notice of non-compliance was issued, a large influx of rental property owners visited City Hall and customer service staff were essential in assisting with

communication. Teams supporting the program were asked to share their role in program operations and to self report an approximate number of hours they dedicate toward the program.

Title	Role	Approximate Hours of Support Per Month
Permit Staff*	Provides guidance, research, and assistance to landlords and staff	88
Customer Service Staff	Assist customers and direct inquiries, answer frequently asked questions	60
GIS & Business/ Operations Specialist	Process data requests and generate reports, develop and improve SmartGov processes, develop and improve ArcGIS inspection portal, create inspector credentials for inspection portal, assist with training inspectors	20
Code Enforcement	Consultation on inspection program, assist with training inspectors, enforce violations referred by Housing staff	11
Buildings & Inspections Staff	Consultation on inspection program, assist with training inspectors, address unpermitted units identified through the registry	20
Addressing Staff (CPED Program Specialists)	Cross check report addresses for accuracy. Follow up on unpermitted units that do not have properly assigned mailing address. Responsible for mail and postage related actions, including those related to code compliance issues.	39
Legal	Review documents and advise staff	As needed

**Permit staff time does not include the 1 FTE dedicated to the Rental Registry and Inspection Program.*

Staff hold bi-weekly check-ins to discuss the operations of the program and to creatively problem-solve and identify process improvements.

2. Enforcement of Business License Code

The requirement of landlords to have a business license to rent residential property in Olympia is not new. However, enforcement of this municipal code has been increased due to the Rental Registry program. Housing staff estimate that there are over 800 unique business licenses associated with validly registered rental properties, a large number of which were applied for after the Rental Registration ordinance went into effect. Program staff ensure that landlords are registered for a state business license and have a city endorsement for that license. An estimated \$20,000- \$25,000 has been collected in business license revenue associated with the Rental Registry and Inspection program to date. This funding currently flows into the General Fund.

3. Rental Housing Code Education

One of the program goals is increased communication with landlords. Staff developed a listserv where landlords (and anyone interested in the topic of rental housing in Olympia) may subscribe to receive updates about the program, educational information, and other resources. Staff have used this communication tool to share information about updates to state landlord-tenant law changes (offering a summary of the new state rent stabilization bill), City-sponsored webinars, and opportunities to engage in feedback on proposed tenant protection policies. Staff organized a series of webinars in 2024 that included updates to the City's Rental Housing Code, a landlord resources webinar (with guest speakers from the State's Landlord Mitigation program, Thurston County's Dispute Resolution Center, and City staff who offer rental rehabilitation funding), and a training on mold prevention and mitigation from Thurston County's Healthy Homes program. These webinars are posted on the City's website. Staff continually update the City's Landlord Information and Rental Registry webpages as they receive frequently asked questions or learn about new community resources.

4. Rental Housing Data Collection

The first 17 months of the program have provided insightful information about Olympia's rental landscape. It was initially thought that roughly 15,500 rental units existed within Olympia city limits. Staff now believe that number is significantly higher and around 18,423. As of July 9, 2025, 5,126 units have been validly registered, and over 200 units have been formally exempted as renting to immediate family members. This means approximately 34% of the originally projected 15,500 units and 29% of the newly estimated 18,423 suspected rental units have been registered or formally exempted. Another 884 units are associated with applications that have been initiated but not fully reviewed for compliance and 2,188 units are associated with incomplete registrations.

A variety of rental housing types have been registered - from 24 Accessory Dwelling Units to 3,859 units that are part of multi-family properties with five or more units. Single-family homes, condominiums, duplexes, fourplexes, triplexes and townhomes have all been registered. Rents are considered affordable when rental rates plus utility costs do not exceed 30% of a household's annual gross income. The average rent across all housing types registered in Olympia is \$1,625, with townhomes being rented at the highest average rental rate (\$2,304) and triplexes rented at the lowest average rental rate (\$1,394). This does not take into account utility costs.

The data shows that on average, rents of units with two or less bedrooms are affordable in Olympia. The average registered rental home's profile, across all housing types, is 904 square feet, 1.7 bedrooms, and 1.4 bathrooms. The U.S. Department of Housing and Urban Development (HUD) considers a 2-bedroom unit renting at \$1,686 or less, not including utilities, as affordable to low-income households whose annual gross income does not exceed 80% of Area Median Income. HUD assumes two individuals per room so a 2-bedroom unit would accommodate a 4-person household with an income not exceeding \$93,350 by HUD's standards. The data also shows that housing types such as townhouses, single-family homes, and condominiums tend to be larger than 2-bedrooms and tend to rent at rates that exceed those considered affordable for low-income households. For example, HUD considers a rental rate of \$1,939, excluding

utilities, as an affordable rate for a 3-bedroom home in the Olympia-Tumwater Metropolitan Statistical Area.

It is also worth noting that there have been concerns by stakeholders that the Rental Registry Program could cause the loss of rental units in the community. There is not sufficient, nor reliable, data available to determine whether this has occurred or to identify a reason(s) for changes in ownership. Staff used Thurston County Assessor data to initially identify potential rental properties. This was the best data available to staff but one limitation of using this method is that Thurston County Assessor data is out of date and changes in ownership frequently take long periods of time to appear in county records. Staff only have qualitative data about the number of long-term rentals sold from email responses to a 60-day notice of non-compliance that was sent to presumed landlords in late 2024. Staff received emails that noted a total of 40 units were sold, or soon to be sold. Some of these units were sold years before the City's rental registration requirements began and only a few respondents stated the reason behind selling as a direct response to the City's adoption of these policies. No conclusive data is available to indicate the reason(s) why most of these properties were sold, and it therefore should not be assumed that properties changed ownership solely due to the implementation of the Rental Registry Program.

Staff stress that this data is only from registered units. We need to increase registration to get more complete data. As part of staff's work to improve the program, changes to the application will be implemented to help gather more useful and insightful data. Changes will be balanced with the need to make the registration process easier for landlords.

Registered Rental Units by Housing Type					
Type	Number of Units	Average Rent	Average sqft	Average of Bedrooms	Average of Bathrooms
ADU	24	\$ 1,403	716	1.0	1.1
CONDO	25	\$ 2,010	1,298	2.4	2.0
DPLX	344	\$ 1,583	1,041	2.0	1.3
FRPLX	211	\$ 1,417	957	1.9	1.3
MULTI-5+	3,859	\$ 1,577	804	1.5	1.3
OTHER	39	\$ 1,439	1,005	1.9	1.2
SFR	565	\$ 2,043	1,514	2.9	1.8
TRPLX	12	\$ 1,394	824	1.4	1.3
TWNHS	47	\$ 2,304	1,619	2.9	2.4
Grand Total	5,126	\$ 1,625	904	1.7	1.4

RENTAL UNITS BY INSPECTION ZONE

Report Date: 7/09/24

	Downtown	Eastside1	Westside1	Eastside2	Westside2	Total
Valid Registrations	555	1,029	1,774	1,278	489	5,125
- Due Next Inspection Cycle	28 (2025) 332 (2030)	478 (2026)	575 (2027)	421 (2028)	249 (2029)	
- Est. Compliance (Valid/Family vs Suspected/Expired)	21%	28%	39%	33%	16%	29%
Expired Registrations	123	105	220	238	384	1,070
Family Member Declarations (Exempt)	5	91	56	40	21	213
Suspected Rentals	1,991	2,719	2,619	2,483	2,203	12,015
Subtotal Estimated Rental Units	2,674	3,944	4,669	4,039	3,097	18,423
- % Renter	55%	42%	56%	52%	51%	51%
Subtotal Estimated Owner/Non-Rental Units	2,225	5,417	3,626	3,775	2,953	17,996
- % Owner/Non-Renter	45%	58%	44%	48%	49%	49%
Grand Total Housing Units	4,899	9,361	8,295	7,814	6,050	36,419

*All data based on records at time of report (7/9/25) and are subject to change.

**Units due for inspection next cycle subject to change based on registration numbers. These figures include units that may be exempt with Certificates of Occupancy issued within the last 10 years.

*** Number of suspected rentals are based on parcel owner mailing address vs physical site address, and utility billing records.

****These numbers are confirmed to be missing roughly 40 family member declarations that were not entered in the system at the time of report.

Program Challenges

While there have been successes, they have been accompanied by challenges which can generally be categorized under four common themes:

1. *Initial Registration*
2. *Program Costs*
3. *Registration Renewal*
4. *Inspections*

Program adjustments intended to address these challenges are detailed later in this report under the *Planned Changes* header.

1. *Initial Registration*

The initial registration of rental units has been more cumbersome than anticipated for both staff and landlords. This can be attributed to limitations with the software used for registration and program requirements that are necessary to complete registration.

a. *Limitations of Registration Software*

The current software (SmartGov) and specific software module (licensing) used for rental registration has several unforeseen limitations. The software does not prevent landlords from submitting incomplete applications. Landlords are typically unaware of their incomplete submission and assume they have complied with City requirements to register their unit(s) until they are contacted by City staff and learn otherwise. City staff are reaching out to hundreds of customers requesting additional information in a way that cannot be sufficiently automated. The time-consuming review of each registration application in partnership with the communication needed

to remedy the problem significantly lengthens the time it takes to process registrations and is frustrating for landlords and staff alike. Another frustration heard from landlords is the inability to register multiple properties at once and the lack of an auto-fill function in the software. This means that folks who own or manage more than one rental property must complete a separate application for each parcel they own within City limits and enter their contact information manually each time.

Investing in Alternative Software for Registration

Staff spent a significant amount of time researching alternative software specifically designed for rental registration. Below is a high-level overview of staff's analysis of this software.

Benefits:

The alternative software that staff was exploring provided benefits to landlords that aren't possible with the SmartGov software: it's a more intuitive platform for customers, with a greater ability to customize the user experience. It also allows for landlords to apply for multiple properties at once, even flagging other properties that are under the same ownership and explicitly asking applicants if they would like to register those additional properties at the same time. Rental registration applicants using this software can also opt in to notifications of reported activity at their registered properties, such as fire or police department activity.

One of the biggest selling points of this alternative software is that it would allow for more automated data collection and data evaluation. The software company spends time integrating data sources from cities and building out a custom dashboard that can be used to easily track data topics of interest. For example, other cities have used this software for successfully flagging the same ownership of multiple properties, even if the ownership is broken down into individual LLC's, which is something that is usually quite difficult to identify. Some cities have used this ownership information, along with code enforcement data, and compliance with rental registration and inspections to create a public-facing lists of "lower-ranking" landlords that have the most compliance issues so that prospective tenants can learn more about who they're considering renting from.

Drawbacks:

While this alternative software comes with added benefits, it also comes at a high cost (\$60,000 + annually) during a tight budget season. Also, after visiting the City of Lakewood to learn more about how they use the software, staff concluded that it would not significantly cut back on staff time required to review rental registration applications, and that City of Olympia would not be able to use it for inspections the same way other cities use it, due to Olympia's use of third-party inspectors. Staff also have concerns about the software's ability to integrate with the City's older systems, such as utility billing. There were also some potential security concerns since the software developers would need extensive access to

the City's current data collection systems in order to fulfill their promises of the in-depth data analysis that is so appealing about the software.

After the robust consideration of alternative software, staff decided to continue using the City's SmartGov software with modifications to improve efficiency. Staff will continue to evaluate whether shifting to another software should be recommended as part of the 2027 City budget process.

b. Program Requirements

The Rental Registration and Inspection Program requires landlords obtain a state business license with a City of Olympia endorsement and document rental rates through a rent roll spreadsheet upon registration. These program requirements result in useful data collection (detailed more under the *Program Successes* header, *Rental Housing Data Collection* section) but have also posed challenges to staff and landlords.

Business License Requirement

A Washington state business license with a City of Olympia endorsement is a prerequisite to register rental units, unless exempted. Because landlords must obtain a business license through the state Department of Revenue (DOR) and register their properties with the City, this has caused confusion. Staff created materials to guide landlords in obtaining a business license; however, many landlords have been frustrated that City staff are unable to provide more hands-on assistance.

The licensing requirement also causes difficulties from a staff perspective. Staff are often unable to verify that a landlord has met the City's business license requirement for rental housing if the landlord has not entered their Unified Business Identifier (UBI#) in each rental registry application. Failing to provide the UBI# (or a copy of their DOR receipt if UBI# is still pending), results in an incomplete application and requires follow up communication with landlords.

i. Removing or Adjusting Business License Requirements

In talking with other cities operating rental registration programs in the state, staff learned that some cities have created their own rental housing license, issuing that license upon valid rental registration. Issuing their own rental housing licenses has allowed these cities to more effectively automate their rental registration process, because staff do not need to manually search the DOR's database for each landlord's UBI# to ensure the licensing requirement is being met. The City's business licensing requirement and the way business licensing is housed under the DOR is part of the reason staff determined that investing in the alternative software we were exploring would not have significantly reduced staff time for initial application review. Staff realized there is no clear way to fully automate the business license verification process as the requirement stands.

If the City were to amend our code to replace the current business licensing requirements for landlords with a City-generated rental housing license issued upon registration of rental units, this would decrease the amount of staff time taken to review and enforce the licensing requirement. It would also make the registration process simpler for landlords because they would no longer need to fill out business license applications with the DOR and would be able to pay all fees associated with registration in one place at the same time each year. However, amending our code to replace current business license requirements would mean a reduction in revenue. For this reason, the current per unit registration fee may also need to be examined as a way to help offset program expenditures.

It is worth noting that both the City's rental housing and business licensing codes were amended at the time the Rental Registration and Inspection Program was adopted to explicitly require a business license when offering housing for rent in Olympia. This amendment was not made very long ago, and another amendment backing away from this requirement may cause additional confusion for landlords. Staff have also invested a lot of time educating the community about these requirements and would have to spend time re-educating the public if the requirements were amended. Removing the business licensing requirement through the DOR as it stands will also likely cause frustration among the landlords who have already obtained a business license and paid all of the fees associated with the first, and for some second, year of operating their businesses. A significant number of the landlords who have registered their properties with the City only learned of the business license requirement upon registration and would not have otherwise gone through the effort of obtaining a business license.

ii. No Active Enforcement of Business Licensing Requirements

Staff have also discussed not actively enforcing the business license requirements for landlords. Before the program launched in March of 2024, the City was not actively enforcing the business license requirement for landlords. In evaluating this option, staff envisions that the rental registration application would still include a field for landlords to enter their UBI# and all help documents about the application process would include the same information about how to obtain a business license. The difference would be that staff would not search the DOR's database for whether the UBI# entered in the application meets the City's requirements and would move forward with registration of rental units regardless. In terms of enforcement, the City would still be able to suspend/revoke business licenses due to a landlord's failure to comply with any of the provisions in the Rental Housing Code (OMC 5.82.160 C).

While this option would reduce staff time spent on reviewing applications and enforcement of not meeting requirements, this would also mean that staff are not verifying the actual amount of revenue generated from business licenses associated with long-term rental properties in Olympia, and would likely mean

any such revenue generated would continue flowing into the General Fund, rather than being used to offset program costs.

Rent Roll Requirement

The rent roll spreadsheet requirement poses similar challenges. This spreadsheet includes record of each registered unit's square footage, number of bedrooms & bathrooms, and how much rent is being charged monthly at the time of registration. City staff are using this data to analyze how monthly rent rates change over time in Olympia.

Many landlords are unfamiliar with spreadsheet software and require hands-on assistance from staff to meet this program requirement, even after staff created templates and information about spreadsheet software in application materials. A few landlords have also expressed that they do not wish to share monthly rental amounts with the City and/or do not feel the City has the authority to require that information. The City's legal department has assured Housing staff that the City does have this authority. Failure of landlords to provide the rent roll results in incomplete registry applications and takes significant staff time to remedy.

i. Eliminating the Rent Roll Requirement

No longer requiring landlords to submit the information requested in the rent roll would make the registration process simpler for landlords. It would also reduce staff time for data entry and evaluation. Eliminating this requirement would also mean the City would rely on external data sources for meeting the program goal of gathering data to track rental housing trends. The external data sources that staff have been made aware of do not include the unit-level data that the City is able to gather through the collection of rent rolls. Many of these external sources also do not capture single-family rental homes and are therefore missing a significant portion of Olympia's rental housing data.

2. Program Costs

Program costs have exceeded original projections. This is due to lower than projected revenue in the first year of operation needed to offset program costs combined with increased staffing needs and costs in the second year of operation.

Revenue

In 2024, the program collected \$69,930 of revenue associated with nine months of registration fees. This was significantly lower than the year-one projected revenue of \$127,000, which assumed 25% of the originally estimated 15,500 rental units would be registered, taking into account exempted properties, and \$9,000 in business license revenue would be collected.

The first year was focused on educating landlords and the public on the program. The program offered to waive the 2025 renewal fee for early adopters and apply registration fee payments to 2025 for property owners who applied in late 2024 to cover both 2024 and 2025.

Business license revenue associated with rental properties was factored into budget projections. However, this revenue has not been allocated to the program to date and instead flows into the General Fund due to extra staff time that would be required from both business and licensing staff and housing staff to manually track that revenue using Unified Business Identifiers (UBI#s). Accounting for \$40,000 in Buildings Up prize money used as seed funds for the program, the first year's revenue was \$109,930. Expenses that same year totaled \$190,188. Expense projections were generally on target, but revenues were not, and the year ended with a \$80,258 deficit as opposed to the \$57,000 deficit expected.

In 2025, the program has collected \$188,125 in revenue as of July 31, 2025. Similar to 2024, this does not include revenues associated with business licenses. Based on the program's average monthly revenue of \$11,515, it's predicted that 2025 will end with approximately \$245,700 in revenue. Original projections estimated year-two revenues at \$253,000, meaning in its second year of operations the program is anticipated to experience revenues just slightly lower than projected.

Expenditures

Current data suggests that the second year of operations will, like the first year, close with a deficit up to \$63,436. Expenditures as of July 31 total \$161,945. Year-end expenses directly related to program operations are expected to reach \$269,136. Additionally, the Buildings Upgrade prize money (\$40,000) was transferred back to the Climate Program for use toward a pilot program early in 2025 when year-end revenue projections were higher. This brings projected expenses to \$309,136. Of that total, \$29,000 is associated with program operating supplies, such as mailed notices to landlords, while \$240,025 is related to staff salaries and benefits.

Limitations of the registration software, current program requirements, and efforts by staff to uphold the City's commitment to providing exceptional customer service has necessitated greater than anticipated staffing to operate the program. In the program development phase, staff conducted peer city research to best estimate staffing needs and anticipate issues, recognizing that every city has their own unique program structure, requirements, processes, and platforms. This research and the projected number of rental units were used as the basis for identifying the number of staff needed to operate the program.

Housing staff estimated 1.5 full-time equivalent (FTE) staff — 1.0 FTE staff to manage program operations plus a 0.5 FTE permit technician to review applications — would be necessary in the first year of implementation. Housing staff recommended a 1.0 FTE code enforcement officer begin halfway through 2025 since the inspection requirement began January 1, 2025. Staff anticipated inspection reports would generate possible investigations into code violations. From January 1, 2026, onward staff estimated 2.5 FTE staff would be needed to meet the program's operational needs. In reality, the program has consumed more staff time than anticipated. The half-time permit specialist's time was increased to full-time in November 2024 to meet the demand created by an influx of applications received toward the end of the year (over 1,300

applications were submitted between November 1 – December 31), after a notice to comply was sent to potential unregistered rental property owners. Due to challenges caused by software limitations and some program requirements, the permit specialist is still employed full-time. Currently, the program is operating with two full-time staff: a Rental Registry program manager and a permit technician.

Staffing costs are higher in 2025 due to the increased need for the permit specialist's assistance in processing applications as well as compensation adjustments implemented at the start of 2025 as a result of the class and compensation study completed in 2024. Total staff related expenses are slightly lower than the anticipated \$277,000 originally predicted, but they account for only 2.0 FTE staff as opposed to 2.5 FTE originally planned for 2025. A code enforcement officer has not been added to the program's staffing roster but will likely be needed in 2026.

The following table demonstrates how many valid registrations would be needed to meet or exceed program expenditures in 2025 and 2026.

Rental Registry & Inspections Program Revenues vs. Expenditures			
	2024 Actuals	2025 Breakeven (48% of units registered)	2026 Breakeven (59% of units registered)
Revenues			
Buildings UP Prize (seed funds)	\$ 40,000	-	-
Registration/Renewal Fees Collected	\$ 69,930	\$ *309,155	\$ **377,370
Business License Fees Anticipated	-	-	\$ 25,000
Total Revenues	\$ 109,930	\$ 309,155	\$ 402,370
Expenditures			
Salaries & Benefits Paid	\$ 179,455	\$ 240,025	\$ ***372,262
Operating Supplies	\$ 10,733	\$ 29,013	\$ 30,000
Office Supplies	-	\$ 98	\$ 100.00
Buildings UP Prize Repayment to Climate Program	-	\$ 40,000	-
Total Expenditures	\$ 190,188	\$ 309,136	\$ 402,362
Program Balance			
Year to Date Balance	-	-	-
Year End Balance	\$ (80,258)	\$ 19	\$ 8

* This represents 8,833 validly registered/renewed units with none exempt from fees.

** This represents 10,782 validly registered/renewed units with none exempt from fees.

*** This accounts for 1.0 FTE Program Manager, 1.0 FTE Permit Specialist, and 1.0 FTE Code Enforcement Officer for the duration of the year. This amount does not account for the 2025 union negotiated salary and benefits for a Code Enforcement Officer. This information was not available at the time of calculation.

3. Registration Renewals

An annual rental registration cycle was adopted in Olympia to standardize communication with landlords, annual budgeting processes, and tracking of inspections, based on staff research of other Washington cities with rental registry requirements.

Rental registration renewals began October 2024 as the program neared its second year of operations. The renewal process is intended to be less time intensive for both landlords and staff; however, it has caused some confusion for landlords.

a. *Timing of renewals*

Landlords are required to renew their registration annually on a calendar year timeframe, meaning the registration is valid from January 1 (or the date they apply if after January 1) to December 31 of the same year. Additionally, Olympia's code requires the City to notify landlords whose properties are due for inspection in the upcoming calendar year by December 1. An annual calendar year renewal frequency helps standardize mass communications to registered rental property owners regarding renewal periods and upcoming inspections, for example, without staff needing to track each property's renewal period. A calendar year renewal also helps staff analyze and manage the budget associated with the program. The calendar year renewal has, however, caused confusion for some landlords.

As mentioned above, landlords must obtain a business license with an Olympia endorsement through the DOR. A business license may be obtained at any given time and must be renewed within one year of the date the license was issued. Because obtaining a business license does not occur on a calendar year cycle, the date by which a landlord's business license must be renewed with the State and the date by which their rental registration must be renewed with the City, are often not the same. Some landlords have expressed confusion regarding when to renew their rental registration and when to renew their business license and some have believed they were renewing their rental registration when, in fact, they only renewed their business license.

Extending the Registration Renewal Period

Staff time to process initial registrations and renewals may be reduced if the registration cycle was shifted to a multi-year cycle. However, staff has concerns that it may be more difficult to track renewal timeframes, the City would lose annual comparison data (for example, how much rents change year by year), properties would be on different cycles for data collection, and property owners may not update the City when changes occur (such as property ownership or management changes). Staff have already had several issues arise from registered property owners and managers not updating the City when contact information and/or ownership changes just between initial registration in 2024 and renewal in 2025. Staff predict that increasing the time between renewal periods would only exacerbate this issue of outdated information. It's also important to consider that the current registration fee is calculated on an annual basis. If the registration cycle changes, the fee amount would need to be evaluated and potentially changed accordingly to cover program costs. This would increase the upfront cost of registration renewal, potentially act as disincentive to register rental properties, and potentially make it more difficult for property owners and managers to balance their expenditures.

b. *Renewal process*

In the second year of the program, several landlords have submitted new registry applications rather than renewing their existing registration. This has caused staff to

manually update registrations and records to accurately reflect a registration renewal instead of a new registration. Staff recognized the need for guidance to landlords and developed a clearer step-by-step guide for renewing registrations in March. This guide was sent to all registered property owners who had not yet renewed their applications and was also published on the City's webpage. Still, roughly 1,000 units were registered in 2024 but have not properly renewed registration in 2025.

4. Inspections

Rental housing inspections help meet the program goals of preserving rental housing and ensuring basic life health and safety. While the Rental Registry Program launched in March 2024, the first year of the program was spent educating the public. Early feedback from landlords calls for more transparency around rental inspections. Inspections began in 2025 with rental properties located in Olympia's downtown being the first due for inspections. Approximately 555 rental units in the downtown inspection zone have been registered, with only 28 units due for inspection by the end of 2025. So far 10 units have undergone inspections. In 2026, inspections will be due for properties located in zone "Eastside 1".

a. Certified Inspectors

The City chose to use third-party inspectors based on peer city research prior to program adoption. An inspector training was developed and conducted in collaboration with Housing, Building and Code Enforcement staff, and the City's Business Operations Specialist. Five inspectors are currently trained and certified to complete inspections. The list of approved inspectors is available on the City's Rental Registry website and by program staff to landlords, who are responsible for hiring one of these inspectors. Inspectors upload inspection results onto an ArcGIS Field Maps application. Program staff review the inspection results and then follow up with landlords and/or code enforcement if any deficiencies are identified.

Third-party inspectors must meet qualification criteria and successfully complete training on Olympia's program expectations and inspection checklist before they are placed on the list. Both the qualified inspectors list and the inspection checklist are available on the Rental Registry webpage. The webpage also includes criteria inspectors must meet to be considered for placement on the list, however, the actions that validate removal from the list are not published.

One improvement considered was the use of a Request for Proposals (RFP) or Request for Qualifications (RFQ) process and contracts with third party inspectors to update the list of approved inspectors, outline expectations of inspectors placed on the City's list, and set a maximum price inspectors are allowed to charge. Program staff discussed these approaches with Olympia legal staff, who strongly recommended not undergoing an RFP or RFQ or entering into contracts with inspectors because these actions increase the City's legal liability and establish inspectors as agents of the City. Additionally, this approach would increase City staff workloads associated with maintaining and upholding contracts.

The City's legal staff instead recommended that we document clear policies and procedures for adding and removing third-party inspectors to/from the qualified inspector list.

b. Inspection Costs

Landlords have expressed frustration about not knowing how much inspections will cost. Inspection costs seen in other Washington cities with rental inspection programs were published on the City's Rental Registry webpage through late 2024. Inspectors on the City's list communicated concerns about the costs from other jurisdictions being published, saying that prices charged in Olympia may vary due to differences in housing stock, housing conditions, Olympia's specific requirements, and other factors. Given this uncertainty, staff removed costs from other jurisdictions and average rates for inspections in Olympia have not yet been published. The webpage communicates that average inspection costs will be provided once more inspections have been successfully completed.

Transitioning to an Affidavit Model for Inspections

Another approach initially considered when designing inspections, was allowing landlords to sign an affidavit or declaration of compliance with health and safety standards in replacement of an on-site inspection by qualified inspectors. An affidavit would reduce the time burden as well as cost incurred by landlords to comply with the Rental Registry and Inspection Program. It would also significantly reduce the amount of staff time required to administer the program. The biggest drawback of this affidavit model is that it leaves room for landlords to self-certify without fully evaluating whether their unit truly meets health and safety standards. It would also mean that the City would need to rely more heavily on tenant complaints to be made aware of unsafe rental housing conditions. This could pose concerns to the health and safety of tenants in those units, which would negate one of the goals of the Rental Registry and Inspection Program.

Planned Changes

After evaluating the program to date, staff will be implementing the following process improvements to help meet program goals.

Program Goal: Ensure basic life health and safety in rental housing.

- Establish a procedure to capture business license revenue to help sustain the program.
- Revise criteria for qualified rental housing inspectors to increase program transparency.
- Switch modules in SmartGov to make it easier to register, thereby encouraging more voluntary compliance from landlords and helping ensure tenants have a safe and healthy place to live.

Program Goal: Preserve existing rental housing.

- Increase transparency of the inspection process to encourage landlords to address health and safety concerns and help preserve rental housing.

Program Goal: Support landlords by sharing information and resources.

- Develop and publish procedures for adding and removing qualified third-party inspectors and publish average inspection costs to the webpage to increase landlords' trust that this program is dedicated to transparency and information-sharing.

Program Goal: Gather data about housing trends to target needs.

- Switch modules in SmartGov to allow for more customizable applications to collect data more effectively.
- Create separate applications for 1 to 4-unit properties & 5+ unit properties to make it easier for smaller landlords to enter data and reduce staff time needed to collect/record this data.

Additional evaluation will be needed as the program becomes more established, particularly once it has completed a full year of renewals and inspections.

Potential Programmatic Changes for Council Consideration

These adjustments would require code amendments or budget enhancements that Council could ask staff to evaluate further.

- *Increasing staffing* (such as adding a Code Enforcement officer and/or administrative staff) would require budget enhancement. This would help support the program but also come at an increased cost during a tough budget season.
- *Investing in alternative software for registration* would require budget enhancement. This would improve the customer experience for landlords and automate data collection and evaluation. This adjustment would also come at a high cost (\$60,000 + annually) that may not outweigh the benefits without changes to program requirements.
- *Removing or adjusting the business license requirement for long-term rental housing* would require code amendments. This would make compliance simpler for landlords and allow for more automated compliance review for staff. This would also reduce revenue and the current per unit registration fee would likely need to be re-evaluated.
- *Transitioning to an affidavit model for inspections* in which landlords self-certify their rentals meet health and safety requirements would reduce staff time to administer the program and reduce the time burden and cost to landlords for inspections. It would leave room for landlords to self-certify without fully evaluating their units for health and safety concerns and relies more heavily on tenant complaints to address unsafe housing conditions. Inspections began in 2025, and changes may be premature.
- *Extending the registration renewal period* so landlords aren't required to renew annually would require a code amendment. This would reduce staff time spent processing applications, but the City would lose annual comparison data, and this may also exacerbate the issue of not being able to reach landlords due to not having updated contact information. The per unit registration fee would likely need to be re-evaluated.
- *Eliminating the rent roll requirement* and relying on broader-scoped external data sources for tracking trends in rental housing would not require a code

amendment or budget enhancement but may significantly impact the City's ability to meet the program goal of gathering data. This would reduce staff time for data entry and evaluation as well as simplify the registration process for landlords. The City would miss out on unit-level data and data about single-family rentals that is currently used to improve City addressing records, identify unpermitted units, and provide data insights for different types of housing in Olympia.